

[B&NES Officer Response to Reg 16 document](#)

[Respondent Coal Authority](#)

[Respondent Con Bradley](#)

[Respondent Environment Agency](#)

[Respondent Highways England](#)

[Respondent Historic England](#)

[Respondent Ivan Batchelor](#)

[Respondent Kristine Mountford](#)

[Respondent National Grid](#)

[Respondent Natural England](#)

[Respondent Simon Waller](#)

[Respondent Simon Waller - Attachement 1](#)

[Respondent Simon Waller - Attachement 2](#)

[Respondent Simon Whittle](#)

[Respondent Stowey Sutton Parish Council](#)

B&NES Council Officer Comments on Stanton Drew Neighbourhood Plan, Regulation 16

This note sets out Bath and North East Somerset Council's Planning Officers response to the Stanton Drew Neighbourhood Plan Regulation 16 consultation. They focus on ensuring general conformity between the Neighbourhood Plan and national policy and strategic policies of the B&NES Development Plan.

Background

Bath and North East Somerset Council Officers made comments on the Regulation 14 stage and informal comments leading to the publication of the plan. Copies of these comments are available in the consultation statement.

A number of the suggested amendments to the plan were minor in nature, or slight wording changes either to improve the clarity of the policies or to improve the structure of the plan. Areas of concern raised at the Regulation 14 stage and informal comments leading to the publication of the plan related to:

- P&D1
- P&D2
- SD1
- BP2
- EL8

Response

The Steering Group engaged positively with the Regulation 14 comments and Officers are now content that the concerns relating to P&D1 and P&D2 have been resolved and that the Plan is in general conformity with Strategic Policies from the Bath and North East Somerset Development Plan. There remains, however, some concerns regarding SD1, BP2 and EL8 of the Plan. Further details are provided below.

SD1

Compliance with the Development Plan is a requirement for all NDPs. The policy does not add anything at a local level, we therefore suggest deletion

BP2

Officers are concerned over the lack of clarity over the intention of this policy, particularly it is unclear if it relates just to extensions to dwellings or to all buildings. Extensions to dwellings that are essentially just an extension for homeworking does not necessarily need a planning application, but if a material change of use occurs then the policy implies that it would be appropriate to change the use of these extensions to all the other use classes listed in the policy. These use classes could potentially result in a new planning unit being created within the residential curtilage or a mixed use unit.

Policy RE1 (Employment Uses in the Countryside) of the B&NES Placemaking Plan provides a better framework to support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings.

EL8

There would appear to be some duplication between this policy and SD3, from the planning and development section of the plan. We would suggest deletion of policy EL8 due to this duplication.

Additional comments

It would be useful if the same list of heritages assets as in the supporting document appeared in the body of the heritage section, clearly noting which assets are designated and undesignated

The conservation area designation should perhaps be referenced in the heritage section at the start with a map as a basis for its further reference later in policies

Dated: 22/01/20



**The Coal
Authority**

Resolving the impacts of mining

Coal Authority
200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T 0345 762 6848
T +44(0)1623 637000
www.gov.uk/coalauthority

Planning Policy Team

Bath and North East Somerset Council

BY EMAIL ONLY: neighbourhood_planning@bathnes.gov.uk

31 December 2019

Dear Sir/Madam

Stanton Drew Neighbourhood Development Plan

Thank you for your notification of 22 November 2019 consulting the Coal Authority on the above Neighbourhood Development Plan.

The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.

As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.

According to the Coal Authority records there are recorded risks from past coal mining activity at shallow depth in the area, including; mine entries, recorded and likely unrecorded shallow workings and past surface hazards.

However, we note that the Neighbourhood Plan does not propose to allocate sites for future development and on this basis we have no specific comments to make.

Yours faithfully

Melanie Lindsley

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader (Planning)

T 01623 637 164

E planningconsultation@coal.gov.uk

George Blanchard

From: Con Bradley [REDACTED]
Sent: 10 January 2020 17:57
To: Neighbourhood Planning
Subject: Orientation of maps & diagrams

Regarding the Stanton Drew Neighbourhood plan.

As I've remarked to the Neighbourhood Plan team, all the diagrams and maps in the plan are presented sideways. For example the map on page 29. While this is not a problem if the plan is printed, the plan is difficult to read electronically especially on a tablet where a page is reorientated as the table is rotated. I don't know if you consider this a problem but it could so easily be fixed. The plan is 96 pages long so I doubt many people will print it. It's worth pointing out that the pictures are correctly orientated so this begs the question why the maps are all sideways.

The second problem with the maps is that they are low resolution and don't scale properly making them difficult to read. Again as an example, the map on page 29 just turns into a blur if you try to zoom in.

Both these problems make the plan difficult to read and secondly, both problems could be fixed making it possible to actually read the plan which must be a requirement of any neighbourhood plan.

Con Bradley

Development Control Manager
Bath & North East Somerset Council
Planning Services
Lewis House
Manvers Street
Bath
BA1 1JG

Our ref: WX/2006/000220/OR-
12/IS1-L01
Your ref:
Date: 20 January 2020

Dear Sir/Madam

Stanton Drew Neighbourhood Development Plan – Regulation 16 Consultation

Thank you for consulting the Environment Agency on the above Neighbourhood Plan. I am responding on behalf of Mark Willitts.

We aim to reduce flood risk, whilst protecting and enhancing the water environment. We focus our detailed engagement where the environmental risks are greatest, therefore we offer the following advice on your Neighbourhood Plan.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [Planning for the Environment at the Neighbourhood Level](#).

Flood Risk

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. The aim should be to keep development out of medium and high flood risk areas, and other areas affected by flooding. 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).

Local planning authorities' [Strategic Flood Risk Assessments](#) (SFRA) should be the primary source of flood risk information in considering whether particular neighbourhood planning areas may be appropriate for development. Other important sources include the [interactive maps of flood risk](#) available on the Environment Agency's web site. Local Planning Authorities (LPAs) should make available to the Parish Councils any reports or information relating to the SFRA, and share any other information relevant to flood risk (such as the application of the [Sequential](#) and [Exception Tests](#) to the Local Plan). There may also be specific issues or local policies, e.g. a Local Flood Risk Management

Environment Agency
Rivers House East Quay, Bridgwater, Somerset, TA6 4YS.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Strategy or Surface Water Management Plan, which should be considered when assessing and managing surface water matters.

If there is any proposed development in flood risk areas, the [Sequential Test](#) should be demonstrated and if necessary, the [Exception Test](#) applied. Where areas under consideration for development are not consistent with growth identified in the Local Plan, further information will be needed to demonstrate that any development proposed by the neighbourhood plan passes both tests.

Further guidance on the approach to [individual development proposals](#), or where a [Neighbourhood Development or Community Right to Build Order is proposed, in an area at risk of flooding](#) can be found at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Regarding the suggested **Policy EL4 - Aquatic Biodiversity** which is stated to be in line with the **B&NES Placemaking Plan**, it is pleasing to see identified that any development must mitigate against increasing flood risk, altering the water course or harming biodiversity.

Also as Stanton Drew is classified as a 'village washed over by the Green Belt, it is pleasing to see that in accordance with the **National Planning Policy and B&NES Local Plan (Core Strategy 2014 and Placemaking Plan 2017)**, development in villages in the Green Belt will not be permitted unless it is limited to infilling and in the case of residential development the proposal is within the defined Housing Development Boundary.

Biodiversity

The National Planning Policy Framework (NPPF) is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.

Similarly the Government's 25 Year Environment Plan (February 2018) has policy for embedding an 'environmental net gain' principle for development, including housing and infrastructure. Therefore, we expect all plans and policies to demonstrate how they will deliver this principle.

Neighbourhood Plans have the potential to affect biodiversity or geodiversity. They should seek opportunities to work collaboratively with other partners, including [Local Nature Partnerships](#), to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. Equally, they should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area.

As identified with **Policy EL2- Green Corridors and Biodiversity**, which is stated to be in line with **Section 40 Natural Environment and Rural Communities Act 2006**, development proposals will be supported if the proposal promotes and protects the network of green spaces, corridors, and biodiversity, and if the application also accords with other policies in the Neighbourhood Plan.

The NPPF states that the planning system should recognise the wider benefits of ecosystem services. Information about ecosystems services is in [Biodiversity 2020: A strategy for England's biodiversity and ecosystems services](#). An [Introductory guide to valuing ecosystems services](#) has also been published by Defra along with a practice

guide, which could, where appropriate, inform plan-making and decision-taking on planning applications. The [National pollinator strategy: for bees and other pollinators in England](#) is a 10 year plan to protect pollinating insects which support our food production and the diversity of our environment. Further guidance can be found at: <https://www.gov.uk/guidance/natural-environment>

Water Quality and Resources

Adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

Protecting and improving water bodies may be relevant when drawing up a [neighbourhood plan](#) or considering a neighbourhood development order. It is always useful to consult the local planning department and the water company about whether water could be a concern. We would therefore advise you speak to your local sewerage infrastructure provider to understand any constraints in your local area.

Water efficiency measures should be incorporated into development as this conserves water for the natural environment and allows cost savings for future housing occupants. Further information can be found at: <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>

Further advice on the production of Neighbourhood Plans can be found at the [Planning Advisory Service](#) function of the Local Government Association, which has detailed advice on neighbourhood planning.

Please contact the undersigned at nwx.sp@environment-agency.gov.uk if you have any queries regarding the above.

Yours faithfully

Richard Jenkyns (on behalf of Mark Willitts)
Sustainable Places - Planning Advisor

e-mail nwx.sp@environment-agency.gov.uk

George Blanchard

From: Garnier, Chrystèle <Chrystele.Garnier@highwaysengland.co.uk>
Sent: 21 November 2019 09:53
To: Neighbourhood Planning
Cc: Lowe, Oliver
Subject: RE: Stanton Drew Neighbourhood Development Plan – Regulation 16 Consultation - Highways England's Comments

Importance: High

Categories: Submission and publicity consultation

Dear Planning Policy Team,

Thank you for providing Highways England with the opportunity to comment on the Stanton Drew Neighbourhood Development Plan Reg 16 consultation. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case consists of the A36 to the east of the plan area.

As the plan area is some distance from our network, we are therefore satisfied that the proposed plan policies are unlikely to result in development which will impact significantly on the SRN and we have no comments to make. However, this response does not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the appropriate policy at the time.

We would like to be kept informed of any progress on the plan. All future correspondence are to be addressed to our Team Inbox planningsw@highwaysengland.co.uk.

Regards,

Chrystèle Garnier, Administrator
Performance Assurance & Business Services Team
Highways England | Brunel House | 930 Hempton Court, Aztec West | Bristol | BS32 4SR

From: Neighbourhood Planning [mailto:Neighbourhood_Planning@BATHNES.GOV.UK]
Sent: 20 November 2019 11:53
Subject: Stanton Drew Neighbourhood Development Plan – Regulation 16 Consultation

Dear Consultee,

The Draft Stanton Drew Neighbourhood Plan has been submitted to Bath & North East Somerset Council by Stanton Drew Parish Council. The Draft Plan will now be subject to a period of public consultation which will run from the **22nd November 2019 – 24th January 2020** at 5pm. Please note that length of consultation has been extended from 6 to 9 weeks due to the Christmas Period.

The Draft Neighbourhood Plan can be found online via the following link: [Stanton Drew Neighbourhood Plan](#)

In addition to this website you can view a hard copy of the Neighbourhood Plan at the following locations:

- Bath Central Library (normal opening hours)
- One Stop Shop, Manvers St, Bath (normal opening hours)
- St Mary's Parish Church, Stanton Drew

How to make representations

- email comments to neighbourhood_planning@bathnes.gov.uk
- write to Planning Policy, B&NES Council, Lewis House, Manvers Street, Bath, BA1 1JG

Comments received at this stage will be passed directly to an Independent Examiner for their consideration.

All comments received will also be published on our website at the end of the consultation period. The name of the organisation or individual will be published alongside the comment but other personal details will be redacted or removed in this document.

If you would like to request to be notified of the decision on the Plan proposal, please mention this as part of your comments. If you have any queries about this process, please do get in contact with us.

Planning Policy
Bath & North East Somerset Council
Telephone: 01225 477684
Email: neighbourhood_planning@bathnes.gov.uk
www.bathnes.gov.uk/neighbourhoodplanning

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George Blanchard

From: Stuart, David <David.Stuart@HistoricEngland.org.uk>
Sent: 15 January 2020 16:18
To: Neighbourhood Planning
Subject: Stanton Drew Neighbourhood Development Plan – Regulation 16 Consultation

Categories: Submission and publicity consultation

Dear Planning Policy

Thank you for your Regulation 16 consultation on the submitted version of the Stanton Drew Neighbourhood Plan.

I can confirm that there are no issues associated with the Plan upon which we wish to comment.

Kind regards

David Stuart

David Stuart | Historic Places Adviser South West
[REDACTED]

Historic England | 29 Queen Square | Bristol | BS1 4ND
<https://historicengland.org.uk/southwest>



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From: Neighbourhood Planning [mailto:Neighbourhood_Planning@BATHNES.GOV.UK]
Sent: 20 November 2019 11:53
Subject: Stanton Drew Neighbourhood Development Plan – Regulation 16 Consultation

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The Draft Neighbourhood Plan can be found online via the following link: [Stanton Drew Neighbourhood Plan](#)

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- write to Planning Policy, B&NES Council, Lewis House, Manvers Street, Bath, BA1 1JG

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All comments received will also be published on our website at the end of the consultation period. The name of the organisation or individual will be published alongside the comment but other personal details will be redacted or removed in this document.

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Planning Policy
Bath & North East Somerset Council
Telephone: 01225 477684
Email: neighbourhood_planning@bathnes.gov.uk
www.bathnes.gov.uk/neighbourhoodplanning

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George Blanchard

From: Ivan Batchelor [REDACTED]
Sent: 14 January 2020 13:02
To: Neighbourhood Planning
Subject: Stanton Drew Neighbourhood Plan - An email of support

Categories: Submission and publicity consultation

To whom it may concern,

I would like to register my support for the neighbourhood plan currently under consultation. In part because it is clearly very well researched, especially with respect to existing national and regional policy, and also I would draw attention to the fact that so many (almost all, in fact) of its included policies have received support of between 71 and 95 percent of original respondents, most of which have support within the high eighties mark, with one of the few major exceptions (internet provision - about 40%) already having been implemented in many homes within the parish.

It would be a shame if this were to be shot down because of a small number of single-issue respondents when the support for vast swathes of it is so high, and after so much work has clearly been put into a document intended as being forward thinking - both locally in the protection of cultural assets and rejection of light pollution, and also globally in terms of promoting sustainability.

Many thanks,
Ivan Batchelor

George Blanchard

From: kris mountford <[REDACTED]>
Sent: 16 January 2020 10:19
To: Neighbourhood Planning
Subject: Stanton Drew Neighbourhood Plan support

Categories: Submission and publicity consultation

After long and thorough consultation, the committee of the NHP have succeeded in developing a plan in response to the community majority. Negative comments from the minority seem to be with self-interest and not community welfare in mind.

Support is needed for both elderly and young, especially those without funds to afford adequate accommodation, transport or care. In order to continue development and welfare a caring community working together is essential. Thank you to the NHP committee for your tireless and committed work on our behalf, you have my full support.

Kristine Ann Mountford

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Our Ref: MV/ 15B901605

T: +44 (0)191 261 2361
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18 December 2019

avisonyoung.co.uk

Planning Policy
Bath and North East Somerset Council

By email only

Dear Sir / Madam

**Stanton Drew Neighbourhood Plan Regulation 16 Consultation
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

Spencer Jefferies, Town Planner

nationalgrid.uk@avisonyoung.com

box.landandacquisitions@nationalgrid.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Date: 20 December 2019
Our ref: 303701
Your ref: Stanton Drew NDP



Planning Policy
B&NES Council
Lewis House
Manvers Street
Bath, BA1 1JG

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

neighbourhood_planning@bathnes.gov.uk

T 0300 060 3900

Dear Sir/Madam,

Stanton Drew Neighbourhood Development Plan – Regulation 16

Thank you for your consultation on the above dated 20 November 2019.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on the Stanton Drew Neighbourhood Development Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully

Victoria Kirkham
Consultations Team

George Blanchard

From: Simon Waller [REDACTED]
Sent: 24 January 2020 16:03
To: Neighbourhood Planning
Subject: Stanton Drew Neighbourhood Plan Representation
Attachments: Stanton Drew Housing and Business Survey Analysis - Simon Waller.pdf;
No_Housing_Need_Evidence.pdf

Categories: Submission and publicity consultation

Hello,

I am a parish member and someone who was involved in the Stanton Drew Neighbourhood plan in the early stages. After raising some concerns about the plan, myself and 2 others were removed from the NP team. I believe this Neighbourhood Plan does not explain the highly pro-development position at the core of the planning section of the plan, and the future consequences of this, and therefore does not represent the views of the community.

2 critically important areas never explained to the parishioners are :

1. **“Unsustainable for development” status, our current gold-plated protection** : this article explains the super-protection that Stanton Drew currently enjoys, over-and-above green belt protection, by having a development classification that is “unsustainable for development” (no food shop, no post office, poor transport links...). This gives Stanton Drew “gold-plated” protection from development pressure, all pressure and targets are applied to “sustainable” villages only, so Stanton Drew is completely off the development radar :

<https://www.theguardian.com/society/2018/nov/19/unsustainable-villages-risk-being-frozen-in-time-say-landowners>

The Neighbourhood Plan changes this, and diverts development pressure to Stanton Drew. Tactics like creating the Site Options Long List will even elevate Stanton Drew above other villages in the area for development.

2. **Rural Exception Sites Rules, the loophole to remove protection** : All land outside the Housing Development Boundary (HDB) is currently protected from development. This protection can only be removed by several steps that need to be driven by a Parish council. This is the exact wording about those steps from the BANES Local Plan :

*“Rural Exceptions Sites 5.30 The rural exceptions policy allows **the release of land that would not normally be used for housing** for development of 100% affordable housing, on small sites and where **there is a demonstrated local need. Robust housing needs surveys will be required to demonstrate this local need.***

*5.31 **Sites should be identified through a sequential approach** which includes assessment of the economic, social and environmental impacts. Development should be appropriate in scale and character to its surroundings.*

*5.32 It is the expectation that **Parish Councils will lead this process** with support from the Council and its partners.*

5.33 Occupancy of the development should remain for people with local connections to the parish in perpetuity. This includes residents of the parish or group of parishes, individuals with strong local links such as those having family in the parish or parishes, or who have lived there for a significant period or are employed in the area. Prioritisation of local connections will be agreed within individual S106 agreements and in accordance with housing letting guidance.

*5.34 In cases where the site identified through the sequential approach is financially unviable, **a small proportion of market housing will be appropriate only where it can be demonstrated that the market housing is required to subsidise the affordable element.**”*

So, the Neighbourhood Plan claims on page 33 to be a balance between (1) protection of environment and (2) drive and support development, but I have created this table from my experience and analysis of the Neighbourhood Plan process to show that this is not the case :

Pro-Development	Pro-Protection
------------------------	-----------------------

General	General
No mention of our unsustainable status protection level. ie. no housing pressure, no housing targets.	Re-asserts the existing greenbelt rules of infill (Pages 37-41 of the document).
Choosing to have a Neighbourhood Plan	Slight tightening of allocation of affordable housing to those in the Chew Valley area (rather than outside it). However, it could be argued this reduces protection because Stanton Drew is therefore offering to take on the Chew Valley allocation of affordable housing.
No mention that we didn't need to do a NP	
Neighbourhood Plan Team	
Pro-development people in the planning team and running that team	
Removal of pro-protection people from the planning team	
Planning team investigated changing infill rules	
Planning team investigated extending the housing development boundaries	
Site Options Long List (SOLL)	
Choosing to create a Site Options Long List (SOLL)	
No mention to parish that no other NP has a Site Options Long List (SOLL)	
Putting 20+ sites on a site options long list (a very large number of sites for a green-belt village)	
Nearly all sites outside HDB and currently protected, no mention this protection is put at risk with SOLL + Rural Exception Sites.	
SOLL still very much a central part of the NP	
(Quality concerns : there are important and significant inaccuracies and inconsistencies still in the SOLL document.)	
Housing Needs Survey	
BANES told NP team SOLL can not be allowed to exist unless there is a housing needs survey concluding there is a local need.	
NP team decided to do a housing needs survey, after BANES advice and also 2 years after start of plan.	
Housing Needs Survey supposedly concludes there is a local need	
Most of answers in survey are from people who were asked for views despite answering they had no need for housing.	
Housing Needs Survey – no numbers, only percentages used, which hides how small some of the numbers are	
No mention to parish that housing needs survey was a choice rather than a requirement	
Includes significant business section despite extremely small number of businesses responded (hidden by only using percentages and not numbers)	
Detailed analysis of housing needs survey actually shows there is no evidence of a need for housing for local people (see attached doc)	
Real world evidence of recent sales and house building in Stanton Drew shows no need for housing for local people (see attached doc)	
Rural Exception Sites	
Parish not told about rural exceptions sites and their “loophole” ability to unlock currently protected land outside HDB.	
Only mention of rural exception sites is Page 45 item 64, and	

I have attached some docs with analysis that relate to the points mentioned above.

It appears to me that the rules of engagement of the NP are not able to handle a scenario of a very small parish, enjoying protection of the green-belt, having an un-representative pro-development Neighbourhood plan being developed in their name. Fortunately, the vote at the end of the process will indeed enable the majority to stop a plan that does not represent their views, and I am certain that this will be the outcome of the situation given this plan.

I therefore ask that you reject the plan in its current form and give a new Neighbourhood Plan team the opportunity to create a different Neighbourhood Plan that represents the needs and views of the majority of the Parish.

Regards,

Simon Waller.

Housing and Business Survey Analysis

This is an analysis of the “Stanton Drew Parish Council - Household and Business Survey 2016” report that was conducted by Worcester research in June 2016. This analysis has been created by a resident of Stanton Drew who is a professional data analyst.

The **main conclusion** from the analysis is :

The “Household and Business Survey 2016” survey and report are NOT robust and should not be considered as evidence to support a local need for housing.

The evidence for the conclusion are:

1. **Critical inaccuracies:**
 - a. Conclusions state “*the most sought-after property in Stanton Drew was 2 or 3 bedroom homes for purchase on the open market*”. This is not correct. It was 3 and 4 bed houses and therefore directly impacts the conclusions about affordable housing.
 - b. Conclusions state “*A further quarter felt they were prevented from moving due to the wrong types of housing available in the parish*”. This not correct. The number mentioned (“a further quarter”) cannot relate to the 6 households that want to remain within the parish. It must relate to a quarter of all those that say they wanting to move (6 households out of 24 households), most of them not wanting to stay in the parish.
2. **Critical information missing:** there is no information on the most important people in the survey, the 6 people that say they want to move within the parish.
3. **Very small numbers 1:** open to manipulation (Note. The author is not suggesting that manipulation has occurred). Eg. Just 10 people could decide to say they want to move within the parish, and to 5 bedroom exec homes, and it would completely change the results.
4. **Very small numbers 2:** the report uses percentages extensively rather than numbers which can over-emphasise any conclusions based on the numbers.
5. **Very small numbers 3: Business Survey:** Largest proportion (9 of 22 business) are working from home and therefore likely to be self-employed individuals. The results are therefore based on a small number of people, highly skewed by views of a few individuals in the parish rather than businesses that employ people. There is no attempt to show or address this in the report.
6. **Unlikely to be representative of the parish as a whole :** self-selecting responders causes bias – see this article for more details on this (https://en.wikipedia.org/wiki/Self-selection_bias)
7. **Spurious questions:** Focuses on what properties people would like even though they are not intending to move.
8. **Using assumptions rather than evidence:** affordable homes “which is likely to come from two sectors of the parish: younger family members and retirees”. No evidence to back this up.
9. **Only at top level - No drilldown:** Summary level statistics can be misleading without drilldown to detail for further checks. Eg. Needed drilldown for point 2, 5 and 8.
10. **No conclusion:** No statement with conclusions of if there is a need or no need.

Further details of the analysis can be found in the Appendices

Appendix 1 – Analysis of the conclusions statement

Appendix 2 – Numbers relating to percentages in the report

Conclusions

The conclusions are that the “Household and Business Survey 2016” survey and report are not robust and do not demonstrate a local need for housing.

Therefore:

1. The survey and report should not be included in the Neighbourhood Development Plan.
2. The survey and report should not be used as evidence for Rural Exception Sites (RA4 BaNES Core Strategy).
3. The survey and report should not be used as evidence to substantiate any documentation relating to sites in the Neighbourhood Development Plan, either directly in the plan or indirectly supporting the plan.
4. The survey and report should not be used as evidence to substantiate any extension to the housing development boundary (HDB).

Appendix 1

Analysis of conclusions section of Household and Business Survey 2016 report

Additional comments added as part of this analysis are in yellow:

From the results of the household survey, it was found the most sought-after property *(by people that are NOT looking to move in the next 5 years)* in Stanton Drew was 2 or 3 bedroom homes for purchase on the open market. *(INCORRECT. it was 3 or 4 bedroom homes for purchase on the open market, and that was from people who are not intending to move)* There was also a desire for affordable home ownership in the parish *(much of this by people that are NOT looking to move in the next 5 years)* which is likely to come from two sectors of the parish: younger family members who, in the next 5 years, will wish to set up their own new independent home *(This could actually be 0. The maximum possible is 6 as there were only 6 in total for all areas, not just the parish. What was the number for those for the parish? Why is it not in the report?)* and retirees who wish to downsize their property. *(How many of there were there? Why was this not in the report? Was bungalows looked into for these? If not, why not?)*

While one-fifth of households stated either they or a member of the household wished to move in the next 5 years *(24 households)* only one-quarter of these hope to stay in the parish *(6 households)*. A further quarter *(6 households)* felt they were prevented from moving due to the wrong types of housing available in the parish *(INCORRECT. A quarter cannot apply to the 6 households that want to remain in the parish ("zero", "one-sixth", "one-third", "one-half" could apply, but not "one-quarter"). Why is this not in the report?)* and *(5 households)* the market prices being too high *(do not know if this was the 6 that want to remain in the parish. Why is this not in the report?)*.

A large proportion of residents *(68% = 47 households)* stated they could afford to spend in excess of £250,000 on a new property *(most of these are not intending to move)*, in addition most stated they had savings or a deposit of £30,000+. This reflects the annual income of many households in Stanton Drew of £50,000+. *(They could purchase houses as investments and rent them out, which is not what is needed by the parish, but has happened with recent small houses that have come to the market in the parish)*. However, for young people wishing to move in the next 5 years *(maximum of 6 wanting to move in the parish, but do not know the number, why not?.)*, their income and deposit is likely to be very much lower than the figures suggested in the survey *(therefore they are likely to be outbid on open market properties by wealthier residents or property investors, as we have recently seen in the parish)*.

In conclusion, in order to meet the needs of local people within the neighbourhood plan *(is this meant to imply that there is a local need?)*, any new houses should meet the following conditions:

- Primarily **2 or 3 bedroom homes**; *(why not say 3 or 4 bedroom for open market?)*
- Primarily for **small families, young people and elderly people**; *(no evidence for this. Are 2 bedroom homes really what young families want, limiting the size of the family?)*
- Should include a proportion of **affordable properties** perhaps shared ownership with a housing association, whilst the majority should be available to **buy on the open market**. *(Lack of evidence. Main analysis for this is based on those people that aren't intending to move)*

Appendix 2

115 Houses Surveyed	
24 say they want to move in the next 5 years	
6 say they want to move within the parish in next 5 years	Very small number. Open to manipulation (note. I am not saying there has been any manipulation!).
6 say biggest issue with moving is lack of smaller homes on market,	Are these the 6 that want to move within the parish? Why are they not analysed further. Not a robust analysis.
5 say market prices too high,	Are these the 6 that want to move within the parish? Why are they not analysed further. Not a robust analysis.
0 say that it is lack of private rented houses	Private rental is not wanted, but often happens when properties built/available in Stanton Drew.
102 say no issue with family member moving away due to unable to find suitable property	A huge proportion have no issue.
"However, it should be acknowledged that the data does not accurately reflect that these households have not had any issues, but more likely that the household has not had a family member who has wanted to move out independently."	Not correct. Even if you don't have family members wanting to move out, YOU HAVE NOT HAD ANY ISSUES. Not a robust analysis.
Next the survey sought to understand what type of future housing residents of Stanton Drew felt they would need. Respondents were asked to state what their preferred type of property is and what type of tenure was favoured. This question was a 'universal' question i.e. all respondents could answer this question, not only those who had previously stated they wished to move in the next 5 years. Interestingly, over half (54%) of respondents to the survey gave an answer to this question.	The question sounds very vague? Was a time period mentioned in the question? Why ask people such a hypothetical question? Why base conclusions of the analysis on these answers. Not a robust analysis.
62 People answered this question, so at least 38 of them do not want to move in the next 5 years.	Any conclusions built on this is from people that do not want to move! Not a robust analysis.
30 of them want open market housing, 11 * 3 bed, 10 * 4 bed, 7 * 2 bed.	Why was 4 bed houses not mentioned in the conclusions? 2 nd highest cell in the table, only 1 behind the highest. Not a robust analysis.
how much the respondent felt they could afford if they wished to buy a home (60%)	69 responders

More than two-thirds (68.2%) of responses stated they could afford a property of £250,000 or more.	47. Large number compared to many numbers in the report!
Savings Questions (47%)	54 Responders
30k or more deposit (62%)	33 of them with large deposits
Income Questions (58%)	67 responders
Over 50k per year (37%)	25 of them.
Businesses	22 of them. 9 are individuals working from home.

Housing Analysis from the Report

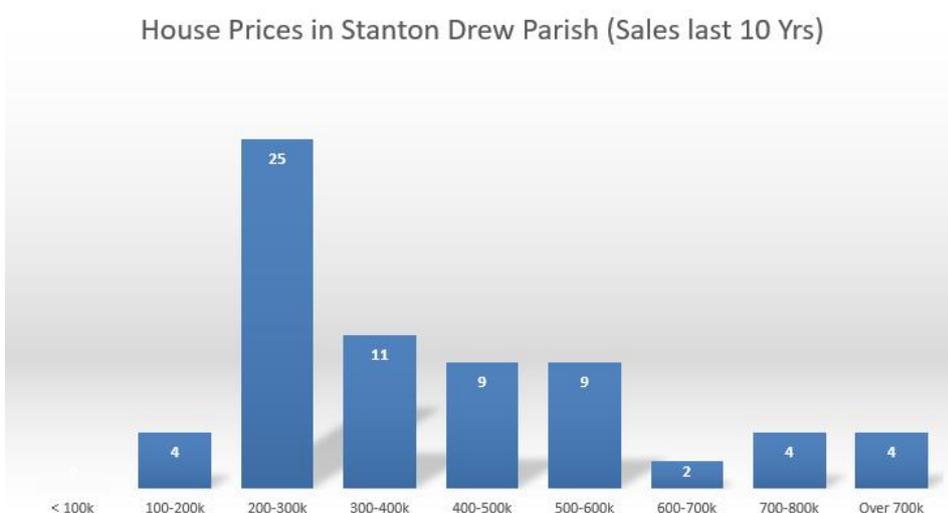
	Affordable rented	Affordable home ownership	Private rented	Open market housing	Self or custom build	Other	Total
1 bed	2	0	1	0	0	1	6.4%
2 bed	3	8	0	7	1	1	31.7%
3 bed	3	4	0	11	1	1	31.7%
4 bed	0	3	2	10	0	0	23.8%
5+ bed	1	0	0	1	0	0	3.2%
Sheltered 1 bed	0	0	0	0	0	0	0%
Sheltered 2 bed	0	1	0	1	0	0	3.2%
Total %	14.2%	25.4%	4.8%	47.6%	3.2%	4.8%	100%

Evidence that there is no extra development needed for the needs of local people in Stanton Drew

1. Stanton Drew Parish currently has a steady supply of affordable housing that comes onto the market

As you can see, a large proportion of properties sold in the last 10 years were sold at prices lower than 300k (29 out of 68 sales = 43% of sales).

Therefore, we can conclude that the parish already has a steady flow of affordable housing that comes to the market that could be purchased by elderly residents downsizing or young people from the village.



See appendix for list of transactions.

2. The sales of affordable housing haven't been to local downsizers or young people

There is no record of the demographics of the purchasers of the 29 affordable houses, but as a resident of Stanton Drew for 8 years I know several have been purchased as BTL properties, and I am not aware of any being purchased by elderly residents of Stanton Drew to downsize or by young people in the village moving out of home.

3. Example of houses built for affordable housing

There is a good example of new, affordable housing being built in the parish with the supposed aim of providing affordable housing for the parish. Details of these houses can be found here :

Planning Applications Reference:10/02457/FUL

<https://isharemaps.bathnes.gov.uk/data.aspx?requesttype=parsetemplate&template=DevelopmentControlApplication.tmplt&Filter=^refval^=%2710/02457/FUL%27>

"this application is being made to change its use and provide small and therefore affordable housing in the village".



3 modern, affordable, 3 bedroom houses were built, and marketed for an extensive period of time for around £270k. No elderly downsizers or young people from the village purchased these.

They have been retained by the builder/owner, and used as rental properties. Local residents therefore have not benefited from purchasing these and the owner/landlord now holds these 3 properties as an income producing asset which contradicts the original aim for the properties.

This is evidence that the building of new modern affordable homes does not benefit the current residents of Stanton Drew.

Overall Conclusions

This is evidence based on real-world housing transactions and historical housing developments that there is **no demand for affordable housing from residents within the parish**, and even if there was there is a steady supply of affordable properties available from current stock in the village, and therefore **no more affordable housing is needed in the parish**.

This evidence of no local need shows that the claims in the Neighbourhood Plan of a local need that can't be satisfied with current housing stock simply cannot be justified. Therefore I conclude that :

- there is no requirement for new affordable housing to be built in the parish
- there is no requirement for rural exception sites in the parish
- and there is no basis to put forward a Site Options Long List as part of the Neighbourhood Plan.

Appendix

Address	Price	Date of Sale	House Type
Sandground Cottage , Stanton Wick, Bristol, BS39 4BZ	£ 400,000	2017-08-22	Detached
8 Tarnwell, Stanton Drew, Bristol, BS39 4ED	£ 272,000	2017-07-13	Semi Detached
Pool Close Sandy Lane, Stanton Drew, Bristol, BS39 4EL	£ 477,500	2017-05-15	Detached
Stanton Drew Garage , Stanton Drew, Bristol, BS39 4ES	£ 270,000	2017-03-27	
9 Tarnwell, Stanton Drew, Bristol, BS39 4ED	£ 235,000	2017-01-25	Semi Detached
47 The Drive, Stanton Drew, Bristol, BS39 4DQ	£ 280,000	2017-01-13	Terraced
3 Bromley Villas, Stanton Drew, Bristol, BS39 4DE	£ 270,000	2016-12-15	Terraced

Penn Lea Bromley Road, Stanton Drew, Bristol, BS39 4DF	£ 743,000	2016-10-28	Detached
Copse Corner , Upper Stanton, Bristol, BS39 4EG	£ 360,000	2016-09-12	
16 The Crescent, Stanton Drew, Bristol, BS39 4DG	£ 252,000	2016-08-12	Semi Detached
Guys Farm Stanton Lane, Pensford, Bristol, BS39 4AL	£ 812,210	2016-08-12	Semi Detached
Alma House , Upper Stanton, Bristol, BS39 4EQ	£ 300,000	2016-02-26	Detached
Druids Garth , Upper Stanton, Bristol, BS39 4EQ	£ 285,000	2016-02-26	Detached
14 The Crescent, Stanton Drew, Bristol, BS39 4DG	£ 270,000	2016-02-25	Semi Detached
Court Lodge , Stanton Drew, Bristol, BS39 4EP	£ 937,432	2015-11-12	Detached
Church Lane Cottage , Stanton Drew, Bristol, BS39 4EW	£ 340,000	2015-11-04	Detached
Long Roof , Stanton Drew, Bristol, BS39 4EJ	£ 400,000	2015-11-04	Detached
Court Farm , Stanton Drew, Bristol, BS39 4EP	£ 510,844	2015-10-30	Semi Detached
Eastwick Farm , Stanton Wick, Bristol, BS39 4BX	£ 700,000	2015-10-30	
3 Rosedale, Stanton Drew, Bristol, BS39 4EN	£ 270,000	2015-10-16	Flat
Wellforge End , Stanton Wick, Bristol, BS39 4BZ	£ 225,000	2015-07-31	Detached
Greenhayes Bromley Road, Stanton Drew, Bristol, BS39 4DF	£ 530,000	2015-03-02	Detached
Jessamy Sandy Lane, Stanton Drew, Bristol, BS39 4EL	£ 580,000	2014-12-03	Detached
Chan-dor , Upper Stanton, Bristol, BS39 4EQ	£ 640,000	2014-11-28	Detached
3 Gloucester Cottages, Stanton Drew, Bristol, BS39 4EJ	£ 245,000	2014-09-12	Terraced
8 Old Tarnwell, Stanton Drew, Bristol, BS39 4EA	£ 270,000	2014-08-08	Semi Detached
Copplestone , Upper Stanton, Bristol, BS39 4EG	£ 591,000	2014-07-10	Detached
51 Highfields, Stanton Drew, Bristol, BS39 4DH	£ 225,000	2014-05-27	Semi Detached
Bromley Mount Bromley Road, Stanton Drew, Bristol, BS39 4DE	£ 500,000	2014-04-29	
Woodbine Cottage , Stanton Wick, Bristol, BS39 4BZ	£ 345,000	2014-03-10	Terraced
3 Holbrook, Stanton Drew, Bristol, BS39 4DT	£ 299,995	2013-12-06	Semi Detached
Orchard House, 2a The Orchard, Stanton Drew, Bristol, BS39 4DS	£ 555,000	2013-11-21	Detached
2 Bromley Villas, Stanton Drew, Bristol, BS39 4DE	£ 176,000	2013-01-11	Terraced
Court Lodge , Stanton Drew, Bristol, BS39 4EP	£ 717,500	2012-11-12	Detached
Daphne House , Stanton Wick, Bristol, BS39 4DB	£ 575,000	2012-09-04	Detached
Avalon , Upper Stanton, Bristol, BS39 4EG	£ 445,000	2012-08-03	Detached

Churchside House , Stanton Drew, Bristol, BS39 4EW	£ 760,000	2012-06-29	Detached
27 The Drive, Stanton Drew, Bristol, BS39 4DQ	£ 250,000	2012-01-20	Semi Detached
29 The Drive, Stanton Drew, Bristol, BS39 4DQ	£ 230,000	2011-12-16	Semi Detached
5 Health Cottages Tarnwell, Stanton Drew, Bristol, BS39 4DZ	£ 280,000	2011-10-28	Terraced
Parsons Farm , Stanton Wick, Bristol, BS39 4BX	£ 900,000	2011-10-06	Detached
Box Bush Bromley Road, Stanton Drew, Bristol, BS39 4DJ	£ 647,500	2011-08-12	Detached
16 The Crescent, Stanton Drew, Bristol, BS39 4DG	£ 226,000	2011-07-15	Semi Detached
Cynyll , Upper Stanton, Bristol, BS39 4EQ	£ 323,750	2011-05-26	Detached
51 Highfields, Stanton Drew, Bristol, BS39 4DH	£ 210,000	2011-04-01	Semi Detached
58 Highfields, Stanton Drew, Bristol, BS39 4DH	£ 209,000	2011-02-15	Terraced
53 Highfields, Stanton Drew, Bristol, BS39 4DH	£ 240,000	2010-11-26	Semi Detached
The White House Sandy Lane, Stanton Drew, Bristol, BS39 4EL	£ 340,000	2010-09-30	Detached
5 The Crescent, Stanton Drew, Bristol, BS39 4DG	£ 100,000	2010-07-08	Semi Detached
Little Meadow Bromley Road, Stanton Drew, Bristol, BS39 4DJ	£ 340,000	2010-06-11	Detached
Salters Brook Cottage , Stanton Wick, Bristol, BS39 4DA	£ 1,075,000	2010-06-02	Detached
Sunny Field Sandy Lane, Stanton Drew, Bristol, BS39 4EL	£ 327,500	2010-05-21	Semi Detached
The Rookery , Stanton Drew, Bristol, BS39 4EP	£ 455,000	2010-05-21	Detached
5 Old Tarnwell, Stanton Drew, Bristol, BS39 4EA	£ 209,500	2010-03-12	Semi Detached
Orange Tree Cottage , Stanton Wick, Bristol, BS39 4BY	£ 380,000	2010-03-05	Detached
Ottery Villa , Stanton Wick, Bristol, BS39 4DA	£ 567,500	2010-03-05	Detached
Drew House Sandy Lane, Stanton Drew, Bristol, BS39 4EL	£ 400,000	2010-02-26	Detached
Utcombe Lodge , Stanton Wick, Bristol, BS39 4DD	£ 499,995	2010-01-29	Detached
2 Gloucester Cottages, Stanton Drew, Bristol, BS39 4EJ	£ 222,000	2009-11-27	Terraced
27 The Drive, Stanton Drew, Bristol, BS39 4DQ	£ 145,000	2009-10-20	Semi Detached
3 Bromley Villas, Stanton Drew, Bristol, BS39 4DE	£ 215,000	2009-10-01	Terraced
5 The Orchard, Stanton Drew, Bristol, BS39 4DS	£ 445,000	2009-08-12	Detached
3 Gloucester Cottages, Stanton Drew, Bristol, BS39 4EJ	£ 225,000	2009-05-01	Terraced
Rose Cottage , Stanton Drew, Bristol, BS39 4EW	£ 300,000	2009-05-01	Detached
Kildorrery Bromley Road, Stanton Drew, Bristol, BS39 4DJ	£ 345,000	2008-09-15	Detached
Druid View , Stanton Drew, Bristol, BS39 4ES	£ 575,000	2008-06-20	Detached

Court Lodge , Stanton Drew, Bristol, BS39 4EP	£ 470,000	2008-04-11	Detached
21 The Drive, Stanton Drew, Bristol, BS39 4DQ	£ 195,000	2008-01-30	Semi Detached

George Blanchard

From: Simon Whittle [REDACTED]
Sent: 17 January 2020 13:13
To: Neighbourhood Planning; Judith
Subject: Comment on Stanton Drew Neighbourhood Plan

Categories: Submission and publicity consultation

I agree with all of the policies in the Draft Plan (02-Oct-2019) and look forward to it passing examination and being approved in a referendum.

I would also like to express my thanks to everyone who has contributed to the creation of the plan, which required hard work and persistence, sometimes in the face of hostile and unreasonable opposition from a small, but vocal minority.

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=====
Simon Whittle

George Blanchard

From: Stowey Sutton Parish Clerk <clerk@stoweysuttonpc.org>
Sent: 02 January 2020 21:48
To: Neighbourhood Planning
Subject: RE: Stanton Drew Neighbourhood Development Plan - Regulation 16 Consultation

Categories: Submission and publicity consultation

At its meeting held on Thursday 2nd January 2020 Stowey Sutton Parish Council considered the draft Stanton Drew Neighbourhood Plan.

It was resolved that Stowey Sutton Parish Council had no objections to the plan.

Joanne Bryant

Clerk to Stowey Sutton Parish Council

Email: clerk@stoweysuttonpc.org | Website: www.stoweysuttonpc.org

Telephone Number: 01275 772 177

Address: Stowey Sutton Parish Council, PO Box 1290, Bristol, BS39 5XY

From: Neighbourhood Planning <Neighbourhood_Planning@BATHNES.GOV.UK>
Sent: 20 November 2019 11:53
To: undisclosed-recipients:
Subject: Stanton Drew Neighbourhood Development Plan – Regulation 16 Consultation

Dear Consultee,

The Draft Stanton Drew Neighbourhood Plan has been submitted to Bath & North East Somerset Council by Stanton Drew Parish Council. The Draft Plan will now be subject to a period of public consultation which will run from the **22nd November 2019 – 24th January 2020** at 5pm. Please note that length of consultation has been extended from 6 to 9 weeks due to the Christmas Period.

The Draft Neighbourhood Plan can be found online via the following link: [Stanton Drew Neighbourhood Plan](#)

In addition to this website you can view a hard copy of the Neighbourhood Plan at the following locations:

- Bath Central Library (normal opening hours)
- One Stop Shop, Manvers St, Bath (normal opening hours)
- St Mary's Parish Church, Stanton Drew

How to make representations

- email comments to neighbourhood_planning@bathnes.gov.uk
- write to Planning Policy, B&NES Council, Lewis House, Manvers Street, Bath, BA1 1JG

Comments received at this stage will be passed directly to an Independent Examiner for their consideration.

All comments received will also be published on our website at the end of the consultation period. The name of the organisation or individual will be published alongside the comment but other personal details will be redacted or removed in this document.

If you would like to request to be notified of the decision on the Plan proposal, please mention this as part of your comments. If you have any queries about this process, please do get in contact with us.

Planning Policy
Bath & North East Somerset Council
Telephone: 01225 477684
Email: neighbourhood_planning@bathnes.gov.uk
www.bathnes.gov.uk/neighbourhoodplanning

As part of the planning process we collect and publish personal information, please see our corporate privacy notice: www.bathnes.gov.uk/council-privacy-notice.

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