

Willoughby Draft Neighbourhood Development Plan - Consultation Responses - 21 January to 10 March 2019

Table 1 - Consultation Bodies and Other Local Organisations

Ref. No. Consultee Name	Page No.	Para. No.	Vision/ Objective/ Policy No.	Support/ Object/ Comment	Comments Received	Parish Council's Consideration	Amendments to NP
Severn Trent 120.1	All			Comment	<p>28 January 2019 Our ref: Willoughby 1</p> <p><u>Willoughby Draft Neighbourhood Development Plan</u></p> <p>Thank you for the opportunity to comment on your consultation. We have provided some specific comments below relating to your draft policies.</p>	Noted.	No change.
120.2			W5	Support / Comment	<p><u>Policy W5</u> – Severn Trent is supportive of your policy to reduce flood risk when building new developments.</p> <p>Further to this we would advise you to include the wording that there should be no net increase in surface water runoff for the lifetime of the development on all new development. Run off rates for development on greenfield sites</p>	<p>Partially accepted.</p> <p>Amend Policy W5 as suggested.</p> <p>Refer to 90.7 below for amended wording in relation to run off rates.</p>	<p>Amend NDP.</p> <p>Amend Policy W5: <u>Insert additional wording to beginning of policy:</u></p> <p>" Development schemes should be sited and designed to reduce flood risk in Willoughby by addressing the following:"</p>

					should not be exceeded, and where possible should be reduced from existing. Run off rates for development on previously developed land should be reduced from the current rate of surface water runoff where feasible. Surface water runoff should be managed at source wherever possible, avoiding disposal to combined sewers.		
120.3			W5	Comment	<p>We encourage you to include a comment relating to the Drainage Hierarchy, in particular the need to direct surface water away from combined sewers on previously developed land and to ensure surface water on new development is not connected to a combined sewers.</p> <p>We would note that where alternatives to a connection to a surface water sewer or indeed combined sewer are available these outfall options should be considered prior to determination of the drainage system.</p>	<p>Accepted.</p> <p>Amend Policy W5 as suggested.</p>	<p>Amend NDP.</p> <p>Amend Policy W5:</p> <p><u>Insert additional wording:</u></p> <p>"Developments should take account of the Drainage Hierarchy and in particular schemes should direct surface water away from combined sewers on previously developed land and ensure surface water on new development is not connected to a combined sewer. Where alternatives to a connection to a surface water sewer or to a combined sewer are available these outfall options should be considered prior to determination of the drainage system."</p>

120.4			W7	Support	Policy W7 – Severn Trent is supportive of the policy to encourage sustainable design. The Severn Trent Water region is not classified as water stressed under the EA definition. This definition is based on population and rainfall data, this is difference from having supply demand deficits.	Noted.	No change.
120.5	All			Comment	<p>The Severn Trent Water Resources Management Plan 2019 (WRMP19) identifies that we forecast a significant deficit between supply and demand for water, and that one of the key changes that has resulted in this deficit is due to the need to prevent the risk of future environmental deterioration.</p> <p>To ensure that our environment is protected for future customers, some of our current sources of water cannot be relied upon in the future. One of the ways in which the WRMP19 has committed to mitigating this risk is by “helping customers to use less water through water efficiency activities and education.”</p> <p>In support of this goal we would also</p>	<p>Partially accepted.</p> <p>NDPs should not include technical standards in planning policies but the voluntary building standard could be mentioned in the supporting text and the policy could be strengthened to include reference to water efficiency.</p>	<p>Amend NDP.</p> <p><u>Insert additional supporting text after 4.5.5:</u></p> <p>"At the Regulation 14 public consultation stage, Severn Trent advised that The Severn Trent Water Resources Management Plan 2019 (WRMP19) (insert reference) identifies that a significant deficit between supply and demand for water is forecast, and that one of the changes that has led to this deficit is the need to prevent risk of future environmental deterioration. To ensure that the environment is protected for future customers, some of the current sources of water cannot be relied upon in the future. One</p>

				<p>strongly recommend that local planning authorities incorporate the voluntary building standard of 110 l/p/d into their planning policies so that new development is designed in line with this approach. Further information on water efficiency can be found within the water efficiency section of this response.</p> <p>Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.</p> <p><i>See Appendix 1. for full document including the specific comments above and the general guidelines.</i></p>	<p>of the ways in which the WRMP19 has committed to mitigating this risk is by 'helping customers to use less water through water efficiency activities and education.'</p> <p>In support of this goal Severn Trent recommends that local planning authorities incorporate the voluntary building standard of 110 l/p/d into their planning policies so that new development is designed in line with this approach. Therefore Policy W7 has been amended slightly to encourage greater water efficiency in new developments.</p> <p><u>Amend Policy W7:</u> <u>Insert additional text after G:</u></p> <p>"New developments should also be designed to include water efficiency measures to reduce water consumption to an estimated water use of no more than 110 litres per person per day or subsequent target. Such measures could include for instance use of water efficient fixtures and fittings, installation</p>
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							of water butts to collect rainwater for garden and external use and recycling of grey water in toilets."
Network Rail 96.	All			No comment	29 January 2019 Network Rail has no comments.	Noted.	No change.
Highways England 98.	All			Comment	12 February 2019 I have been advised that the plan will affect A45 for this reason if there are any developments regarding housing that may affect the traffic on the A45 please let us know.	Noted. This is a development management matter. Highways England should be consulted by RBC as and when any planning applications are submitted.	No change.
National Grid 111.	All			Comment	07 February 2019 Willoughby Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID National Grid has appointed Wood to review and respond to	Noted.	No change.

				<p>development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p><u>About National Grid</u> National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National</p>		
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				<p>Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p><u>Specific Comments</u> An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p><u>Key resources / contacts</u> National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p> <p><u>Electricity distribution</u> The electricity distribution operator</p>		
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					<p>in Rugby Borough Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.</p>		
<p>The Coal Authority</p> <p>84.</p>	All			Comment	<p>15 February 2019</p> <p><u>Willoughby Neighbourhood Development Plan - Draft</u></p> <p>Thank you for consulting The Coal Authority on the above.</p> <p>Having reviewed your document, I confirm that we have no specific comments to make on it.</p> <p>Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.</p>	Noted.	No change.

Natural England 88.	All			Comment	<p>Date: 16 February 2019 Our ref: 272142</p> <p><u>Willoughby Neighbourhood Development Plan - Formal Consultation (Regulation 14)</u></p> <p>Thank you for your consultation on the above dated 18 January 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.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a</p>	Noted.	No change.
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					<p>Neighbourhood Plan.</p> <p><i>See Appendix 2. for full document including the comments above and the attached annex referred to.</i></p>		
<p>Historic England</p> <p>93.</p>	All		<p>Vision Objectives Conservation and Design</p>	Support	<p>28 February 2019</p> <p>WILLOUGHBY NEIGHBOURHOOD PLAN- REGULATION 14 CONSULTATION</p> <p>Thank you for the invitation to comment on the Regulation 14 Neighbourhood Plan.</p> <p>Historic England is extremely supportive of both the content of the document and the vision and objectives set out in it. We particularly commend the use of historic characterization to provide a context and a sound evidence base for well thought out Plan policies.</p> <p>The Plan has also benefitted from the advice of Warwickshire County Council (WCC) specialists as evidenced by the WCC HER records that are Referenced.</p> <p>In this and other respects Historic</p>	Noted.	No change.

					<p>England considers that the Plan takes an exemplary approach to the historic environment.</p> <p>The emphasis on the conservation of local distinctiveness through good design and the protection of locally significant buildings and landscape character including archaeological remains, farmsteads and important views is to be applauded.</p> <p>Overall Historic England considers that the Willoughby Draft Neighbourhood Plan is a well-considered, concise and fit for purpose document that exemplifies “constructive conservation” and constitutes a very good example of community led planning. All those who have clearly worked extremely hard in drafting the Plan are to be congratulated on the end product.</p> <p>I hope you find this advice helpful. If you have any queries please do not hesitate to contact me.</p>		
Warwickshire County Council 4.1	All			Comment	8 March 2019 The County Council welcomes communities proposing	Noted.	No change.

					neighbourhood Plans that shape and direct future development. The main responsibilities of the County Council are highways and public transport, education, social services, libraries and museums, recycling/waste sites and environment. The County Council's role is to deliver the services and facilities efficiently.		
4.2	All			Comment	<p>Financial implications of Parish Plans</p> <p>We would like to state at the outset that the County Council cannot commit to any financial implications from any proposals emanating from Neighbourhood Plans.</p> <p>Therefore, Neighbourhood Plans should not identify capital or revenue schemes that rely of funding from the Council. However, we will assist communities in delivering infrastructure providing they receive any funding that may arise from S106 agreements, Community Infrastructure Levy or any other sources.</p> <p>We have the following comments to make as a guide any amendments</p>	<p>Noted.</p> <p>The NDP consultation process has identified a number of non planning issues and these are noted in the NDP and hopefully will be progressed where possible over the plan period. The NDP does not commit WCC to future expenditure.</p>	No change.

					prior to formal submission of the Plan.		
4.3			W7 W4	Support / Comment	<p>Comments on transport matters</p> <p>The County Council is satisfied that sufficient emphasis has been placed on increasing public footpaths and cycle routes. We recommend that projects, such as, car share schemes or car clubs be considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood Plan.</p> <p>Warwickshire County Council would recommend that projects such as car share schemes or car clubs be considered for further investigation in order to reduce car usage in the area covered by the Neighbourhood Plan.</p> <p>Our specific comments on the Plan are as follows:</p>	<p>Noted.</p> <p>It is likely that the scale of development in Willoughby will be limited but schemes such as car share clubs could be included in transport plans as part of the development management process.</p>	No change.
4.4	All			Comment	<p>Transport matters</p> <p>Although no significant housing sites are proposed and we have no major concerns regarding traffic matters in the immediate vicinity. However, are aware that there are a number of</p>	<p>Noted.</p> <p>These are largely matters for RBC as they refer to proposed developments</p>	No change.

				<p>proposed Local Plan developments in South West Rugby and Daventry which are likely to increase traffic flows on the A45 to the south of Rugby.</p> <p>The cumulative impact of such developments is likely to lead to a requirement for capacity and safety improvements along the route over the coming years. A significant increase in traffic volumes on the route is likely to adversely affect an existing accident cluster site identified at the A45 London Road/Longdown Lane/Woolscott Road junction north of Willoughby.</p> <p>The section of the A45 between its junction with the M45/B4429 and the Warwickshire county boundary has a relatively poor accident record and is also likely to be adversely affected by further traffic growth.</p> <p>We would expect developers to contribute towards highway improvements where there is a demonstrable impact as part of the planning process. We expect to be consulted on these major applications in Daventry that could impact on the A45 to</p>	<p>outside Willoughby Parish. The comments should be referred to RBC and Daventry DC.</p>	
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					<p>the south of Rugby in Warwickshire.</p> <p>Please could you also make Daventry District Council are made aware of these issues and request for joined up traffic matters in the locality.</p>		
4.5	All			Comment	<p>Public Health matters</p> <p>Public Health Warwickshire have prepared a Neighbourhood Development Planning for Health document. The document contains evidence and guidance for promoting healthy, active communities throughout the planning and design process. Alongside this, Public Health England's local health tool can be used to understand the health needs of the population. Should the Parish Council wishes to discuss the guidance document or the local health tool further please contact Gemma McKinnon on gemmamckinnon@warwickshire.gov.uk.</p>	<p>Noted.</p> <p>The NDP promotes walking and cycling and protects local community and recreational facilities which contribute towards healthy lifestyles.</p>	No change.
4.6			W5	Comment	<p>Flood Risk Matters</p> <p>Please see attached detail comments about Flood Risk Management</p>	<p>Accepted.</p> <p>Insert reference</p>	<p>Amend NDP.</p> <p><u>Insert additional text to Policy</u></p>

					<p>matters contained in appendix A.</p> <p>Appendix A.</p> <p>Tabulated Warwickshire County Council Flood Risk Management Comments on the Willoughby Neighbourhood Development Plan to 2031</p> <p>WCC FRM has the following content related comments: “steps should be taken to preserve and enhance wildlife habitats, green and blue infrastructure corridors... such as... drainage ditches”</p> <p>We support the above comments regarding the protection of open spaces and river corridors – this could be developed to mention the benefits of open space as flood risk management to retain water. Above ground SuDS could be utilised in open spaces.</p>	<p>to above ground SuDS being used in open spaces.</p>	<p><u>W5:</u></p> <p>" Schemes should make use of open space to retain water as part of flood risk management."</p>
4.7	All			Comment	<p>The adoption and maintenance of all drainage features is a key consideration to ensure the long term operation and efficiency of SuDS. As part of the planning procedure the LLFA will expect to see a maintenance schedule, at</p>	<p>Noted.</p> <p>The NDP addresses drainage issues and further text has been inserted</p>	<p>No change.</p>

				<p>detailed design stages. All SuDS features should be monitored and cleaned regularly as a matter of importance.</p> <p>SuDS features should be at the surface and adequate treatment of flows should be provided to ensure that final flows leaving the site do not degrade the quality of accepting water bodies. Flood attenuation areas must be located outside of flood zones and surface water outlines to ensure that the full capacity is retained. You could include a point that the Lead Local Flood Authority requires SuDS to be designed in accordance with CIRIA 753 SUDS Manual.</p> <p>Please be aware that 5 l/s is NOT the minimum possible discharge rate achievable. In relation to this, the requirements set out in the following documents should also be adhered to in all cases:</p> <ul style="list-style-type: none"> • The National Planning Policy Framework • Paragraphs 030 - 032 of the Planning Practice Guidance (PPG) • DEFRA's Non-statutory technical standards for sustainable 	<p>following the advice of Severn Trent above. These are largely detailed matters and would be considered as part of the development management process.</p>	
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					<p>drainage</p> <p>On smaller development sites where the discharge rate is below 5 l/s, these rates are achievable through water reuse, protected orifices, and better design.</p> <p>Discharge rates should be set to control run off at greenfield rates for a 1% AEP (Annual Exceedance Probability) event, plus an allowance for climate change. You could refer to our standing advice document found on the website: https://apps.warwickshire.gov.uk/api/documents/WCCC -1039 -73)</p>		
Environment Agency 90.1	All			Comment	<p><u>Willoughby Neighbourhood Plan Submission (Regulation 16)</u></p> <p>Thank you for referring the above listed document to the Environment Agency for comment. We apologise for the delay in our response and hope the following comments will be taken into consideration:</p> <p>The Neighbourhood Development Plan (NDP) should propose Local Policies to safeguard land at risk from fluvial flooding and the</p>	Noted - see proposed detailed changes to NDP below.	No change

					provision of sustainable management of surface water from both allocated and future windfall sites. The Local Policies should seek to enhance the policies in Rugby District Councils Local Plan 2011 – 2031 and Rugby District Councils Local Plan examination hearing Main Modifications.		
90.2			W5	Comment	We have reviewed the Willoughby Neighbourhood Development Plan 2019 – 2031, January 2019 and the NDP does propose a Flood Risk Management policy however this could be strengthened to safeguard land at risk of flooding from the allocated sites or any future windfall sites.	Noted - see proposed detailed changes to NDP below.	No change.
90.3			W5	Comment	The NDP should further identify what mitigation measures it considers necessary e.g. safeguarding specific land (after identification) for flood attenuation or natural flood risk management, and include this in the policies, to ensure that sites are safe and will not increase flood risk elsewhere and that opportunities to reduce flood risk are identified.	Partially accepted. The PC do not have the resources or skills to identify specific areas of land for flood attenuation but Policy W5 could be strengthened to support such	Amend NDP. <u>Insert additional text after 4.3.11:</u> "At Regulation 14 public consultation stage the Environment Agency (EA) submitted detailed comments noting that the NDP should propose local policies to safeguard land at risk from fluvial flooding and to make provision for the sustainable

						measures in suitable areas.	<p>management of surface water from both allocated and future windfall sites and that such local policies should seek to enhance the policies in Rugby District Council's Local Plan 2011 – 2031. The EA noted that the Draft NDP included a Flood Risk Management policy but advised that this could be strengthened to safeguard land at risk of flooding from any future windfall sites. The NDP should further identify what mitigation measures are considered necessary such as safeguarding specific land (after identification) for flood attenuation or natural flood risk management, and include this in the policies, to ensure that sites are safe and will not increase flood risk elsewhere and that opportunities to reduce flood risk are identified. The Parish Council does not wish to commit resources at this stage to identifying specific areas of land for flood mitigation measures but it recognises the need to plan positively and support such proposals.</p>
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							Policy W5 has been amended and strengthened taking into account the advice provided by the EA."
90.4			W5	Comment	<p>We recommend that the flood risk management policy is strengthened to cover these aspects and take into account the impacts of climate change.</p> <p>This should support the strategic development needs as set out in Rugby District Councils Local Plan. In particular with regard to Policy NE3: Green Infrastructure Policy, Policy SDC5: Flood Risk Management, Policy SDC6: Sustainable Drainage, Policy SDC7: Protection of the Water Environment and Water Supply of the Local Plan and emerging Main Modifications.</p>	<p>Accepted.</p> <p>Amend Policy W5 as recommended.</p>	<p>Amend NDP.</p> <p>Insert further text to Policy W5:</p> <p>New criterion D (or other): " <u>Flood Storage</u> Areas of land in Flood Zone 2 and Flood Zone 3 adjacent to the River Leam and its tributaries will be protected from development to support flood attenuation measures or natural flood risk management. This will help to ensure that sites are safe and that development will not increase flood risk elsewhere."</p>
90.5			W5	Comment	<p>The River Leam, classified as an Ordinary Watercourse, flows along the Southern edge of the Willoughby NDP area and a tributary of this watercourse flows through the plan area.</p> <p>This watercourse should be shown within the NDP as it is a major feature and there may be potential</p>	<p>Accepted.</p> <p>Insert further text and map showing the watercourses.</p>	<p>Amend NDP.</p> <p>Insert further text after 4.3.11: " The EA also advised that the River Leam, classified as an Ordinary Watercourse, flows along the Southern edge of the Willoughby NDP area and a tributary of this watercourse</p>

					opportunities to protect and enhance the river corridor and reduce flood risk in the area.		flows through the plan area. This watercourse is a major feature and there may be potential opportunities to protect and enhance the river corridor and reduce flood risk in the area. The watercourses are shown on Map 6 below". Insert new Map 6 showing watercourses in NDP area.
90.6			W5	Comment	<p>Consideration should be given to the following measures to protect and enhance the river corridors located in the NDP area and could be incorporated within the Flood Risk policy;</p> <ul style="list-style-type: none"> Ensuring all new development is in Flood Zone 1. Only if there is no viable/available land in Flood Zone 1 should other areas be considered using the Sequential Test approach. Please note that any watercourse which does not have any flood extents associated with them, will require further work or modelling as part of detailed planning applications to ensure the development will be safe 	<p>Accepted.</p> <p>Amend Policy W5 as suggested.</p>	<p>Amend NDP.</p> <p>Delete A and replace with: " All new development should be located in Flood Zone 1. Only if there is no viable/available land in Flood Zone 1 should other areas be considered using the Sequential Test approach. Any watercourse which does not have any flood extents associated with it, will require further work or modelling as part of detailed planning applications to ensure the proposed development will be safe and not increase flood risk.</p> <p>New criterion:</p>

					<p>and not increase flood risk.</p> <ul style="list-style-type: none"> • All developments should create space for water by restoring floodplains and contributing towards Blue and Green Infrastructure (Draft Policy W4). • Allocated sites should be highlighted and the flood risk associated with them identified. • Opportunities to reduce flood risk elsewhere by allocating flood storage areas. • Setting back development 8m from the watercourses to allow access for maintenance and restoring the natural floodplain. This includes existing culverted watercourses. • Ensure all SuDs features are located outside of the 1 in 100 year plus climate change flood extent. • Open up culverted watercourses and remove unnecessary obstructions. 		<p>"Wherever possible, development proposals should seek to provide a betterment. Developments should create space for water by restoring floodplains and contributing towards Green and Blue Infrastructure (see Policy W4). Culverted watercourses should be opened up and any unnecessary obstructions removed.</p> <p>Insert new text: "Development should be located a suitable distance from watercourses to allow access for maintenance and restoring the natural floodplain. This includes existing culverted watercourses."</p> <p>Insert additional text to C:</p> <p>" All SuDs features should be located outside of the 1 in 100 year plus climate change flood extent."</p>
90.7			W5	Comment	In addition to the above, all developments should seek to control and discharge all surface water runoff generated on site during the 1	Accepted. Amend Policy W5 as suggested.	<p>Amend NDP.</p> <p><u>Amend Policy W5:</u></p>

					in 100 year plus climate change rainfall event. For Greenfield development sites, the surface water runoff generated as a result of the development should not exceed the Greenfield runoff rate. For Brownfield development sites, developers are expected to deliver a substantial reduction in the existing runoff rate, and where possible, reduce the runoff to the equivalent Greenfield rate.		<u>Insert additional text:</u> "All developments should seek to control and discharge all surface water runoff generated on site during the 1 in 100 year plus climate change rainfall event. For greenfield development sites, the surface water runoff generated as a result of the development should not exceed the greenfield runoff rate. For brownfield development sites, developers are expected to deliver a substantial reduction in the existing runoff rate, and where possible, reduce the runoff to the equivalent greenfield rate."
90.8			W4	Comment	Specific advice on existing NDP policies Draft Policy W4: Green and Blue Infrastructure in Willoughby Bullet point D – whilst we support the inclusion of measures to protect and enhance the river corridors within the NDP boundary, this could be strengthened by incorporating opportunities to create space for water to reduce the risk of flooding	Accepted. Amend Policy W4 as suggested.	Amend NDP. <u>Amend Policy W4.</u> <u>D - delete:</u> <u>" Opportunities should be taken to open up culverted watercourses wherever possible."</u> <u>(now in W5)</u> <u>Insert additional text to D:</u>

					downstream and provide other benefits including amenity and enhancing biodiversity.		" Proposals also should incorporate opportunities to create space for water to reduce the risk of flooding downstream and to provide other benefits including amenity and enhancing biodiversity."
90.9			W5	Comment	<p>Draft Policy W5: Reducing Flood Risk in Willoughby</p> <p>Whilst we support the inclusion of the Flood Risk Management policy within the NDP, we feel this could be strengthened to ensure flood risk is effectively managed and not increased.</p>	Accepted - see detailed changes above.	No further change.
90.10			P32 maps	Comment	<p>The Flood Map within the NDP boundary is based on national generalised mapping. We recommend that detailed hydraulic modelling of the ordinary watercourses is undertaken as part of any planning application within close proximity of any ordinary watercourse to properly define the extent of the floodplain taking into account the effect of climate change.</p>	<p>Accepted.</p> <p>Insert additional supporting text as suggested.</p>	<p>Amend NDP.</p> <p><u>Insert additional supporting text after 4.3.8:</u></p> <p>"Maps 4 and 5 are based on national generalised mapping. The EA recommends that detailed hydraulic modelling of the ordinary watercourses is undertaken as part of any planning application within close proximity of any ordinary watercourse to properly define</p>

							the extent of the floodplain taking into account the effect of climate change."
90.11			W5	Comment	We also recommend that you include an additional design feature to ensure that "finished floor levels are set a minimum of 600mm above the 1 in 100 year plus climate change flood level".	Accepted. Insert additional text after new criterion.	Amend NDP. <u>Amend Policy W5.</u> <u>Insert additional text:</u> "Development should be located a suitable distance from watercourses to allow access for maintenance and restoring the natural floodplain. This includes existing culverted watercourses" "Finished floor levels should be set a minimum of 600mm above the 1 in 100 year plus climate change flood level"
90.12				Comment	In order to reduce flood risk elsewhere, we recommend that consideration should be given to the creation of flood storage areas which can provide multiple benefits including biodiversity, amenity and flood risk reduction.	Accepted. See 90.5 above.	No further change.
90.13			W5	Comment	Bullet point A – Currently the wording states that suitable mitigation could be provided which does not exacerbate run off elsewhere.	Accepted. See 90.6 above and insert additional text as	Amend NDP. <u>Add further text to that in 90.6 above to W5:</u>

					<p>However, in areas where fluvial flood risk is a known issue, development should be avoided within Flood Zone 2 and 3 unless the development can ensure flood risk is not increased elsewhere as well as ensuring surface water run-off is no greater than the existing pre-development run-off.</p> <p>In addition, this should also be expanded to include consideration of flood extents within climate change as NPPF requires that new developments are demonstrated to be safe over their lifetime taking into account climate change. This may result in existing areas in Flood Zone 2 to be located in Flood Zone 3 under the climate change scenario.</p>	suggested.	" In areas where fluvial flood risk is a known issue, development should be avoided within Flood Zone 2 and 3 unless the development can ensure flood risk is not increased elsewhere as well as ensuring surface water run-off is no greater than the existing pre-development run-off. This should include consideration of flood extents within climate change. This may result in existing areas in Flood Zone 2 being located in Flood Zone 3 under the climate change scenario."
90.14			W5	Comment	Bullet point B – for Greenfield development sites, surface water run-off should be minimised to the Greenfield run-off rate or for Brownfield development sites, a substantial reduction in the existing run-off rate should be achieved.	Accepted. See 90.7	No further change.
90.15			W7	Comment	Draft Policy W7: Encouraging High Quality and Sustainable Design	Accepted.	Amend NDP.

					Bullet point J – This needs re-wording. Development should not increase flood risk elsewhere. Surface water run-off should be no greater than the existing pre-development run-off, irrespective of whether or not the receiving watercourse has capacity to take additional flows as any additional run-off may exacerbate flood risk downstream.	Amend criterion J as suggested.	<u>Delete J and replace with:</u> " Development should not increase flood risk elsewhere. Surface water run-off should be no greater than the existing pre-development run-off, irrespective of whether or not the receiving watercourse has capacity to take additional flows as any additional run-off may exacerbate flood risk downstream."
90.16			W5 and supporting text	Comment	We recommend you contact your Lead Local Flood Authority, Warwickshire County Council, who are responsible for managing flood risk from local sources including ordinary watercourses, groundwater and surface water and will be able to provide further advice on surface water flood risk (including groundwater and sewerage flood risk) in your Neighbourhood plan area.	Noted. Refer to WCC comments above.	No change.
90.17	All			Comment	The Surface Water Management Plan will contain recommendations and actions about how areas at risk of surface water flooding can be managed. This may be useful when developing policies or guidance for	Noted.	No change.

					particular sites.		
Local Groups and Organisations							
Willoughby Society 162.	All			Support		Noted.	No change.
The Willoughby Thursday Club 163.	All			Support	<p>WILLOUGHBY NEIGHBOURHOOD DEVELOPMENT PLAN : WILLOUGHBY THURSDAY CLUB</p> <p>As secretary of the 'Willoughby Thursday Club' I am asked by our committee to state that the Club strongly supports the above plan. It has been prepared by extensive consultation of the people in the parish, and expresses our wishes for the future of Willoughby.</p>	Noted.	No change.
Willoughby WI 167.	All			Support		Noted.	No change.
Village Hall Management Committee	All			Support	The Management Committee of Willoughby Village Hall give their full support to the draft NDP.	Noted.	No change.

168.							
Willoughby Cricket Club	All			Support	<p>By way of introduction I am Honorary Secretary of Willoughby Cricket Club.</p> <p>At our last committee meeting the Willoughby Neighbourhood Plan was discussed and the document shared. I can see how much time and effort it has taken to produce such a thorough document.</p> <p>On behalf of the committee and the members of the club I would like to thank you and all of those involved in producing the document for the protected status bestowed upon us.</p> <p>As I am sure you are aware the club has been in existence for over 100 years and I am confident we are in position to continue for many more years benefitting both the community of Willoughby and the wider area.</p> <p>It is also fantastic that the club is highly respected by the residents of</p>	Noted.	No change.
169.							

					<p>the village, and we intend to continue to be an integral part of the village.</p> <p>I would also like to take the opportunity to welcome the villagers to the ground throughout 2019 as we are extremely proud of our ground and facilities.</p> <p>It is fantastic that in the modern world when everybody seems to be rushing around there are still community minded people who wish to maintain a traditional village life in Willoughby.</p> <p>Thank You.</p>		
Willoughby Parish Council 170.	All			Support	An important document well put together.	Noted.	No change.

Appendix 1

Severn Trent

28 January 2019

Our ref: Willoughby 1

Dear Sir/Madam

Willoughby Draft Neighbourhood Development Plan

Thank you for the opportunity to comment on your consultation. We have provided some specific comments below relating to your draft policies.

Policy W5 – Severn Trent is supportive of your policy to reduce flood risk when building new developments. Further to this we would advise you to include the wording that there should be no net increase in surface water runoff for the lifetime of the development on all new development. Run off rates for development on greenfield sites should not be exceeded, and where possible should be reduced from existing. Run off rates for development on previously developed land should be reduced from the current rate of surface water runoff where feasible. Surface water runoff should be managed at source wherever possible, avoiding disposal to combined sewers.

We encourage you to include a comment relating to the Drainage Hierarchy, in particular the need to direct surface water away from combined sewers on previously developed land and to ensure surface water on new development is not connected to a combined sewers. We would note that where alternatives to a connection to a surface water sewer or indeed combined sewer are available these outfall options should be considered prior to determination of the drainage system

Policy W7 – Severn Trent is supportive of the policy to encourage sustainable design. The Severn Trent Water region is not classified as water stressed under the EA definition. This definition is based on population and rainfall data, this is difference from having supply demand deficits.

The Severn Trent Water Resources Management Plan 2019 (WRMP19) identifies that we forecast a significant deficit between supply and demand for water, and that one of the key changes that has resulted in this deficit is due to the need to prevent the risk of future environmental deterioration. To ensure that our environment is protected for future customers, some of our current sources of water cannot be relied upon in the future. One of the ways in which the WRMP19 has committed to mitigating this risk is by "helping customers to use less water through water efficiency activities and education."

In support of this goal we would also strongly recommend that local planning authorities incorporate the voluntary building standard of 110 l/p/d into their planning policies so that new development is designed in line with this approach. Further information on water efficiency can be found within the water efficiency section of this response.

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone

(SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Rebecca McLean

Strategic Catchment Planner

growth.development@severntrent.co.uk

2 St Johns Street, Coventry, CV1 2LZ

Appendix 2.

Natural England

Date: 16 February 2019
Our ref: 272142
Your ref: Willoughby Neighbourhood Plan



Maggie Beech
Chair of the NDP Steering Group,
The Leys, Woolscott Road
Willoughby
Rugby, CV23 8DA

BY EMAIL ONLY
mywndp@gmail.com

Hornbeam House
Crewe Business Park
Electra Way
Crewe
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CW1 6GJ

T 0300 060 3900

Dear Ms Beech,

Willoughby Neighbourhood Development Plan - Formal Consultation (Regulation 14)

Thank you for your consultation on the above dated 18 January 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 this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

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

Yours sincerely

Victoria Kirkham
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic¹](http://magic.defra.gov.uk/) website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, **National Parks (England)**, **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here²](http://magic.defra.gov.uk/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here³](http://magic.defra.gov.uk/). Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here⁴](http://magic.defra.gov.uk/).

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic⁵](http://magic.defra.gov.uk/) website and also from the [LandIS website⁶](http://www.landis.org.uk/), which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework⁷](https://www.gov.uk/government/publications/national-planning-policy-framework-2) sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance⁸](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/) sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>