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Representation # _____	

STURMINSTER NEWTON NEIGHBOURHOOD PLAN 2016-2031 Regulation 16 Consultation 6 April to 25 May 2018

Response Form

The proposed Sturminster Newton Neighbourhood Plan 2016-2031 has been submitted to North Dorset District Council for examination. The neighbourhood plan and all supporting documentation can be viewed on the District Council's website via:

<https://www.dorsetforyou.com/article/422589/North-Dorset-Neighbourhood-Plans--Submitted-Plans>

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy (North Dorset), South Walks House, South Walks Road, Dorchester, Dorset, DT1 1UZ

Deadline: 4pm on Friday 25 May 2018. Representations received after this date will not be accepted.

Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council in line with its retention schedule. Your data will be destroyed when the plan becomes redundant.

*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

	Personal Details (if applicable)*	Agent's Details (if applicable)*
Title		
First Name	Richard	
Last Name	Dodson	
Job Title (where relevant)		
Organisation (where relevant)	Dorset County Council	
Address	County Hall Dorchester	
Postcode	DT11XJ	
Tel. No.	██████████	
Email Address	████████████████████	

Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other <i>Please specify:</i>

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

	<i>Location of Text</i>
Whole document	
Section	4 onwards
Policy	
Page	
Appendix	

3. Do you wish to? *Please tick one box only.*

<input type="checkbox"/>	Support
<input type="checkbox"/>	Object
<input checked="" type="checkbox"/>	Make an observation

4. Please use the box below to give reasons for your support/objection or make your observation.

We acknowledge that the NP makes limited site specific comments in relation to flood risk and surface water in some policies, notably in relation to the Bull Tavern.

Whilst this is helpful we remain concerned (representation on pre submission draft) that the policies, from a flood risk and drainage perspective, are too specific to individual sites to be applied to all the development areas identified or other planning applications that are submitted in the future. The plan would benefit from a general policy against which development proposals and flood risk or mitigation could be assessed.

The Neighbourhood Plan is limited in its discussion of existing flooding issues within the wider community, beyond the individual sites discussed. Developers are required, under NPPF guidelines, not to worsen offsite flood risk, however, there are no national policies we are aware of that require developers to introduce betterment. New development can often be used, however, to drive off site improvements by, for instance, reducing runoff from a site to below greenfield runoff.

The Town Council may wish to include information regarding known flooding concerns and use this to substantiate a general policy which might require developers to provide offsite betterment i.e. drainage improvements, flood defence measures etc.

Because of the cumulative effects of site runoff and combined effect of drainage and fluvial risk, Surface Water management on a specific site should be considered holistically and in the context of the wider urban area as a whole not just the site and its immediate surroundings. Unfortunately national guidance provides limited scope for driving betterment in terms of reducing flood risk, unless this is supported by a local strategic document, such as a local plan or SFRA.

Inclusion of local knowledge with regards flooding, within NPs provides a useful source of

information for developers and DCC FRM as a statutory consultee for major planning applications. Inclusion of a connected policy may allow us to consider objecting to a drainage strategy, where we consider this may be in contravention of a NP Policy which requires offsite improvement.

Suggested wording (below) 5

Continue overleaf if necessary

5. Please give details of any suggested modifications in the box below.

Additional policy

All development proposals, whether greenfield or brownfield redevelopment, must give adequate consideration to all sources of flood risk and surface water management. Site characteristics and constraints should be investigated and a deliverable strategy for surface water management presented, with due consideration of climate change, in accordance with the requirements of the National Planning Policy Framework (NPPF). Dorset County Council (DCC) act as the Lead Local Flood Authority (LLFA) and statutory planning consultee in such matters, for schemes regarded as major development. Pre-application discussion is encouraged to ensure that appropriate development proposals are presented, in compliance with the NPPF.

Such a policy, provides another local, but strategic planning document that can be used to determine if a future planning application complies with such a policy.

Continue overleaf if necessary

6. Do you wish to be notified of the District Council's decision to make or refuse to make the neighbourhood plan? *Please tick one box only.*

<input checked="" type="checkbox"/>	Yes
<input type="checkbox"/>	No

Signature: _____

Date: 23 5 18

If submitting the form electronically, no signature is required.