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Representation # _____

MILBORNE ST ANDREW NEIGHBOURHOOD PLAN 2018 TO 2033 Regulation 16 Consultation 18 January to 1 March 2019

Response Form

The proposed Milborne St Andrew Neighbourhood Plan 2018 to 2033 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.gov.uk/planning-buildings-land/planning-policy/north-dorset-planning-policy/local-planning-policy-north-dorset.aspx>

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 1 March 2019. 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 and privacy policy (<https://www.dorsetforyou.gov.uk/privacypolicy>). 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	Mr	
First Name	Richard	
Last Name	Dodson	
Job Title (where relevant)	Planning Obligations Manager	
Organisation (where relevant)	Dorset County Council	
Address	County Hall Dorchester	
Postcode	DT1 1XJ	
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	2
Policy	MSA 15
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 had previously suggested that the plan made reference, or had regard to the FRA Standing Advice on Drainage & Flood Risk Policy.

The specific site policies appear to have had regard to this. It must however be recognised that detailed proposals can only be confirmed through the planning application process.

We have found that the Standing Advice assists this process and is thus a benefit to NHP policy implementation. The advice is as below:



Neighbourhood Planning Advice for Managing Surface Water

What can you achieve within a Neighbourhood Plan to improve surface water management from new development sites?

The Neighbourhood Planning process is an ideal opportunity to shape new development in a positive manner. Through the Plan you are able to include drainage knowledge, issues that affect your area and specify policies to affectively influence the management of surface water from new development.

Flood risk and resilience to climate change can be planned through Neighbourhood Plans. By highlighting local flooding problems and developing policies for land use, a community can manage and reduce the risk of flooding. In addition, water can be used as a resource to enhance biodiversity, beauty, tranquillity, places and landscape.

A Neighbourhood Plan should incorporate evidence from the community to provide safe, sensible and sustainable development that prevents flooding by:

- Providing local knowledge about drainage and historic flooding including, for areas worst hit by flooding, flood depths & flow paths as well as causes and impacts.
- Identifying, within any proposed development sites, whether there are any low spots that are regularly wet and should be considered within the landscaping and/or built elements?
- Considering mitigation measures to be included within future development proposals. Any development should mitigate against existing flooding problems and any potential future flooding.
- Specifying that surface water should be managed above ground level so any future blockages in the drainage system can be easily visually identified.
- Ensuring surface water management considers amenity value.
- Supporting drainage systems that mimic the landscape and natural flow paths.
- Ensuring runoff rates are well managed when flowing into sensitive drainage systems and identifying downstream constraints which have proven problematic in the past.
- Detailing potential solutions or improvements to infrastructure within your community that may help reduce flood risk, which could be part funded by developer contributions through the CIL (Community Infrastructure Levy).

You can check the current mapped areas of risk identified on the Strategic Flood Risk Assessment on explorer.geowesssex.com/SFRA. Please do not assume an area locally known to flood will be appropriately represented on national scale strategic maps. Areas of known flood risk presented within the Neighbourhood Plan can help steer development to areas of lower flood risk.

Example of neighbourhood plans with flooding outlined and polices:

A good example with policies to reduce flooding:

<http://www.muchwenlock-tc.gov.uk/wp-content/uploads/2016/04/Much-Wenlock-Neighbourhood-Plan-201326-Adoption-Version.pdf>

An example where local areas of risk are identified:

<https://www.bereregisparishcouncil.co.uk/berenc/files/Bere-Recis-Plan-21.06.18-Consultation-Doc.pdf>

Further relevant information:

- [National Planning Policy Framework](#) (Page 23-26, paragraphs 99-104, 109)
- Planning Practice Guidance – Flood Risk and Coastal Change
- Non-statutory technical standards for SuDS
- [BS 8582](#) Surface water flood risk management
- [Designing for exceedance in urban drainage - good practice \(C635\)](#)
- [The SuDS manual \(C697\)](#)
- Sewers for Adoption 7th Edition

Working together for a strong and successful Dorset

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

As above

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: _____

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Postcode	DT1 1XJ	
Tel. No.	██████████	
Email Address	████████████████████	

Part B – Representation

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

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<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	
Policy	LGS10
Page	
Appendix	

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

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

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

Local Green Space

LGS 10 identifies an area of highway as LGS
As Highway this has a particular singular purpose and should not be designated otherwise.
It is, for all intents and purpose, protected as highway and does not need any other protection.

LGS allocations need to ensure that the NPPF criteria para 100 – 101 is met.

Critically, and notwithstanding the above, it would appear that LGS10 does not meet any of the example criteria in NPPF 100 b.

Whilst it is appreciated that it has a 'value' it does not need the addition constraint conferred by LGS designation.

If the policy had been amended as suggested in the earlier representations such that it allowed for development which :
'enhances or is ancillary to the primary purpose for which the land is used '
we would not have maintained this objection

As submitted DCC object to LGS 10.

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

As above – the LGS policy should be amended such that it allows for development which enhances or is ancillary to the primary purpose for which the land is used’.

This would apply to all the LGS proposed sites. As drafted the policy requires Green Belt considerations even if the development is a benefit –

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: _____

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