

### Three Parishes Neighbourhood Plan - Regulation 16 – Summary of Responses

	<b>Consultee</b>	<b>Summary of comments</b>
1	Sport England	No specific comments.
2	National Highways	National Highways note that the Strategic Road Network in closest proximity to the plan area is the M6 which is approximately 10.5km away. They support the commitments of the Parish for sustainable development and consider that the contents of the plan are for local determination and therefore have no further comments to make.
3	Environment Agency	No specific comments.
4	Severn Trent	<p><b>H1 Housing Design</b> Severn Trent is supportive of this policy, however the policy could contain specific wording around water efficiency and the drainage hierarchy policies. Example policy wording has been shown below.</p> <p><b><i>Drainage Hierarchy Policy</i></b> <i>New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.</i></p> <p><b><i>Water Efficiency Policy</i></b> <i>New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.</i></p> <p><b>Policy G1 Protecting Public Open Spaces in the Three Parishes</b> Severn Trent encourages the Steering Group to include reference to the green open spaces policy. Example wording has been shown below.</p> <p><b><i>Green Open Spaces Policy</i></b> <i>Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.</i></p>
5	Natural Resources Wales	No specific comments.
6	The Coal Authority.	No specific comments.

7	Historic England	Historic England reiterate their response to the Reg 14 consultation: 'Historic England is supportive of both the content of the document and the vision and objectives set out in it. We commend the commitment in the Plan to support limited well designed locally distinctive development that is sympathetic to the character of the area including its rural landscape character, heritage assets and green infrastructure.'
8	British Horse Society	No specific comments. Wishes to ensure that the needs and safety of horse riders are taken into account particularly when considering improvements to walking and cycling infrastructure and opportunities.
9	United Utilities Water	<p>Note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for Shropshire.</p> <p>UUW support Objectives 1 and 2 of the NP but highlights the need to ensure that progressive infill proposals do not result in a level of growth within a settlement which is disproportionate to the size of the settlement, which can place a strain on existing infrastructure. They request that the Objectives reference consistency with wider development plan policy in the emerging Shropshire Local Plan 2016-2038, in particular, Policies SP8 (Managing Development in Community Hubs), Policy SP9 (Managing Development in Community Clusters) and Policy SP10 (Managing Development in the Countryside).</p> <p><b>Policy H1 Housing Design</b></p> <p>Whilst being supportive of Policy H1, UUW requests that this also makes reference to wider design requirements of the emerging local plan relating to water efficiency and sustainable drainage. They include three additional points for inclusion in this policy:</p> <ul style="list-style-type: none"> <li>• <i>'Provides new housing to meet the Building Regulations Optional Standard for Water Efficiency in new housing.</i></li> <li>• <i>Robustly applies the surface water hierarchy for managing surface water and incorporates sustainable drainage which is multi-functional, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible.</i></li> <li>• <i>Ensure landscaping proposals are integrated with the strategy for sustainable water management.'</i> We also request that the NP includes provision for water efficiency in non-domestic buildings. We recommend the following wording in the wider NP.</li> </ul> <p>And the inclusion of the following wording in the wider NP:</p>

		<ul style="list-style-type: none"> <li>• <i>‘Non-domestic buildings will be required to reach ‘Good’ BREEAM status or an equivalent status endorsed by Shropshire Council, for water efficiency as a minimum, unless it can be demonstrated that this make the development unviable.’</i></li> </ul> <p><b>Policy G2 Protection and Enhancement of Biodiversity</b></p> <p>UUW support the implementation of sustainable drainage systems (SuDS) using natural features such as drainage ditches and ponds. They object to the final criterion and suggest the following amendment to the proposed policy wording:</p> <p><i><u>Where on-site net gain for biodiversity is not feasible appropriate then other areas will be considered specified by the Parish Council may be appropriate to add such value to the local Nature Recovery Network. in accordance with wider government policy and the latest biodiversity metric.</u></i></p> <p>UUW request the inclusion of an additional policy:</p> <p><b>Supporting Utility Infrastructure</b></p> <p><i>We will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers including development proposals for water and wastewater infrastructure beyond the settlement boundaries in open countryside or in existing green spaces, where it is demonstrated that the investment is needed to respond to future growth and environmental needs.</i></p>
10	Canal and River Trust	<p><b>Development Plan Conformity</b></p> <p>The Trust suggest that, given the current status of the emerging Shropshire Local Plan, the Council and Parish Councils consider whether a commensurate delay to the preparation and consideration of this NDP, starting now, would be beneficial to ensure that their timeframes progress together and do not result in abortive work.</p> <p><b>Vision and Objectives</b></p> <p>The Trust notes that neither Objective 9 nor 11 have been amended as requested in their response to the Regulation 14 consultation. They remain of the view that these wording additions to both objectives remain important to the contribution our network can make to the ‘Transport and Movement’ and ‘Built Environment and Heritage’ objectives of the Plan and reiterate their request for their amendment.</p>

**Policy H1 - Housing Design**

The Trust notes that policy H1 has not been amended as requested in their response to the Regulation 14 consultation. They therefore repeat our request that the list of design principles be expanded to specifically incorporate the canal corridor as suggested, and more broadly that the policy title be amended to reflect the applicability of high-quality design to all development rather than exclusively, by title, to housing.

**Policy G2 – Protection and Enhancement of Biodiversity**

The Trust welcomes the addition of specific reference to the canal corridor within this policy wording, and explicit mention of external lighting control. More generally, the policy wording supports and promotes Biodiversity Net Gain and integration of the canal into wider green infrastructure. Accordingly, they request no further amendments to this policy.

**Policy G3 - Local Carbon Reduction**

The Trust notes that the wording of this policy does not list the potential sources of energy facilities and the policy would benefit from strengthening in this respect, and within it explicit inclusion of the use of water-source heat pumps utilising the canal network. Alternatively, they suggest that the associated explanatory text for the policy should be expanded to add this level of detail and thereby clarify the Plan's expectations.

**Policy T1 – Linkages and Connections**

The Trust welcomes the addition of reference to the Shropshire Union Canal towpath within the policy wording as requested. Accordingly, they request no further amendments to this policy.

**Built Environment and Heritage/ Policy LE1 – Conservation of the Three Parishes Historic Character**

The Trust notes that not all of its previous heritage-related comments have been explicitly incorporated into the general text or detailed policy wording, and they reiterate their request for these additions. In particular, protection and enhancement of the canal corridor in this interest would be better secured by specific policy reference to protecting and enhancing the heritage significance of the Shropshire Union Canal corridor as a non-designated heritage asset, and the designated and non-designated heritage assets along its length. They therefore reiterate their previous requests for expansion of both the text and policy wording to address this aspect.