

Foxton Neighbourhood Plan Review

Summary of representations submitted by Harborough District Council to the independent examiner pursuant to Regulation 17 of Part 5 of The Neighbourhood Planning (General) Regulations 2012

	Name	Policy /Page	Full Representation
1	Natural England Jacqui Salt Hornbeam House Crewe Business Park Crewe		<p>Foxton Review Neighbourhood Plan - Regulation 16 Consultation</p> <p>Thank you for your consultation on the above dated 26 May 2021</p> <p>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.</p> <p>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 neighbourhood plan.</p>
2	Leicestershire Clinical Commissioning Group Joanna Clinton		<p>Re: Draft Neighbourhood Plan, Foxton</p> <p>We are writing in response to the draft Neighbourhood Plan for Foxton</p> <p>The LLR Clinical Commissioning Groups (CCGs) are supportive of the vision set out in your draft plan and would want to work collectively with you to understand in more detail how the local NHS can contribute to its delivery.</p> <p>Many of the themes identified in the plan will impact upon the wider determinants of health and as a result population health outcome. We would therefore welcome working together to maximise the opportunity for health and wellbeing within the vision outlined in your plan.</p> <p>In particular we would welcome:</p> <ul style="list-style-type: none"> • Actions to support the development of community identity; maximising opportunities for residents to come together to create community cohesion and support each other. • Maximise the opportunities and provision of green space and local recreational facilities that actively promote enable residents to access and undertake physical activity with ease (both formal and informal). Consideration for this type of provision should be varied, evidenced based and compatible with local leisure, and open space strategies. Types of provision could range from (but not limited to) built leisure centre facilities, community centres to play areas to structures walking trails, café / social facilities, or semi nature accessible open space.

		<ul style="list-style-type: none"> • The actions to create local jobs (Logistics Park) are welcome as this is a large contributor to people's health and wellbeing. We would like employers to consider how they support the health and wellbeing of their employees. • That the development is designed in such a way to encourage and enhance physical and mental health and wellbeing and demonstrate compatibility with published national guidance from Sport England, Public Health England, NHS, Design Council and others e.g Active Design Guidance, Building for Life 12, Manual for Streets, Spatial Planning for Health • Ensure that there are a range of options for travel (including active travel) within the development that enables residents to get to and from work and leisure easily. • Infrastructure for Active Travel should be actively encouraged with provision for high quality cycling and walking routes within the development, good connectivity to surrounding settlements and ease of access to public transport. • Designs that support the reduction in carbon emissions, as this has a direct impact on some resident's health <p>As well as the above generic comments it is important to note that an increase in the number of new residents in any area will have a direct impact upon local NHS services whether that is primary, hospital or community care. Local primary care services are already under high demand and therefore any additional demand from housing developments will require developer contribution to mitigate this.</p> <p>Thank you for the opportunity to comment on your vision and I look forward to working together to make the most of the opportunity and mitigate any impacts from increases in population upon local NHS services.</p>
3	Canal & River Trust, The Kiln, Mather Road, Newark, Notts NG24 1FB Ian Dickinson Area Planner	<p>Thank you for consulting the Canal & River Trust on the review of the Foxton Neighbourhood Plan.</p> <p>The Trust has reviewed the proposed changes and can advise that we have no comments to make.</p>
4	Environment Agency Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR Nick Wakefield Planning Specialist, Sustainable	<p>Thank you for giving the Environment Agency the opportunity to comment on the Foxton Review Neighbourhood Plan - Regulation 16 Consultation.</p> <p>We have no adverse comments to make on the Plan as currently submitted.</p>

	Places Team		
5	Highways England (Area 7) Stirling House Lakeside Court Osier Drive Sherwood Business Park Nottingham NG15 0DS Steve Freek Midlands Operations Directorate		<p>Consultation on the Submission Draft Foxton Neighbourhood Plan Highways England welcomes the opportunity to comment on the Submission Draft version of the Foxton Neighbourhood Plan which covers the period of 2016 - 2031. The document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.</p> <p>Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Foxton Neighbourhood Plan, our principal interest is in safeguarding the operation of the A14, located approximately 12km to the south of the Plan area.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Foxton is required to be in conformity with the adopted Harborough Local Plan and this is acknowledged within the document.</p> <p>From our review of the Neighbourhood Plan, we note that no employment sites have been allocated within the Neighbourhood Plan area. Similarly, as the Local Plan identifies Foxton as a rural village, no additional housing is allocated within the Parish boundaries. The Neighbourhood Plan will however support windfall sites coming forward where they provide for local needs, are within the limits of development of the village, and are in keeping with the character of the surroundings.</p> <p>Due to the minimal growth coming forward within the Foxton Neighbourhood Plan area, we do not consider that there will be any material impacts on the operation of the SRN.</p> <p>We have no further comments to provide and trust that the above is useful in the progression of the Foxton Neighbourhood Plan.</p>
6	Harborough District Council Strategic Planning Team	F1	<p>General comment: The Plan has been well reviewed and the amendments made have brought the Plan up to date with the changes to Local Plan policies and National Policy. The LPA consider it sensible to delete policies that have now been superseded by events (housing delivery) or cannot be delivered (Hog Lane allocation).</p> <p>Comments on policies</p> <p>Policy F1 Countryside</p> <p>The policy was part of the 'made' Foxton NDP and has been brought up to date with the Local Plan. The</p>

			<p>policy now references the Local Plan policies SS1, GD3 and GD4. The changes are sensible to reflect new Local Plan policies</p>
		F2	<p>Policy F2 Renewable Energy</p> <p>Minor text changes – no comments</p>
		F3	<p>Policy F3 Tranquillity</p> <p>Minor text changes – no comments</p>
		F4	<p>Policy F4 Foxtton Areas of Separation</p> <p>Policy has been shortened.</p> <p>Original</p> <p><i>Policy F4: Foxtton Areas of Separation</i></p> <p><i>The open character of the two Foxtton Areas of Separation, as defined on the adjacent map and the Policies Map, will be retained. The construction of new buildings or inappropriate uses of land which adversely affect this open character or the character and setting of Foxtton village will not be supported. Any development proposal within the Areas of Separation must assess and address its impact on the setting of Foxtton Village, (as appropriate) the historic Foxtton Locks and the objective of separation and give specific attention to location, design and landscaping appropriate to the character of the area.</i></p> <p>New</p> <p><i>Policy F4: Foxtton Green Zone</i></p> <p><i>The open and undeveloped character of the two Foxtton Areas of Separation, as defined on Map 2 and the Policies Map, will be retained.</i></p> <p><i>The construction of new buildings, including new caravan and lodges sites, will not be supported unless they preserve the openness of these Areas and do not conflict with the objective of separation.</i></p> <p>The revised policy has been amended to provide clarity to decision makers on development that is not supported but allow some flexibility for delivery of appropriate development in these areas.</p>
		F5	<p>Policy F5 Ecology and Biodiversity</p> <p>Minor text changes and to identify individual sites. No comments</p>
		F6	<p>Policy F6 The Canal</p>

			No changes. No comments
		F7	Policy F7 Local Heritage Assets
			No changes. No comments.
		F8	Policy F8 Ridge and Furrow
			New policy for Ridge and Furrow. Ridge and Furrow can be considered a non designated heritage asset. The policy should not materially affect the nature of the Plan, as the previous version of the Foxtan Plan also considered non designated heritage assets. The LPA considers that the policy text is appropriate to give clarity to the decision maker and are not overly restrictive where development might be appropriate.
		F9	Policy F9 (formerly F8) Design
			No changes. No comment.
		F10	Policy F10 (formerly F9) Local Green Spaces
			No changes. No comment.
		F11	Policy F11 (formerly F10) Trees
			No changes. No comment.
		F12	Policy F12 (formerly F11) Housing Provision
			Updated to take account of completions and planning permission given. No comments
		F13	Policy F13 (formerly F12) Windfall Housing
			Minor wording changes relating to remove reference to dispersed nature of village and internal configuration of existing buildings. Added text for development not to extend beyond the limits to development. No further comment.
			<i>(Fishers Farm (F13) and Land at Middle Street and Vicarage Drive (F14) – deleted as housing has been delivered through the policies)</i>
		F14	Policy F14 (formerly 16) Housing Mix
			Minor text changes to update the policy. No comment
		F15	Policy F15 (formerly F17) Affordable Housing
			Minor text changes. No comment.
		F16	Policy F16 (formerly F18) Retention of Key Services and Facilities

		F17	Minor text changes to update policy. No comment. Policy F17 (formerly F19) Water management
		F18	Minor text changes to update policy. No comment. Policy F18 (new policy) Car Parking New policy to require car parking standards as set out in Appendix 4, which sets out the number of spaces required according to the size and typology of the development. The policy is supported by the Leicestershire Highways Design Guide, which being only guidance requires policy to ensure effective implementation.
		F19	Policy F19 (formerly F20) Foxton Locks Minor text changes. Addition of text for electrical charging points. No Comments
7	Strategy & Business Intelligence, Chief Executive's Department, Leicestershire County Council, County Hall, Glenfield,		Foxton Neighbourhood Plan Review Comments Requested – 26th May 2021 Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation. Highways General Comments The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth. Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents,

	<p>Leicestershire LE3 8RA</p> <p>Nik Green (Mrs)</p>	<p>Policy F18</p>	<p>businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.</p> <p>To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems. Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a commuted sum.</p> <p>In regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped ie they would be able to operate without being supported from public funding.</p> <p>The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third-party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third-party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.</p> <p>Policy F18: Car Parking</p> <p>The normal maximum vehicular parking standards shown in Table DG11 of the Leicestershire Highway Design Guide (LHDG) are taken from RPG8. For developments below the threshold, Leicestershire County Council will continue to apply the standards contained in the previous guidance document 'Highway Requirements for Development' (HRfD) for the time being as the normal maximum standards. In certain circumstances, for example, where there are road safety or amenity issues that cannot be satisfactorily resolved, we may require a higher level of parking provision</p> <p>Flood Risk Management</p> <p>The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution.</p> <p>The LLFA is not able to:</p> <ul style="list-style-type: none"> • Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.
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		<p>carbon neutral by 2050. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and to increasing the county's resilience to climate change.</p> <p>Landscape The County Council would like to see the inclusion of a local landscape assessment taking into account Natural England's Landscape character areas; Leicester, Leicestershire and Rutland Landscape and Woodland Strategy; the Local District/Borough Council landscape character assessments and the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (2017) which examines the sensitivity of the landscape, exploring the extent to which different areas can accommodate development without impacting on their key landscape qualities. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest 'Streets for All East Midlands' Advisory Document (2006) published by English Heritage. LCC would encourage the development of local listings as per the National Planning Policy Framework (NPPF) and LCC have some data on the social, cultural, archaeological and historic value of local features and buildings (https://www.leicestershire.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record)</p> <p>Biodiversity The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment, providing net gain for biodiversity, and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development or management of open spaces on enhancing biodiversity and habitat connectivity, such as hedgerows and greenways. Also, habitat permeability for habitats and species which addresses encouragement of movement from one location to another such as the design of street lighting, roads, noise, obstructions in water, exposure of species to predation and arrangement of land-uses. The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme. Contact: planningecology@leics.gov.uk, or phone 0116 305 4108</p> <p>Green Infrastructure Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls. The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design;</p>
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		<p>area and Leicestershire County Council. The County's Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local HWRC infrastructure then appropriate projects to increase the capacity to off-set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire's Planning Obligations Policy (2019) and the relevant Legislation Regulations.</p> <p>Communities</p> <p>Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> 1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community. 2. Set out policies that seek to; <ul style="list-style-type: none"> • protect and retain these existing facilities, • support the independent development of new facilities, and, • identify and protect Assets of Community Value and provide support for any existing or future designations. 3. Identify and support potential community projects that could be progressed. <p>You are encouraged to consider and respond to all aspects of community resources as part of the Neighbourhood Planning process. Further information, guidance and examples of policies and supporting information is available at www.leicestershirecommunities.org.uk/np/useful-information.</p> <p>Economic Development</p> <p>We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.</p> <p>Fibre Broadband</p> <p>High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a fast broadband connection is no longer merely desirable but is an essential requirement in ordinary daily life. All new developments (including community facilities) should have access to ultrafast broadband (of at least 100Mbps) and allow mechanisms for securing a full fibre broadband provision for each premise and business from at least one network operator, provided on an open access basis. Such provider must deploy a Fibre to the Premise (FTTP) access network structure in which optical fibre runs from a local exchange to each premise. Developers should take active steps to incorporate adequate broadband provision at the pre-planning phase and should engage with telecoms providers to ensure fibre broadband is available as soon as build on the development is complete. Where practical, developers should consider engaging several telecoms providers to encourage competition and consumer choice.</p> <p>The Council supports a 'dig once' approach for the deployment of communications infrastructure and a build which is sympathetic to the character and appearance of the surrounding area. The Council encourages telecommunications build which does not significantly impact on the appearance of any building or space on which equipment is located and which minimises street clutter.</p> <p>Equalities</p> <p>While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council's Equality Strategy 2020-</p>
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		<p>2024 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be view at: https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2020/7/10/Equality-strategyTH-2020-2024.pdf The Neighbourhood plan should comply with the main requirements of the Public Sector Equality Duty. This requires public bodies to have due regard of the need to: Eliminate discrimination Advance equality of opportunity Foster good relations between different people</p> <p>Accessible Documents</p> <p>In today’s working environment more and more information is being produced digitally. When producing information which is aimed at or to be viewed by the public, it is important to make that information as accessible as possible. At least 1 in 5 people in the UK have a long-term illness, impairment or disability. Many more have a temporary disability. Accessibility means more than putting things online. It means making your content and design clear and simple enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt things. For example, someone with impaired vision might use a screen reader (software that lets a user navigate a website and ‘read out’ the content), braille display or screen magnifier. Or someone with motor difficulties might use a special mouse, speech recognition software or on-screen keyboard emulator.</p> <p>Public sector organisations have a legal requirement to make sure that all information which appears on their websites is accessible. As Neighbourhood Plans have to be published on Local Planning Authority websites, they too have to comply with government regulations for accessibility. Guidance for creating accessible Word and PDF documents can be found on the Leicestershire Communities website under the heading ‘Creating Accessible Documents’:- https://www.leicestershirecommunities.org.uk/sr/</p>
8	<p>Sport England Sportpark Loughborough Planning Administration Team</p>	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p>

		<p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p>
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9	<p>Severn Trent Water Ltd, PO Box 51, Raynesway, Derby, DE21 7JA Chris Bramley Strategic Catchment Planner (Leics & Notts)</p>	<p>Thank you for giving Severn Trent an opportunity to comment on the Foxton Neighbourhood Development Plan. The changes made do not fundamentally change our response, in such that we would still recommend the inclusion of the water efficiency target to ensure developers understand the design parameters that they will be expected to meet under the reference of Water efficiency which will also support Energy efficiency and subsequently climate change. As our response hasn't changed I have therefore attached a copy of our previous response for reference.</p> <p>Foxton Neighbourhood Plan Review</p> <p>Thank you for the opportunity to comment on your consultation for the Foxton Neighbourhood Plan review. Severn Trent would not that we do not provide sewerage services to Foxton and would recommend that Anglian Water is consulted to ensure that you have the views of the appropriate sewerage undertaker.</p> <p>Severn Trent acknowledge the proposals within the summary document to introduce renewable energy within the parish, reduce greenhouse emissions and slow climate change. Severn Trent have adopted our own Triple Carbon pledge and are looking to reduce our own emission, source from renewable sources and mitigate the impacts of our operations. Due to the nature of providing water for consumption we do however have several energy intensive processes. We would therefore recommend that the Neighbourhood Plan also looks to promote water efficient design and the use of water efficient technology.</p> <p>Water efficiency within certain products within the home help to reduce the use of energy therefore carbon through the need to heat less water, key examples include water efficient dishwashers, washing machines, showerheads and taps. Water usage through these systems makes up a large proportion of energy use within the home, as such water and energy efficiency are complimentary.</p> <p>89% of the carbon emissions within the water supply – usage – disposal system are attributed to water usage in the home and includes energy for heating water (excluding space heating), which compared to 11% through the supply and disposal treatment processes.</p> <p>Severn Trent would therefore recommend that the neighbourhood Plan incorporates a statement regarding the need to deliver against the optional higher water efficiency target. The following wording is provided to assist with the interpretation of this request.</p> <p><i>Development proposals should demonstrate that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110</i></p>

		<p>litres/person/day Further guidance regarding the water efficiency standard can be found in building regulations Part G (2015 edition with 2016 amendments). Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. 2</p> <p>For your information we have set out some general guidelines that may be useful to you.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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/</p> <p>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</p>
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