

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	1
Response Date	13/08/19 08:34
Status	Processed
Submission Type	Web
Version	0.3

To which part of the Seagry Neighbourhood Plan does your comment relate? Seagry Community Design Statement

Comment:

Overall I thought this was a comprehensive document, balanced and well thought out. However the section 5.4 on buildings is perhaps a bit of date in the recommendations. This would benefit from being revised.

Section 5.4 makes suggestions of Solar panels, Chimney for wood burning stove, High level of insulation. My opinion on solar panels is that people forget to take into account the maintenance costs. Electronics do not last forever and one should expect the need to the repair the solar panel electronics every 5-10 yrs. When that is taken into account with the lower FIT now the economics I don't think stack up.

Wood burning stoves as was recently in the news are not that carbon neutral. It takes a long time to capture the carbon released by burning wood and burning wood is not very efficient compared to other fuels. This site <https://nativeforestry.co.uk/about-native-plants/products-from-native-plants/firewood/> suggests

An average three bedroomed house would need 7-9 tonnes of air-dried wood to provide all the heating requirements. The area of coppice woodland would need to be at least 3 hectares in order to be self-sufficient in firewood.

Currently the demand for wood is leading to deforestation making the climate issue worse not better.

And my final point is the recommendation, just, for high levels of insulation. Building regs already demand high levels of insulation and increasing those is not the best way to spend money. Now to prove this point I'll have to use some maths I'm afraid.

Take a house 10m wide, 5m deep, 5m tall
Floor/ceiling = 50m²
Walls = 150m²
Volume = 250m³
Building regs (L1A) say For new builds
Roof 0.2 W/m²K
Wall 0.3 W/m²K
Floor 0.25W/m²K
So at 20C inside 0 C outside the heat loss is:
Roof 200W
Wall 900W
Floor 250W
This ignores windows as A rated windows are energy neutral, solar gain matches heat loss, hence they are better than walls. This is one area where I would suggest A or greater (A+, A++) as the cost difference is small but the gains are significant (A is >0 KWh/m²/yr, B is -10 to 0, C is -20 to -10, etc). Total loss for this house through the fabric is thus 1350W. But this has ignored ventilation. Building regs (F) says a minimum of 0.3 l/s per m² of floor area, so 30 l/s for this house. Or 108m³ per hour, 0.43 air changes per hour. At 20C to 0C this is a loss of 713W and of course the ventilation figure is only controllable if you have mechanically ventilation. Open vents will likely be more as the building regs figure is the minimum for comfort. In the old days 1 air change per hour was the rule of thumb, more for bathrooms. Note that open chimneys,

wood burners will drag more air out of the house. Total loss is 2063W of which air changes are ~35%. Mechanical Heat recovery ventilation (MHRV) are about 90% efficient so using one would save 642W, ~31% of fuel bill (or CO₂). Not only that but controlled ventilation gets rid of damp problems too. Out going air takes out damp. Incoming air is heated and thus the RH drops so the air coming is drier. Open chimneys, wood burners, are not compatible with MHRV as you need to have a sealed house. Open gas flames (i.e. hobs) are ok with MHRV. The forced ventilation ensures there is enough air for the flame and the wastes gases are removed.

Also note that to equal the MHRV saving you would roughly have to double the fabric insulation. Roof insulation is already at 270mm so this would increase to 540mm. This is why I would not increase the insulation above the building regs figures as it is not cost efficient. A 10% increase in depth with gain 10% saving. 135W for this house. Far better to spend the money on MHRV. Likewise triple glazing is often installed but with modern coated glass double glazing is almost the same performance and the increase in cost is not justified (again the money would be better spent on MHRV).

Hence I think 5.4 should recommend MHRV, and drop solar panels, wood burning stoves and open chimneys.

Do you wish to be notified of the decision on the **No**
Seagry Neighbourhood Plan proposal?

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	2
Response Date	12/08/19 09:13
Status	Processed
Submission Type	Email
Version	0.3

Comment:

Dear Neighbourhood Plan team

Thank you for providing Highways England with the opportunity to comment on the submission version of the Seagry Neighbourhood Plan. As you are aware, Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this location comprises the M4 to the south of the plan area. It is in the context of these responsibilities that our comments are made.

Whilst noting that the Plan area is in close proximity to our network, we are satisfied that the proposed plan policies are unlikely to result in development which will adversely impact on the SRN and we therefore have no specific comments to make.

This does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time. We will expect any large scale proposals which have the potential to impact on the operation of the M4 and Junction 17 in particular to be supported by a transport assessment and if necessary mitigation measures in line with the requirements of DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development.

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	3
Response Date	12/08/19 14:00
Status	Processed
Submission Type	Email
Version	0.3

Comment:

Thank you for your consultation on the Seagry Neighbourhood Plan Regulation 16 Consultation. The Canal & River Trust have considered the content of the document and have no comments to make in this case.

Do you wish to be notified of the decision on the Seagry Neighbourhood Plan proposal? No

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	4
Response Date	23/08/19 11:00
Status	Processed
Submission Type	Letter
Version	0.5

Comment:

Excellent, well constructed plan, supported fully.

Do you wish to be notified of the decision on the Seagry Neighbourhood Plan proposal? Yes

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	5
Response Date	03/09/19 13:21
Status	Processed
Submission Type	Letter
Version	0.3

Comment:

Dear Neighbourhood Planning team

Thank you for your Regulation 16 consultation on the submitted version of the Seagry Neighbourhood Plan.

I can confirm that there are no issues associated with the Plan upon which we wish to comment.

Kind regards

Do you wish to be notified of the decision on the Seagry Neighbourhood Plan proposal? Yes

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	6
Response Date	03/09/19 13:29
Status	Processed
Submission Type	Letter
Version	0.4
Files	Rep 6 Attachment.pdf

Comment:

For the attention of the Spatial Planning Team

Seagry Neighbourhood Plan Regulation 16

Please find attached Natural England's response in relation to the above mentioned consultation.

Kind regards,

Do you wish to be notified of the decision on the Seagry Neighbourhood Plan proposal? Yes

Date: 03 September 2019
Our ref: 291663
Your ref: Seagry Neighbourhood Plan



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BY EMAIL ONLY

neighbourhoodplanning@wiltshire.gov.uk

Dear Sir/Madam,

Seagry Neighbourhood Plan Regulation 16

Thank you for your consultation on the above dated 08 August 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 neighbourhood plan.

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

Yours faithfully


Consultations Team

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	7
Response Date	17/09/19 11:50
Status	Processed
Submission Type	Email
Version	0.3

Comment:

Seagry Neighbourhood Plan Consultation

SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Wood to review and respond to 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.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the

UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

Assets in your area

National Grid has identified the following high voltage overhead powerlines as falling within the Neighbourhood area boundary:

ZF Route - 400kV two circuit route from Melksham substation in Wiltshire to Minety substation in Wiltshire Unitary Authority.

From the consultation information provided, the above overhead powerline does not interact with any of the proposed development sites.

Gas Distribution – Low / Medium Pressure

Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact plantprotection@cadentgas.com

Electricity distribution

Information regarding the distribution network can be found at: www.energynetworks.org.uk

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition, the following publications are available from the National Grid website or by contacting us at the address overleaf:

- . A sense of place – design guidelines for development near high voltage overhead lines: A sense of place design guidelines for development near high voltage overhead lines:
<https://www.nationalgridet.com/document/130626/download>
- . Guidelines when working near NGG assets:
<https://www.nationalgridgas.com/land-and-assets/working-near-our-assets>
- . Guidelines when working near NGETT assets:
<https://www.nationalgridet.com/network-and-assets/working-near-our-assets>

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	8
Response Date	24/09/19 11:56
Status	Processed
Submission Type	Email
Version	0.4

Comment:

Seagry Neighbourhood Plan Regulation 16 Consultation

Thank you for consulting the Environment Agency on the above Neighbourhood Plan. I am responding on behalf of my colleague [**].

We aim to reduce flood risk, whilst protecting and enhancing the water environment. We focus our detailed engagement where the environmental risks are greatest, therefore we offer the following advice on your Neighbourhood Plan.

We note that the Neighbourhood Plan does not propose the allocation of any specific housing development sites. We note that any development from the "Call for sites for Seagry Parish" assessed as suitable would normally qualify as infill development, so would not be considered for allocation within this plan.

Flood Risk

We note that although there is no specific chapter in the plan on flood risk, this is referenced in 5.13 Permeable Paving linked with Objective O10. Also that there is a proposed flood management project around Lower Seagry. We would welcome further engagement with Seagry Parish Council around this project. We note the plan states that no part of Upper or Lower Seagry is in or near to any of Flood Zones 2 or 3, although there has been flooding on the edge of Lower Seagry in recent years.

We would remind you the Local planning authorities' Strategic Flood Risk Assessments (SFRAs) should be the primary source of flood risk information in considering whether particular neighbourhood planning areas may be appropriate for development. Local Planning Authorities (LPAs) should make available to the Parish Councils any reports or information relating to the SFRA, and share any other information relevant to flood risk (such as the application of the Sequential and Exception Tests to the Local Plan). With regard to any development proposed in flood risk areas, the Sequential Test should be demonstrated and if necessary, the Exception Test applied.

Other important sources of flood risk information include the interactive maps of flood risk available on the Environment Agency's web site. However in some instances, we would encourage developers to not solely rely on the flood maps we have produced, but that further modelling may be required.

Green Infrastructure

We are pleased to see that green infrastructure is a consideration of the neighbourhood plan linked with Objective O1, O2, O3 and O4, although there is no separate policy included within the plan. Also that development proposals must demonstrate that attention has been paid to on-site and local features of the natural environment and biodiversity, linked with Objective 1.

If you have any queries please do not hesitate to contact the undersigned. Please direct correspondence to swx.sp@environment-agency.gov.uk

Comments

Seagry Neighbourhood Plan (12/08/19 to 24/09/19)

Comment ID	9
Response Date	24/09/19 15:00
Status	Processed
Submission Type	Web
Version	0.5
Files	Rep 09 Wiltshire Council attachment.pdf

Comment:

Please find representations attached

Do you wish to be notified of the decision on the Seagry Neighbourhood Plan proposal? Yes

Draft Seagry Neighbourhood Plan 2019 - 2036 Wiltshire Council Response (Regulation 16 Consultation)

1 Context

- 1.1 These comments set out Wiltshire Council's response to the 'Regulation 16' consultation on the draft Seagry Neighbourhood Plan (SNP), which was submitted to the Council in July 2019.
- 1.2 Wiltshire Council is fully supportive of neighbourhood planning and has welcomed the opportunity to engage with Seagry Parish Council on the development of the Seagry Neighbourhood Plan, and through working with the neighbourhood plan steering group during the Plan's preparation. The Seagry Neighbourhood Area on which the plan is based was officially designated on 01 September 2015 and comments were provided by Wiltshire Council to the pre-submission consultation (Regulation 14 consultation) undertaken by the qualifying body which took place from April 2019 to May 2019.
- 1.3 The comments that follow are made in the interests of ensuring that the draft Seagry Neighbourhood Plan (SNP) is in general conformity with the strategic policies set out in the Wiltshire Core Strategy and can be effectively interpreted by the Council in determining planning applications.

2 Submission of the draft neighbourhood development plan

- 2.1 The draft SNP was submitted to Wiltshire Council in July 2019. Wiltshire Council, as local planning authority, has considered the submitted plan and is satisfied that it complies with all the relevant statutory requirements set out in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). The submitted plan was accompanied by a Basic Conditions Statement and a Consultation Statement.
- 2.2 Wiltshire Council formally consulted on the submitted draft Plan (Regulation 16) between 12 August 2019 and 24 September 2019.

3 Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA)

- 3.1 The SEA screening was undertaken on the draft Seagry Neighbourhood Plan in November 2018 and confirmed in December 2018. Wiltshire Council considered that it is unlikely to have significant environmental effects and accordingly does not require a Strategic Environmental Assessment.
- 3.2 It is noted that the SEA screening decision was submitted as an Appendix to the Consultation Statement.

4 Wiltshire Core Strategy

- 4.1 The Wiltshire Core Strategy (WCS) was formally adopted on 20th January 2015. It provides a positive and flexible overarching planning policy framework for Wiltshire

for the period up to 2026¹. The draft SNP has been prepared to be in accordance with this Plan. The SNP is generally considered by the Council to be in conformity with the overall strategy set out in the WCS.

- 4.2 The review of the Wiltshire Core Strategy (known as the Local Plan Review) is planning for the period to 2036. Having considered the emerging plan and the available evidence base, the SNP covers this same time period. The SNP commits to an early review should this be necessary to ensure it remains in conformity with the strategic policies of the development plan and any National Planning Policy changes.

5 Draft Seagry Neighbourhood Plan

- 5.1 The draft SNP represents a considerable amount of work reflecting the interests of the community and is a coherent plan. The Neighbourhood Plan has been positively prepared with a proactive attitude to achieving the desired objectives of the parish.
- 5.2 It is acknowledged that the SNP (in section 1) summarises the relevant strategic policies of the Wiltshire Core Strategy in relation to the location of development and states that there is some development pressure for the village. Through this Neighbourhood Plan, the aim of the Seagry community is to ensure that future developments are appropriate to the specific and distinctive context of the Parish in social, economic and environmental terms. As such, the Plan does not conflict with Core Policy 1 and 2 or affordable housing policy (core policy 43) within the Wiltshire Core Strategy.
- 5.3 The Neighbourhood Plan includes policies that aim to influence any limited infill development that may take place during the plan period. It sets out policy requirements that aim to guide the design of any new development, as well as protect/enhance environmental and cultural features within the parish, in addition to the protection already contained within local and national planning policy.
- 5.4 The relevant Wiltshire Core Strategy policies are set out in supporting text in the policy sections which is helpful for the reader.
- 5.5 Paragraph 16(d) of the NPPF states that Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. To this end, there is a need to adjust some of the policies so that they are effective (please see the table below for detailed comments).
- 5.6 The views of specialist officers of the Council have been taken into account in this response and in places repeat some of the Regulation 14 comments that were provided previously.
- 5.7 The following table sets out detailed comments in relation to the draft SNP to help improve the Neighbourhood Plan.

Plan Ref:	Wiltshire Council comments
Paragraph 1.12	Reference to 'Wiltshire County Council' which should be amended to 'Wiltshire Council'.

¹ Wiltshire Core Strategy available at <http://www.wiltshire.gov.uk/adopted-local-plan-jan16-low-res.pdf>

General policies	<p>Wiltshire Council feel that many of the policies do not yet include the level of detail needed to enable them to be successful in achieving the intentions of the policy as indicated in the supporting text. Also, at present the wording of some of the policies in the Plan is ambiguous and does not provide sufficient clarity that a decision maker can apply consistently and with confidence when determining planning applications. It can be understood how the policy relates to the Vision and Objectives of the Plan, but the text is not adding local distinctiveness to the WCS policies. The inclusion of the community projects at the end of the neighbourhood plan, and the clear explanation of why this has been identified is welcomed.</p> <p>To be effective, the wording of the criteria in this policy would benefit from review in order to make it clearer to the reader or decision-maker as to what is required.</p> <p>It would be beneficial to adjust the policy wording to read more clearly and enable a planning officer to assess a planning application.</p>
Vision	<p>Considering the proposed Vision in more detail, it is not clear in the first sentence what criteria would be used to demonstrate that Seagry would 'still be viable as a community' and how will this be delivered through the implementation of the Plan over the period to 2036.</p> <p>Furthermore, terms such as "existing patterns", valued rural nature" and [having] "minimum impact on ecology and heritage" could usefully be explained and defined by evidence to assist the user of the Plan.</p>
Objectives	<p>The Plan Objectives are included within their own specific section and are then used to frame the policies of the draft Plan. However, the section could usefully include a preamble to explain how they relate to the evidence gathered to date in respect of the Parish. Moreover, a preamble section could usefully provide a mechanism for demonstrating how the Plan's Objectives and policies will deliver the communities Vision for the area.</p> <p>Objectives O6 and O7 are positively prepared. However, beyond the prescriptive criteria set out in paragraph 4.3 of the Plan, it is not clear how much, what form and where development would take place. The Plan could usefully provide more clarity on these points. As worded, the user of the Plan would not be clear what the Parish Council and local community would support by way of housing over the Plan period.</p>
Overall Principles	<p>Paragraph 4.1 states that the plan does not propose the allocation of any sites but does not provide a reasoned justification for this position. As outlined above, the Plan could usefully define what form, level and location(s) of housing would be acceptable to the local community, and that conforms with WCS CP1, 2 and 44, as opposed to simply saying such development would be supported subject to the criteria set out in paragraph 4.3.</p>
Section 5.4 Natural Environment and Biodiversity	<p>The policy text is vague and does not indicate what is required through the policy and how this is locally distinctive and in addition to WCS Core Policy 51.</p>
Section 5.5 Footpaths and Bridleways	<p>The intent of the proposed policy is clear insofar as it seeks to protect and enhance the local Public Rights of Way (PRoW) network in the Parish. However, as worded, the policy is ambiguous and lacks precision. Whilst development proposals could directly, or indirectly impact on the local PRoW network, there</p>

	are legislative procedures ² and development plan policies ³ that would essentially deliver the same aspirations as the proposed policy (5.5). The phrase ‘affect Public Rights of Way...’, is not clear and could usefully be qualified in supporting text. defined. The policy text should refer to Map 6 and the evidence for this policy.
Section 5.8 Character and Design	It is not easy to see how new minor development can help to meet this objective and therefore could be regarded as too onerous. The policy could indicate that developments of a certain size would have specific requirements. It is also uncertain how this differs from WCS Core Policy 57. Paragraph 5.8.3 refers to SNP14 Community Involvement Protocol – see comments under SNP14. The policy uses terms such as ‘high quality’ but does not define what is meant by these terms. The supporting text refers to the Seagry Community Design Statement, are there any specific objectives or guidance within the Seagry Community Design Statement that can be formalised through this policy?
Section 5.13 Permeable Surfacing	The intent of SNP11 is understood and relates well to the Vision and Objectives of the Plan. Further explanation of the local area to include maps (Environment Agency Indicative Surface Water Flood Risk, Environment Agency Indicative River Flood Risk and the Wiltshire Council Groundwater map) could offer assistance in explaining the policy and aid clarity, or a reference to where it can be viewed elsewhere in the documents. Reference to Core Policy 57 (WCS) could also be included in paragraph 5.13.4.
	Section 5.17 Community Facilities The intent of SNP12 is understood and relates well to the Vision and Objectives of the Plan. However, this largely duplicates Core Policy 49 (WCS). It lists some community facilities but does not identify types of uses that constitute community facilities. It refers to new developments making a contribution to retention of facilities but does not clarify the mechanism for how this would be achieved. The policy text refers to “...new development...” but offers no insight as to how this will be delivered. Further thought should be given to this policy as it could be seen as unduly restrictive. Evidence should be given in the explanatory text as to why these facilities have been identified. For example, it may be that there are other community uses that may be acceptable benefitting the community as a whole and hence a degree of flexibility within the draft Policy would be appropriate.
Basic Conditions Statement	
General comment	The Basic Conditions is well presented and provides a clear explanation of how the Neighbourhood Plan meets each of the Basic Conditions.
Consultation Statement	
General comment	The consultation statement clearly presents the community-led process that has been carried out to prepare the Neighbourhood Plan. It represents the determination of the steering group in researching and gathering community input and efforts to keep the community informed throughout. The consultation statement includes documentation of the parties consulted, responses received, how they were considered and the proposed resolution / resulting changes to the neighbourhood plan.

Wiltshire Council
September 2019

² Highways Act 1980; Town & Country Planning Act 1990; Countryside and Rights of Way Act 2000

³ Core Policies 57 and 66 of the Wiltshire Core Strategy