

Comments received during Publication of Waters Upton Neighbourhood Development Plan Proposals Period 19th January – 6th March 2015

Date received	Name of contributor	Comments
15/02/15	Waters Upton Parish Council (Katrina Baker Clerk)	<p>Waters Upton Parish Council understood that the PUBLICATION PERIOD, immediately prior to the examination by an appointed Examiner, was a final opportunity for any objections to be registered.</p> <p>Residents have already made their observations at the CONSULTATION STAGE and will again vote on the NEIGHBOURHOOD PLAN at the Referendum.</p> <p>We now have some concern regarding a recent press release included on the Telford & Wrekin Council Planning Portal, 30th January 2015. This quotes Councillor Charles Smith, Cabinet Member, as saying “The consultation process over the next few weeks will give local people an opportunity to express their opinion on the Plan”.</p> <p>Following earlier discussions with officers of Telford & Wrekin Council we were advised that residents only needed to respond if they had new views to record.</p> <p>Waters Upton Parish Council would like to put on record that following the original advice we have actively recommended that residents do not post comments of support if they have already made their views clear during the many stages of consultation.</p> <p>Residents’ views have been recorded in detail within the CONSULTATION STATEMENT, provided with the Examination Version of the Waters Upton Neighbourhood Plan.</p>
25/02/15	Mobile Operators Association (John Cooke)	<p>Thank you for your recent consultation on the above. We have considered the proposal relevant to the Mobile Operators Association and offer the following comments on their behalf.</p> <p>We would like to offer our support to the inclusion of Policy WUA2 within the Waters Upton Neighbourhood Plan. We welcome the inclusion of this policy within the Neighbourhood Plan to facilitate telecommunications development and support its provisions which we find to be generally in accordance with the guidance within National Planning Policy Framework (NPPF) relating to both development planning and to support for communications infrastructure</p>
25/02/15	John Brown (Agent: Base Architecture and Design Limited)	<p>Representations submitted in response to the Consultation relating to the Waters Upton Neighbourhood Plan (WUNP) made on behalf of Messer’s Brown and Hockenhull.</p> <p>(Objection)</p> <ol style="list-style-type: none"> 1. The WUNP itself correctly identifies that it should be developed in accordance with the NPPF and with the Development Plan, to include the adopted Core Strategy. Only a draft Neighbourhood Plan or Order that meets the basic conditions (as are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 and as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004) can be put to a referendum and be made. The basic conditions include both a requirement to have regard to national policies and advice contained in guidance issued by the Secretary of State; and also that the making of the order should be in general conformity with the strategic policies contained in the development plan for the area of the Authority (or any part of that area). 2. The examination version of the Neighbourhood Plan fails to satisfy those basic conditions, as a number of its objectives run counter to the Development Plan and other relevant Planning Policies, including the NPPF. Accordingly, it is clear that it is fundamentally flawed in its conception and we would suggest it be withdrawn, edited and resubmitted prior to the process proceeding any further. This will avoid the risk of the inspecting officer dismissing the plan, delaying its incorporation / adoption. Whilst the concept of Neighbourhood Planning is to enable local people to shape the development of their community, it must be within the overarching framework established by the Local Planning Authority, to ensure that the Borough-wide requirements are properly met. 3. The WUNP seeks to resist additional housing development within the village of Waters Upton (save for infill and development on the site referred to as SHLAA 551) and explicitly seeks to counter the Core Strategy Policy which identifies Waters Upton village as a rural ‘Service Centre’. Core Strategy Policy CS7 identifies Waters Upton as one of three settlements within which

development within the rural area should be focussed. The Core Strategy seeks to focus housing, employment and services in the identified settlements in order to maximise the accessibility to services and facilities to rural residents. The WUNP seeks to achieve the benefits of improved employment, services and facilities for the Parish, without providing the essential level of additional housing which is necessary in order to support those services and the rural community. WUNP Housing Objective 1 specifically asserts that Waters Upton should be removed from Core Strategy Policy CS7 in this context. This key objective within the WUNP means that it fails to satisfy the remit of a Neighbourhood Plan and as such its approach is fundamentally flawed. Further, the WUNP seeks to distribute new housing development within the Parish, rather than focussing it on the *settlement* identified by the Core Strategy as the most sustainable focus for such development i.e. Waters Upton; again, this approach is flawed and is entirely contrary to the Core Strategy approach which seeks to focus housing and facilities in those settlements which are identified as being suitable and accessible.

4. The WUNP also runs counter to a key objective of the NPPF, namely to *boost significantly the supply of housing* : by seeking to undermine the identified demand for new housing and reduce the number of new homes to be provided within the settlement of Waters Upton, the WUNP fails to comply with this objective. Whilst the WUNP identifies a certain degree of new housing development that it perceives as acceptable, this is insufficient to demonstrate *a significant boost* .
5. Addressing specific sections of the WUNP, we would highlight the following:
 1. Please note that figure 2.2 is on page 12, not 11 as stated on page 17.
 2. Housing - Notwithstanding any assertions as to localised supply of affordable housing (page 18), compliance with the Core Strategy must be demonstrated: Core Strategy Policy CS7 requires that all new housing development will be expected to deliver 40% affordable housing and any application for new development would have to accord with this requirement. There are other appropriate mechanisms which allow any individual scheme to submit evidence to support a case for a lower proportion, if otherwise they would not be viable; the WUNP is not the appropriate mechanism to regulate this and should not be used to undermine the overarching Borough-wide requirements.
 3. The settlements identified in figure 2.2 do not have any support facilities such as schools, shops or crèches. The settlement of Waters Upton does have those facilities and this is one reason why it was selected to form the focus for new development. The WUNP (page 17) asserts that there is a loss of community involvement and spirit and overdevelopment is referred to in this context; and reference is made on page 21 to two local pubs having closed. The NPPF at para 55 however, identifies a requirement to promote sustainable development in rural areas: housing development is identified as a means of boosting communities and helping to sustain the vitality of those communities – the focus of the WUNP on resisting significant new development runs counter to this thereby contravening the Core Strategy.
 4. Education – Contrary to the assertion made on page 21, Crudgington Primary School does have the potential to be extended with the consent of the adjacent land owner.
 5. Getting around – the WUNP at page 21 refers to a reduced level of public transport provision serving a number of settlements within the parish. However, as identified in the NPPF, the provision of additional housing development in rural communities is what supports and sustains them sufficiently to enable the necessary investment in such services. An increase in the scale of Waters Upton will likely result in an improved bus service, as the economy of scale for the transport provider will make additional services more viable. Pathways, cycle routes and roads would also see improvement.
 6. Housing Demand – Strutt and Parker have demonstrated during the recent planning application (ref: TWC/2014/0761) that there is demand in the village of Waters Upton for family homes. Recently the development land at Parish Room Croft sold before going to open market.

OBJECTIVES:

Housing (page 25):

1. Objective 1 - The neighbourhood plan should not seek to change the core strategy, but accord with it – so objective 1 cannot be accommodated.
2. Objective 2 - Insists on a Community Levy – CIL is not in place in Telford and Wrekin yet and there is no other means to accommodate this other than a 106 agreement – which will be at the discretion of the Local Authority according to the

requirements generated by each specific scheme.

3. Objective 3 - Whilst it is understood that local needs should be given priority, it should not solely take the form of single storey units. Lifetime homes with access lifts are just as accommodating as single storey units and they are more 'land efficient'.
4. Objective 4 – Waters Upton is classified as a 'service centre' within the core strategy and objective 4 is therefore contrary to the core strategy. Confining development to brownfield sites is also not supported by the core strategy and each site has to be reviewed on its own merits. Brownfield sites do not always present viable development opportunities, so to limit development in this manner would be unduly restrictive and would be contrary to the NPPF objectives.

Green Areas and Public Spaces: No Comment

Amenities and employment :

1. Additional housing development will boost the community, which will assist towards the Objectives 1 and 4 identified on page 26 in terms of encouraging the use of community buildings and providing employment opportunities, making for a more sustainable community. The objectives of the WUNP as currently drawn are conflicting in this key aspect.

Local Character (page 27):

1. Objective 4 – The main settlement of Waters Upton is no longer a linear development. The spur roads of Orchard Close, Pinfold Croft, River lane and Upton Stones have dissolved this. Waters Upton is naturally moving towards a cluster settlement which reduces travel distances to essential services for the local residents. Any future developments in Waters Upton should continue this cluster approach so as not to stretch the village, which would make accessibility more challenging. This is contrary to WUNP Housing Objective no.3 where accessible properties are promoted. If an accessible property is located towards the end of a linear development it would not be within easy walking distance of the community facilities, defeating its principle purpose.

Getting Around: No Comment

Neighbourhood Plan Policies:

Housing:

1. Policy WUH1: The Neighbourhood Plan fails to recognise Waters Upton as a 'Service Centre'. This is clearly interpreted by the Core Strategy in CS7. Growth cannot be limited. Shaping places identifies appropriate land to extend the village.
2. Policy WUH2: Limitation on scale of development is not in accordance with policy CS7. Limiting affordable homes is contrary to policy CS7 which states 40% is required.
3. Policy WUH3: This Policy proposal is in conflict with both Policies WUH1 and WUH2 of this Neighbourhood Plan in terms of scale of development. Designation of a specific site which is remote from the settlement of Waters Upton, without the capacity to extend the primary school to cope with the extra demand, is not in keeping with the Core Strategy in principle. Each available site should be considered on its own merits. The SHLAA site 551 is not identified in the Shaping Places documentation and sits out outside the settlement of Waters Upton.
4. Policy WUH4 : No comment

Green Areas and Public Spaces : No Comment

Amenities and Employment :

Policy WUA1 seeks to promote the retention, protection and development of local services and community facilities in the Parish, which objectives would be facilitated by the boost of housing in Waters Upton as the identified focus for such

		<p>development and service provision: the additional housing will help to boost the local economy and would naturally boost the other facilities as well as justifying additional investment in such services and facilities. There is therefore a conflict between this Policy and Policies WUH1 and WUH2.</p> <p>Local Character : No Comment</p> <p>Getting Around : No Comment</p> <p>Conclusion:</p> <p>In Summary the WUNP has not been developed in accordance with the NPPF or the Development Plan, including the adopted Core Strategy, for the reasons detailed in this consultation response.</p> <p>As the WUNP fails to meet the basic conditions that are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 and as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004, this Neighbourhood Plan cannot be approved.</p>
25/02/15	<p>Mark Hockenull (Agent: Base Architecture and Design Limited)</p>	<p>Representations submitted in response to the Consultation relating to the Waters Upton Neighbourhood Plan (WUNP) made on behalf of Messer's Brown and Hockenull.</p> <p>(Objection)</p> <ol style="list-style-type: none"> 1. The WUNP itself correctly identifies that it should be developed in accordance with the NPPF and with the Development Plan, to include the adopted Core Strategy. Only a draft Neighbourhood Plan or Order that meets the basic conditions (as are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 and as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004) can be put to a referendum and be made. The basic conditions include both a requirement to have regard to national policies and advice contained in guidance issued by the Secretary of State; and also that the making of the order should be in general conformity with the strategic policies contained in the development plan for the area of the Authority (or any part of that area). 2. The examination version of the Neighbourhood Plan fails to satisfy those basic conditions, as a number of its objectives run counter to the Development Plan and other relevant Planning Policies, including the NPPF. Accordingly, it is clear that it is fundamentally flawed in its conception and we would suggest it be withdrawn, edited and resubmitted prior to the process proceeding any further. This will avoid the risk of the inspecting officer dismissing the plan, delaying its incorporation / adoption. Whilst the concept of Neighbourhood Planning is to enable local people to shape the development of their community, it must be within the overarching framework established by the Local Planning Authority, to ensure that the Borough-wide requirements are properly met. 3. The WUNP seeks to resist additional housing development within the village of Waters Upton (save for infill and development on the site referred to as SHLAA 551) and explicitly seeks to counter the Core Strategy Policy which identifies Waters Upton village as a rural 'Service Centre'. Core Strategy Policy CS7 identifies Waters Upton as one of three settlements within which development within the rural area should be focussed. The Core Strategy seeks to focus housing, employment and services in the identified settlements in order to maximise the accessibility to services and facilities to rural residents. The WUNP seeks to achieve the benefits of improved employment, services and facilities for the Parish, without providing the essential level of additional housing which is necessary in order to support those services and the rural community. WUNP Housing Objective 1 specifically asserts that Waters Upton should be removed from Core Strategy Policy CS7 in this context. This key objective within the WUNP means that it fails to satisfy the remit of a Neighbourhood Plan and as such its approach is fundamentally flawed. Further, the WUNP seeks to distribute new housing development within the Parish, rather than focussing it on the <i>settlement</i> identified by the Core Strategy as the most sustainable focus for such development i.e. Waters Upton; again, this approach is flawed and is entirely contrary to the Core Strategy approach which seeks to focus housing and facilities in those settlements which are identified as being suitable and accessible.

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		<p>Conclusion:</p> <p>In Summary the WUNP has not been developed in accordance with the NPPF or the Development Plan, including the adopted Core Strategy, for the reasons detailed in this consultation response.</p> <p>As the WUNP fails to meet the basic conditions that are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 and as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004, this Neighbourhood Plan cannot be approved.</p>
27/02/15	Environment Agency (Graeme Irwin)	<p>Waters Upton Neighbourhood Plan – Examination Version</p> <p>Thank you for referring the above consultation which was received on the 21 January 2015. We have reviewed the submitted document and would offer the following comments at this time.</p> <p>Evidence Base: As stated in my previous response it is understood that Telford & Wrekin’s Local Plan will replace the existing Core Strategy (2007) and Wrekin Local Plan (saved polices 2000) and will run from 2015 to 2031. We also note that the Council are in the process of developing an Outline Water Cycle Strategy (WCS) which, along with the Strategic Flood Risk Assessment (SFRA), is a key tool to ensure the Council are abreast of the infrastructure requirements of the Borough and <i>that forthcoming Neighbourhood Plans are consistent with the wider aims and aspiration of the area</i> .</p> <p>In this instance the Waters Upton Neighbourhood Plan (WUNDP) precedes the forthcoming Shaping Places Local Plan and updated SFRA and WCS evidence base. Therefore reference to the current Core Strategy is referred to in the submitted WUNDP. There is a current SFRA document as well as a Strategic Housing Land Availability Assessment (SHLAA) which identifies a number of potential sites in Waters Upton.</p> <p>The Waters Upton Plan itself does not identify any specific sites for housing, although Objective 4 seeks to restrict development to infill development with any larger development (the Dairy Crest site and potential SHLAA sites) confined to brown field sites. As previously stated we would expect all development to be located within Flood Zone 1, the low risk Zone. We would also expect to see no development within 8 metres of the top of the banks of any watercourses, with specific reference to the Rivers Tern, Meese and Strine. These watercourses are designated Main River and fall under the jurisdiction of the Environment Agency.</p> <p>We would expect the document to confirm that all built development will be located within Flood Zone 1 and that it should accord with existing planning policy, in this instance the NPPG and Telford & Wrekin’s Core Strategy (inc. SFRA and WCS). We note Objective 1 which confirms the need to ‘protect rivers and wildlife corridors’ and, similarly, the inclusion of Policy WULC1 which seeks to secure this objective. We welcome this Policy but would recommend that it is accompanied by further text to steer developers as to how this can be achieved.</p> <p>In the absence of any specific development sites we would welcome a reference to ensure that there will be no built development in the areas liable to flooding i.e. Flood Zone 2 and 3, as defined in the Telford & Wrekin Strategic SFRA (2008) and/or a site specific Flood Risk Assessment (FRA), or within 8 metres from the top of bank of any watercourse. Appendix A1 of the SFRA (Assessment all possible allocations for Housing) does highlight potential housing sites in Water Upton, a number of which lie adjacent to the River Tern.</p> <p>We would also welcome a reference to SuDS design standards and the types of options available to reduce flood risk, improve water quality (contributing to wider Water Framework Directive (WFD) objectives) and improve ecology. Whilst, the detail would also be informed by discussion with the Telford & Wrekin’s Land Drainage team, we include the following wording to assist: opportunities, where appropriate, should help to conserve and enhance watercourses and riverside habitats. Where necessary, this should be through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of any aquatic environment in or adjoining the development site.</p> <p>Source Protection Zones: In our previous response we made reference to Source Protection Zones (SPZ) which are prominent</p>

		<p>within the Waters Upton area. Development should be kept out of SPZ 1 (high risk) to ensure no detrimental impact on groundwaters and potable water supplies. As previously stated there is a borehole on the Dairy Crest site, with an associated SPZ1 surrounding it. It is understood that this borehole is to be decommissioned prior to any redevelopment of the site.</p> <p>I trust the above is of assistance at this time. We would be happy to co-operate further on the areas detailed above.</p>
27/02/15	Homes & Communities Agency (Steven Sheasby)	<p>The Homes and Communities Agency is the national housing, regeneration and social housing regulation agency for England, and its vision is for successful places with homes and jobs.</p> <p>We have reviewed your discussion document, and note the range of local consultation exercises that have been undertaken with the local community to date, which is a positive approach in the preparation of your Neighbourhood Plan.</p> <p>A range of objectives have been identified, and those of particular interest to the Homes and Communities Agency (HCA) relate to housing.</p> <p>The HCA welcomes that you explore the issue of affordable housing in the Neighbourhood Plan and that Objective 2 of the Housing Objectives requires that the amount of affordable housing provided should be based on demand.</p> <p>The HCA does, however, recommend that the wording for Policy WUH2 is amended. At present, it states that <i>'Affordable homes should be limited to no more than required'</i>. However, in accordance with paragraph 50 of the National Planning Policy Framework, the converse is also true and there should also be no less affordable housing than required. Therefore, we would recommend that the wording of this policy is amended to say that <i>'Affordable housing should be provided in accordance with up to date evidence of housing need'</i>.</p> <p>Sources of further information</p> <p>The HCA website provides a range of information relating to housing, affordable housing, rural housing, gypsy and traveller provision, economic development and communities and neighbourhoods, and is accessible via http://www.homesandcommunities.co.uk/ourwork</p> <p>The website also provides information in relation to various funding streams available via the Agency which may be of interest, including:</p> <ul style="list-style-type: none"> • The Custom Build Fund (the fund will run until March 2015, although it may close to new applications earlier than March 2015 if the entire budget has been allocated or looks likely to be allocated before that date); • Community Led Project Fund (funding is available until 31 March 2015 or until the funding is fully committed whichever occurs first); • Affordable Homes Programme (2011-2015 and 2015-18), including Traveller Pitch Funding; • Help to Buy (which is available in England from registered house builders and will run until 31 March 2016, or earlier if the funding is taken up); • Care and Support Specialised Housing Fund (over five years from 2013/14, £160m of capital funding is available for specialist housing providers to bring forward proposals for development of specialist housing to meet the needs of older people and adults with disabilities outside of London. <p>In addition to the above, the HCA website has a specific section dedicated to communities and neighbourhoods via http://www.homesandcommunities.co.uk/communities-and-neighbourhoods which incorporates a range of resources including articles, information, tool kits and other sources of information from a range of existing networks and sector groups including (note: the HCA does not officially promote or endorse any individual group or service): http://www.homesandcommunities.co.uk/community-led-development</p>

		We hope that the above information is helpful in the preparation of your plan.
05/02/15	Natural England (Susan Murray)	<p>Planning consultation: Waters Upton Neighbourhood Plan Location: Borough of Telford & Wrekin</p> <p>Thank you for your consultation on the above was received by Natural England on 07 January 2015. 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 (NE) has reviewed the Waters Upton Neighbourhood Development Plan (WUNP) and considers that it fails to address the natural environment. NE offers the following comments.</p> <p>Waters Upton Neighbourhood Plan 2014-2031 (WUNP) – Examination Version (Amended December 2014)</p> <p><i>Document Structure</i></p> <p>Structurally, the document contains a confusing array of headings and sub-headings. There are also a number of inconsistencies relating to section numbering and headings. This can be easily rectified so that it is more user friendly. The WUNP is particularly confused at the beginning of the document. Clearly, the information provided at page 7 (i.e. 'How this Plan is organised') needs to be provided ahead of 'Introduction' which (according to the structure provided on page 7) should be clearly entitled 'Section One (.1)' or, for greater clarity, - 'Section A.1'. (i.e. would recommend switching pages 6 & 7 for greater reader understanding.)</p> <p><i>Section 1 (.1) Introduction</i></p> <p>NE supports the WUNP's focus upon the protection and enhancement of green spaces and recognition of a need to encourage an increased pattern of walking and cycling within the Plan Area and its surroundings.</p> <p><i>Section 1 (.2) Background (p18-19)</i></p> <p>We welcome the inclusion of 'Green spaces and public spaces' as a key theme of the Plan. We do, however, note that this theme relates solely to defined children's play areas and identified small scale 'manicured' green open space. The description of existing 'green spaces' fails to recognise the importance and value of wider green infrastructure, including the natural environment, for people and wildlife. We would welcome a amendment to this 'theme' to include this wider multi-functional green infrastructure, perhaps retitling this theme as 'Green infrastructure'.</p> <p>Multi-functional GI can involve habitats and green spaces resulting from a need to mitigate or compensate for unavoidable losses or impacts, in addition to spaces which may not be priority habitat but which provide a wide range of functions of benefit to the development and community. Such functions include improved flood risk management, provision of accessible green spaces, climate change adaptation, biodiversity and landscape enhancement (including better functionality of local ecological networks) as well as quality of life benefits for the local community (including health and economic well-being and access to wildlife).The provision of GI is supported by the National Planning Policy Framework (NPPF, DCLG March 2012).</p> <p>Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.</p> <p>Telford & Wrekin Council (TWC) itself recognises the value of GI in its document 'Green Infrastructure Evidence and Analysis Document'. http://www.telford.gov.uk/downloads/download/227/green_infrastructure_evidence_and_analysis_document In this document, TWC tells us that the majority of the land within the Borough, and indeed the Ercall Magna Ward, can be described as GI given that they have included agricultural land in their interpretation. Indeed, agricultural land provides a considerable habitat for wildlife. It is, therefore, made clear to us that much of the WUNP Area is comprised of GI and much of what the community values about the Plan Area is, itself, GI. By consequence, Natural England considers it disappointing to see that GI is not mentioned within the WUNP and would welcome its inclusion.</p> <p>Furthermore, a Neighbourhood Plan should set a community's vision for the future. Therefore, and whilst the level of detail provided can be variable, Natural England considers the intentions of the WUNP may be more readily conveyed from identification of desirable corridors / routes that the community would support.</p> <p>Natural England also notes that a number of river corridors cross the Plan Area (e.g. Tern, Meese, and Strine). These are valuable 'Blue Infrastructure' and can offer significant multi-use GI benefits. Perhaps the WUNP could provide Policy to specifically support</p>

	<p>enhancement of these assets for people and wildlife, potentially identifying specific areas of opportunity. <i>Section 1(.3) Process Summary (in response to the statement relating to NE at p23)</i> Natural England recommend's the inclusion of a description of existing green infrastructure (GI) within the Plan Area, consideration of a wider GI 'theme', and provision of a related wider GI policy to provide for the needs of both people and wildlife. <i>Section 2: (4) Visions and Objectives: 'Green Areas and Public Spaces'</i> All 3 proposed objectives are supported. We also welcome the acknowledgement of the value of green spaces to health and well-being. However, Natural England is disappointed to see that there are no proposed objectives relating to the natural environment, wildlife or GI. The stated objectives relate to the preservation and enhancement of open space and public corridors for people only. We would wish the objectives here also recognise the value of wider multi-functional GI for both people and wildlife. Specific recommended changes:</p> <p>OBJECTIVE 1: To protect and enhance the area's green infrastructure network, offering particular protection to the area's green spaces and corridors. These are visually valuable and offer benefits to health and well-being, as well as local ecology. OBJECTIVE 2: (as suggested.) OBJECTIVE 3: To protect and enhance the network of sustainable travel in the Area (e.g. the Rights of Way, as well as provide new safe and attractive routes for pedestrians / cyclists / equestrian). Also, maintain stiles and way-markers enabling the communities and visitors to appreciate the rural area and, at the same time, contributing to health and fitness. <i>Section 2: (4) Visions and Objectives: 'Getting Around'</i> NE supports Objective 2 to 'improve pedestrian and cycle way connections within the Plan area and further afield as appropriate.' <i>Section 3 – The Neighbourhood Plan Policies: 6. Green Area and Public Spaces'</i> NE supports the principle of the 3 policies provided here. In particular, we are happy to see Policy WUGS3 recognise the benefits of multi-functional green open space. Specific recommended changes: Policy WUGS1: to include 'enhancement' of green spaces and the GI network. Improved GI connectivity benefits both the community and wildlife. Policy WUGS2: to include 'enhancement' of pedestrian / rights of way network to incorporate potential new routes for sustainable movement. The creation of new attractive routes to local green spaces and identified areas of priority habitat should be particularly supported as they can also act as ecological corridors improving connectivity of habitat. Policy WUGS3: amend as follows ..'multi-functional benefits of green and blue infrastructure.' <i>Section 3: 10. Monitoring and Review of the Plan</i> No comments.</p> <p>Habitat Regulations Assessment (HRA) – HRA not required Where a Neighbourhood Plan could potentially lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive. In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Therefore measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the Local Plan.</p> <p>Natural England does not consider the WUNP need be accompanied by a HRA as proposals are unlikely to result in significant effects upon European Sites. Strategic Environmental Assessment (SEA) – SEA not required</p>
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05/03/15	Dairy Crest Limited (Agent: G L Hearn Limited)	<p>Representations by Dairy Crest Limited</p> <p>We act on behalf of Dairy Crest Limited in respect of the current Waters Upton Neighbourhood Plan Consultation which closes on the 06 March 2015. Our client has a freehold interest in the Dairy Crest site, Crudgington, Telford. Following the recent closure of this large factory, it is proposed that the site should be redeveloped for residential and commercial purposes to ensure that this large brownfield site is brought back into an active and sustainable use. These development proposals are the subject of a current planning application reference TWC/2015/0157.</p> <p>We write to confirm our support for the emerging Neighbourhood Plan, particularly in respect of Policy WUH3 which states that if larger scale developments are required in the Parish to achieve Borough wide housing targets, these should be fulfilled by developing the Dairy Crest site. It is considered that the detailed approach to prioritising residential development on brownfield land is consistent with Paragraph 12 of the National Planning Policy Framework (NPPF) which details that promoting the reuse of previously developed is a core principle of the planning system.</p>

		<p>Similarly we confirm our support for Policy WUA5 which seeks to encourage and support small businesses with this being compliant with paragraph 17 of the NPPF which sets out that one of the core land-use planning principles is to “<i>promote mixed use developments and encourage multiple benefits from the use of land in urban and rural areas</i>”. It is considered that suitably sized commercial floorspace as part of future developments would support the wider role of Waters Upton and Crudgington.</p>
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