



# Newport Neighbourhood Plan

Summary of comments submitted to  
the Independent Examiner

Comments received during  
Publication of Newport  
Neighbourhood Development Plan  
Proposals Period 5 December 2017 to 23  
January 2018.

Date received	Name of contributor	Comments
21/01/2018	Beverly Ashton	<p>The sensitive and in keeping redevelopment of the Water Lane area would make good use of brownfield sites, and is much needed.</p> <p>Regarding housing, it would be good to support the building of an extra care scheme in Newport, like many other towns have now, with the growing older population?</p> <p>A centrally located larger community space/building with good parking for the use and benefit of the growing town I think would be very well supported. The ex Co-op/Budgeons site would seem to be ideal for this?</p> <p>I note on Plan 1 - Newport Neighbourhood Development Plan Boundary, that the strip of naturalised wooded and hedgerow area south of Nova House (between Station Court and Audley Ave) is shown in green, but is not listed in the green spaces or shown in green on Plan 6, Policies Map? This area is a much needed natural buffer between residential areas and the Nova Industrial Park, assisting with minimising noise and light pollution, and importantly also a haven for wildlife, with a large variety of birds, and provides a summer bat roost too. It would be good to give clarity on the protection of this woodland area of trees and hedgerow, and a pond too.</p>
19/01/2018	Carol Murphy	<p>I represent Newport in Bloom ( previously known as Heart of England in Bloom, Newport HOEIB) and I would like to fully support and endorse the submission made by Janet Clarke.</p>
21/01/2018	Church Aston Parish Council	<p>CAPC notes with interest proposals set out in the draft Newport Neighbourhood Development Plan (NNDP) made available for consultation under provisions of the NDP Regulations 2012. Our comments, however, focus solely on the area known as Baddeley's Wells.</p> <p>Proposed Local Green Space: Baddeley's Wells</p> <p>In the Regulation 14 Consultation on the Draft Newport Neighbourhood Development Plan reference was made to an area of land off Station Road, known as Baddeley's Wells, part of which falls within the</p>

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		<p>Newport Town Council (NTC) boundary with the remainder falling within Chetwynd Aston &amp; Woodcote Parish. The area had been referenced in the Regulation 14 version as site H13, a site allocated for housing in the Telford &amp; Wrekin Council (T&amp;WC) Emerging Local Plan (eLP), and as such, in order to confirm with the eLP, was allocated for housing and ‘therefore was not included as an open space in the NNDP’ (Housing: Strategic Policies, para 3, page14). This was due to what was mistakenly thought to be a potential conflict with the eLP, but as a result of the Inspector’s Main Modifications (MM 92, Appendix 2 of the Local Plan) the site was withdrawn from the eLP and so is no longer shown as an allocated housing site. Notwithstanding this, a 2015 outline planning application (TWC/2015/0057) for housing on this T&amp;WC owned site was rushed through the Council’s Planning Committee in August, immediately after the publication of the Inspector’s Main Modifications, and a resolution to grant given, despite strong objections from NTC and adjoining parishes given the acknowledged severe deficiency in public open space in this area. Nevertheless, the site now remains undesignated in the final Local Plan (now formally adopted by T&amp;WC on 11/1/18) and a Site Allocation Development Plan has been requested by the Inspector before any additional housing sites are identified in the future.</p> <p>However, whilst the site (as a housing site) has also now been omitted from the Regulation 15 Consultation version of the NNDP, it has not been designated as a Local Green Space (in Table 2, pages 24 &amp; 25), and in fact no reference is made at all to the Baddely’s Wells area.</p> <p>The site abuts the CAPC boundary and as a parish council we have made submissions to NTC in their development plan process seeking to have the site retained as open space for the benefit of both existing and future local residents living in Church Aston, Chetwynd Aston and south Newport. Given that the site is no longer shown as allocated for housing in the Local Plan, the opportunity arises for the Newport NDP to designate the site as a Local Green Space and to protect it from future development, particularly in light of the case currently being put forward by Shropshire Wildlife Trust, following a decision by the Shropshire Local Sites Partnership, to designate the adjoining (to the east) ‘Black Butts’ field (which is within Chetwynd Aston parish) as a Local Wildlife site (Figure 1).</p>

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		<p>In the light of the above, CAPC would ask that the Baddeley's Wells area is clearly designated within the NNDP as a Local Green Space.</p>
22/01/2018	Environment Agency	<p>We have been working with Telford and Wrekin Council on their emerging Local Plan submission to ensure those matters within our remit are secured within the strategic framework of the borough. Similarly, it is important that the associated Neighbourhood Plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.</p> <p>We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. You are advised to utilise the attached Environment Agency guidance and pro-forma which should assist you moving forward with your Plan.</p> <p>However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Telford and Wrekin Council in their role as the Lead Local Flood Authority (LLFA).</p>
22/01/2018	Gladman	<p>Policy H1</p> <p>Policy H1 states that housing development within Newport will be supported in order to meet local needs.</p> <p>Gladman consider it important the either Policy H1 or the supporting text provide a definition or breakdown of 'local needs' and demonstrate the sufficient robust evidence supports this defined need. Further we submit, that in stating that support will only be offered to developments that meet local needs, the policy fails to understand that it may be necessary for Newport to assist in meeting unmet need from surrounding area.</p> <p>Policy GS1</p>

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		<p>Policy GS1 identifies 18 areas within the NPA that are to be designated as Local Green Space.</p> <p>We remind the Council that in order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements set out in the Framework. The Framework makes clear in paragraph 76 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development for the wider area. Paragraph 76 states that:</p> <p>‘Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.’</p> <p>Further guidance is provided in paragraph 77 which sets out three tests that must be met for the designation of Local Green Spaces. Paragraph 77 states that:</p> <p>‘The Local Green Space designation will not be appropriate for most green areas or open space</p> <p>The issues surrounding LGS designations have been considered in a number of other Examiner’s reports across the country and we highlight the following decisions:</p> <ul style="list-style-type: none"> <li>- The Seldlescombe Neighbourhood Plan Examiner’s Report<sup>1</sup> recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.</li> </ul>

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		<p>- The Oakley and Deane Neighbourhood Plan Examiners Report<sup>2</sup> recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.</p> <p>- The Alrewas Neighbourhood Plan Examiner's Report<sup>3</sup> identifies that both sites proposed as LGS in the neighbourhood plan 'in relation to the overall size of the Alrewas Village' to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.</p> <p>- The Freshford and Limpley Neighbourhood Plan Examiner's Report<sup>4</sup> identified that the six LGS proposed did not meet the criteria required by the Framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of an extensive tract of land. The Examiner also considered that the protection of fields to 'prevent agglomeration between the settlement areas... is not the purpose of Local Green Space designation'.</p> <p>- The Eastington Neighbourhood Plan Examiner's Report<sup>5</sup> recommended the deletion of three LGS (16ha and 2ha) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance and significance to the local community.</p> <p>- The Tattenhill and Rangemore Neighbourhood Plan Examiner's Report<sup>6</sup> recommended the deletion of 2 LGS comprising of 4.3ha and 9.4ha.</p> <p>- The Norley Examiner's Report<sup>7</sup> identified a total of 13 parcels of land to be designated as LGS. The Examiner recommended at §4.98 that the identification of these extensive tracts of agricultural land was contrary to NPPF policy and recommended that the policy should be deleted. The proposed LGS measured in the range of 1ha – 4.3ha.</p> <p>It is essential that evidence to demonstrate how any proposed LGS meet the criteria of paragraph 77 is provided and can be easily accessed by anyone wishing to comment on the draft Neighbourhood Plan.</p>

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		<p>Gladman do not consider that the evidence provided to support Policy GS1 is sufficient and recommend that further work is carried out to ensure that all of the proposed Local Green Spaces meet the criteria set out in the Framework.</p> <p>Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the NNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development. Gladman formally request to participate at the hearing session(s) should the Examiner decide it necessary to discuss these issues in a public forum.</p> <p>Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>
09/01/2018	Historic England	<p>We are supportive of the content of the document, particularly its' emphasis on local distinctiveness and the emphasis placed upon the proactive conservation and continued viability of the historic market town core and associated conservation area. We are pleased to note the clear recognition in the Plan of the significance of the Town's layout and the role played by its historic burgage plots in reflecting its medieval growth.</p> <p>We are also supportive of the proposal to recognize the importance of the Shropshire Union Canal and Victoria Park as a setting to the medieval core through designation as Local Green Space.</p>

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		<p>However, we are concerned that the potential impact of the proposed redevelopment at Water Lane on the built environment and underground archaeology has been somewhat underestimated. This site represents a whole quadrant of the medieval town and much evidence of the evolution of the settlement comprising a whole range of backland activities can be expected to survive both above and below ground.</p> <p>Currently in our view Policy WL1, although laudable in its aspirations to conserve the character of the historic environment, does not afford this fact sufficient recognition or make suitable provision for the amount of buildings recording, archaeological assessment, evaluation and recording that is likely to be required. To address this we suggest adopting the following Policy wording:</p> <p>“Development proposals must take full account of and avoid harm to statutorily listed buildings and undesignated heritage assets and their settings both within and beyond the Water Lane site and preserve or, preferably enhance the character and appearance of the Newport conservation area.</p> <p>Development proposals should also take full account of known surface and sub-surface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development after consultation with the Shropshire Historic Environment Record (HER), which is maintained by Shropshire Council on behalf of Telford &amp; Wrekin Council under a Service Level Agreement (SLA). Lack of current evidence of sub-surface archaeology must not be taken as proof of absence and further archaeological planning advice is available from Shropshire Council, who provide this advice to Telford &amp; Wrekin Council under the same SLA”.</p> <p>In general, however, overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Town.</p> <p>Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning.</p>

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14/12/2017	Hugh Burton	<p>Water Lane Development Site - Plan 3 on page 26 is incorrect in two areas:</p> <p>Newport Baptist Church purchased the former Council Offices more than 20 years ago yet the map is still annotated 'Cnl Offices'.</p> <p>The photograph at the bottom of the same page has been printed back-to-front. The church main entrance is on the left of the building.</p> <p>These two errors suggest that scant attention has been given to detail on a plan that should be up-to-date as it concerns development over the next 14 years.</p> <p>Water Lane Development Principles – Plan 5 on page 30 shows Newport Baptist Church as 'offices'. Again this suggests that scant attention to detail has been given in preparing this plan.</p> <p>Policies 4.4.4 - Policy WL1 on page 31 states in bullet point 10 'Identify and retain all buildings of merit'. This is a very loose statement that needs clarifying as to the identification process and the definition of merit. Both aspects are open to wide interpretation – it would have been better to publish a list of those buildings that will be retained.</p> <p>Regulation 15 Consultation Statement</p> <p>The Neighbourhood Plan - on page 4 the final bullet point states that 'the Town Council has fully engaged with its local community to produce the Plan'. Newport Baptist Church is part of the local community yet I know of no approaches from the Town Council for us to be involved/engaged.</p> <p>Pre-Regulation 14 Consultation and Engagement on page 6 shows a rather disparate list of groups/organisations with whom AECOM consulted. Why was the group 'Churches Together in Newport'</p>

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		not part of this consultation process – after all there are 5 church congregations in Newport who are all community based and community focussed.
15/01/2018	Janet Clarke	<p>I have been a member of the Steering Group of the Newport Neighbourhood Plan since its formation representing Newport and District Civic Society.</p> <p>I had a particular interest in ‘green spaces’ and together with another member of the Steering Group, we surveyed sites in Newport and reported at various times to the Steering Group the relevant details for each green space site. Subsequently, the details of each of the ‘green spaces’ was included in the draft NDP.</p> <p>However, as you will see from my emails below to the Newport Town Clerk and the Deputy Clerk, the site at Baddely Wells has been omitted from the draft NDP due to what was mistakenly thought to be a potential conflict with what was the emerging Local Plan (eLP) for Telford and Wrekin Council (TWC). Subsequently, this has been shown not to be the case as the Inspector had removed the Baddely Wells site from the TWC housing site allocations. This removal is now confirmed in the Local Plan 2011 –2031 which was adopted by TWC Full Council on 11th January 2018.</p> <p>The relevant extract in the Local Plan which relates to Baddely Wells (H13) site can be found in reference MM 92 of Appendix 2 –the Main Modifications to the Local Plan.</p> <p>In the light of the above and the below, I would ask that Baddely Wells is reinstated to the draft NDP as a recognised green space.</p> <p>If you require any further information from me regarding any questions you may have arising from this submission, I would be happy to provide.</p> <p>With reference to the agenda item above,I would ask that you bring to the attention of NTC the statement following from me, as a member of the NDP Steering Group :-</p>

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		<p>With regard to the NDP, I would ask that the land at Station Road, known as Baddely Wells, and previously as Site H13, be retained as 'green space' in the NDP that is to be submitted to Telford and Wrekin Council.</p> <p>The reason is that, as members may recall, earlier this year Mr Barker advised that Baddely Wells (Site 12 in the NDP Evidence Review) could not be retained as green space in the NDP because it was identified as a housing allocation site (H13) in the emerging Local Plan.</p> <p>However, following the removal of this site by the Inspector, and following the Reg 14 Public Consultation, the Process Management Group reported to the Steering Group on 26th July that Baddely Wells would now be shown as green space in the NDP.</p> <p>The Councillors speaking at Planning Committee on 30 August drew attention to this in objecting to the application for housing on the site - planning application TWC/2015/0057.</p> <p>TWC have only passed a 'resolution to grant' on land which currently remains deleted from housing site allocations. H13, together with other deleted sites, awaits the decision from the Inspector to the response to consultation on the Major Modifications, which he is considering at present . This issue is not just about H13 but other sites elsewhere in Telford .</p> <p>As the largest number of responses from Newport people on the Neighbourhood Plan referred to green space at Baddely Wells, I would ask that this site is retained, or referenced in some way, as intended, in the NDP to reflect the fact that it has been identified as existing green space since the initial gathering of evidence, way back in 2014, as those Town Council members on the Steering Group will recall.</p> <p>Furthermore, as Mr Barker, when Head of Planning, will recall, Baddely Wells (i.e. H13) is described in his own 2008 and 2012 Open Space Studies as "natural and semi-natural OPEN SPACE in which Newport is deficient".</p>

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		<p>Nothing has changed, the description still fits, it is still open and it is still green - the fields, the woodland with a winding path created by TWC, the copses and hedgerows, the beautifully enhanced entrance created by Newport in Bloom, the public footpaths still widely used, particularly as a link between Church Aston and south Newport. - this should continue to be identified as existing now, whatever the future may hold. To simply say nothing is to negate the views of the majority of those local people who cared enough to respond to the NDP.</p> <p>With NTC seeking to continue with its previous application to extend the town boundary to the A518 by 2019, the whole of Baddely Wells would come within the town boundary.</p>
21/01/2018	Katie Foster	<p>I was Member then Chairman of the Heritage Lottery Fund Committee for the West Midlands 2001-2010</p> <p>Chair of the former Wrekin Heritage, Wrekin Tourism Association later Telford Tourism Partnership until 2014</p> <p>I am a previous Chairman of Governors, Newport Girls High and now a member of the Academy Trust Governing Body</p> <p>I am a member of the Newport Town Team, the Civic Society and of Newport Rotary Lite</p> <p>I am Chairman of the Alzheimer's Research Shropshire Fundraising Group</p> <p>I was Tourism Consultant to Advantage West Midlands.</p> <p>I am a Trustee of the Shropshire Wildlife Trust and currently sit on the Marches Nature Partnership and chair its Tourism subgroup</p> <p>Comments:</p>

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		<p>In my view, the 'policies' set out in the draft NDP relating to “Tourism &amp; Leisure”, “Newport as a Retail &amp; Service Centre” and “Employment &amp; Jobs”, are lacking in sufficient detail as to be practicable and able to be implemented.</p> <p>There is a considerable lack of data and analysis of the town's current assets and future opportunities, especially in terms of the way retail, business and future employment is developing.</p> <p>There are considerable opportunities for external funding to add to the visitor economy and cultural offering and provision in the town - on which I have tried to advise both the Town Council as well as other bodies in the town such as the Market Company.</p> <p>The Water Lane area has long deserved a proper master-plan - often discussed with former head of planning Michael Barker, yet this remains largely unaddressed and only covered in a piecemeal fashion.</p> <p>The policies on jobs - eg the example of the former Coop building - still empty after months and months - not even being used as a 'pop up' venue such as happens in other small and large towns - reveals a lack of creative thinking - during which time more and more out of town developments are taking business away from our precious high street - and detracting from both the viability as well as the character of the market town.</p> <p>Policies are not sufficiently integrated or 'bullish' and need considerable more detail and granular attention to the linkages between different aspects of the town's strengths and weaknesses :</p> <p>e.g. the high performing schools and the potential for high end jobs, the heritage of the town and its inward investment/suitable markets/bog standard housing without character. The loss of green fields to development and the relationship to the traditional farming economy post Brexit. The well being and health of an ageing population and the ever diminishing lack of open green space - the issues of air</p>

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		<p data-bbox="768 272 1973 344">pollution which is now becoming ever more worrying - needs to be linked to the way new houses are being built close to the edge of roads - becoming ever busier in the town.</p> <p data-bbox="768 379 1630 411">I would also like to support and endorse the response from Janet Clarke,</p>
06/12/2018	Laurence Bennett	<p data-bbox="768 451 2029 603">This plan shares a number of features with the T&amp;W Local Plan in that it looks superficially good but upon closer inspection it avoids many of the real issues. These issues revolve around the substantial increase in population and the resulting pressures on the town's infrastructure - there is no real impact assessment made of the increased demands on the existing facilities.</p> <p data-bbox="768 643 1973 715">Overall the impression given by the document is one of a 'copy and paste job' with suitable inserts to localise the content.</p> <p data-bbox="768 754 2018 866">Rather than write a treatise on the plan, which I believe should be rewritten to make it more objective and easy to understand, I would make to following comments on two areas that are vital to the future of the town:</p> <p data-bbox="768 906 1133 938">4.6 Transport and Accessibility</p> <p data-bbox="768 978 920 1010">POLICY TA1.</p> <p data-bbox="768 1042 1939 1114">Development that would result in the loss of off-street car parking will not be permitted unless an equivalent or better capacity is provided elsewhere in Newport.</p> <p data-bbox="768 1153 1995 1265">What is actually required are more parking spaces not just maintaining the status quo. The challenge is how to meet the parking needs of an expanding town where all the new houses are on the periphery whilst supporting the parking needs of the businesses operating in the town centre.</p>

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		<p>This policy conforms to Telford &amp; Wrekin Local Plan policy SP2 Newport, C1 Promoting Alternatives to the Private Car,</p> <p>The only policy suggested here is that people should ride bikes on cycle paths yet to be built. Hardly much help to Newport residents who are increasingly working away from the town which is rapidly turning into a 'bedroom' suburb of Telford and the I54.</p> <p>4.7 Newport as a Retail and Service Centre</p> <p>Policy EC6 sets out the approach to managing the centre to make sure that Newport continues to fulfill its primary role of providing convenient and accessible shopping facilities within a compact area.</p> <p>4.7.2 Policy Objectives ☐</p> <p>To support retail uses and make sure that non-retail uses do not impact negatively on shopping environment or local amenity within the centre ☐ To protect and enhance the Conservation Area and support the centre as part of measures to conserve the Town's heritage and as a destination for residents and visitors.</p> <p>Very difficult to see how this policy sits with the Aldi/Lidle out of town shopping centre being set up at the end of Audley Avenue.</p>
21/01/2018	Malcom Bennett	<p>I would like to formally object to the proposed boundary change made by Newport Town Council to encompass part of Chetwynd Aston.</p> <p>The argument that they advance for doing this is on the grounds that people do not know where they are living. The real reason is to gain the precept for the houses that not only exist now but also will soon be built.</p>

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		<p>Chetwynd Aston is older than Newport and to start the destruction of this village is indefensible and would need the support of English Heritage to proceed that it does not have.</p> <p>Please pass my objection to the appropriate person.</p>
18/01/2018	Mr & Mrs Dredge	<ol style="list-style-type: none"> <li>1. My name is Brian Dredge and I live in Newport where I have resided for over 34years. I can be contacted by post or email.</li> <li>2. I have long been interested in the lack of public open space in Newport, particularly during the last 10years, a period when consideration of plans for the erection of homes on much of the surrounding countryside has been prevalent.</li> <li>3. In response to an invitation to send comments on the Newport Neighbourhood Development Plan (NDP) to Newport Town Council I emailed them to the Council on 5 June 2017. The content of that email is reproduced in the next three paragraphs.</li> <li>4. The NPD is not so much a plan as a statement of the status quo and appears to be mightily constrained by the Telford &amp; Wrekin Local Plan, which has manifestly failed to protect the countryside in the west and south-west of Newport and in that surrounding the south of Newport.</li> <li>5. A significant part of the NDP deals with the public green space in Newport, but none of it is particularly natural and spacious. Admittedly one only has to go to The Wrekin or to one of the various National Trust or English Heritage sites in Shropshire to have open natural space but the people of Newport should not have to travel so far in order to obtain recreation and to relax for a while from the built environment.</li> <li>6. Newport has just over 7.1% of its area designated as public green space but many of the spaces are very small. The H13 Baddely's Wells site is currently open green space and should remain so. It would only increase the designated public green space to just over 7.8% and this increase is justified because of</li> </ol>

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		<p>all the extra dwellings that have been and are being built in and to the south and west of Newport. Whilst the T&amp;W Local Plan classes it as suitable for housing development, this should be strongly resisted.</p> <p>7. I have seen the statement of Janet Clarke made for the purpose of the Regulation16 Consultation and understand that she represented the Newport and District Civic Society on the Steering Group of the Newport Neighbourhood Plan from its inception. I support and endorse the submission made by Mrs. Clarke in that the Baddely Wells (H13) site be reinstated in the draft NDP as a recognised green space</p>
21/01/2018	Newport Regeneration Partnership	<p>At the recent Newport Regeneration Partnership Meeting, Members were reminded that the consultation period for the Newport NDP finishes on Tuesday 23rd January and the Chairman encouraged all the partners to respond direct, where appropriate.</p> <p>The Newport Regeneration Partnership wishes to acknowledge the work undertaken throughout the process to arrive at this stage in the production of a document that will be very important for the future development of the Town. Members also wished to express their thanks to Newport Town Council Members and Staff as the enormous amount of work involved has been recognised.</p> <p>Our Partners have had an opportunity to respond and comment and we ask that all the comments you receive are taken into consideration.</p> <p>One of the main points is that Members believe that Baddely's Wells should be reinstated into the Newport Neighbourhood Development Plan as a recognised local green space, in order to protect it from future development. This is now in line with the Telford &amp; Wrekin Local Plan and is very important to the people of Newport as well as surrounding areas.</p>
21/01/2018	Newport Shropshire Town Team	Newport {Shropshire} Town Team Limited, a representative body whose membership comprises town centre businesses, acknowledges the challenges confronting town and parish councils when developing a meaningful and effective Neighbourhood Development Plan.

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		<p>Whilst the town team has reviewed the whole document our comments relate primarily to the sections relating to “Employment &amp; Jobs”, “Tourism &amp; Leisure”, and “Newport as a Retail &amp; Service Centre”.</p> <p>The town team’s overall view of the draft Neighbourhood Development Plan (NDP) for Newport now before us as part of a formal consultation process is that:-</p> <p>It is long overdue having taken over 4 years to collate from its inception as a front-runner pilot;</p> <p>The plan development process could have benefited from the earlier engagement of an independent planning policy expert to guide collation of relevant evidence, shape &amp; test draft policies, and ensure integration across the differing policy areas;</p> <p>The evidence base used to create the draft NDP policies was too narrow in that it ignores substantial amounts of relevant information / evidence held by contributors and other local organisations;</p> <p>Local contributors were encouraged to focus on a fairly narrow policy spectrum too early in the process resulting in some contributors (including the town team) withdrawing from the NDP development process;</p> <p>In our view the effect of these procedural decisions is:</p> <p>A proposed policy framework as set out in the draft NDP for Newport that is not as strong, integrated, or relevant as it could be.</p> <p>A missed opportunity to shape / influence the T&amp;W Local Plan 2016 to 2031 resulting in a weaker strategic planning policy framework for Newport;</p> <p>These assertions are evidenced in many ways including:-</p> <p>the absence of a strategic development plan for Newport town centre;</p>

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		<p>the absence of a development action plan for Water Lane;</p> <p>planning consents being granted for ~1,400 new dwellings in Newport since 2013 many of which have now emerged on green fields;</p> <p>planning consents gained for edge-of-town retail developments including the Aldi store, and more recently for modified proposals on the so called Morrison's site;</p> <p>a vacant major commercial town centre property, whose demise was widely anticipated prior to edge-of-town retail developments, with no clear proposals to bring this important building back into use.</p> <p>ECONOMY &amp; JOBS</p> <p>Strategic Policies</p> <p>The draft NDP asserts that the emerging draft (now approved) Telford &amp; Wrekin Local Plan 2016 to 2031 identifies "consolidating and strengthening Newport's role as a market town as a key objective for the Borough as a whole".</p> <p>Local evidence does not support this assertion:-</p> <p>Whilst parts of Newport's high street enjoy conservation area status there is no town centre focused strategic development plan nor is there a town centre action plan;</p> <p>The Local Planning Authority (LPA) has failed over many years to bring together various landholdings on Water Lane to create a coherent and deliverable development plan;</p>

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		<p>Aside of “safe and attractive environments” and a precursor “archaeological survey” the draft NDP entirely ignores the Water Lane development opportunity</p> <p>The effect of the above is a piecemeal rather than an integrated strategic approach to development in and around Newport’s town centre, including the vital issues of car parking and traffic management, and inter-related leisure &amp; heritage opportunities.</p> <p>In the view of town team members the draft NDP now before us does nothing to address the above shortcomings.</p> <p>A second assertion says “The aim is to achieve a sustainable balance between available employment opportunities and available local skills”.</p> <p>Whilst this is a very laudable aspiration it is also reasonable to ask both T&amp;WC as the LPA responsible for the Local Plan 2016 to 2031 and the Town Council as authors of the draft NDP:-</p> <p>Why has a substantial area of land to the north of the A518 (Aldi roundabout to sheep island) which had been allocated for employment uses for in excess of 20 years never come forward for development?</p> <p>What has now changed to give observers any confidence that the new allocation of land south of the A518 (Aldi roundabout to sheep island) will be actively marketed and developed in the foreseeable future?</p> <p>When will an action plan be published to effect this employment related development that will give observers confidence that there is policy provision and political will to deliver?</p> <p>How will the Local Plan and Newport’s NDP (given it is outside of the town boundary) shape the high quality jobs intended by development of this site?</p>

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		<p>In our view, without answers to these questions, observers may believe that the borough council was only ever interested in a re-designation of former employment land to the north of the A518 for housing development to increase its council tax base – strangely, an area that the town council now seeks to include within its geographical boundaries through its current active pursuit of a boundary review!</p> <p>Policy Objectives</p> <p>I is interesting to note that the assertions at page 19 refer to observations of residents.</p> <p>The draft NDP offers no evidence that local businesses, irrespective of location or type, were canvassed for views or their ideas, and if this is a correct assertion then this significant omission calls into question the basis upon which many of the draft policies of the NDP have been derived.</p> <p>Importantly, if the LPA and / or landowners do not actively market sites allocated for employment uses then they are unlikely to come forward in any scale, especially when competing with lower value / lower cost sites in Telford and similar sites in Stafford, Wolverhampton (including i54) and the West Midlands.</p> <p>The absence of an effective marketing strategy for land allocated for employment uses north of the A518 (Aldi roundabout to sheep island), which has now been re-allocated in part for housing, effectively means that Policy E.1 is meaningless. And, as previously stated without a delivery plan the newly allocated employment land south of the A518 may well lay idle for 20 years just as the land to the north of the A518 did previously.</p> <p>Another important observation relating to the above employment land is that it is outside of the Newport town boundary and therefore any related policies in the Newport NDP may only be aspirational (what we would like to see) rather than influential (how we intend it to be).</p> <p>Similarly, policy E2 of the draft NDP is superfluous as the two stated criteria are integral aspects of the LPA process i.e. it is inconceivable that the LPA would grant consent to a new business on land already in</p>

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		<p>commercial use that had “significant harmful effects on the amenities of the adjoining areas” or “where the proposal would not have unacceptable impacts on the local road network”</p> <p>Critically, the policy objectives and specific policies within the draft NDP do not appear to recognise the vital importance to the local economy of Newport’s town centre where there are already well over 1,000 people employed in the retail and service sectors.</p> <p>This new policy framework does not seek to influence an inevitable evolution in the type and structure of employment in Newport’s town centre.</p> <p>In our view this omission offers no comfort to existing businesses investing in their futures and it potentially undermines aspirations to develop Newport’s tourism &amp; leisure offer. Critically, in the medium-term it will inevitably lead to significant decline in the maintenance, repair and quality of many town centre buildings that are also the town’s heritage assets.</p> <p>TOURISM &amp; LEISURE</p> <p>Strategic Policies</p> <p>Understandably, the primary focus of this part of the draft NDP is the opportunities presented by the outstanding work of the Shrewsbury and Newport Canals Trust. The ‘town team’ fully endorse their work and are committed to working cooperatively with them to achieve their aims insofar as they enhance opportunities for Newport.</p> <p>Furthermore, the draft NDP ignores several other really important opportunities to shape Newport’s future tourism and leisure offer including:-</p>

Date received	Name of contributor	Comments
		<p>Opportunities linked to a plethora of high quality heritage buildings throughout the town centre (St. Nicholas Church, the Guildhall, the Market Hall, and many individual shops &amp; business premises);</p> <p>Opportunities for linked heritage visits to Newport with the World Heritage Site(s) of Ironbridge, the historical towns of Shrewsbury &amp; Stafford, and a host of market towns in near proximity to Newport with similar heritage assets and opportunities;</p> <p>natural links to adjacent countryside including easy access to footpaths, bridleways, towpaths and the former Stafford to Newport railway line;</p> <p>A complete absence of narrative and policies to address Newport's very limited cultural offer.</p> <p>In summary, whilst the town team fully supports Policy TL1 (comprising six sub-points) we believe opportunities to considerably strengthen this policy area have been missed.</p> <p><b>NEWPORT AS A RETAIL AND SERVICE CENTRE</b></p> <p><b>Strategic Policies &amp; Policy Objectives</b></p> <p>Whilst the 'town team' supports in principle the policy objectives and draft policy RS1 (comprising 3 sub-points) their effect is very limited and in our view they leave this important policy area wanting.</p> <p>We are concerned to note the omission of any policies that would seek to control both the extent and type of edge-of-town commercial / retail development. Edge-of-town retail development is not sustainable in that it generates additional car journeys (as both Mere Park Garden Centre and the Aldi store already do). Whereas a good proportion of people employed in the town centre and many of those who choose to shop there regularly walk or cycle as a preferred mode of transport.</p> <p>Separately, we are especially concerned to note a complete absence of pro-active policies to support and enhance Newport's commercial heart for retail and services where people have gathered for business,</p>

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		<p>shopping and leisure purposes over hundreds of years – despite huge changes in the ways commerce is conducted and in the means of communications this social hub remains as relevant today as it ever has in Newport’s long history.</p> <p>In our view and our experience there is clear evidence that a town centre retail and service offer is adversely affected by competition at the edge-of-town. Some recent local examples include:-</p> <p>the rapid demise and ultimately closure of the Royal Victoria Hotel following development of a Premier Inn alongside the A41 by-pass;</p> <p>the future of the Coop / Budgen supermarket, held in balance for many months, was finally resolved upon arrival of the Aldi store;</p> <p>arrival of a new hard-ware store (Home Essentials) in Newport’s town centre shortly after closure of the edge-of-town Focus store;</p> <p>establishment of TFM close to Newport’s town centre confirmed within several months the decline and closure of the edge-of-town Countrywide store;</p> <p>the extensive giftware and clothing offer at Mere Park Garden Centre which adversely affects the town centre giftware and clothing offer.</p> <p>These examples, alongside findings set out in reports from the 2013, 2014 and 2016 Newport town centre benchmarking surveys, show that many businesses are firmly established for the future but a significant proportion of traders, maybe as many as 25% of town centre businesses, remain marginal leaving a ‘fragile high street’.</p> <p>Further evidence collated by the town team confirms that over 60 businesses have failed and left Newport’s town centre since April 2013. Thankfully, commercial property closures in the town centre</p>

Date received	Name of contributor	Comments
		<p>tend to be relatively short-term (typically 2 to 3 months) before new businesses emerge in place of those departing.</p> <p>Whilst the ‘town team’ acknowledge that competition is good for consumers we believe that it is also important to acknowledge the wider implications of such policies and the longer-term implications where they are less than robust.</p> <p>For example, edge-of-town retail and service developments are invariably housed in “tin sheds” with a life expectancy typically around 40 years. Retail and service businesses established in Newport’s town centre occupy in the main some superb heritage buildings often 100 years and in some cases 200 or more years old.</p> <p>Observations from many midlands and northern market towns show that edge-of-town commercial developments result in town centre closures where heritage buildings then often fall into terminal decline.</p> <p>As a forecast, it is highly likely that the tin sheds on the edge-of-town will lie derelict or have been replaced in forty years whereas our town centre heritage assets may by then have gone forever.</p> <p>Conclusions</p> <p>In our view, policies set out in the draft NDP relating to “Employment &amp; Jobs”, “Tourism &amp; Leisure”, and “Newport as a Retail &amp; Service Centre” are under-developed, are not sufficiently integrated, and lack robustness in context of rapidly changing technologies for communicating, doing business and socialising.</p> <p>Critically, there is a policy vacuum for the town centre which in our view demonstrates that the draft NDP is not sound, and therefore not fit for purpose.</p>
19/01/2018	Peter Chadwick	I am Peter Chadwick of 12 Newport, Shropshire. I can be contacted by email or by post.

Date received	Name of contributor	Comments
		<p>I am a member of Newport and District Civic Society. The Society submitted evidence over a number of years both to the Local Plan process as well as to the Newport Neighbourhood Development Plan (NNDP) process.</p> <p>I support and endorse the submission from Janet Clarke below.</p> <p>I would add that I attended both T&amp;WC Plans Committee meetings held August 2017, when the public consultation on the Major Modifications issued by the Local Plan Inspector was taking place. After the consultation period expired, even though the Inspector was aware that T&amp;WC officers had recommended outline planning approval for houses on the H13 site and Plans Committee had followed the officer recommendation, the Inspector nevertheless, in his final Major Modifications that were adopted by T&amp;WC Full Council on 11th January 2018, exclude site H13 and 3 other sites from the T&amp;WC housing site allocations list. Per the reasons set out in his note to T&amp;WC of 30th March 2017, the Inspector said that T&amp;WC had included sites owned by T&amp;WC to the exclusion of sites in private ownership and that he could find no support for this in the NPPF. As T&amp;WC were unable to provide evidence as to how the various sites had been selected or rejected, the Inspector requires T&amp;WC to produce a Sites Allocation Local Plan in due course to provide evidence of any further housing need and any additional sites over and above those in the current sites allocation list. T&amp;WC have said they unlikely to go through this Sites Allocation Local Plan process until past 2020 at the earliest.</p> <p>As site H13, which includes the land at Baddelys Wells, is now excluded by the Local Plan Inspector from the approved site allocation list in the adopted Local Plan 2011-2031, it can be reinstated in the NNDP as to do so causes no conflict with the adopted Local Plan.</p>
12/01/2018	RPS	<p>Representations to the Newport Neighbourhood Plan</p> <p>RPS is retained on behalf of St Modwen Developments Ltd and Telford and Wrekin Council to represent them in relation to the production of the Newport Neighbourhood Development Plan (NDP). These</p>

Date received	Name of contributor	Comments
		<p>representations are made on their behalf and specific to their land interests at land to the West of Station Road Newport.</p> <p>RPS welcomes the progress of the NDP and will seek to work with the Town Council and others to ensure a NDP is progressed to deliver a sound Regulation 15 document which can thereby be appropriately considered by an Independent Examiner.</p> <p>To this end it is acknowledged that the NDP should adhere to strategic policies of the local plan, not promote less development than set out in the Local Plan and more importantly in relation to Newport be based on a sound and credible evidence base. It is acknowledged that at the present time some uncertainty exists regarding the future direction of the Local Plan following the initial Examination sessions and the Inspector's initial note of March 2017. The Planning Authority has indicated that by 3rd July the Council intend to publish its re-appraisal of the Local Plan evidence base.</p> <p>It is also noted that on 9 June, the Council published additional information including Examination Documents F10b and G24, which follows the Inspector's conclusion's that the Local Plan's Housing Requirement for the Authority should increase from the 15,555 requirement in the submission plan to 17,280 dwellings as indicated by the Kestrel Close Inspector.</p> <p>In relation to the NDP we note that the Housing Policies (Chapter 4) addresses my clients land interests to the West of Station Road and states the following:</p> <p>Telford &amp; Wrekin Local Plan Site H13, also known locally as Baddely's Wells, was the subject of considerable debate by residents. This site was considered by some to be a long-standing open space. However, Telford &amp; Wrekin Council's position is clear in the Local Plan that is that the site H13 is both suitable and available for development. Consequently in order to meet the Basic Conditions requirement for the Neighbourhood Plan to be in conformity with the local Development Plan Strategic Polices the</p>

Date received	Name of contributor	Comments
		<p>Neighbourhood Development Plan must recognise site H13 as an allocation for housing and therefore it is not included as an open space in the Newport Neighbourhood Development Plan.</p> <p>Irrespective of the direction in which the Local Plan eventually chooses to proceed regarding site allocations, that the NDP seeks to exclude H13 from being identified as 'Open Space' is supported and will continue to be appropriate for two principal reasons:</p> <p>Firstly – The NDP Development Plan Boundary as indicated by Plan 1 of the 2017 NDP excludes the majority of Local Plan site H13, so in effect it is not within the gift of the NDP to consider whether site H13 of the Submitted Local Plan should or should not be included or excluded as Open Space within the NDP as indicated in the paragraph above. The part of H13 which is included within the NDP boundary (principally to the west of Badleys Wells Pumping Station) is simply an agricultural field and in no way can be considered 'long standing open space', despite the paragraph associated with Chapter 4 not defining what 'open space' actually constitutes.</p> <p>Secondly – Despite the NDP indicating that the site 'was indicated by some' to be open space, there is no credible evidence base for considering the site constitutes open space to an extent that it merits a related designation in the NDP. In contrast there is substantial evidence which demonstrates the opposite:</p> <p>☒ It is contrary to the Local Planning Authority's own evidence base on Open Space provision in Newport and in particular its recent submissions<sup>1</sup> to the Local Plan Inspector, where it was clearly stated by the LPA that Site H13 is not designated as an OL6 (Open Space) site on the Proposals Map of the existing Wrekin Local Plan and the site is not well used apart from rights of way across it a positioned backed up by the Council's own ecologist;</p> <p>The most recent December 2012 Roger Tym/Peter Brett Report on Open Space in Newport which concludes:</p>

Date received	Name of contributor	Comments
		<p data-bbox="768 339 2022 491">“We therefore consider that in summary, Newport is adequately provided for in terms of the quantity of space it can avail of in most of the identified categories. Notwithstanding this general conclusion, there is a need to address provision of open space for allotments and children’s play in the context of future development.”</p> <p data-bbox="768 531 2022 683">☐ A Village Green Application for the site was made on the 16 December 2011 by Mr J. Rudd on behalf of local residents. A non-statutory inquiry in respect of the proposal for Village Green status took place in October 2012. The Inspector, in his report dated 18 January 2013, recommended that the Village Green Application should be rejected by the Registration Authority, concluding that:</p> <p data-bbox="768 794 2022 986">“...the Applicant has failed to prove his case and that none of the Application Land qualifies for registration as a town or village green under section 15(2) of the Commons Act 2006. It has not been shown that a significant number of the inhabitants of any locality or any neighbourhood within a locality indulged in lawful sports and pastimes as of right on the Application Land or any part of it for a period of at least twenty years, and continued to do so at the time of the Application.”</p> <p data-bbox="768 1026 2022 1305">☐ A current planning application for the site has been informed by landscape and ecological assessments and demonstrates how elements of the site (along the northern boundary) can be retained for recreational use and assimilated into off-site areas of open space, but the majority of the site (the pony paddock and open field) is entirely suitable for residential development and effectively represents a filling in of a scheme which is already committed and therefore appropriate and deliverable, having regard to the provision of the necessary infrastructure and facilities, and taking account of environmental constraints.</p>

Date received	Name of contributor	Comments
		<p>We trust the above comments are helpful in demonstrating the current proposals within the NDP in relation to the site are entirely appropriate and sound based on a substantial and credible evidence base. Given the above, should the NDP propose any related amendments seeking to alter the plans current approach to the site then this would not be based on sound and credible evidence and would be strongly resisted by my clients at all future stages of plan making.</p> <p>We look forward to being kept informed of all future plan making stages of the NDP.</p>
08/12/2017	Severn Trent	<p>Thank you for the opportunity to comment on your consultation. We currently have no specific comments to make, but please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p> <p>For your information we have set out some general guidelines that may be useful to you.</p> <p>Position Statement</p> <p>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>

Date received	Name of contributor	Comments
		<p data-bbox="768 272 969 300">Sewage Strategy</p> <p data-bbox="768 339 2029 531">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 data-bbox="768 571 1182 598">Surface Water and Sewer Flooding</p> <p data-bbox="768 638 2029 874">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 data-bbox="768 914 2029 1070">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 data-bbox="768 1110 2029 1267">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</p>

Date received	Name of contributor	Comments
		<p data-bbox="768 272 1957 344"><a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</a></p> <p data-bbox="768 379 943 411">Water Quality</p> <p data-bbox="768 448 2007 683">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 development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p data-bbox="768 722 936 754">Water Supply</p> <p data-bbox="768 791 2024 903">When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.</p> <p data-bbox="768 943 1995 1094">We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p data-bbox="768 1134 969 1166">Water Efficiency</p> <p data-bbox="768 1203 2018 1315">Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption</p>

Date received	Name of contributor	Comments
		<p>of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <p>Single flush siphon toilet cistern and those with a flush volume of 4 litres.</p> <p>Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</p> <p>Hand wash basin taps with low flow rates of 4 litres or less.</p> <p>Water butts for external use in properties with gardens.</p> <p>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</p> <p><a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</a></p>

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		<p>Water Quality</p> <p>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 development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p>Water Supply</p> <p>When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.</p> <p>We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p>Water Efficiency</p> <p>Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p>

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		<p>Single flush siphon toilet cistern and those with a flush volume of 4 litres.</p> <p>Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</p> <p>Hand wash basin taps with low flow rates of 4 litres or less.</p> <p>Water butts for external use in properties with gardens.</p> <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website</p> <p><a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</a></p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p> <p>We hope this information has been useful to you and we look forward in hearing from you in the near future.</p>

Local Planning Authority's  
Submission in Respect of the  
Newport Neighbourhood Development  
Plan

Telford & Wrekin Council comments on Newport Neighbourhood Plan (Regulation 15/16 version)

Section/ Policy Area	Page/ Policy Ref	TWC Reg 14 recommended suggestion	TWC Reg 14 Comments	Newport Neighbourhood Plan Response	Any additional comments following the Reg 15 version
Foreword	3				
About this document					
	9	Include a bullet point on heritage and character...	<p>The people of Newport want their Plan to:</p> <ul style="list-style-type: none"> <li>- ..... there's no mention of 'heritage' or 'character' here?</li> </ul> <p>Should there be if this is the 'vision' that the NP mentions and refers to, for example, page 8 third paragraph and last sentence states that, "The community's vision can be summarised as seeking to combine the benefits from new development with the preservation of the best of the character and heritage from the past."</p>	A bullet point on protecting and preserving the historic character and heritage added.	
A Plan for Newport	10	An Infrastructure Delivery Plan that identifies important strategic infrastructure for the borough accompanies the Local Plan.	The original text refers to the IDP as an investment plan with funding arrangements. The purpose of the document is to identify strategic infrastructure required to support the plan as well as 'likely' funding sources that might help bridge the gap. The document will be updated on an annual basis to reflect any changes in the delivery of infrastructure. The document will be used to	No action	

Section/ Policy Area	Page/ Policy Ref	TWC Reg 14 recommended suggestion	TWC Reg 14 Comments	Newport Neighbourhood Plan Response	Any additional comments following the Reg 15 version
			support bids for funding and securing developer contributions.		
<b>Preparing the Plan</b>					
<b>Policies</b>					
<b>Housing</b>	<b>4.1.2 Policy Options, p15</b>	Replace 'HO6' with 'HO5'	Draft plan incorrectly references policy HO6. The correct policy is HO5.	Amended	
	<b>4.1.2 Policy Options, p15</b>	Last sentence on page 15 does not have appropriate regard to the NPPF. Amend to better reflect the NPPF and policy HO6 of the emerging local plan.	The wording demands an affordable housing contribution 'in full' on each site. This is contrary to the NPPF, given that policy requirements must not 'threaten viability' of development (NPPF, para 173). Consequently, there may be instances where viability will impact on delivery of affordable housing and so cannot be delivered in full.	Added reference to NPPF	
	<b>4.1.2 First paragraph on page 16</b>	Text needs to recognise Local Plan Policy NE1: Biodiversity and Geodiversity	The last part of this paragraph talks about wishing to see a wider range of habitats etc. This is essentially a part of Local Plan Policy NE1 and should be acknowledged as such.	Reference to Local Plan NE1 made	
	<b>4.1.2 Policy Options, p16</b>	Amend first sentence of second paragraph in line with the comment.	Draft plan appears to quote policy HO7 as specifically relating to older people. This is incorrect. Policy HO7 relates to all types of specialist housing provision including other vulnerable people, not simply older people.	Amended	

Section/ Policy Area	Page/ Policy Ref	TWC Reg 14 recommended suggestion	TWC Reg 14 Comments	Newport Neighbourhood Plan Response	Any additional comments following the Reg 15 version
	<b>4.1.3 Policies, Policy H1, p16</b>	Suggest that the policy is amended with a broader focus on housing to meet the needs of range of household groups rather than particular groups.	The second sentence of the policy expects new development to include provision specifically to meet the needs of the elderly and disabled. Whilst the Council is sympathetic to this aim, it does not have appropriate regard to the NPPF. It is suggested that it is not for the plan to set as a policy presumption the requirement for provision of certain types of housing, but to plan for it's delivery in response to a local need, in line with para 50 of the NPPF.	Policy amended to remove reference to the elderly and people with disabilities.	
	<b>H2</b>		Points 3 and 4 of policy H2 basically repeat parts of NE1: Biodiversity and Geodiversity. Is this repetition of Local Plan policies necessary?		
	<b>Housing section and entire text</b>		References in the document to Bio-diversity and Geo-diversity should be corrected to the correct accepted spellings – biodiversity and geodiversity		There are still some sections of the plan which does not use the correct accepted spellings of biodiversity and geodiversity.
	<b>General comment</b>		The NP refers to Local Plan housing allocation H13. In response to the Inspectors note to the Council, the Council has adjusted the current schedule of site allocations to reflect only sites with planning permission or Section 7(1) New Towns Act approval. This has an implication on	Reference to H13 has been removed in the Plan	

Section/ Policy Area	Page/ Policy Ref	TWC Reg 14 recommended suggestion	TWC Reg 14 Comments	Newport Neighbourhood Plan Response	Any additional comments following the Reg 15 version
			site H13. It is the Council's position that the site is still considered to be appropriate for housing and is the subject of a live planning application with a decision pending.		
	<b>4.1.3 Policies, p18</b>	Suggest an amendment in line with the comment.	The first paragraph on p18 refers to policies in the emerging local plan. It should be noted that whilst some weight may be given to certain policies in the emerging plan, the Telford & Wrekin Local Plan has yet to be adopted and so does not yet legally form part of the development plan. It is also noted that no reference is made to policies in the current adopted development (Core Strategy or Wrekin Local Plan). It may be helpful to add in those relevant current development plan policies where conformity is considered to exist. This comment applies to other policy sections in the NP.	Actioned	
<b>Economy and jobs</b>	<b>Policy E1</b>	Suggest clarifying in the policy what form of uses of land or buildings are being controlled here. Not clear in the policy.	The policy as drafted is not clear as to the circumstances to which it would be applied. It appears to have some words missing from the first sentence.		
<b>Green and open spaces</b>	<b>4.3.1 first paragraph on page 20</b>	The paragraph needs to be clarified. It is the Green Network principal which is being extended to Newport in the Local Plan not the 'forest city' idea.	The supporting text to the green open spaces part says 'the emerging local plan aims to extend these principles across the borough by protecting valuable trees, woodlands, hedgerows and open spaces.' This is inaccurate. The LP extends the Green Network designation to Newport. Protection	Amended	

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			for biodiversity, trees, woodlands, hedgerows and open spaces has always been borough wide.		
	<b>GS1</b>	Suggest an amendment in line with the comment.	Policy is restrictive and not in line with NPPF. It should provide some exceptions and allow development when it may be appropriate.	Added “except in special circumstances” at the end of the policy	
		Remove Gravelly Drive from the list	There is currently a proposal for the removal of the play equipment on the Gravelly Drive play area as part of the play rationalisation programme by Public Realm / Environmental Services although some equipment could be relocated to a nearby existing play area. In addition, this location was investigated to be the location for a relocated scout hut which would be funded through the building of dwellings on the current location of the scout hut.	Removed	
		Add Broomfield Road Play area as a new site.	Broomfield Road Play area is Green Network but new development to the side of Newport Canal is already eating away at this open space to create sufficient width for the vehicular access to the site	Added	
		LGS8 - Shropshire Union Canal Newport Branch	The inclusion of a SSSI within a local green space designation is not straightforward. The national designation of a SSSI offers far higher protection to the site than the local green space designation		

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			will and the benefit of including the SSSI in the local green space designation is not clear.		
		LGS10 - Shukers Field	The boundary of this site in the NNP does not match the Green Guarantee site boundary.		
	GS2	Amend Policy GS2 to read “New development will include or contribute to the provision of recreational open space that meets the standards set out in the “Fields in Trust Guidance for Outdoor Sport and Play (England) and <b><u>supported by Telford &amp; Wrekin Councils Play Strategy</u></b> ”.	<p>Telford &amp; Wrekin Council does not fully support the ‘Fields in Trust Guidance for Outdoor Sport and Play’ as there are a number of issues arising from this revised document which the Borough council believe need to be amended. Therefore (and as highlighted in the FIT document), Telford &amp; Wrekin Council has applied its own play standard as identified in Telford &amp; Wrekin Councils Play Strategy. This Telford &amp; Wrekin Council strategy covers the Newport area. An example of the differences are as follows:</p> <ul style="list-style-type: none"> <li>• Telford &amp; Wrekin Council do not support the provision of LAPs (Local Areas of Play) as these tend to be both costly to maintain and as they are close to residential areas can become confrontational when used (particularly in the evening). These areas are better placed as well designed open spaced areas which can provide amenity value for all. The implications of accepting the FIT policy may mean more play areas, but it is likely that this would reduce the overall</li> </ul>		

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			<p>quality of provision as resources are spread more thinly.</p> <ul style="list-style-type: none"> <li>• The information on the quality of proposed provision is not as detailed as in the previous document that this new FIT document has replaced. This again, is highlighted in more detail in the councils play strategy.</li> <li>• A further policy, is that of encouraging use of suds features as locations for equipped play provision. I'm not sure that FIT have thought this one through properly as this may prove to be a high maintenance cost due to issues relating to requiring to regularly clean the facilities apart from the obvious safety concerns. This is currently evident in Newport at the Wellington Road development where the dry suds feature is consistently wet and muddy.</li> </ul> <p>Healthy Spaces would advise that Telford &amp; Wrekin Councils Play Strategy is also highlighted in this section.</p>		
Water Lane	WL1 P28		The Council supports the policy presumption for redevelopment of this centrally-located site for mixed-use development.		
		Use <u>significance</u> instead of merit.	Change the terminology on: 'identify and retain all buildings of merit' use <u>significance</u> instead of merit –Then this indicates that a formal methodology		

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			can be adopted in accordance with term <u>significance</u> which is set out in English Heritage's Conservation Principles.		
		Include wording in the policy text	There is a concern about division/layout of the plot. The supporting text mentions something about composition of buildings and spaces reflecting the appearance and form of the original burgage plots. This needs to form part of the policy because there are plots that aren't in their original linear form (where areas have been sold off etc.) so there's more scope for it to become a standard 'estate' layout which isn't what we'd want to see.		
			<p>Waters Lane regeneration/development – it notes the objectives including:</p> <p><i>-“To take advantage of and enhance valuable views to and from the area”</i></p> <p>This is an opportunity to be specific about what is a 'valuable view'. Everyone has a different idea of what a valuable view is to them. Can the NP give examples of what would qualify? If an application was to come in how would it be proved that the applicant is ticking this box? Or how would someone argue that they're not ticking this box? Is</p>		

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			a valuable view one that captures the character of Newport? One that includes landmark buildings?		
Tourism and leisure	Paragraph 4.5.1 on page 32	Clarification of the references to the potential for restoration to navigable water way for the Newport Canal is recommended	The language of the text in these two paragraphs does not reflect the discussions TWC have had with NE relating to the project and are overly optimistic and simplistic in their presentation of the opportunities. It is recognised that the SSSI designation is given mention in the text but it is a concern that the text suggests that restoration to navigation is an uncomplicated option and that it may be possible in the plan period. The Council remains very cautious about restoration to navigation and our discussions with NE suggest that there would be a long process to go through before that option was anywhere close to meaningful consideration. NE has indicated to the Council a high level of caution relating to the proposal and the paragraphs do not reflect this.		
		Clarification of the reference to potential navigation of a section of canal around Town Lock is recommended	The Town Lock is right in the centre of the designated SSSI. The restoration of this area to navigation would not be simple or swift and the text is overly simplistic in presenting this option. The Council remains very cautious about restoration to navigation and our discussions with NE suggest that there would be a long process to go through before that option was anywhere close to meaningful consideration. NE has indicated to		

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			the Council a high level of caution relating to the proposal and the paragraphs do not reflect this.		
Transport and accessibility	TL1 page 35	Points 1 and 2 of this policy do not appear to be in conformity with the Local Plan. Reference needs to be made to NE1 which protects designated sites in the supporting text.	The Local Plan does not give explicit support to the restoration of the canal to navigation but this policy does – equally the Local Plan does not prevent development on the route of the canal but this policy does.		
Newport as a retail and service centre	RS1 p37	change protect to <u>preserve</u>	Change terminology to match our policy... first bullet point  <i>'Development will be expected to protect or enhance the Conservation Area'</i> – change protect to <u>preserve</u>		
			<i>The Policy mentions 'Locally important buildings....'</i> What are 'locally important buildings'? Newport doesn't have any 'local <u>interest</u> buildings' for whatever reason. So this presents an opportunity to set CRITERIA for any 'local INTEREST buildings' to which the LPA can apply its new Local Plan (and existing WLP) policy. The NP doesn't need to identify the buildings. Just set and consult on the criteria. If the PC want to do that the Councils Conservation Officer will be willing to assist in the process? If the PC doesn't want to go down this route then		

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			the NP need to define what are 'locally important buildings'. The reason being that we have two different tiers that may mean two different things, so it gets unnecessarily complicated.		
		Include something on signage and shopfronts	The NP doesn't mention anything about signage/shopfronts? I know the LPA has an SPD for that, but the Town Council have commented on shopfront/signage applications before. This might be something important to the Town Council with it being a concentrate shopping district and the impact this can have.		
Local landscape and wildlife	4.8.1 page 38	The text makes an inaccurate reference to best most versatile land which requires clarification	BMV is considered to be land of grade 1, 2 and 3a. The text states that grade 3 land is considered to be BMV – but grade 3b is not considered BMV. This requires clarification within the text.		
		Replace word with <b><u>protect</u></b>	The NPPF seeks to <del>project</del> <b><u>protect</u></b> such good quality agricultural land		
	LW1 page 39	The text of this policy basically repeats policy NE1 of the Local Plan	Is this policy necessary since it repeats aspects of NE1 but only relates them to the rural environment when NE1 already applies to all sites.		
Community wellbeing					
Sustainability and climate change					

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Telford & Wrekin Development Plan Documents					
Policies map	44	Include the conservation area	Include conservation area on the policies map, which is different from the market town boundary.		
Monitoring and review	45				
Other					
SEA/SA	Pg 1, para 1.1	Include the following at the end of the first sentence in paragraph 1.1: 'Although the qualifying body must demonstrate how it's neighbourhood plan will contribute to achieving sustainable development'			
	Pg 10, 1 (d) and 2 (b)		See the Council's latest position on site allocations and revise accordingly.		
	2g page 12	This section does not reference the impacts particularly of policy TL1 and the canal restoration proposals on	If the policies, and the whole plan, are to be understood to mean that the NNP has the intention of supporting and promoting the restoration of the Shrewsbury to Newport canal to navigable waterway including the SSSI section		

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		the Newport Canal SSSI.	through Newport then this would, in real terms, result in the loss of, or significant damage to, a SSSI which surely must be recognised in the SEA/SA and is currently not even mentioned. Even with mitigation (which would be required) restoration to navigation would be likely to result in significant adverse impacts on the SSSI.		
<b>HRA</b>					
<b>General comments</b>			A general comment on the policy expression “will be permitted” –A number of policies in the NP say this, for example policies H2, WL1, TL1 and TA1. This is not kind of expression used in the Local Plan. It does not mean that you the NDP cannot use it as long there is evidence to back it up but it is a restrictive expression. The Local Plan use expressions like “will support development..., will not be supported...”		