

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

<b>Section/ Policy Area</b>	<b>Page/ Policy Ref</b>	<b>TWC Reg 14 recommended suggestion</b>	<b>TWC Reg 14 Comments</b>	<b>Newport Neighbourhood Plan Response</b>	<b>Any additional comments following the Reg 15 version</b>
<b>Foreword</b>	<b>3</b>				
<b>About this document</b>					
	<b>9</b>	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.	
<b>A Plan for Newport</b>	<b>10</b>	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	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
			used to 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 site H13. It is the Council's position that the site is still considered to be	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
			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	The supporting text to the green open spaces part says 'the emerging local plan aims to extend these principles across the borough by	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
		principal which is being extended to Newport in the Local Plan not the 'forest city' idea.	protecting valuable trees, woodlands, hedgerows and open spaces.' This is inaccurate. The LP extends the Green Network designation to Newport. Protection 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	The inclusion of a SSSI within a local green space designation is not		

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
		Canal Newport Branch	straightforward. The national designation of a SSSI offers far higher protection to the site than the local green space designation 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 <u>supported by Telford &amp; Wrekin Councils Play Strategy</u> ”.	<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</li> </ul>		

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
			<p>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 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.</li> </ul>		

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
			<p>This is currently evident in Newport at the Wellington Road development where the dry suds feature is consistently wet and muddy.</p> <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 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.)		



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
			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:  <i>-“To take advantage of and enhance valuable views to and from the area”</i>  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 a valuable view one that captures the character of Newport? One that includes landmark buildings?</p>		
<b>Tourism and leisure</b>	<b>Paragraph 4.5.1 on page 32</b>	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		

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
			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 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	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.		

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
		protects designated sites in the supporting text.			
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 interest 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 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	The NP doesn't mention anything about signage/shopfronts? I know the LPA has an SPD for that, but the		

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
		signage and shopfronts	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>protect</b>	The NPPF seeks to <del>project</del> <b>protect</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					
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.		

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
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 the	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 through Newport then this would, in real		

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
		Newport Canal SSSI.	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...”		