

Comments received during the Waters Upton Neighbourhood Development Plan – Telford & Wrekin Submission Publicising Period 8th July – 22nd July 2015

Date received	Name of contributor	Comments
15/07/15	The Coal Authority	<p><u>Waters Upton Neighbourhood Plan – Submission</u></p> <p>Thank you for the notification of the 8 July 2015 consulting The Coal Authority on the above NDP. I note that the consultation period is very short being only 14 days.</p> <p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware parts of Telford and Wrekin lies within the current defined coalfield. However as you will also be aware the Waters Upton NDP area is outside of the defined coalfield and therefore The Coal Authority has no specific comments to make on the Neighbourhood Plan.</p> <p>In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to provide The Coal Authority with any future updates to the emerging Neighbourhood Plan. This letter can be used as evidence for the legal and procedural consultation requirements.</p> <p>The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.</p>
15/07/15	Waters Upton Parish Council (Katrina Baker Clerk)	<p>Waters Upton PC response to the TWC submission onto planning portal</p> <p>The TWC Tabulation</p> <p>The TWC tabulation appears to us to be an exercise in overcomplicating the process. The response to the original Consultation Period was 7 pages long compared with the latest response to the Publication Period of 39 pages plus a 7 page submission. The WUNP is only 31 pages long including many photographs. The latest tabulation has 37 new points, mainly prefaced with “it would be helpful” or “it would be useful”. Our aim in producing the WUNP was to have a simple document that gave the residents preferences for the future development of the parish, we did not intend to cover every last subject that may arise, that is for the LPA’s more detailed Local Plan.</p> <p>The key concerns of TWC appear to be covered in detail by their 7 page submission and this we address below.</p> <p>The TWC Submission</p> <p>Introduction.</p> <p>2. We disagree with this statement. There have been no discussions or correspondence identifying the “number of significant issues of concern” prior to 30th June 2015.</p> <p>Issues identified.</p> <p>The Core Strategy policies currently run until 2016 and there are three raised by TWC at various points in the Submission and one not referred to (CS1) which is also relevant.</p> <p>Saved policy H9 & CS7 identify three settlements on which development will be focused for the rural area.</p> <p>Saved policy H10 states “within the suitable settlements identified in policy H9 development will be permitted where” then goes on to restrict this to infill etc. as WUH1.</p> <p>CS1 covers the scale of development required in the rural area and states that the rural need will be met by approximately 170 new dwellings over the 10 years of the Core Strategy. This target has been exceeded already.</p> <p>There are also several references, within the submission, suggesting that the WUNP restricts development. The Plan has four policies on housing and in sequence WUH1 reflects the current policies of TWC as detailed above. WUH2 provides for future growth, to meet local needs, if infill is exhausted. WUH3 identifies the sites preferred by residents, as detailed in the Evidence Base, should larger sites be required in the parish to meet Borough wide housing needs.</p>

		<p>These policies only restrict development when read in isolation. Collectively they allow for an increase in the size of the parish by over 50% (excluding SHLAA 551) and include the re-use of a brown field site which is already the subject of a planning application.</p> <p>With regard to the NPPF this document requests on many occasions that the policies are considered as a whole and not taken in isolation. We consider that the WUNP is not in conflict with NPPF paragraphs 14, 17 & 47 when read as a whole rather than quoting isolated text.</p> <p>The over complication and confusion of TWC's interpretation of policies is best illustrated in the NB remark following section B, comment 2. The inference is that the LPA can retrospectively decide which policies take precedence and we cannot understand the muddled thinking when comparing settlements named in H9 and CS7.</p> <p>Since the TWC submission was produced two new relevant pieces of information have been published. On Wednesday 15th July 2015 at a planning Committee meeting the application for the first 111 houses at the Dairy Crest site in Crudgington was approved. This is a key part of the WUNP as it was the site preferred by residents for any larger scale development and is a brown field site.</p> <p>TWC have now published their replacement for Shaping Places, now called Telford & Wrekin Local Plan – Consultation Version. This covers the period until 2031 and whilst at the current emerging stage, carries little weight; it does identify the housing requirements for the rural area. There are now 5 villages identified to provide a total of 80 new homes up until 2031, of which Waters Upton is one. They also expect this number to be delivered on small infill sites.</p> <p>This revised housing requirement is less than that provided for in the WUNP and appears to align with the WUNP policies.</p> <p>WUNP Steering Group</p>
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