

Waters Upton

Neighbourhood

Plan

Consultation Statement

Regulation 14 Consultation

Amended December 2014



Waters Upton Parish Council

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Introduction

The Waters Upton Neighbourhood Plan ('the Plan') is being produced by Waters Upton Parish Council under the Government's Localism Act. This Act has a set of regulations which Waters Upton Parish Council must follow.

This formal Consultation Statement complies with requirements of Regulation 15 (2) of the Neighbourhood Planning Regulations 2012 (the Regulations) and provides the response to Regulation 14 of the Regulations (pre-submission statutory consultation). It has been prepared by Waters Upton Parish Council to fulfil its legal obligations under these Regulations.

The Regulation 14 consultation on the Plan was carried out between 14th April 2014 and 6th June 2014.

This report sets out what a formal Consultation Statement should contain:

- Details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explains how they were consulted;
- summarises the main issues and concerns raised by the persons consulted;
- It describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

A much greater level of consultation has been undertaken than the legislation requires. During the Consultation period Base Architecture held a public meeting on the 14th May 2014 to present their proposed development scheme, which was outside of the original SHLAA sites. This was to run parallel to the village road, in Waters Upton, and would more than double the number of houses in the village. On 28th May 2014 a Shaping Places public meeting was held to consult on a revised SHLAA proposal which was identical, in size and shape, to the site included in the Base Proposal. The responses to both of these meetings are listed separately in the tables below.

This Regulation 14 Consultation Statement summarises all statutory and non-statutory consultation undertaken with the community and other relevant statutory bodies and stakeholders on the pre submission draft. In particular it describes how concerns have been addressed and what changes have been made to the Plan as a result of the consultation.

The formal consultation carried out by Waters Upton Parish Council involved the following:

- Placing a hard copy of the Plan and supporting documents at the local Parish Centre.
- Publicising the Plan by writing to all households in the Parish, with a summary of the Policies, and encouraging people to feedback comments using a supplied form to be handed to Parish Councillors or handed in at the parish shop.
- Receiving e-mail comments via "watersuptonpreservation".
- Contacting organisations within the Parish and the Village School.
- Discussions with the Ward member
- Conducting an exit poll at a Base Architecture presentation on 14th May 2014 held at the Village Hall
- Recording comments at a Shaping Places Consultation on 28th May 2014 held at the Village Hall

Summary of the responses from residents to the consultation.

In total, 20 specific comments, not covered by Waters Upton Neighbourhood Plan policies were received, following the mail circulation promoting the Consultation Period. These came from total of 37 respondents. These are listed in detail in the table below along with the specific policies in the Plan that they relate to and the response action determined

Of the responses received:

- 1 Was against the Plan – concerns and actions taken are tabled below.
- 5 Supported part of the Plan – concerns about the Policies and points not covered under Policies are tabled below including actions taken.
- 31 Were in full support of the Neighbourhood Plan

Written comments received from residents during the Consultation period 14th April to 6th June 2014

Resident	Support	Comment
N & L Gatley	No	<i>There is too much traffic locally now. This is a rural area which is why we bought our property and do not want to see it turned into another Telford overspill. Possible increase in crime, vandalism and the general destruction of the peaceful environment and charm of a small village. Action = Noted, no policy changes needed, relevant TWC personnel will be advised of concerns.</i>
Mr& Mrs Hemmings	some	<i>Agree on WUH1, WUH2, WUGS1, WULC1, WULC2, WULC4, WULC5. In the last few weeks there has been some activity on the corner of Catsbitch Lane and the B5062; it would appear that someone has ideas to alter the shape of the corner. If this was done and the traffic coming down Catsbitch Lane was allowed to speed up, it would cause accidents at the junction, at the moment it is not a problem. In this SAT NAV world if a new Highway was created between the two main roads it would be a rabbit run between the B5062 and the A442. We definitely do not want another road leading into Catsbitch Lane. It would have been nice to have been informed about the discussions which started in 2012 or at least be informed of what was said or decided. Action = Noted, no policy changes needed, relevant TWC personnel will be advised of concerns.</i>
Nigel Owen	some	<i>Policy WUH3 whilst we agree with developing the Dairy Crest site and therefore building on a brown field site, we don't feel that building on site 551 will be in keeping with the size of the village or preserving greenfield sites. Action = re site 551 this was arrived at by a parish wide consultancy and was chosen, after Dairy Crest, as the least damaging option. No policy changes.</i>
Mr& Mrs Painter	some	<i>as stated in the Neighbourhood Plan, the main problem is traffic congestion; the village was never designed for this amount of vehicles. Action = Noted, no policy changes needed, relevant TWC personnel will be advised of concerns.</i>

Mr& Mrs Porter **some** *we agree with the vast majority of the plan but would like extensions. We would like to see a network of interlinking footpaths between Waters Upton parish and neighbouring parishes and along existing routes without recourse to using the busy lanes and thus avoiding dangerous traffic collisions. We would like to see orchard trees protected WULC2 and the UK biodiversity action plan 2008 priority habitat safeguarding and recognising the importance of old orchards recognised and implemented. Action = TWC current policy does not recognise the importance of orchards. The scale of footpaths requested is outside the scope of the Neighbourhood Plan. No policy changes needed, relevant TWC personnel will be advised of concerns.*

Mr& Mrs Vincent **some** *the pedestrian and cycle way route needs to be extended south along the A442 to the parish boundary at Long Lane, as a minimum. This was a request we made to W.U.P.C. in 2012 but no action has followed since that time. The scale of footpaths and cycle ways requested are outside the scope of the Neighbourhood Plan. No policy changes needed, relevant TWC personnel will be advised the request.*

The residents who acknowledged their agreement to the Neighbourhood Plan are listed below. Comments made on topics not covered by policies are also summarised.

Resident	Support	Comment
K Baker	Yes	
D Bell }	Yes	High level of traffic on local roads
S Chisholm }		
D& J Bennett	Yes	High level of traffic on local roads
Chris Chambers	Yes	
Mr& Mrs Curran	Yes	
Tom Davis	Yes	
R & A Eade	Yes	
A& M Edwards	Yes	2 weeks wait for Doctors appointment
Anthony Holworth	Yes	
A & M Jones	Yes	High level of traffic on local roads
Mr & Mrs M Law	Yes	
B & K Lister	Yes	
H & K Mc Dowell	Yes	
David Oliver	Yes	
Mr & Mrs M Osborn	Yes	
K & S Pedley	Yes	
D & M Peever	Yes	Complete existing sites with planning permission
A & R Reed	Yes	
H Revitt & T Irwin	Yes	
Mr & Mrs T Revitt	Yes	
Mr & Mrs E Roberts	Yes	
D & H Sandall	Yes	High level of traffic on local roads
D & S Sanders	Yes	
Mr N Stein	Yes	High level of traffic on local roads
P Stubbley	Yes	
Mr& Mrs Thornton	Yes	Parking area for the Church parking
R & S Wall	Yes	
G Williams	Yes	High level of traffic on local roads
Mr& Mrs Williamson	Yes	High level of traffic on local roads
Mr& Mrs Wyatt	Yes	

Action taken in response to comments on topics not covered by policies.

7 residents identified = High level of traffic on local roads. Action = outside scope of the plan. Relevant TWC personnel will be advised of concerns.

1 resident raised = Parking area for the Church parking. Action = included in planning approval TWC/2011/0575.

1 resident raised = Complete existing sites with planning permission. Action = Outside scope of plan

1 resident raised = Complete existing sites with planning permission. Action = Outside scope of plan

There are no changes that are required, to policies, following the comments of residents.

Consultation held by Base Architecture 14/05/2014 on their proposals for SHLAA site numbers 43, 635, 406 & 404

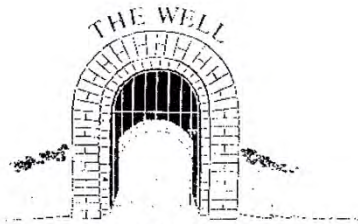
The Parish Council conducted an exit poll, outside the meeting, and recorded the names of the residents that attended. A List of the residents who attended the consultation on 14/05/2014 is listed below.

Some 110 residents, representing 81 households in the parish, were questioned on their exit from the meeting and all were against each of the three proposals made for development of sites 43, 635, 406 and 404.

Residents confirmed their preference for the sites listed in the Neighbourhood Plan i.e. Dairy Crest and 551 if development on this scale has to be accepted in the parish. The general opinion was that Dairy Crest, at a proposed 130 dwellings, would increase the number of dwellings in the parish by 35% and this would more than fill any conceivable requirement for houses up to 2031. This new development on the Dairy Crest site would also become the largest settlement in the parish. There was also concern about the 37 houses with planning permission still to be built. The combination of the Dairy Crest houses and the 37 to be built will increase the parish housing numbers by 45%.

Copies of some of the letters sent to Base, in response to the meeting, are included in the Evidence Base folder.

The responses given after the meeting, and the copy letters, have been considered by the Parish Council and there is no evidence that policies require amendment.



Vat Registration No. 815 7684 02

Chairman: Councillor Lynda Baker Oliver

WATERS UPTON PARISH COUNCIL

Also representing:

WATERS UPTON CRUDGINGTON GREAT BOLAS
COLD HATTON MEESON
SHRAY HILL SYTCH LANE SLEAPFORD & LONGSWOOD
Web: www.watersupton.gov.uk

Clerk to the Council:

Katrina Baker MBE
Oaklands, Waters Upton, Telford TF6 6NP
Telephone / Fax 01952 541939 or 07813 788094
E mail: watersuptonpc@btinternet.com

BASE – consultation event re J Brown /Hockenhull proposed development on land at Waters Upton – 14th May 2014

ATTENDANCE

Graham Skeats, The Tyrrill
Graham's Neighbour, The Brilch, The Tyrrill
Norman Quin, Waters Upton
Mr & Mrs Mark Edwards, Cold Hatton
Louise Hughes, High Ercall
Mark & Liz Law, Waters Upton
Kevin & Paula Bright
Trish Bowen, Waters Upton
Mr & Mrs Pedley, Waters Upton
Sandra Capes, Waters Upton
Mike & Caroline Osborn, Chapel House
Mr & Mrs Sandall, Waters Upton
Karen Sermon Waters Upton
Annette Burgess, Crudginton
Judith Owens, Crudginton
Heather Pritchard, Crudginton
Darren Morgan, Waters Upton
Rose Street, Cold Hatton
Terry Revitt, Sytch Lane
Mr & Mrs Michael Gwynne, Waters Upton
Billy Higgins, Waters Upton
John Gray, High Ercall
Mr & Mrs David Bennett, Waters Upton,
Mr & Mrs Sanders, Great Bolas
Janette Curran, Waters Upton
Eric Ashcroft, Tibberton
Herbert, Crudginton
Lynda Baker Oliver, Cold Hatton
Stephen Bentley, Waters Upton
Michelle Brockway, Waters Upton
Wendy Woolley, Waters Upton
Mr & Mrs Wainwright, Cold Hatton
Daph Williams, Waters Upton
Mr Earps, Waters Upton
Mr & Mrs Davies & Son, Cold Hatton
Deb & Andy Dury, Waters Upton
Gary Holloway, Waters Upton
Steve & Gilly Cooper, Waters Upton
Kas & Colin Owen, Waters Upton
Di Thornton, Waters Upton

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Mr & Mrs McDowell, Waters Upton
M Redwood, Great Bolas
Lee & Wendy, Waters Upton
Neighbours, of Lee & Wendy, Waters Upton
John & Helen Williams, Sleaford
Mr & Mrs Davies, Crudgington
Alwyn & Carol Lee, Sytch Lane
Michael Bell, Crudgington
Ian Craddock, Crudgington
Mrs Whittle, Sytch Lane
Jamie Brockway, Waters Upton
Barrie Cooper, Great Bolas
Rosie Paxton, Waters Upton
Les & Sue Finzi, Cold Hatton
Jo Paxton, Waters Upton
Michael Curran, Waters Upton
Mr Martindale, Crudgington
Mr & Mrs C Goode, Waters Upton
Deborah Bell, Sytch Lane
Mr & Mrs Yapp, Waters Upton
Mr & Mrs J Smart, Hadley
Mr Wilson, Sytch Lane
M Smith, Ellerdine
Mr & Mrs C Sankey, Longswood
Stephen Williams, Waters Upton
Mr & Mrs Burgess, Crudgington
Mr Osborne, Waters Upton
Bev Porter, Waters Upton
Mr & Mrs Fisher, Great Bolas
Paul Harrison, Waters Upton
Mr & Mrs Brown, Waters Upton
Mr & Mrs Bentling, Crudgington
Mr Twiss, Waters Upton
Mr Boughey, Crudgington
Mr & Mrs Thomas, Lower House Farm, Waters Upton
Keith Woolley, Waters Upton
Mr Darby & Mother-in-Law, Harebutts
Michelle Elliott, Waters Upton
Katrina Baker, Waters Upton
Sue & Roy Wall, Waters Upton
Lady from Holly Grove, Cold Hatton
114

Apologies (letters written to BASE)
Derek & Margaret Peever
Huw & Angela Robertsc
Chris Chambers

Consultation held by Telford & Wrekin Council officers and Waters Upton Parish Council 28/05/2014 on the Shaping Places proposed Housing and Employment Sites.

The proposal presented to the residents, and later to the Parish Council, involved the sites from the original SHLAA 43, 404, 406, & 635. Changes had been made to the sites, originally outlined in the 2012 SHLAA, with only part of 404 included but both 406 & 635 had each trebled in size. This created a new configuration joining up all four sites, which were originally separate, in exactly the same profile as the Base proposal from two weeks earlier.

Mr M Barker, The Assistant Director: Planning Specialist, stressed that this was a consultation process and that all views would be considered. Although the Base proposal was the same profile as Shaping Places, Mr Barker insisted that decisions had not been made and again the sites were subject only to consultation at this stage. He also confirmed that the 500 houses, to be built at Allscott and the 130 at the Dairy Crest site would be considered as part of the number required, identified by the SHMA, until 2031 in the rural area.

Many strong arguments were offered against the new proposed sites including, need of so many houses, the loss of agricultural land, suitability of sites, loss of parish character, and the apparent lack of regard for the emerging Neighbourhood Plan, which reflects the wishes of the parish. Many other points were raised and these will be put in writing, by residents, in response to the consultation.


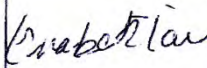

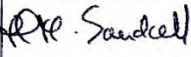

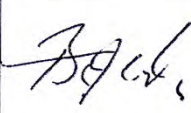
There were no residents offering support for the proposals and, as the suggested sites are only at the consultation stage, the Parish Council decided there was no need to make amendments to the Neighbourhood Plan.

Listed below are the names of the 45 residents who attended the meeting, in addition to the Parish Council, and comments made on the night as they left the meeting.






SHAPING PLACES CONSULTATION EVENT




WATERS UPTON VILLAGE HALL


WEDNESDAY 28TH MAY 2014 4.30 – 6.30PM




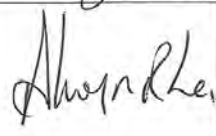



Name	Address	Signature	Comments
Roy Wall	Orchard Close		DO NOT AGREE - KEEP TO W.U. NEIGHBOURHOOD PLAN - CREAM GUY & SHAA SS1
Stanley Childs	Catharine Lane		Don't agree at all - don't warrant this in the village
Liz Law Mark Law	3. Hanford Terrace Waters Upton		I Do not agree with this amount of development on top of the amount with planning permission already granted. The development should be allocated to brownfield sites eg - Maxell and adjoining areas in the centre of Watford
Sue + Kevin Paddy	Westwood House		
Home owners David Sandell	Quint Ho		STRONGLY DISAGREE
	Millfield House		Today's development is completely premature in the absence of any important details.


CHRIS Purvis	MIDDLE LANE COLD HATTON HEATH	GA	
JACKIE BLANCH	"	JSB.	
Philippa + Malcolm Owen	Crudgington	ROSE AK	Waters Upton have struggled to sell 1111 existing new builds - what evidence do you have that rural homes in such numbers are required?
Barbara Greale	Waters Upton	Boole	Brownfield site Crudgington should be used before greenfield sites
Sue Finzi	Stars Lane Cold Hatton	Sa Finzi	
L. E. FINZI	COLD HATTON	Li	
Dave Alford	Old Sully Great Bolas	D Alford	

Michael + Jennifer Savage	Waters Upton PLAN		copy of letter to Base already sent
Katrina + Brian Lister	10 Waters Upton		Letter emailed and copy passed to representatives of council at meeting 28/5/14
Stuart Breene	Cole Hallon		
Karen Wyatt	Waters Upton	K. Wyatt	Totally Against extensive development
Aileen Wainwright + Dave	Cole Haton		
Mike Ridgway	FAIRBOURN		Against.
Derek Parker	BAUSLEIGH.		

Mike & Carolie Osborn	CHALICE HOUSE. WATERS UPTON	Caroline Osborn 	All proposals will ruin village life and are not viable.
Jackie Hayes	The Harebells Waters Upton	J. Hayes.	I strongly object to the plans proposed!
Ann Reed.	Crescent House	F.W. Reed	I shall be writing e-mail my response to this overwhelming amount of housing
David Bennett	Braemar Waters Upton		If TWC seek to destroy the heritage of Charnock A Waters Upton then the current proposals will certainly do that!
Janet Bennett	Braemar Waters Upton	Janet Bennett	I totally disagree with the proposals to build 200 houses in Waters Upton.
Michelle BROCKHAM	3 UPTON STONES WATERS UPTON		MY FAMILY + I STRONGLY DISAGREE WITH THESE PROPOSALS. WATERS UPTON IS A LOVELY STAFF VILLAGE + THESE DEVELOPMENTS WILL DOUBLE THE SIZE + STRIP AWAY THE CHARACTER.

HOW ROBERTS	TWIN OAKS	E.H. R	
CHRIS DAVIES RUSSEN DAVIES	Cold Hatten	C. Davies	
DICK & Shulick SANDERS	Great Bolas-	S.M. Sanders	Hope we are not ignored this time!
Lois Brown Peter Brown	Orchard Close	W. B.	Cradington should be the option NOT green BELT LAND
H.M. CROWELL	ORCHARD Close		This is the wrong place for large scale development. The proposed site is a <u>nonsense</u>
S Cooper G. Cooper	THE WHITE HOUSE	Sophie Cooper G.D. Cooper	Totally <u>against</u> any further development. You have planning for houses, so stop building more!
A. TWISS	5 UPON STONES	AZ	STRONG OBJECTIONS TO MORE HOUSES NOT NEEDED

Jeannette + Michael CURRIAN	MANOR LORD		NO EVIDENCE GIVEN THAT ANY DEMAND FOR THIS COULD NOT EXPLAIN WHY CONTRADICT THEIR PREVIOUS COMMENTS BE SITE
Darren Morgan	24 Waters Upn		strongly disagree an issue of overdevelopment
MICHAEL ZALUP Angela Torres	STATION Home CRUDGINGTON "		
Alwyn Lee	Syden Lane		
Norman Queen	Melnerley Home		Would prefer smaller development
I. R. MARTINDALE	CRUDGINGTON MANOR		Against development to this extent.
Guy a Richard Williams	Waters Upn		TOTALLY AGAINST GREENFIELD DEVELOPMENT ESPECIALLY WHEN ALREADY APPROVED HOUSES NOT BUILT YET.

Harrison	8 Orchard Close	Ben Harrison	Listen to community & don't build because govt said so.
THOMAS	Lower House Farm		
Jim BERRY	Tibleenden House Tibleenden		
Jim SWINDLEY	NETHERFIELD T SYTH NAME		AGREES TO THE PROPOSED DISTRICT COUNCIL
Sue Wall	Orchard Close	Sue Wall	Strongly object to any further houses in the SUVA Area.

Consultees who were contacted in addition to residents

Consultees contacted under regulation 14b of the Town & Country Planning Neighbourhood Planning (general) regulations 2012.

Consultee	Method	Response
Crudgington school	Letter 18.04 2014	No response
A T Brown Coaches Ltd	Letter 18.04 2014	No response
Base Architecture	Letter 18.04 2014	Letter Received
Severn Trent Water Ltd	Letter 18.04 2014	No response
Arriva Midlands	Letter 18.04 2014	No response
Dairy Crest	Letter 18.04 2014	No response
Telford & Wrekin Borough Council	by hand	E-mail received

TWC policies referred to by Base and TWC in their responses.

For ease of reference the main policies referred to in the Base and TWC responses are outlined below.

Saved from the Wrekin Local Plan and forming part of the Core Strategy.

H9 Location of new housing

New residential development will be permitted only within the following suitable settlements: High Ercall, Tibberton, Waters Upton. All proposals for new development within these villages must accord with policy **H10**. Elsewhere in the Rural Area, there will be a policy of refusing proposals for new residential development except that permitted under the exceptional circumstances detailed in policies H11, H18, and H24.

H10 Scale of development.

Within the suitable settlements identified in policy **H9**, development will be permitted where:

- a) it involves one or two dwellings on a suitable infill plot within the existing built up frontage,
- b) the site does not cause the loss of an important area of open space, nor cause an extension of the village into open countryside.
- c) the proposal conforms with policy EH2 of the Plan, and
- d) the proposal conforms with policies H12, H14 and UD2 of the Plan.

Current from the Core Strategy.

CS7 Rural Area.

Development within the rural area will be limited to that necessary to meet the needs of the area. It will be focussed on the settlements of High Ercall, Tibberton and Waters Upton. New housing development will be expected to deliver affordable housing to the level of 40% of all such development. Outside of these settlements development will be limited and within the open countryside will be strictly controlled.

Telford and Wrekin response to consultation on the Neighbourhood Plan

For easy reference the TWC comments are referenced as [TR](#) and the general comments are referenced as [TRG](#). The actions taken and any changes to the Plan are recorded alongside the Comments. These are detailed on pages 19 - 26.

The Base Architects response was in the form of a letter. The letter is copied below and comments are referenced [BR](#). A list of actions taken and any changes to the plan are recorded below the Base letter. Where comments raised by Base are similar to TWC comments these are cross referenced with the [TR](#) or [TRG](#) action on pages 27 - 35.

Section/Page/ Policy Ref	Action Recommended	Comments	Observation & Recommendation
Section One			
Foreword			
Introduction	Include Wrekin Local Clarify Evidence Base	Must also conform to the saved policies from the Wrekin Local Plan P16. –The most recent local housing needs survey (2010) identified the need for a minimum of four additional affordable homes in the parish. In addition, the recently published Strategic Housing Market Assessment (2014), which addresses the requirement to establish the objectively need for housing, identifies a need for additional private sector and affordable homes up to 2031.	TR1 Wording will be amended TR2 Needs survey in EB is 2011 37 homes have been approved since this survey. Remains unchanged
Background	Please amend the third and fourth paragraphs on P16 accordingly	P16. – in the fourth paragraph, reference is made and commentary presented relating to housing land supply in the rural area. This section seeks to establish a five year housing land supply position specifically for the rural area, and to use this to demonstrate an 'oversupply' and 'overbuild' in the rural area since 2006. This approach would benefit from being more in line with national policy. The calculation of, and the delivery of housing against, the five year land supply target is based on, and applied across, the whole borough. Therefore, it is not appropriate to apply the figure of 17 dwellings per year over five years as a basis for a five year calculation, because the five year position has already been assessed and is presented in the Five Year Housing Land Supply Statement, which is available on the Council's website. Therefore, any shortfall in the supply of land against a five year target could be addressed in any part of the borough, providing the proposal is on accordance with the NPPF, in particular paragraph 14. For clarity, the Council has now published the Annual Monitoring Report (2013), which is available on the Telford and Wrekin Council website at http://www.telford.gov.uk/info/1004/planning_policy/1540/annual_monitoring_report_amr	TR3 Our interpretation of the NPPF and the 5 year supply differs from the TWC interpretation. The wording is unchanged while we seek legal clarification.
Process Summary			TR4 We are aware of your 2013 monitoring report. This appears to concur with our statement.
Section Two			
Visions & Objectives			
Housing		Objective 1 as with Policy WUH1 (see comment below) would appear to contradict the strategic policies of the Wrekin Local Plan and Core Strategy by seeking to limit future development in Waters Upton. For comments on objective 2, please see response to Policy WUH4 below. Objective 1 required evidence of the loss of green areas which has not been provided. A more positive objective would be 'to protect green area'. We would support the green area and public spaces objective.	TR5 Mr M Barker has informed us on several occasions, as recorded in the EB, that Shaping Places will reflect this. Wording remains unchanged. TR6 Noted. Wording will be amended.
Green Areas & Public Spaces			
Amenities & Employment		Objective 3 The plan highlights the lack of cemetery space within the parish. This is echoed within the Borough and should therefore be something which is considered as part of the wider Shaping Places Local Plan. How this could be achieved on a parish level may be more difficult, but dialogue with the parish should identify a solution so that should opportunities arise this can then be considered.	TR7 Noted.

Section/Page/ Policy Ref	Action Recommended	Comments	Observation & Recommendation
Local Character			
Section Three			
5. Housing/ P26/WUH1	WUH1 Amend Policy WUH1/Objective 1 to reflect the strategic policies of the development plan.	<p>The Council supports the inclusion of an area-wide policy relating to the distribution of housing development in the Neighbourhood Plan (NP). However, a key test is whether or not the policy is in general conformity with the strategic policies of the development plan and the NPPF, as mentioned in page 5 of the draft NP. The current development plan (Core Strategy CS7) identifies Water Upton as a location for sustainable development within the rural area, alongside Tibberton and High Ercall, whilst development outside these areas will be strictly controlled. Wrekin Local Plan Policy H10 (which is saved) sets out additional criteria, but this pre-dates the Core Strategy/NPPF and relates specifically to housing development. Policy WUH1, as written, would appear to contradict the strategic policies of the development plan by seeking to limit future development in Water's Upton. Indeed, this approach is reflected under Objective 1 of the Plan.</p> <p>Granting consent for only very small infill developments is unlikely to lead to the provision of new affordable homes.</p> <p>The policy refers to H10 of the Core Strategy this is incorrect as H10 is a policy in the Wrekin Local Plan. It appears there is a contradiction of the two policies WUH3 and WUH1 and in addition to this H10 has not been applied since the adoption of the NPPF. From a heritage perspective, infill sites need to take into consideration the character of the area by increasing the density. Policy WUH1 would benefit from concentrating on compliance with the NPPF and urban design policy contained in that</p>	<p>TR8 See TR5. The wording in this Policy is quoted from H10. We have re – read H9, H10, & CS7 in full and cannot see any conflict. The wording will be changed to clarify the Wrekin Local Plan policies. The 5 year housing Land Supply Statement April 2014 confirms that the Core Strategy is up to date. The comment “relates specifically to housing” is confusing as this policy accords only covers housing. As this policy accords with current TWC policies Only the wording detailed above, will be amended.</p> <p>TR9 WUH3 acknowledges the emerging Shaping Places document and the possible need for greater development than existing TWC policies permit. Further, we do not accept that you can choose to ignore H10 as this is a current policy and we are in a rural area. No changes made.</p>
P26/WUH2	Ensure wording is in conformity with the strategic policies of the development plan and provide sufficient evidence to support them.	<p>The Council supports the inclusion of policies seeking to influence the type and nature of new development within the Plan area. This policy seeks to promote bungalow development above other types of dwelling i.e houses or apartments. Clearly, such an approach would need to accord with NPPF (paragraph 50) by delivering a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities within the context of Water Upton. In addition, rural development should be located where it will enhance or maintain the vitality of rural communities. In addition, no detail is provided under the policy as to how the ‘regular housing surveys’ will be undertaken.</p> <p>Waters Upton Parish Council has worked with Telford & Wrekin Council to develop two small affordable housing schemes in Waters Upton village. These include a mix of affordable tenures and property types.</p> <p>The most recent local housing needs survey (2010) identified the need for a minimum of four additional affordable homes in the parish. This includes bungalows or level access accommodation, which may release existing family homes.</p> <p>The statement about the Parish Council and Telford & Wrekin Council working together to update the local housing needs survey is welcomed. The development of bungalows or level access accommodation is also welcomed – these could be in a range of tenures, including open market and affordable. A number of property types could be considered (e.g. 2 bedroom dormer bungalows that are fully wheelchair accessible and contain two bathrooms, including a ground floor wet room).</p> <p>The implementation of existing planning consents is likely to increase the need for affordable homes in the Parish in the future.</p>	<p>TR10 TWC appear to ignore the NPPF requirement on choice as at the Planning Committee meeting to consider TWC/2013/0685 The officer present stated that “inclusion of a Bungalow, as requested by the P.C., could not be enforced”. Bi annual housing surveys will be undertaken by the P.C. this will be added to the policy. Wording will be amended.</p> <p>TR11 As majority of the existing planning consent is outline only, we envisage TWC working with the P.C. to ensure development provides affordable and a mix of type of housing in line with local requirements. No changes made.</p>

Section/Page/ Policy Ref	Action Recommended	Comments	Observation & Recommendation
P26/WU43	Amend wording to be in conformity with the strategic policies of the development plan and provide sufficient evidence	It is not clear from reading the policy whether the wording seeks to allocate specific sites or simply refer to them as potential sites. Site 551 is not being promoted by the Council through Shaping Places Local Plan process, however, this does not preclude other sites from coming forward that accord with the development plan and neighbourhood plan policies, provided this can be justified by the evidence.	TR12 Noted. Wording will be amended.
	Amend wording to make clear which sites are being referred to.	Any development within the Parish should include a proportion of affordable housing to meet local needs (of the whole parish).	TR13 Parish wide surveys, included in the EB, justify the sites identified in the plan.
	Prepare a Policies Map showing the extent of the allocation boundaries	Notwithstanding the above, in the case of mixed tenure developments the strong preference is for affordable homes to be provided on site, rather than as a commuted sum.	TR14 Noted. Wording will be amended.
	Amend wording to reflect the current approach to securing developer contributions.	For any affordable homes it is expected that preference will be given to local residents (or those with a strong local connection) who have a housing need. Also that an affordable housing provider will prepare a Local Lettings Plan (all affordable tenures) for agreement and will work with the Parish Council and the Borough Council on the allocation/sale of affordable homes. It is also expected that arrangements will be made to ensure that any new affordable homes (all tenures) will remain as affordable in perpetuity.	TR15 Noted. Wording will be amended.
P26/WU44	Amend wording to reflect the current approach to securing developer contributions.	It is difficult to assess whether or not this policy is justified as no evidence is presented in support of this approach. Clearly, the Council is not currently progressing a CIL/tariff at this time, and any CIL approach if it were to be adopted would cover the rural area. Without a CIL being in place any approach to developer contributions must accord with current legislation re. s106. These obligations can only be requested in line with the necessity tests as set out in the NPPF.	TR16 A detailed response is included in appendix 2 at the end of this document.
		It is difficult to assess whether or not this policy is justified as no evidence is presented in support of this approach. Clearly, the Council is not currently progressing a CIL/tariff at this time, and any CIL approach if it were to be adopted would cover the rural area. Without a CIL being in place any approach to developer contributions must accord with current legislation re. s106. These obligations can only be requested in line with the necessity tests as set out in the NPPF.	TR17 Noted. Wording will be amended.
		In addition this, it is difficult to see how this approach can be achieved in accordance with WU41. In practice all new developments (including affordable housing) are expected to provide contributions to local infrastructure and service provision.	TR18 Noted. Wording will be amended.
P26/WU45	Amend wording More justification is needed to support the policy It would seem more appropriate to put this policy in the 'Getting Around' section.	There seems to be no evidence to support the need for 3 spaces per dwelling. Clearly in a rural area with limited public transport higher parking standards would generally be applied. The number of parking spaces should be proportionate to the number of bedrooms, a 1 bedroom houses will not require 3 spaces. The document states that there is no demand for 3-4 bedroom houses in Waters Upton, therefore if the NP is aiming to encourage smaller houses/bungalows then 3 spaces per dwelling is not justified. This should be based on suitable criteria e.g. 1 parking space per bedroom potentially up to a maximum. 3 spaces is a high standard, which also may be inappropriate for bungalow or level access accommodation. Adequate parking should be a policy however there is a difference between want and need. Three spaces is not sustainable and would suggest the bungalows would have three spaces to one bedroom. Wording should be amended to use appropriate parking standards. Remove "at least 3 spaces" proportionate to development. Sufficient evidence is required to support the approach.	TR19 Noted. Wording will be amended.
		This policy is concerned with the protection of existing valuable green space, play areas and recreational space.	TR20 The policy will be moved into "getting around"
6. Green areas and public spaces P27/WUG51	Amend wording	Consider re-wording to protect valuable green areas, play areas and recreational space. The word "including" needs to be removed. This issue should also be considered in the context of urban design i.e. the design and quality of the whole place including the open spaces. For example, existing policy UD4 in the Wrekin Local Plan relates to open space in the wider context of the overall quality of an area. A positively worded policy would be more NPPF compliant e.g. 'To ensure the protection and retention of....' Prepare policies map to show extent of green spaces.	TR21 Noted. Wording will be amended.
			TR22 Included in WUNP page 13

Section/Page/ Policy Ref	Action Recommended	Comments	Observation & Recommendation
P27	Amend wording		
WUGS2		<p>The Council does not have a CIL and as such they must accord with current legislation re S106 obligations. These obligations can only be requested where they are needed to make a development acceptable. This must be seen in the round against the wider issue of the compound effects on viability.</p> <p>It is not clear what the policy is seeking and evidence to support the policy. It is difficult to see how this approach can be achieved in accordance with WUH1 & WUH2.</p> <p>Wording of the policy needs to be more explicit and defined, expand on 'community gain' as 'any development' is not precise enough.</p> <p>The Council and the NPPF supports the maintenance of rights of way. The NPPF goes further in encouraging policies which "protect and enhance". The policy may provide more detail of doing this within the local area.</p> <p>Consider re-wording as policy is worded as more of an objective than policy.</p> <p>The policy encourages a joint approach and encourages different stakeholders to promote the benefits of green spaces. Green Infrastructure provides a multi-functional space which is capable of providing so many benefits for communities. What the policy seems to do is just focus on one function of open space, that is leisure and recreational. The policy should maximise all the benefits of green infrastructure in the area.</p> <p>This policy appears to be more to do with implementation and delivery issue than policy.</p> <p>This policy would benefit from reference to the existing Green Infrastructure Framework Evidence & Analysis document http://www.telford.gov.uk/gi</p>	<p>TR23 Noted. Wording will be amended.</p> <p>TR24 Noted. Wording will be clarified.</p> <p>TR25. Noted. Wording will be amended.</p> <p>TR26. Noted. Wording will be amended.</p>
P27/WUGS3	Amend wording		
P27/WUGS4	Amend wording		TR27. Noted. Wording will be amended.
7. Amenities & Employment P27/WUA1	Revise policy	<p>Policy WUA1 and related Objective 1 raise a number of questions:</p> <ul style="list-style-type: none"> ▣ Who are the management committees? ▣ How would the policy be achieved/implemented – what planning tools/measures would be used? ▣ Would this involve the development of a new/extended Parish Centre? (Page 17 of the NP identifies that meeting rooms are currently of an insufficient size). ▣ Would developer contributions be sought e.g. for additional parking, to achieve the objectives of this policy? ▣ Should the policy seek to protect the existing community facilities from change of use or redevelopment? ▣ The Village Hall and Parish Centre are named in the plan. Are there any other community facilities in the Parish that would fall under this policy? It would be easier to implement if there were a list or a map identifying where these facilities area. <p>The NPPF does not include a requirement to work with management committees to enhance the use of community buildings. The Core Planning Principles in the NPPF paragraph 17 does include 'deliver(ing) sufficient community and cultural services and facilities to meet local needs'</p> <p>Paragraph 28 of the NPPF states that Neighbourhood Plans should "promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship", so perhaps a requirement to protect existing community facilities should be incorporated within the policy.</p> <p>Paragraph 70 of the NPPF also includes more specific requirements to 'plan positively for the provision and use' of community facilities, guard against their unnecessary loss, and ensure that the location of such facilities and services is integrated with the location of housing and economic uses.</p> <p>Core Strategy policy CS10 states that "improvements to existing community facilities to meet the needs of local residents will be supported". Waters Upton's policy objectives would be in general conformity with this.</p> <p>Wrekin Local Plan policy H22 requires contributions from major residential developments for the provision of new community facilities. As Waters Upton are not currently seeking contributions from development then conformity with this policy is not so relevant. It is recommend that they seek to incorporate a requirement for contributions within their policy to fund enhancements to community facilities in the parish, where these might be needed.</p> <p>As currently worded this appears to be more of an objective than a planning policy.</p>	TR28. Noted. Wording will be amended.

Section/Page/ Policy Ref	Action Recommended	Comments	Observation & Recommendation
		<p>It is unclear how improvements to wifi and broadband connectivity are to be achieved e.g. through developer contributions? Large scale development could include broadband and the use of developer contributions could be considered in order to achieve improvements to communications infrastructure.</p> <p>NPPF paragraph 42 states that "The development of high speed broadband technology and other communications networks ... plays a vital role in enhancing the provision of local community facilities and services".</p> <p>NPPF paragraphs 43 to 45 state that plans should be supportive of telecommunication proposals in their area but only to a degree that allows efficient operation of networks and in a way that is sympathetic to the area. Proposals can only be resisted in limited circumstances.</p> <p>The draft policy is supportive of wifi and broadband provision however only in community buildings, so as currently drafted it is partially in conformity with the NPPF.</p> <p>Core Strategy policy CS9 promotes the enhancement of communications, whilst minimising their social, economic and environmental impact.</p> <p>Wrekin Local Plan policy T21 supports the development of new telecommunication systems, provided that there is no negative impact on the surrounding environment and amenity. Policy WUA2 could include safeguards to ensure that improvements to communications infrastructure do not have a negative impact on the local environment and amenity.</p> <p>The emerging Shaping Places Local Plan (Strategy & Options document 2013) proposed a policy to "help guide the siting and design of new telecommunications development and promote high quality broadband". Although this is not specific to community buildings as the WUA2 policy is.</p> <p>Consider re-wording as policy is worded as more of an objective than policy. Also consider combining with WUA3.</p> <p>The same comments for policy WUA2 will apply to this policy – the only difference is that references to community buildings would now be replaced with the wider parish</p>	TR29. Noted. Wording will be amended.
P27/WUA2	Amend wording Combine with Policy WUA3		
P27/WUA3	Combine with policy WUA2		TR30. Noted. Wording will be amended.
P27/WUA4	Amend wording	<p>The policy wording should make clear whether it is seeking to provide cemetery space within development schemes or seeking contributions from development proposals to fund new cemetery provision.</p> <p>Is there a site identified for the new cemetery provision? If so; then this should be proposed to be allocated for that use in order to safeguard it against other development proposals that may come forward over the plan period.</p> <p>The Core Strategy and Wrekin Local Plan do not contain any requirements for cemetery provision. The only reference to cemetery provision in the NPPF relates to Green Belt locations, of which there are none in Telford & Wrekin borough. Reference is made, however, to 'community' facilities (para 156), and cemeteries would fall into that category.</p> <p>Policy would benefit from being guided and informed by the evidence contained in Green Infrastructure Evidence & Analysis document and Local Green Infrastructure Needs Study for evidence.</p> <p>Consider re-wording and making clear what is meant by an 'appropriate planning application'. Consider how it could be applied to provide additional space and how it relates to the existing cemetery with the scale of development and capacity evidence base.</p> <p>Consider including specific requirements for developer contributions towards new cemetery provision within the policy. Consider making an allocation within the plan if there is a specific site or area of land already identified for additional cemetery provision. Prepare policies map to show extent of the allocation.</p>	TR31. Noted. Wording will be amended.
K			

Section/Page/ Policy Ref	Action Recommended	Comments	Observation & Recommendation
		<p>This policy is worded more like an objective rather than a policy. If there is a specific site or land identified for this additional parking then proposing an allocation for that land within the plan may be appropriate. It may also be appropriate to seek contributions from development proposals in order to fund this additional parking provision. Consider proposing an allocation for the land to be used for additional parking provision.</p> <p>There are no longer any car parking standards set within either national or local planning policy. Although Shaping Places Local Plan Policy Option 16 of the Strategy & Options document proposes either maximum parking standards or a more flexible approach.</p> <p>NPPF Paragraph 41 states that sites and routes which could be critical in developing infrastructure to widen transport choice should be identified and protected. This may not be entirely relevant, it depends whether or not additional car parking would 'widen transport choice'.</p> <p>The Core Strategy does not contain any policies that are specific to car parking provision, although CS8 does promote sustainable forms of transport.</p> <p>Wrekin Local Plan policy L1 states that proposals for community facilities should demonstrate adequate car parking provision – although this applies to new, not existing facilities.</p> <p>Local evidence on parking need for the Village Hall in Waters Upton would help in determining parking requirements for the village. This could be sought as a contribution from a planning application which could include on-site, off-site provision as well as continuing funding for management & maintenance.</p> <p>Consider re-wording as policy is worded as more of an objective than policy.</p>	TR32. Noted. Wording will be amended.
P27/WUA5	Amend wording		
P27/WUA6	Amend wording	<p>The majority of small businesses will already get business rates relief because of their size, planning policy may not be the means to achieve this. Although, Amenities & Employment policy objective 4 refers to supporting the alternative use of redundant buildings and seek to provide employment opportunities, this is relevant to planning policy and ought to be incorporated within the policy wording rather than in the policy objective.</p> <p>Consider re-wording as policy is worded as more of an objective than policy and incorporating the Amenities & Employment policy objective 4 relating to the reuse of redundant buildings in to the policy wording.</p> <p>Consider rewording to define 'may adversely affect' and 'to resist'. Consider in the light of NPPF paragraph 14 i.e. the weight of adverse effects.</p> <p>Relate policy to Green Infrastructure Evidence & Analysis and NPPF paragraph 58 and consider positive wording 'To ensure the protection of...' rather than 'to resist future development...' in terms of NPPF. The planning system does not have the power to 'protect them at all times from inappropriate use' since lots of those uses will not be things which require permission.</p> <p>Consider rewording to define 'trees' e.g. protected trees and define 'significant features' and include 'seek to retain or enhance'. To help inform the policy relate to Green Infrastructure Evidence & Analysis and reference NPPF paragraph 58.</p> <p>Consider combining with policy WULC3 to include the Waters Upton Village Well.</p> <p>This policy might be better included in policy WULC2 along with 'significant features'. Clarification on the status of the ownership could be made in background text under the Local Character (history-heritage) section. Policy should be related to the NPPF paragraph 58.</p> <p>The content of this policy conflicts with policy WUH1 and policy WUT2 as development, improvement and enhancement to the pedestrian and cycle routes would inevitably require alterations to the residential cartilage. Policy also conflicts with NPPF a presumption in favour of sustainable development paragraph 14.</p> <p>This policy conflicts with the implementation of policy WUT2. Consider re-wording as needs to be more explicit and defined.</p> <p>Policy is in line with NPPF policy to support sustainable transport, improving travel choice and accessibility to opportunities. Transport policies within the emerging Shaping Places Local Plan will reflect this with measures to secure contributions to support transport services.</p> <p>Large scale development can provide opportunity for public transport. There is limited scope for enhancement to existing bus service without increase in existing bus subsidy unless this is secured through S106 agreement, however it is unlikely to be sustainable past the end of the S106 monies without additional subsidy.</p> <p>Consider re-wording as policy is worded as more of an objective than policy.</p>	TR33. Noted. Wording will be amended.
8. Local Character P28/WULC1	Amend wording		TR34. Noted. Wording will be amended.
P28/WULC2	Amend wording Combine with Policy WULC3		TR35. Noted. Wording will be amended.
P28/WULC3	Combine with Policy WULC2		TR36. Noted. This will be amended.
P28/WULC4	Revise this policy		TR37. Noted. Policy deleted
P28/WULC5	Revise this policy		TR38. Noted. Wording will be amended.
9. Getting around P28/WUT1	Amend wording		TR39. Noted. Wording will be amended.

Section/Page/ Policy Ref	Action Recommended	Comments	Observation & Recommendation
P28/WUTZ	Amend wording	<p>This policy is in line with NPPF policy to support sustainable transport and improving links to services, facilities and open space. Transport policies in the emerging Shaping Places Local Plan will reflect this policy with measures to secure funding contributions to support improvements to walking and cycling routes which improve connections to services and facilities.</p> <p>However, there is no evidence on which cycle routes either new or existing the neighbourhood plan is trying to improve, where cyclist want to get to or how improvements could be achieved.</p> <p>The policy would also be difficult to apply to infill development, but may be achievable with major developments. Suggested change of wording should be 'where appropriate' shall maintain and enhance pedestrian and cycle routes.</p>	TR40. Noted. Wording will be amended.
General Comments	Consider comments	<p>Many policies are general in nature and require further evidence (see specific policy comments for further information).</p> <p>Amend any contradictions between policies and supporting text.</p> <p>Phrases such as 'make every effort' are very difficult to define and enforce. Therefore, wording of the policy needs to be more explicit and defined to be effective.</p> <p>It would be useful to read the relating policy objectives with the policy. Locating the objectives immediately before the policy would assist this.</p> <p>Consider how all policies conform with the NPPF.</p> <p>Policies emphasise considerably protection and preservation. They would benefit from making explicit what is being protected to justify what is appropriate.</p> <p>Policies would benefit from being precise and specific to the matters they seek to address. They would also benefit from more reasoned justification as supporting text under each policy.</p> <p>Reference is made to Local Strategic Planning Policy. We recommend that this reads Local Planning Policy</p> <p>To avoid contradiction, the neighbourhood plan should have a design criteria to enhance the opportunity of Conservation Status as not a conservation area.</p> <p>The conformity of focusing development on Crudington with the adopted Local Planning Policy needs to be considered.</p> <p>Fig 2.2 Distribution of Dwellings in the Parish doesn't show clear division of where numbers lie.</p> <p>No consideration is given to barn conversions and affordable housing exceptions which conflicts with Wrekin Local Plan policy H23</p> <p>Figures need to be checked i.e. number of houses and references given.</p> <p>Should consider opportunity for new school if major development came forward</p> <p>There is no mention of arts, culture, creative industries e.g. providing access to our developing infrastructure.</p> <p>Creative Industries could be included under the Amenities and Employment Objectives as an option for the small business site provision. The parish centre and community buildings might be an option as a space for cultural provision for the local area. Cultural wellbeing could also be identified among the issues to be considered in relation to health and wellbeing in Green Areas and Public Spaces Objective 1.</p> <p>We recommend that written confirmation is sought from DCLG for not completing an Sustainability Appraisal.</p> <p>Sustainability impacts need to be considered as part of good planning.</p> <p>In terms of Strategic Environmental Assessment, this needs to be shown to be considered and screened under EU regs and a screening opinion received from the statutory consultees; Environment Agency, English Heritage and Natural England. As to whether the NP has potential to create "significant environmental effects", this is based on the views of the statutory consultees and Waters Upton making a screening determination.</p> <p>Prepare a policies map to include those areas/sites which need to be spatially represented on a plan, for example areas of protected open space relating to Policy X, and also show specific site allocation boundaries.</p>	<p>TRG1 Noted.</p> <p>TRG2 Noted.</p> <p>TRG3 Noted.</p> <p>TRG4 This approach could be better during examination but for long term use we prefer the existing format.</p> <p>TRG5 Noted</p> <p>TRG6 Noted</p> <p>TRG7 Noted</p> <p>TRG8 Noted. Wording amended.</p> <p>TRG9 Noted</p> <p>TRG10 Complies with emerging Shaping Places</p> <p>TRG11 Noted</p> <p>TRG12 Noted</p> <p>TRG13 Clarification requested from TWC</p> <p>TRG14 Noted</p> <p>TRG15 Noted</p> <p>TRG16 Noted. We are still of the view that there is no impact, we have requested conformation of this.</p> <p>TRG17 Policies are Parish wide other than the identified SHLAA sites</p>
SEA/5A			
Policies Map	Prepare policies map		

Appendix 2 TR16 A detailed response

Affordable Housing in Waters Upton – June 2014

Waters Upton Parish Council administers a local housing needs register and works in partnership with Sanctuary Housing Association in order that the Section 106 Agreement, to provide housing for people with local connections, is implemented when a property at Pinfold Croft, Waters Upton, becomes vacant.

The properties, under the management of Sanctuary Housing, are for rent only. We have 4 x three bedroom and 4 x two bedroom units available through the scheme.

A further nine homes are managed by Wrekin Housing Trust. Whilst these were also provided as an Affordable Housing Scheme, under the Government Funding Terms, WHT does not apply the same credibility to the Section 106 Agreement. Waters Upton Parish Council attempts to work with this Social Landlord and by negotiation we try to ensure that tenants have local connections. However, the changes at WHT and their policies have enabled "out of area" tenants to move into the remaining properties on the Pinfold Croft site.

Phase II of the site included 4 x 1 bedroom single floor accommodation units (for rent only), 3 x three bedroom shared ownership units, 1 x two bedroom shared ownership unit and 1 x 3 bedroom (for rent – changed from shared ownership).

The scheme was supported by Telford and Wrekin Council to ensure affordable homes in perpetuity. The combination of rental and shared ownership was important along with the mix of housing types and sizes. Waters Upton is adequately covered when it comes to affordable homes in this regard.

The local housing needs register shows little need for additional homes as there is no current waiting list.

The current system of allocation (Choose Your Home) comes to an end in the near future. The Parish Council has asked to meet with representatives of Sanctuary and WHT to discuss the implications of the new way in which properties will be allocated.

At this meeting, it is the Parish Council intention to raise awareness of the importance of keeping these properties available both as "affordable" and as "available to local people". The recent sale of a shared ownership property has meant that one of the dwellings has now been removed from the housing stock. Similarly, the agreement for an exchange allowed one flat to be allocated to someone with no local connections.

base.

Waters Upton Parish Council
C/O Katrina Baker MBE
Oaklands
Waters Upton
Telford
TF6 6NP

5th JUNE 2014
Project Ref: BA1104

Dear Katrina

Response to the Waters Upton Neighbourhood Plan

We are consultants acting on behalf of Mr. John Brown and Mr. Mark Hockenhull, the landowners of site reference numbers 43, 635, 406 and 404 from the Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites). Acting on behalf of our clients and in their interest we would make the following representations on the draft Waters Upton Neighbourhood Plan:

Although there are no set guidelines which describe what a neighbourhood plan should contain or look like the overarching Government requirement is that all Neighbourhood Plans should be in line with higher level planning policy. As stated in The Waters Upton Neighbourhood Plan, it should conform to the National Planning Policy Framework (NPPF) and Local Strategic Planning Policies including Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites) which is presently open for comments. Our response refers (where appropriate) to these documents.

We have not had opportunity to examine the Evidence Base but will endeavor to review the information at a later date and make further comment.

Section 1

1. Introduction

The introduction states that the core strategy restricts growth in the Rural Area. For clarity, POLICY CS 7 (Rural Area) of Telford & Wrekin Council's adopted Core Strategy Development Plan Document, states that 'development within the rural area will be limited to that necessary to meet the needs of the area. It will be focused on the settlements of High Ercall, Tibberton and **Waters Upton**.' The Core Strategy Development Plan Document therefore specifically identifies Waters Upton as one of the settlements for development. The supporting text to Policy CS 7 states that 'The Development Strategy aims to help sustain rural communities, by focusing development on a limited number of rural settlements that offer rural residents a number of key local services and facilities. By focusing housing, employment, and service and facility

development at these centres, a pattern of development should be created that maximises the accessibility of services and facilities to rural residents, whilst reducing the need to travel by car, and enhancing local identity and character.'

The Neighbourhood Plan looks to sit alongside Telford and Wrekin Councils Strategic Planning Policy to enhance the right housing mix, improve green space, protect the local character and heritage of the Parish, encourage walking and cycling and encourage local employment. All of these are a sound planning strategy but we have further commented on a number of these aspects.

2. Background

The Parish

BR01

Crudgington is identified as having the most historical merit - 'a conservation area in all but name!' This suggests that Crudgington should be the last resort in terms of development.

Socio-Economic Profile

BR02

The socio-economic profile supports family homes that are owner occupied with two or more cars. Travel to employment is predominantly by car but with those working from home in second place.

Surly the Neighbourhood Plan should encourage more working from home and /or to provide better flexible workspace in the village.

Housing

BR03

The Neighbourhood Plan identifies that the number of transient occupiers is increasing due to the increased number of short term rental properties and this is resulting in a lack of community involvement and spirit. We would suggest an alternative approach is needed; one in which growth and community support / involvement can be achieved. Allowing further houses to be built would offer a larger resident base with enhanced community facilities and spaces such as a kick about areas and space for village events.

BR04

The Plan states that the 'rural feel' of the village is disappearing. We interpret this to be a perceived negative aspect of any future development. There are, however, both positive and negative considerations for the rural feel of an area and it would be beneficial to identify / define 'rural feel' to enable any future development to address this.

BR05

A lack of sheltered homes, care homes and bungalows in the parish is identified. Any new proposals need to address this but it should be noted that single storey dwellings are quite land hungry and demand will need to be identified.

BR06

Poor road infrastructure and lack of car parking issues are identified. Any new development ideally needs to take pressure off the existing highway through the village and adjacent narrow lanes (or at least not exacerbate problems). Provision for three cars per dwelling would seem reasonable for larger dwellings but assumes public transport arrangements cannot be improved. Ideally any new or enhanced community buildings or spaces will have no impact on the existing highway.

BR07

The Neighbourhood Plan suggests new houses are not selling because the target of providing 17 new dwellings per year in the rural area has been exceeded (identified in Telford and Wrekin Council Annual Monitoring Report (2012)). Please note that we believe the houses that are not selling have inherent problems and that the Parish Room Croft land sold for housing before even getting to market. Also, Waters Upton is identified as one of the settlements for growth in Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007). Its capacity for growth has been highlighted both in the Strategic Housing Land Availability Assessment (SHLAA) and in the recent Shaping Places document.

BR08

The Plan suggests there is a lack of local demand for houses. There is no evidence to suggest this and it should be noted that the Telford and Wrekin Council Annual Monitoring Report (2012) identifies a borough shortfall of 2,014 housing completions between 2006/7 and 2011/12 against the target housing supply demanded by government.

BR09

While the Neighbourhood Plan correctly states that no sites are currently under construction, it should be noted that there will be very shortly (Parish Room Croft) and that other consents are held up by onerous section 106 agreements rather than a lack of demand.

BR10

The growth plans (Central Waters Upton Housing Schematics 2000, 2013 and projection for 2015) indicate that the spine road is reaching its capacity. The Shaping Places Local Plan referred to in the Neighbourhood Plan does point to development opportunities via a separate highway access adjacent to the settlement.

Green Areas and Public Space

BR11

Many green spaces have been lost in the local area. New development should provide green space but, by default, this will result in new land parcels outside the existing settlement.

BR12

There is a need for a significant green play space but the available spaces are of insufficient size. New development should provide significant green play space but, again by default, this will mean new land parcels outside the existing settlement.

BR13

The Neighbourhood Plan states 'unanimous' local opposition to Parish Room Croft and the Orchards by the locals. For clarity, objections were not unanimous (Parish Councillors spoke FOR Parish Room Croft) and it should be noted that The Parish also agreed to buy the land for Village Hall car parking etc at an 'affordable' value.

Amenities and Employment

BR14

The existing shop and post office may be well used but the adjoining Parish Centre is underutilised due to its size and all are poorly located for the village's convenience. The parking is dangerous and impedes the access to /from Upton Stones. A new central location with larger rooms and better parking would be an advantage.

BR15

The Plan identifies that two of the three traditional Public Houses in the village have closed whilst the third is now an Indian Restaurant and bar. This reflects a present trend in the loss of traditional pubs. With limited increase in the number of local residents and their potential support, such amenities are likely to be lost.

Local Character (history – heritage)

BR16

The Plan points to some aspects of local character. Local Character should be maintained and ideally any new development should leave the existing character of Waters Upton as it is but in order to do this, the 'character' should be identified. It is more than river banks, hedgerows, trees, wildlife corridors, local sandstone walls, the Well and a lack of street lighting. The character varies as you pass through the Parish and its villages. Some of the character may be positive whilst other 'character' may be negative and undesirable.

BR17

Options should be explored to look at alternative accesses to the village that do not impact on the current layout or road system. This will allow the consideration of enhancements without causing character or highway issues.

BR18

In the Neighbourhood Plan Lighting needs careful consideration.

Education

BR19

The Neighbourhood Plan states that Crudgington Primary School cannot extend on its current site. With the permission of surrounding landowners, however, there is scope to increase the size of the current site. It would also be useful to understand if all pupils are local or whether they travel some distance to attend the school.

Getting Around

BR20

The Neighbourhood Plan identifies lack of appropriate public transport provision for full time employment commuting, access to doctors surgeries, the hospital and adult learning services. Public transport is inevitably governed by demand and could be addressed if future development increased demand / use of public transport or, indeed, was sufficient to justify the provision of facilities within Waters Upton for which travelling outside the village has previously been necessary.

BR21

Lack of cycle routes and the identification that pavements are too small and, in places, don't exist may not be addressed along the road through the village due to existing width and other constraints.
Any future development could provide safe and level pedestrian and cycle access.

SECTION 2:

4. Visions and Objectives

Housing:

Objective 1

BR22

Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007), Strategic Housing Land Availability Assessment (SHLAA) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites) identify that the settlement is appropriate for development. It seems inappropriate for the objective to seek to remove a key requirement of the higher level

BR23 planning policies with which the Neighbourhood Plan is intended to align. The criteria set out in the Neighbourhood Plan can be achieved with careful phased development.

Objective 2

BR24 Balanced housing types with sufficient parking must be a consideration. To strive for a Community Levy seems appropriate.

Objective 3

BR25 Prioritising bungalows or single floor units requires further evidence of demand. It could, however, be achieved.

Objective 4

BR26 Restricting larger scale developments to brown field sites alone is not achievable or deliverable in meeting government targets for housing supply. Sensitive design of the landscape and use of land to minimise impact needs to take precedence. A larger well considered scheme controlled through phasing will bring much better community benefit than piece meal developments.

Green areas and Public Spaces:

Objective 1

BR27 No appropriate green areas for recreation purposes are left in Waters Upton, new ones need to be created.

Objective 2

BR28 Agreed that safeguarding and enhancing existing play areas is desirable but adding new areas to allow older children to play is essential.

Objective 3

BR29 Agree - rights of way should be protected.

Amenities and Employment:

Objective 1,2,3 and 4

BR30 Agree with all points but adding the potential for provision of new flexible buildings to encourage working from the village would be beneficial.

Local Character:

Objective 1,2 and 3

BR31 Agree but these are a limited number of positive characteristics. An expanded list of characteristics would be beneficial – both positive (to be encouraged) and negative (to be discouraged).

Objective 4

BR32 This is rather prescriptive and generalised, Waters Upton has had none linear growth over many years. Orchard Close and other developments have created cul-de-sacs which have spiraled off the linear strip. Waters Upton, however, would benefit from restrictions on infill development as a means of avoiding erosion of its character. A well designed separately accessed development adjacent to the settlement would not harm the character of the village and would enhance its existing offering.

Getting Around:

Objective 1 and 2

Agree

Section 3:

Neighbourhood Plan Policies:

5. Housing:

Policy WUH1

BR33

Agreed that restrictions on infill development as a means of avoiding erosion of character are desirable but it should not be used to restrict development which aligns with Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007), Strategic Housing Land Availability Assessment (SHLAA) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites).

Policy WUH2

BR34

WUH2 should not be used to restrict development which aligns with Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007), Strategic Housing Land Availability Assessment (SHLAA) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites). The demand for bungalows or single floor units should be established prior to implementation of the policy.

Policy WUH3.

BR35

By restricting larger scale developments to the Dairy Crest or SHLAA site 551, the Waters Upton Neighbourhood Plan is not in line with Strategic Housing Land Availability Assessment (SHLAA) nor the emerging Shaping Places Local Plan 2011 – 2031 and as such is not compliant with the overarching Government requirement that all Neighbourhood Plans should be in line with higher level planning policy (this includes Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007), Strategic Housing Land Availability Assessment (SHLAA) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites) all of which identify that the settlement of Waters Upton is appropriate for development on other identified parcels of land).

Policy WUH4.

To strive for a Community Levy seems appropriate.

Policy WUH5.

BR36

Agree to the need for adequate parking but the specific provision of at least 3 spaces per property would seem inappropriate for smaller properties.

Green areas and Public Spaces:

Policy WUGS1

BR37

Generally agree but WUGS1 should not be used to restrict development which aligns with Telford & Wrekin Council's adopted Core Strategy Development Plan Document

(Adopted December 2007), Strategic Housing Land Availability Assessment (SHLAA) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites).

Policy WUGS2

To strive for Community Gain seems appropriate.

Policy WUGS3 and Policy WUGS4

Agree

Amenities and Employment:

Policies WUA1 to WUA6

Agree

Local Character:

Policy WULC1

Agree

Policy WULC2

BR38

Agree assuming it does not inhibit necessary works or alterations and is not used to restrict development which aligns with Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007), Strategic Housing Land Availability Assessment (SHLAA) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites).

Policy WULC3

Agree

Policy WULC4

BR39

Agree but it should not be used to restrict development which aligns with Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007), Strategic Housing Land Availability Assessment (SHLAA) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites).

Policy WULC5

Agree, providing this does not become a safety issue.

Getting Around

Policy WUT1

Agree

Policy WUT2

Agree but this may not be feasible or practical on smaller projects.

Summary

We have commented constructively on many aspects of the Neighbourhood Plan and trust they will be incorporated in future iterations of the Plan.

From The Core Strategy Development Plan: 'High Ercall, Tibberton and Waters Upton are the service centres outside Telford and Newport on which the majority of development required to meet local rural needs will be focused.'

The Development Strategy aims to help sustain rural communities, by focusing development on a limited number of rural settlements (including Waters Upton) that offer rural residents a number of key local services and facilities. By focusing housing, employment, and service and facility development at these centres, a pattern of development should be created that maximises the accessibility of services and facilities to rural residents, whilst reducing the need to travel by car, and enhancing local identity and character.

This strategy embraces many of the Waters Upton Neighbourhood Plan objectives but whilst some of the individual objectives and proposed policies of the Neighbourhood Plan are reasonable, others challenge the higher level planning policies they are intended to support. In light of this we believe the Neighbourhood Plan should be reviewed to ensure its compliance with the overarching Government requirement that all Neighbourhood Plans should be in line with higher level planning policy. This includes the National Planning Policy Framework (NPPF) and Local Strategic Planning Policies including Telford & Wrekin Council's adopted Core Strategy Development Plan Document (Adopted December 2007) and the emerging Shaping Places Local Plan 2011 – 2031 (Proposed Housing and Employment Sites).

Yours sincerely

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For

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Responses to the Base Architects comments.

Ref Observations & Recommendation

- BR01 Dairy Crest is a TWC preferred site. SHLAA551 is not in the village of Crudington.
- BR02 Residents choice of employment is outside the scope of the Plan.
- BR03 Houses are not selling and so are being rented. More houses will make this situation worse.
- BR04 Residents identify “rural feel” as being surrounded by open farm land and the associated views.
- BR05 The Plan is in line with TWC policies.
- BR06 Noted.
- BR07 Parish room croft is still subject to an agreement of the S106, before planning is granted, how has this been sold? Current TWC policy for Waters Upton is for infil of 1 or 2 houses only. The Shlaa sites have been amended and are undergoing a consultancy perion as part of Shaping Places and will not be confirmed for many months. No changes made to the Plan.
- BR08 See [TR3](#).
- BR09 Noted.
- BR10 Shaping Places is only at consultation stage. No changes required.
- BR11 New development will reduce green spaces not create them.
- BR12 There is no evidence of this in our surveys. No changes required.
- BR13 All residents were oposed to development in these areas. The PC spoke in favour in exchange for the S106 agreement.
- BR14 The residents have not requested a new centre during the creation of the Plan. No action.
- BR15 The loss of Public Houses in the urban areas do not confirm this idea.
- BR16 From the responses in the evidence base you will see that the residents value highly the character of the villages and do not want to loose this important feature. No changes.
- BR17 This was not raised during the creation of the Plan.
- BR18 Noted. Dark skies are a valued feature of rural areas.
- BR19 The future of the school, and it’s pupil base, is outside the scope of the Plan.
- BR20 It is not concievable that the rural area will support sufficient demand for regular public transport or the sort of infrastructure that urban areas have. The Evidence Base has a large number of comments confirming that residents would live in the urban area if they wanted facilities on their door step. No changes to the Plan.
- BR21 Pedestrian and cycle access in new developments would not benefit the parish as a whole.
- BR22 This objective complies with existing TWC policies. No changes.
- BR23 As [BR22](#).
- BR24 Noted.
- BR25 The NPPF requires “a mix of housing based on current & future demoraphics” paragraph 50
- BR26 Since your letter measures have been taken by the government to priorities brown field.
- BR27 See [TR6](#)
- BR28 TWC support the Green and Public Spaces Objectives.
- BR29 Noted.
- BR30 Noted.
- BR31 TWC have agreed with these objectives.
- BR32 This was a major concern of residents and TWC agree with objectives.
- BR33 See [TR5](#), [TR8](#), [TR9](#).
- BR34 See [TR10](#), [TR11](#).
- BR35 See [TR12](#), [TR13](#), [TR14](#), [TR15](#), & [TR16](#).
- BR36 See [TR19](#),[TR20](#).
- BR37 See [TR21](#)
- BR38 See [TR36](#)
- BR39 See [TR37](#)

Outcome of Statutory Consultation

Following statutory consultation, a number of changes were proposed to the Neighbourhood Plan. Each comment and the proposed response have been identified in this document. A number of non-planning issues were raised which did not fall within the remit of the Plan. In these cases, the matter were noted and forwarded to the appropriate officer/Committee to consider an appropriate response.

The revised Plan was presented to the Parish Council on the 25th June 2014 and it supported the submission of the revised Plan to the Local Planning Authority for examination.

Further details on the SEA assessment (and the comments on page 25 from TWC)

Some confusion was experienced over the SEA screening process as detailed in the TWC response on page 25. In August 2014 as requested by TWC, the consultation agencies were consulted by WU Parish Council. In September it was determined that TWC had to conduct this process. TWC confirmed on 13/11/2014 that they had received notification that the agencies had determined that there were no significant environmental effects resulting from the WUNP. Waters Upton Parish Council has confirmed, at a full council meeting on 26/11/2014 that the WUNP will not be subject to an SEA. Details of this process are in the Evidence Base.

Conclusion

This Regulation 14 Consultation Statement and the supporting consultation statement are considered to comply with Section 15(2) of part 5 of the 2012 Neighbourhood Planning Regulation.