

Newport Neighbourhood Plan
Comments on the Newport NP Regulation 15 Submission
Index

Library Ref	Consultee
N01	Beverly Ashton
N02	Carol Murphy
N03	Church Aston Parish Council
N04	Environment Agency
N05	Gladman
N06	Historic England
N07	Hugh Burton
N08	Janet Clarke
N09	Katie Foster
N10	Laurence Bennett
N11	Malcom Bennett
N12	Mr & Mrs Dredge
N13	Newport Regeneration Partnership
N14	Newport Shropshire Town Team
N15	Peter Chadwick
N16	RPS
N17	Severn Trent

From: [REDACTED]
Sent: 21 January 2018 11:39
To: DevelopmentPlans
Cc: enquiries@newportsaloptowncouncil.co.uk
Subject: Comments on Newport Neighbourhood Development Plan 2017-2031

Thank you for giving the opportunity to comment on the plan, which appears comprehensive.

A few specific comments:

The sensitive and in keeping redevelopment of the Water Lane area would make good use of brownfield sites, and is much needed.

Re Housing, would it be good to support the building of an extra care scheme in Newport, like many other towns have now, with the growing older population?

A centrally located larger community space/building with good parking for the use and benefit of the growing town I think would be very well supported. The ex Co-op/Budgeons site would seem to be ideal for this?

I note on Plan 1 - Newport Neighbourhood Development Plan Boundary, that the strip of naturalised wooded and hedgerow area south of Nova House (between Station Court and Audley Ave) is shown in green, but is not listed in the green spaces or shown in green on Plan 6, Policies Map? This area is a much needed natural buffer between residential areas and the Nova Industrial Park, assisting with minimising noise and light pollution, and importantly also a haven for wildlife, with a large variety of birds, and provides a summer bat roost too. It would be good to give clarity on the protection of this woodland area of trees and hedgerow, and a pond too.

Yours sincerely,

B Ashton
[REDACTED]

Sent from my iPad

From: [REDACTED]
Sent: 19 January 2018 10:22
To: DevelopmentPlans
Subject: Fwd: T&W Formal Consultation of Newport Neighbourhood Development Plan (Regulation 16 Consultation)

T&W Formal Consultation of Newport Neighbourhood Development Plan
(Regulation 16 Consultation)

My name is Carol Murphy. I live at [REDACTED]
[REDACTED]

I represent Newport in Bloom (previously known as Heart of England in Bloom, Newport HOEIB)

I would like to fully support and endorse the submission made by Janet Clarke in the email below.

Carol Murphy

**T&W Formal Consultation of Newport
Neighbourhood Development Plan (Regulation 16
Consultation)**

I am Janet Clarke of [REDACTED]

[REDACTED]. I can be contacted by email or post.

**I have been a member of the Steering Group of the
Newport Neighbourhood Plan since its formation
representing Newport and District Civic Society.
I had a particular interest in 'green spaces' and
together with another member of the Steering Group,
we surveyed sites in Newport and reported at various
times to the Steering Group the relevant details for
each green space site. Subsequently, the details of
each of the 'green spaces' was included in the draft
NDP.**

**However, as you will see from my emails below to the
Newport Town Clerk and the Deputy Clerk, the site at
Baddely Wells has been omitted from the draft NDP
due to what was mistakenly thought to be a potential
conflict with what was the emerging Local Plan (eLP)
for Telford and Wrekin Council (TWC). Subsequently,
this has been shown not to be the case as the
Inspector had removed the Baddely Wells site from
the TWC housing site allocations. This removal is
now confirmed in the Local Plan 2011 –2031 which
was adopted by TWC Full Council on 11th January
2018.**

**The relevant extract in the Local Plan which relates
to Baddely Wells (H13) site can be found in reference
MM 92 of Appendix 2 –the Main Modifications to the
Local Plan.**

N02 - Carol Murphy

In the light of the above and the below, I would ask that Baddely Wells is reinstated to the draft NDP as a recognised green space.

If you require any further information from me regarding any questions you may have arising from this submission, I would be happy to provide.

17/11/17 at 8:52 AM

To Enquiries@newportsaloptowncouncil.co.uk

Lee,

Following our call on Monday, I have to say that I am surprised and disappointed that the NDP was delivered to T&W so quickly following the NTC meeting particularly in the light of previous views from T&W and Michael Barker to the effect that NTC might want to review the NDP following the publication by the Planning Inspector of his final report on the Major Modifications for the emerging Local Plan (eLP). Ironically, the report from the Inspector was published by T&W last Friday morning i.e less than 48 hours after the NTC meeting.

It seems that I will now need to respond to the T&W public consultation on the NDP as regards the important conclusions from the Inspector as regards site H13 and on other matters.

Thank you.

Janet Clarke

Newport and District Civic Society

From: Janet Clarke

Sent: 07 November 2017 12:36

To: Sheila Atkinson <Sheila@newportsaloptowncouncil.co.uk>

Subject: Newport Neighbourhood Development Plan update - Town Council Meeting 8 November 2017

Sheila,

With reference to the agenda item above, I would ask that you bring to the attention of NTC the statement following from me, as a member of the NDP Steering Group :-

With regard to the NDP, I would ask that the land at Station Road, known as Baddely Wells, and previously as Site H13, be retained as 'green space' in the NDP that is to be submitted to Telford and Wrekin Council.

The reason is that, as members may recall, earlier this year Mr Barker advised that Baddely Wells (Site 12 in the NDP Evidence Review) could not be retained as green space in the NDP because it was identified as a housing allocation site (H13) in the emerging Local Plan.

However, following the removal of this site by the Inspector, and following the Reg 14 Public Consultation, the Process Management Group reported to the Steering Group on 26th July that Baddely Wells would now be shown as green space in the NDP.

The Councillors speaking at Planning Committee on 30 August drew attention to this in objecting to the application for housing on the site - planning application TWC/2015/0057.

TWC have only passed a 'resolution to grant' on land which currently remains deleted from housing site allocations. H13, together with other deleted sites, awaits the decision from the Inspector to the response to consultation on the Major Modifications, which he is considering at present. This issue is not just about H13 but other sites elsewhere in Telford.

N02 - Carol Murphy

As the largest number of responses from Newport people on the Neighbourhood Plan referred to green space at Baddely Wells, I would ask that this site is retained, or referenced in some way, as intended, in the NDP to reflect the fact that it has been identified as existing green space since the initial gathering of evidence, way back in 2014, as those Town Council members on the Steering Group will recall.

Furthermore, as Mr Barker, when Head of Planning, will recall, Baddely Wells (i.e. H13) is described in his own 2008 and 2012 Open Space Studies as "natural and semi-natural OPEN SPACE in which Newport is deficient".

Nothing has changed, the description still fits, it is still open and it is still green - the fields, the woodland with a winding path created by TWC, the copses and hedgerows, the beautifully enhanced entrance created by Newport in Bloom, the public footpaths still widely used, particularly as a link between Church Aston and south Newport. - this should continue to be identified as existing now, whatever the future may hold. To simply say nothing is to negate the views of the majority of those local people who cared enough to respond to the NDP. With NTC seeking to continue with its previous application to extend the town boundary to the A518 by 2019, the whole of Baddely Wells would come within the town boundary.

Thank you,

Janet Clarke

Newport and District Civic Society

**Development Plans Manager
Telford & Wrekin Council
C/o Addenbrooke House
Ironmasters Way
Telford
Shropshire TF3 4NT**



18th January 2018

Dear Sir / Madam,

Church Aston Parish Council (CAPC): Response to the Regulation 16 Consultation on the Newport Neighbourhood Development Plan

CAPC notes with interest proposals set out in the draft Newport Neighbourhood Development Plan (NNDP) made available for consultation under provisions of the NDP Regulations 2012. Our comments, however, focus solely on the area known as Baddeley's Wells.

Proposed Local Green Space: Baddeley's Wells

In the Regulation 14 Consultation on the Draft Newport Neighbourhood Development Plan reference was made to an area of land off Station Road, known as Baddeley's Wells, part of which falls within the Newport Town Council (NTC) boundary with the remainder falling within Chetwynd Aston & Woodcote Parish. The area had been referenced in the Regulation 14 version as site H13, a site allocated for housing in the Telford & Wrekin Council (T&WC) Emerging Local Plan (eLP), and as such, in order to confirm with the eLP, was allocated for housing and 'therefore was not included as an open space in the NNDP' (Housing: Strategic Policies, para 3, page14). This was due to what was mistakenly thought to be a potential conflict with the eLP, but as a result of the Inspector's Main Modifications (MM 92, Appendix 2 of the Local Plan) the site was withdrawn from the eLP and so is no longer shown as an allocated housing site. Notwithstanding this, a 2015 outline planning application (TWC/2015/0057) for housing on this T&WC owned site was rushed through the Council's Planning Committee in August, immediately after the publication of the Inspector's Main Modifications, and a resolution to grant given, despite strong objections from NTC and adjoining parishes given the acknowledged severe deficiency in public open space in this area. Nevertheless, the site now remains undesignated in the final Local Plan (now formally adopted by T&WC on 11/1/18) and a Site Allocation Development Plan has been requested by the Inspector before any additional housing sites are identified in the future.

However, whilst the site (as a housing site) has also now been omitted from the Regulation 15 Consultation version of the NNDP, it has not been designated as a Local Green Space (in Table 2, pages 24 & 25), and in fact no reference is made at all to the Baddely's Wells area.

*Michael Atherton
Clerk to Church Aston Parish Council
c/o 53 Beechfields Way, Newport, Shropshire TF10 8QA*

N03 - Church Aston Parish Council

The site abuts the CAPC boundary and as a parish council we have made submissions to NTC in their development plan process seeking to have the site retained as open space for the benefit of both existing and future local residents living in Church Aston, Chetwynd Aston and south Newport. Given that the site is no longer shown as allocated for housing in the Local Plan, the opportunity arises for the Newport NDP to designate the site as a Local Green Space and to protect it from future development, particularly in light of the case currently being put forward by Shropshire Wildlife Trust, following a decision by the Shropshire Local Sites Partnership, to designate the adjoining (to the east) 'Black Butts' field (which is within Chetwynd Aston parish) as a Local Wildlife site (Figure 1).

In the light of the above, CAPC would ask that the Baddeley's Wells area is clearly designated within the NNDP as a Local Green Space.

Yours sincerely

Mike Atherton

Mike Atherton
Clerk to Church Aston Parish Council
Tel: 07581 454882
Email@ churchaston@gmail.com

Michael Atherton
Clerk to Church Aston Parish Council
c/o 53 Beechfields Way, Newport, Shropshire TF10 8QA



Shropshire
Wildlife Trust



Shropshire Ecological
Data Network

NEWPORT TOWN COUNCIL BOUNDARY

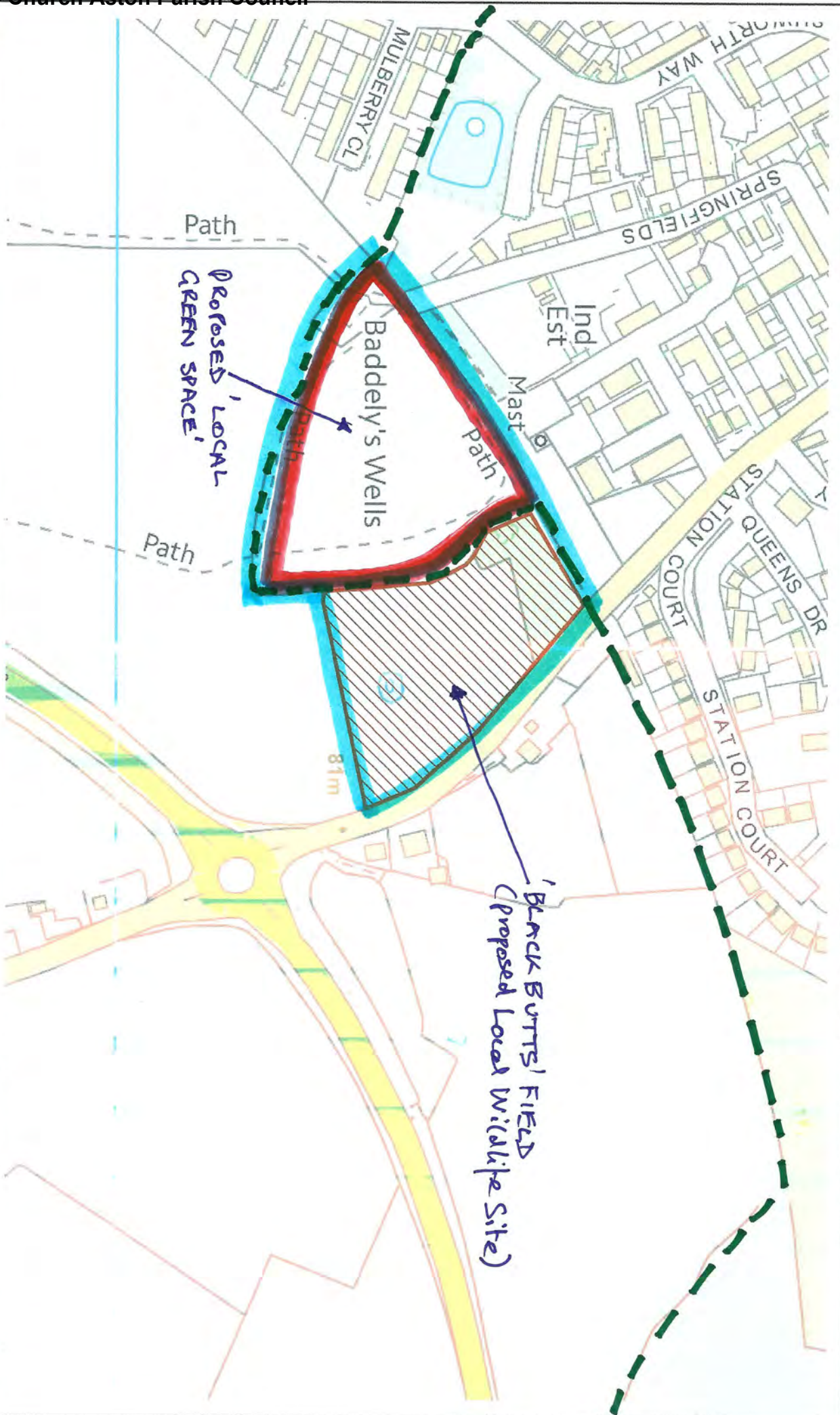
Black Butts, Newport



ALLOCATED HOUSING SITE (H13) - since withdrawn

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Date: 06/01/2016



Telford & Wrekin Council
Development Management
PO Box 457
Telford
TF2 2FH

Our ref: SV/2012/106308/AP-
06/PO1-L01

Your ref:

Date: 22 January 2018

Dear Sir/Madam

NEWPORT REG 16 NEIGHBOURHOOD DEVELOPMENT PLAN

I refer to your email of the 5 December 2017 in relation to the above consultation. Having reviewed the submitted Draft Neighbourhood Plan, and associated documents, I would offer the following comments for your consideration at this time.

We have been working with Telford and Wrekin Council on their emerging Local Plan submission to ensure those matters within our remit are secured within the strategic framework of the borough. Similarly, it is important that the associated Neighbourhood Plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. You are advised to utilise the attached Environment Agency guidance and pro-forma which should assist you moving forward with your Plan.

However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Telford and Wrekin Council in their role as the Lead Local Flood Authority (LLFA).

I trust the above is of assistance at this time. Please can you also copy in any future correspondence to my team email address at SHWGPlanning@environment-agency.gov.uk

Yours faithfully

N04 - Environment Agency
Mr. Graeme Irwin
Senior Planning Advisor

Direct dial 02030 251624

Direct fax

Direct e-mail graeme.irwin@environment-agency.gov.uk

Neighbourhood Plan

Environment Agency consultation pro-forma

October 2016

To assist the Environment Agency in providing the most focused and accurate consultation responses through the Neighbourhood Planning process we have produced the following guidance and attached pro-forma.

Together with Natural England, English Heritage and the Forestry Commission we have published joint advice on Neighbourhood Planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

The below detail takes you through the issues we would consider in reviewing your Plan. We aim to reduce flood risk, whilst protecting and enhancing the water environment, land and Biodiversity. We recommend completing this to check whether we are likely to have any concerns with your Neighbourhood Plan at later stages.

Flood Risk

Your Neighbourhood Plan should conform to national and local policies on flood risk.

National Planning Policy Framework (NPPF) – Paragraph 100 states that ‘Inappropriate development in areas of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere’.

If your Neighbourhood Plan is proposing sites for development you should check whether any of the proposed allocations are at risk of fluvial flooding based on our Flood Map. For example are there any areas of Flood Zone 3 or 2 (High and Medium Risk). In line with National Planning Policy and, specifically, the Sequential Test, we would expect all built development to be located within Flood Zone 1, the low risk Zone. Our **Flood Map** can be accessed via the following link:

<http://watermaps.environment-agency.gov.uk/wiyby/wiyby.aspx?topic=floodmap#x=357683&y=355134&scale=2>

In addition to the above you should also check with the Telford and Wrekin Council with regards to other sources of flooding as detailed in their Strategic Flood Risk Assessment (SFRA). Telford and Wrekin Council, as the Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

Specifically, some watercourses have not been modelled on our Flood Maps (Our Flood Maps primarily show flooding from Main Rivers, not ordinary watercourses, or un-modelled rivers, with a catchment of less than 3km²).

Your Sequential Test should include a consideration of climate change (see below). In the absence of up to date modelled flood risk information, or a site specific FRA, to confirm an appropriate allowance you may wish to utilise the current Flood Zone 2 extent (where available) to indicate the likely, nominal, Flood Zone 3 with climate change extent. Where no modelling or flood map outline is available you will need to consider an alternative approach.

Where an un-modelled watercourse is present, or adjacent to a site, then it may be prudent to incorporate a buffer zone in consideration of flood risk not shown on the Flood Map. Where flooding could be extensive

N04 - Environment Agency

modelling may be necessary to confirm that the site is developable, that there will be no impact on third parties and assess any opportunities for enhancement.

As stated above, some assessment is necessary in your Plan, to inform the deliverability of sites. Additionally all sites with flood risk issues, especially those with ordinary watercourses or un-modelled rivers within/adjacent or near to sites, are likely to need detailed modelling at the planning application stage to verify the design flood extents, developable areas and that the development will be safe.

Climate Change

Your Local Authority's SFRA should indicate the extent of flood zones with likely climate change. Revised climate change allowances have been published (February 2016). These update the figures within Table 2 of the current 'Climate change allowances for planners' (September 2013) guide, as referenced in paragraph 7-068-20140306 of the National Planning Practice Guidance (NPPG) at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296964/LIT_8496_5306da.pdf

The latest allowances can be viewed at:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The table below is for '**peak river flows**' within the Severn River Basin district:

Severn Peak River Flows: Total potential change anticipated	2015-39	2040-2069	2070-2115
Upper end	25%	40%	70%
Higher central	15%	25%	35%
Central	10%	20%	25%

The following table is for '**peak rainfall intensity**' allowance in small and urban catchments. **Surface water (peak rainfall intensity) climate change allowances should be discussed with the LLFA.**

Peak Rainfall Intensity - Applies across all of England	Total potential change anticipated for 2010-2039	Total potential change anticipated for 2040-2059	Total potential change anticipated for 2060-2115
Upper end	10%	20%	40%
Central	5%	10%	20%

Note to above: This table shows anticipated changes in extreme rainfall intensity in small and urban catchments. The peak rainfall intensity ranges are appropriate for small catchments and urban or local drainage sites. For river catchments around or over 5 square kilometres, the peak river flow allowances are appropriate.

We have produced a SHWG climate change allowance guidance document (dated March 2016) that should be referred to for more detailed advice on this subject.

Flood Defences - Areas of your Parish, or proposed sites, may be afforded protection by a flood defence/alleviation scheme. Where this is the case your Plan should acknowledge this and identify the level of protection provided. It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

Waste Water Infrastructure

The Environment Agency has offered advice to Telford and Wrekin Council, as part of their Local Plan, to help ensure that their strategic housing growth can be accommodated in consideration of waste water infrastructure.

Where there is an identified infrastructure constraint you will need to demonstrate that there is a solution (it may be already programmed, or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Utility Company and we have developed a set of general questions to assist this process. The outcome of this may inform a 'phasing' policy within your plan where appropriate. It may also be necessary to produce an 'Infrastructure Delivery Plan' to set out any key milestones for waste water infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is 'sound'.

Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to "ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making". Plans should be "deliverable".

Water Management and Groundwater Protection

In February 2011, the Government signalled its belief that more locally focussed decision making and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive. It seeks to:

- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
 - to encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.
- Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment.

Source Protection Zone: Some areas of your Parish, and specific potential site allocations, may be located within Source Protection Zone (SPZ) 1, which indicates a sensitive hydrogeological setting. You should consider this constraint within your plan and when allocating sites. Specifically your plan should consider the relevance of the designation and the potential implication on development, with reference to our Groundwater Protection: principles and Practice (GP3) policy:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/297347/LIT_7660_9a3742.pdf

Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to controlled waters and address potential environmental impact associated with low flows. For example SuDS on the sites may need to provide multiple levels of treatment. To address the quantitative issues with the waterbodies, SuDS should be designed so to maximise recharge to the aquifer and support water levels in the receiving brooks.

N04 - Environment Agency

For further information or advice please contact us on shwgplanning@environment-agency.gov.uk

Waste water Infrastructure Questions:

What is the waste water capacity issue? We would recommend discussions with the Utility Company to ascertain how you can progress with your Plan without impact on the works. To assist in these discussions we would recommend the following:

- What solutions are programmed within Asset Management Plans (AMP)? When will these solutions be delivered? Are there any options for accelerating these schemes via developer contributions?
- In the absence of an improvement schemes what could alternative solutions be (type and location of) for short/medium/long term growth. Are these solutions cost prohibitive?
- Are there any short term options to facilitate growth? Some options to consider could be SUDS retrofitting or removing surface water from sewer systems.
- Utility companies could be asked about what WFD work they already have programmed in to their AMP Schemes for Phosphate stripping or other sanitaries (e.g. ammonia/Biological Oxygen Demand).

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

T: 01260 288800
F: 01260 288801

www.gladman.co.uk

Development Management
Telford & Wrekin Council
PO Box 457
Telford
TF2 2FH

By email only to: developmentplans@telford.gov.uk

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Newport Neighbourhood Plan (NNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman requests to be added to the Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the NNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively

seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the NNP's ability to meet basic condition (a) and (d) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

The current adopted plan that covers the Newport Neighbourhood Plan area and the development plan which the NNP will be tested against is the Telford & Wrekin Local Plan, which was adopted in January 2018. It provides the overarching planning policy framework for Cornwall covering the period up to 2031.

The adopted plan sets out a minimum housing target across the 20-year plan period of 17,280 new homes.

Policy H1

Policy H1 states that housing development within Newport will be supported in order to meet local needs.

Gladman consider it important the either Policy H1 or the supporting text provide a definition or breakdown of 'local needs' and demonstrate the sufficient robust evidence supports this defined need. Further we submit, that in stating that support will only be offered to developments that meet local needs, the policy fails to understand that it may be necessary for Newport to assist in meeting unmet need from surrounding area.

Policy GS1

Policy GS1 identifies 18 areas within the NPA that are to be designated as Local Green Space.

We remind the Council that in order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet national policy requirements set out in the Framework. The Framework makes clear in paragraph 76 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development for the wider area. Paragraph 76 states that:

'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.'

Further guidance is provided in paragraph 77 which sets out three tests that must be met for the designation of Local Green Spaces. Paragraph 77 states that:

'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- *Where the green space is in reasonably close proximity to the community it serves;*
- *Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and*
- *Where the green area concerned is local in character and is not an extensive tract of land.'*

The issues surrounding LGS designations have been considered in a number of other Examiner's reports across the country and we highlight the following decisions:

- The Seldlescombe Neighbourhood Plan Examiner's Report¹ recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.

¹ <http://www.rother.gov.uk/CHttpHandler.ashx?id=22996&p=0>

- The Oakley and Deane Neighbourhood Plan Examiners Report² recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.
- The Alrewas Neighbourhood Plan Examiner's Report³ identifies that both sites proposed as LGS in the neighbourhood plan '*in relation to the overall size of the Alrewas Village*' to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.
- The Freshford and Limpley Neighbourhood Plan Examiner's Report⁴ identified that the six LGS proposed did not meet the criteria required by the Framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of an extensive tract of land. The Examiner also considered that the protection of fields to 'prevent agglomeration between the settlement areas... is not the purpose of Local Green Space designation'.
- The Eastington Neighbourhood Plan Examiner's Report⁵ recommended the deletion of three LGS (16ha and 2ha) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance and significance to the local community.
- The Tattenhill and Rangemore Neighbourhood Plan Examiner's Report⁶ recommended the deletion of 2 LGS comprising of 4.3ha and 9.4ha.
- The Norley Examiner's Report⁷ identified a total of 13 parcels of land to be designated as LGS. The Examiner recommended at \$4.98 that the identification of these extensive tracts of agricultural land was contrary to NPPF policy and recommended that the policy should be deleted. The proposed LGS measured in the range of 1ha – 4.3ha.

It is essential that evidence to demonstrate how any proposed LGS meet the criteria of paragraph 77 is provided and can be easily accessed by anyone wishing to comment on the draft Neighbourhood Plan. Gladman do not consider that the evidence provided to support Policy GS1 is sufficient and recommend that further work is carried out to ensure that all of the proposed Local Green Spaces meet the criteria set out in the Framework.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the NNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development. Gladman formally request to participate at the hearing session(s) should the Examiner decide it necessary to discuss these issues in a public forum.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

² <https://www.basingstoke.gov.uk/content/doclib/1382.pdf>

³ <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Neighbourhood-plans/Downloads/Alrewas/Alrewas-Neighbourhood-Plan-Examiners-Report.pdf>

⁴ http://www.wiltshire.gov.uk/freshford_limpley_examination_final_report.pdf

⁵ <https://www.stroud.gov.uk/media/2596/2016-04-28-eastington-examiners-report-final.pdf>

⁶ <http://www.eaststaffsb.gov.uk/sites/default/files/docs/planning/planningpolicy/neighborplanning/tattenhill/02%20Tattenhill%20Neighbourhood%20Plan%202015.pdf>

⁷ <http://consult.cheshirewestandchester.gov.uk/file/3626372>

N05 - Gladman

Yours Faithfully,



Megan Pashley

m.pashley@gladman.co.uk

Gladman Developments Ltd.



WEST MIDLANDS OFFICE

Sir/Madam Development Management
Telford and Wrekin Council
Wellington Civic Offices
Larken Way
Telford
TF1 1LX

Direct Dial: 0121 625 6887

Our ref: PL00109763

8 January 2018

Dear Sir/Madam Management

NEWPORT NEIGHBOURHOOD PLAN - REGULATION 16 CONSULTATION.

Thank you for the invitation to comment on the Newport Neighbourhood Plan. We are supportive of the content of the document, particularly its' emphasis on local distinctiveness and the emphasis placed upon the proactive conservation and continued viability of the historic market town core and associated conservation area. We are pleased to note the clear recognition in the Plan of the significance of the Town's layout and the role played by its historic burgage plots in reflecting its medieval growth.

We are also supportive of the proposal to recognize the importance of the Shropshire Union Canal and Victoria Park as a setting to the medieval core through designation as Local Green Space.

However, we are concerned that the potential impact of the proposed redevelopment at Water Lane on the built environment and underground archaeology has been somewhat underestimated. This site represents a whole quadrant of the medieval town and much evidence of the evolution of the settlement comprising a whole range of backland activities can be expected to survive both above and below ground. Currently in our view Policy WL1, although laudable in its aspirations to conserve the character of the historic environment, does not afford this fact sufficient recognition or make suitable provision for the amount of buildings recording, archaeological assessment, evaluation and recording that is likely to be required. To address this we suggest adopting the following Policy wording:

"Development proposals must take full account of and avoid harm to statutorily listed buildings and undesignated heritage assets and their settings both within and beyond the Water Lane site and preserve or, preferably enhance the character and appearance of the Newport conservation area.

Development proposals should also take full account of known surface and sub-surface archaeology and ensure unknown and potentially significant deposits are identified and appropriately considered during development after consultation with the Shropshire Historic Environment Record (HER), which is maintained by Shropshire Council on behalf of Telford & Wrekin Council under a Service Level Agreement (SLA). Lack of current evidence of sub-surface archaeology must not be taken as proof of absence and further archaeological planning advice is available from Shropshire Council, who provide this advice to Telford & Wrekin Council under the



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk





WEST MIDLANDS OFFICE

same SLA”.

In general, however, overall the plan reads as a well-considered, concise and fit for purpose document which we consider takes a suitably proportionate approach to the historic environment of the Town.

Beyond those observations we have no further substantive comments to make on what Historic England considers is a good example of community led planning. I hope you find this advice helpful.

Yours sincerely,



Peter Boland
Historic Places Advisor
peter.boland@HistoricEngland.org.uk

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk



From: [REDACTED]
Sent: 14 December 2017 16:29
To: DevelopmentPlans
Subject: Newport Neighbourhood Development Plan 2017 - 2031

Categories: [REDACTED]

Dear Sir/Madam,

The following comments are submitted on behalf of Newport Baptist Church in response to letter ref: NNDPReg16 dated 5th December 2017 from Katherine Kynaston.

Regulation 14 Consultation

Water Lane Development Site - Plan 3 on page 26 is incorrect in two areas:

- Newport Baptist Church purchased the former Council Offices more than 20 years ago yet the map is still annotated '*Cnl Offices*'.
- The photograph at the bottom of the same page has been printed back-to-front. The church main entrance is on the left of the building.

These two errors suggest that scant attention has been given to detail on a plan that should be up-to-date as it concerns development over the next 14 years.

Water Lane Development Principles – Plan 5 on page 30 shows Newport Baptist Church as '*offices*'. Again this suggests that scant attention to detail has been given in preparing this plan.

Policies 4.4.4 - Policy WL1 on page 31 states in bullet point 10 'Identify and retain all buildings of merit'. This is a very loose statement that needs clarifying as to the identification process and the definition of merit. Both aspects are open to wide interpretation – it would have been better to publish a list of those buildings that will be retained.

Regulation 15 Consultation Statement

The Neighbourhood Plan - on page 4 the final bullet point states that '*the Town Council has fully engaged with its local community to produce the Plan*'. Newport Baptist Church is part of the local community yet I know of no approaches from the Town Council for us to be involved/engaged.

Pre-Regulation 14 Consultation and Engagement on page 6 shows a rather disparate list of groups/organisations with whom AECOM consulted. Why was the group 'Churches Together in Newport' not part of this consultation process – after all there are 5 church congregations in Newport who are all community based and community focussed.

Regards

H R Barton
Trustee
Newport Baptist Church
Water Lane
Newport
TF10 7LD

From: DevelopmentPlans
Sent: 15 January 2018 09:20
To: Munyuki, Lawrence
Subject: FW: T&W Formal Consultation of Newport Neighbourhood Development Plan (Regulation 16 Consultation)

FYA

From: Janet Clarke [mailto:]
Sent: 12 January 2018 17:44
To: DevelopmentPlans <DevelopmentPlans@telford.gov.uk>
Subject: T&W Formal Consultation of Newport Neighbourhood Development Plan (Regulation 16 Consultation)

T&W Formal Consultation of Newport Neighbourhood Development Plan (Regulation 16 Consultation)

I am Janet Clarke of . I can be contacted by email or post.

I have been a member of the Steering Group of the Newport Neighbourhood Plan since its formation representing Newport and District Civic Society.

I had a particular interest in 'green spaces' and together with another member of the Steering Group, we surveyed sites in Newport and reported at various times to the Steering Group the relevant details for each green space site. Subsequently, the details of each of the 'green spaces' was included in the draft NDP.

However, as you will see from my emails below to the Newport Town Clerk and the Deputy Clerk, the site at Baddely Wells has been omitted from the draft NDP due to what was mistakenly thought to be a potential conflict with what was the emerging Local Plan (eLP) for Telford and Wrekin Council (TWC). Subsequently, this has been shown not to be the case as the Inspector had removed the Baddely Wells site from the TWC housing site allocations. This removal is now confirmed in the Local Plan 2011 –2031 which was adopted by TWC Full Council on 11th January 2018.

The relevant extract in the Local Plan which relates to Baddely Wells (H13) site can be found in reference MM 92 of Appendix 2 –the Main Modifications to the Local Plan.

In the light of the above and the below, I would ask that Baddely Wells is reinstated to the draft NDP as a recognised green space.

If you require any further information from me regarding any questions you may have arising from this submission, I would be happy to provide.

17/11/17 at 8:52 AM

To Enquiries@newportsaloptowncouncil.co.uk

Lee,
Following our call on Monday, I have to say that I am surprised and disappointed that the NDP was delivered to T&W so quickly following the NTC meeting particularly in the light of previous views from T&W and Michael Barker to the effect that NTC might want to review the NDP following the publication by the Planning Inspector of his final report on the Major Modifications for the emerging Local Plan (eLP).

N08 - Janet Clarke

Ironically, the report from the Inspector was published by T&W last Friday morning i.e less than 48 hours after the NTC meeting.

It seems that I will now need to respond to the T&W public consultation on the NDP as regards the important conclusions from the Inspector as regards site H13 and on other matters.

Thank you.

Janet Clarke
Newport and District Civic Society

From: Janet Clarke [REDACTED]
Sent: 07 November 2017 12:36
To: Sheila Atkinson <Sheila@newportsaloptowncouncil.co.uk>
Subject: Newport Neighbourhood Development Plan update - Town Council Meeting 8 November 2017

Sheila,

With reference to the agenda item above, I would ask that you bring to the attention of NTC the statement following from me, as a member of the NDP Steering Group :-

With regard to the NDP, I would ask that the land at Station Road, known as Baddely Wells, and previously as Site H13, be retained as 'green space' in the NDP that is to be submitted to Telford and Wrekin Council.

The reason is that, as members may recall, earlier this year Mr Barker advised that Baddely Wells (Site 12 in the NDP Evidence Review) could not be retained as green space in the NDP because it was identified as a housing allocation site (H13) in the emerging Local Plan.

However, following the removal of this site by the Inspector, and following the Reg 14 Public Consultation, the Process Management Group reported to the Steering Group on 26th July that Baddely Wells would now be shown as green space in the NDP.

The Councillors speaking at Planning Committee on 30 August drew attention to this in objecting to the application for housing on the site - planning application TWC/2015/0057.

TWC have only passed a 'resolution to grant' on land which currently remains deleted from housing site allocations. H13, together with other deleted sites, awaits the decision from the Inspector to the response to consultation on the Major Modifications, which he is considering at present. This issue is not just about H13 but other sites elsewhere in Telford.

As the largest number of responses from Newport people on the Neighbourhood Plan referred to green space at Baddely Wells, I would ask that this site is retained, or referenced in some way, as intended, in the NDP to reflect the fact that it has been identified as existing green space since the initial gathering of evidence, way back in 2014, as those Town Council members on the Steering Group will recall.

Furthermore, as Mr Barker, when Head of Planning, will recall, Baddely Wells (i.e. H13) is described in his own 2008 and 2012 Open Space Studies as "natural and semi-natural OPEN SPACE in which Newport is deficient".

Nothing has changed, the description still fits, it is still open and it is still green - the fields, the woodland with a winding path created by TWC, the copses and hedgerows, the beautifully enhanced entrance created by Newport in Bloom, the public footpaths still widely used, particularly as a link between Church Aston and south Newport. - this should continue to be identified as existing now, whatever the future may hold. To simply say nothing is to negate the views of the majority of those local people who cared enough to respond to the NDP.

With NTC seeking to continue with its previous application to extend the town boundary to the A518 by 2019, the whole of Baddely Wells would come within the town boundary.

Thank you,

Janet Clarke
Newport and District Civic Society

From: [REDACTED] >
Sent: 21 January 2018 20:21
To: DevelopmentPlans
Subject: TWC Formal Consultation on the draft Newport Development Plan (Regulation 16 Consultation)

I am Kathryn Foster, [REDACTED]. I can be contacted by post, email or phone.

I wish to comment on the draft **Newport Neighbourhood Development Plan as above.**

My experience may be of relevance:-

- I was Member then Chairman of the Heritage Lottery Fund Committee for the West Midlands 2001-2010
- Chair of the former Wrekin Heritage, Wrekin Tourism Association later Telford Tourism Partnership until 2014
- I am a previous Chairman of Governors, Newport Girls High and now a member of the Academy Trust Governing Body
- I am a member of the Newport Town Team, the Civic Society and of Newport Rotary Lite
- I am Chairman of the Alzheimer's Research Shropshire Fundraising Group
- I was Tourism Consultant to Advantage West Midlands.
- I am a Trustee of the Shropshire Wildlife Trust and currently sit on the Marches Nature Partnership and chair its Tourism subgroup

Comments:

In my view, the 'policies' set out in the draft NDP relating to "Tourism & Leisure", "Newport as a Retail & Service Centre" and "Employment & Jobs", are lacking in sufficient detail as to be practicable and able to be implemented.

There is a considerable lack of data and analysis of the town's current assets and future opportunities, especially in terms of the way **retail, business and future employment is developing**.

There are considerable opportunities for external funding to add to the visitor economy and cultural offering and provision in the town - on which I have tried to advise both the Town Council as well as other bodies in the town such as the Market Company.

The **Water Lane** area has long deserved a **proper master-plan** - often discussed with former head of planning Michael Barker, yet this remains largely unaddressed and only covered in a piecemeal fashion.

The policies on jobs - eg the example of the former Coop building - still empty after months and months - not even being used as a 'pop up' venue such as happens in other small and large towns - reveals a lack of creative thinking - during which time more and more out of town developments are taking business away from our precious high street - and detracting from both the viability as well as the character of the market town.

Policies are not sufficiently integrated or 'bullish' and need considerable more detail and **granular attention to the linkages between different aspects of the town's strengths and weaknesses** :

e.g. the high performing schools and the potential for high end jobs, the heritage of the town and its inward investment/suitable markets/bog standard housing without character. The loss of green

N09 - Katie Foster

fields to development and the relationship to the traditional farming economy post Brexit. The well being and health of an ageing population and the ever diminishing lack of open green space - the issues of air pollution which is now becoming ever more worrying - needs to be linked to the way new houses are being built close to the edge of roads - becoming ever busier in the town.

which brings me to my final point:

Furthermore -

I would also like to support and endorse the response from Janet Clarke, as below.

T&W Formal Consultation of Newport Neighbourhood Development Plan (Regulation 16 Consultation)

I am Janet Clarke of [REDACTED] I can be contacted by email or post.

I have been a member of the Steering Group of the Newport Neighbourhood Plan since its formation representing Newport and District Civic Society.

I had a particular interest in 'green spaces' and together with another member of the Steering Group, we surveyed sites in Newport and reported at various times to the Steering Group the relevant details for each green space site. Subsequently, the details of each of the 'green spaces' was included in the draft NDP.

However, as you will see from my emails below to the Newport Town Clerk and the Deputy Clerk, the site at Baddely Wells has been omitted from the draft NDP due to what was mistakenly thought to be a potential conflict with what was the emerging Local Plan (eLP) for Telford and Wrekin Council (TWC). Subsequently, this has been shown not to be the case as the Inspector had removed the Baddely Wells site from the TWC housing site allocations. This removal is now confirmed in the Local Plan 2011 –2031 which was adopted by TWC Full Council on 11th January 2018.

The relevant extract in the Local Plan which relates to Baddely Wells (H13) site can be found in reference MM 92 of Appendix 2 –the Main Modifications to the Local Plan.

In the light of the above and the below, I would ask that Baddely Wells is reinstated to the draft NDP as a recognised green space.

email to [LeeJakeman, Newport Town Council](#)

Dear Lee,

Following our call on Monday, I have to say that I am surprised and disappointed that the NDP was delivered to T&W so quickly following the NTC meeting particularly in the light of previous views from T&W and Michael Barker to the effect that NTC might want to review the NDP following the publication by the Planning Inspector of his final report on the Major Modifications for the emerging Local Plan (eLP). Ironically, the report from the Inspector was published by T&W last Friday morning i.e less than 48 hours after the NTC meeting.

It seems that I will now need to respond to the T&W public consultation on the NDP as regards the important conclusions from the Inspector as regards site H13 and on other matters.

Thank you.

Janet Clarke

Newport and District Civic Society

From: Janet Clarke [REDACTED]

Sent: 07 November 2017 12:36

To: Sheila Atkinson <Sheila@newportsaloptowncouncil.co.uk>

Subject: Newport Neighbourhood Development Plan update - Town Council Meeting 8 November 2017

Sheila,

With reference to the agenda item above,I would ask that you bring to the attention of NTC the statement following from me, as a member of the NDP Steering Group :-

With regard to the NDP, I would ask that the land at Station Road, known as Baddely Wells, and previously as Site H13, be retained as 'green space' in the NDP that is to be submitted to Telford and Wrekin Council.

N09 - Katie Foster

The reason is that, as members may recall, earlier this year Mr Barker advised that Baddely Wells (Site 12 in the NDP Evidence Review) could not be retained as green space in the NDP because it was identified as a housing allocation site (H13) in the emerging Local Plan.

However, following the removal of this site by the Inspector, and following the Reg 14 Public Consultation, the Process Management Group reported to the Steering Group on 26th July that Baddely Wells would now be shown as green space in the NDP.

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TWC have only passed a 'resolution to grant' on land which currently remains deleted from housing site allocations. H13, together with other deleted sites, awaits the decision from the Inspector to the response to consultation on the Major Modifications, which he is considering at present . This issue is not just about H13 but other sites elsewhere in Telford . As the largest number of responses from Newport people on the Neighbourhood Plan referred to green space at Baddely Wells, I would ask that this site is retained, or referenced in some way, as intended, in the NDP to reflect the fact that it has been identified as existing green space since the initial gathering of evidence, way back in 2014, as those Town Council members on the Steering Group will recall.

Furthermore, as Mr Barker, when Head of Planning, will recall, Baddely Wells (i.e. H13) is described in his own 2008 and 2012 Open Space Studies as "natural and semi-natural OPEN SPACE in which Newport is deficient".

Nothing has changed, the description still fits, it is still open and it is still green - the fields, the woodland with a winding path created by TWC, the copses and hedgerows, the beautifully enhanced entrance created by Newport in Bloom, the public footpaths still widely used, particularly as a link between Church Aston and south Newport. - this should continue to be identified as existing now, whatever the future may hold. To simply say nothing is to negate the views of the majority of those local people who cared enough to respond to the NDP.

With NTC seeking to continue with its previous application to extend the town boundary to the A518 by 2019, the whole of Baddely Wells would come within the town boundary.

Thank you,

Janet Clarke

Newport and District Civic Society

Yours faithfully

Kathryn Foster (Ms)

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

From: [REDACTED]
Sent: 06 December 2017 19:00
To: DevelopmentPlans
Subject: Newport Neighbourhood Plan

Categories: [REDACTED]

This plan shares a number of features with the T&W Local Plan in that it looks superficially good but upon closer inspection it avoids many of the real issues. These issues revolve around the substantial increase in population and the resulting pressures on the town's infrastructure - there is no real impact assessment made of the increased demands on the existing facilities.

Overall the impression given by the document is one of a 'copy and paste job' with suitable inserts to localise the content.

Rather than write a treatise on the plan, which I believe should be rewritten to make it more objective and easy to understand, I would make the following comments on two areas that are vital to the future of the town:

4.6 Transport and Accessibility

POLICY TA1. —

Development that would result in the loss of off-street car parking will not be permitted unless an equivalent or better capacity is provided elsewhere in Newport.

What is actually required are more parking spaces not just maintaining the status quo. The challenge is how to meet the parking needs of an expanding town where all the new houses are on the periphery whilst supporting the parking needs of the businesses operating in the town centre.

This policy conforms to Telford & Wrekin Local Plan policy SP2 Newport, C1 Promoting Alternatives to the Private Car,

The only policy suggested here is that people should ride bikes on cycle paths yet to be built. Hardly much help to Newport residents who are increasingly working away from the town which is rapidly turning into a 'bedroom' suburb of Telford and the I54.

4.7 Newport as a Retail and Service Centre

Policy EC6 sets out the approach to managing the centre to make sure that Newport continues to fulfill its primary role of providing convenient and accessible shopping facilities within a compact area.

4.7.2 Policy Objectives —

To support retail uses and make sure that non-retail uses do not impact negatively on shopping environment or local amenity within the centre — To protect and enhance the Conservation Area and support the centre as part of measures to conserve the Town's heritage and as a destination for residents and visitors.

Very difficult to see how this policy sits with the Aldi/Lidl out of town shopping centre being set up at the end of Audley Avenue.

Laurence Bennett

From: [REDACTED]
Sent: 21 January 2018 14:43
To: Munyuki, Lawrence
Subject: RE: Newport NP boundary

Hi Lawrence

Thank you.

I would like to formally object to the proposed boundary change made by Newport Town Council to encompass part of Chetwynd Aston.

The argument that they advance for doing this is on the grounds that people do not know where they are living. The real reason is to gain the precept for the houses that not only exist now but also will soon be built.

Chetwynd Aston is older than Newport and to start the destruction of this village is indefensible and would need the support of English Heritage to proceed that it does not have.

Please pass my objection to the appropriate person.

Regards

Malcolm Bennett

From: Munyuki, Lawrence [mailto:Lawrence.Munyuki@APT-Group.co.uk]
Sent: 10 January 2018 14:42
To: [REDACTED]
Subject: Newport NP boundary

Malcolm

The boundary used in the NP is the same boundary used by Newport Town Council when they applied for designation as a neighbourhood area. The application was made by in 2013 by Newport TC and TWC consulted on it and formally approved the designation in June 2013. Relevant information is available on our website –

www.telford.gov.uk/newportndp

Have you raised this issue with Newport Town Council? The reason I'm asking is that if the Local Authority has to amend the boundary, it has to be via a new application from Newport Town Council. The Planning Practice Guidance provides a bit of guidance on this. It states that:

“Can a local planning authority amend the boundary of a neighbourhood area once it has been designated?”

A local planning authority can amend the boundary of a neighbourhood area after it has been designated only if the local planning authority is responding to a new application for a neighbourhood area to be designated.

Paragraph: 037 Reference ID: 41-037-20140306

Revision date: 06 03 2014

<https://www.gov.uk/guidance/neighbourhood-planning--2>

Let me know if you have any queries regarding the above.

Kind regards

Lawrence Munyuki
Senior Planning Policy Officer

Environment & Planning Policy Team

N11 - Malcom Bennett

Development Management
Business, Development & Employment
1st Floor Upper
Wellington Civic Offices
Larkin Way (off Tan Bank)
Telford
TF1 1LX

Tel: 01952 384251
Fax 01952 381806
Email: Lawrence.Munyuki@telford.gov.uk
www.telford.gov.uk

External Postal Address:
Development Management
Telford & Wrekin Council
PO Box 457
Telford
TF2 2FH



www.telford50.co.uk

For all latest Council news visit our [newsroom](#); follow us on Facebook at www.facebook.com/telfordwrekin and Twitter at www.twitter.com/telfordwrekin

You can use the Council's new 'My Telford' service to create a personal account that conveniently brings your service requests with us together in one place – with one log in.

So whether you are checking your bin day, paying your council tax, reporting an issue and tracking the progress or seeing what local services are available based on your address – do it all on your My Telford account. To set yours up visit www.telford.gov.uk/mytelford

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From: DevelopmentPlans
Sent: 18 January 2018 11:22
To: Munyuki, Lawrence
Subject: FW: Newport Neighbourhood Development Plan

From: Brian & Elizabeth Dredge [REDACTED]
Sent: 17 January 2018 15:21
To: DevelopmentPlans <DevelopmentPlans@telford.gov.uk>
Subject: Newport Neighbourhood Development Plan

T&W Formal Consultation of Newport Neighbourhood Development Plan (Regulation 16 Consultation)

1. My name is Brian Dredge and I live at [REDACTED], where I have resided for over 34years. I can be contacted by post or email.
2. I have long been interested in the lack of public open space in Newport, particularly during the last 10years, a period when consideration of plans for the erection of homes on much of the surrounding countryside has been prevalent.
3. In response to an invitation to send comments on the Newport Neighbourhood Development Plan (NDP) to Newport Town Council I emailed them to the Council on 5 June 2017. The content of that email is reproduced in the next three paragraphs.
4. The NPD is not so much a plan as a statement of the status quo and appears to be mightily constrained by the Telford & Wrekin Local Plan, which has manifestly failed to protect the countryside in the west and south-west of Newport and in that surrounding the south of Newport.
5. A significant part of the NDP deals with the public green space in Newport, but none of it is particularly natural and spacious. Admittedly one only has to go to The Wrekin or to one of the various National Trust or English Heritage sites in Shropshire to have open natural space but the people of Newport should not have to travel so far in order to obtain recreation and to relax for a while from the built environment.
6. Newport has just over 7.1% of its area designated as public green space but many of the spaces are very small. The H13 Baddely's Wells site is currently open green space and should remain so. It would only increase the designated public green space to just over 7.8% and this increase is justified because of all the extra dwellings that have been and are being built in and to the south and west of Newport. Whilst the T&W Local Plan classes it as suitable for housing development, this should be strongly resisted.
7. I have seen the statement of Janet Clarke made for the purpose of the Regulation16 Consultation and understand that she represented the Newport and District Civic Society on the Steering Group of the Newport Neighbourhood Plan from its inception. I support and endorse the submission made by Mrs. Clarke in that the Baddely Wells (H13) site be reinstated in the draft NDP as a recognised green space

Brian Dredge

N12 - Mr & Mrs Dredge

17 January 2018

N13 - Newport Regeneration Partnership

From: [REDACTED]
Sent: 21 January 2018 18:10
To: DevelopmentPlans
Cc: Carter, Eric, Cllr; [REDACTED]
Subject: Newport Neighbourhood Development Plan Consultation - from Newport Regeneratio Partnership

Importance: High

Expires: 20 July 2018 00:00

At the recent Newport Regeneration Partnership Meeting, Members were reminded that the consultation period for the Newport NDP finishes on Tuesday 23rd January and the Chairman encouraged all the partners to respond direct, where appropriate.

The Newport Regeneration Partnership wishes to acknowledge the work undertaken throughout the process to arrive at this stage in the production of a document that will be very important for the future development of the Town. Members also wished to express their thanks to Newport Town Council Members and Staff as the enormous amount of work involved has been recognised.

Our Partners have had an opportunity to respond and comment and we ask that all the comments you receive are taken into consideration.

One of the main points is that Members believe that Baddely's Wells should be reinstated into the Newport Neighbourhood Development Plan as a recognised local green space, in order to protect it from future development. This is now in line with the Telford & Wrekin Local Plan and is very important to the people of Newport as well as surrounding areas.

Kind Regards

Katrina

Katrina Baker MBE
Secretary
Newport Regeneration Partnership

Newport's Neighbourhood Development Plan (draft)

This response to the draft Neighbourhood Development Plan for Newport, currently out to consultation under Regulation 16 of the Neighbourhood Planning Regulations 2012, is provided by Newport {Shropshire} Town Team Limited.

Contact details:-

Mail: Newport {Shropshire} Town Team Ltd, c/o 53 Beechfields Way, Newport, Shropshire TF10 8QA

Email: newportshropstownteam@hotmail.co.uk

Mobile: 07581 454882

Contact: Mike Atherton, Town Team Manager

Consultation Response

Newport {Shropshire} Town Team Limited, a representative body whose membership comprises town centre businesses, acknowledges the challenges confronting town and parish councils when developing a meaningful and effective Neighbourhood Development Plan.

Whilst the town team has reviewed the whole document our comments relate primarily to the sections relating to "Employment & Jobs", "Tourism & Leisure", and "Newport as a Retail & Service Centre".

The town team's overall view of the draft Neighbourhood Development Plan (NDP) for Newport now before us as part of a formal consultation process is that:-

1. It is long overdue having taken over 4 years to collate from its inception as a front-runner pilot;
2. The plan development process could have benefited from the earlier engagement of an independent planning policy expert to guide collation of relevant evidence, shape & test draft policies, and ensure integration across the differing policy areas;
3. The evidence base used to create the draft NDP policies was too narrow in that it ignores substantial amounts of relevant information / evidence held by contributors and other local organisations;

4. Local contributors were encouraged to focus on a fairly narrow policy spectrum too early in the process resulting in some contributors (including the town team) withdrawing from the NDP development process;

In our view the effect of these procedural decisions is:

- A proposed policy framework as set out in the draft NDP for Newport that is not as strong, integrated, or relevant as it could be.
- A missed opportunity to shape / influence the T&W Local Plan 2016 to 2031 resulting in a weaker strategic planning policy framework for Newport;

These assertions are evidenced in many ways including:-

5. the absence of a strategic development plan for Newport town centre;
6. the absence of a development action plan for Water Lane;
7. planning consents being granted for ~1,400 new dwellings in Newport since 2013 many of which have now emerged on green fields;
8. planning consents gained for edge-of-town retail developments including the Aldi store, and more recently for modified proposals on the so called *Morrison's site*;
9. a vacant major commercial town centre property, whose demise was widely anticipated prior to edge-of-town retail developments, with no clear proposals to bring this important building back into use.

ECONOMY & JOBS

Strategic Policies

The draft NDP asserts that the emerging draft (now approved) Telford & Wrekin Local Plan 2016 to 2031 identifies *"consolidating and strengthening Newport's role as a market town as a key objective for the Borough as a whole"*.

Local evidence does not support this assertion:-

10. Whilst parts of Newport's high street enjoy conservation area status there is no town centre focused strategic development plan nor is there a town centre action plan;
11. The Local Planning Authority (LPA) has failed over many years to bring together various landholdings on Water Lane to create a coherent and deliverable development plan;
12. Aside of "safe and attractive environments" and a precursor "archaeological survey" the draft NDP entirely ignores the Water Lane development opportunity

The effect of the above is a piecemeal rather than an integrated strategic approach to development in and around Newport's town centre, including the vital issues of car parking and traffic management, and inter-related leisure & heritage opportunities.

In the view of town team members the draft NDP now before us does nothing to address the above shortcomings.

A second assertion says "The aim is to achieve a sustainable balance between available employment opportunities and available local skills".

Whilst this is a very laudable aspiration it is also reasonable to ask both T&WC as the LPA responsible for the Local Plan 2016 to 2031 and the Town Council as authors of the draft NDP:-

13. Why has a substantial area of land to the north of the A518 (Aldi roundabout to sheep island) which had been allocated for employment uses for in excess of 20 years never come forward for development?
14. What has now changed to give observers any confidence that the new allocation of land south of the A518 (Aldi roundabout to sheep island) will be actively marketed and developed in the foreseeable future?
15. When will an action plan be published to effect this employment related development that will give observers confidence that there is policy provision and political will to deliver?
16. How will the Local Plan and Newport's NDP (given it is outside of the town boundary) shape the high quality jobs intended by development of this site?

In our view, without answers to these questions, observers may believe that the borough council was only ever interested in a re-designation of former employment land to the north of the A518 for housing development to increase its council tax base – strangely, an area that the town council now seeks to include within its geographical boundaries through its current active pursuit of a boundary review!

Policy Objectives

It is interesting to note that the assertions at page 19 refer to observations of residents.

The draft NDP offers no evidence that local businesses, irrespective of location or type, were canvassed for views or their ideas, and if this is a correct assertion then this significant omission calls into question the basis upon which many of the draft policies of the NDP have been derived.

Importantly, if the LPA and / or landowners do not actively market sites allocated for employment uses then they are unlikely to come forward in any scale, especially when competing with lower value / lower cost sites in Telford and similar sites in Stafford, Wolverhampton (including i54) and the West Midlands.

The absence of an effective marketing strategy for land allocated for employment uses north of the A518 (Aldi roundabout to sheep island), which has now been re-allocated in part for housing, effectively means that Policy E.1 is meaningless. And, as previously stated without a delivery plan the newly allocated employment land south of the A518 may well lay idle for 20 years just as the land to the north of the A518 did previously.

Another important observation relating to the above employment land is that it is outside of the Newport town boundary and therefore any related policies in the Newport NDP may only be aspirational (*what we would like to see*) rather than influential (*how we intend it to be*).

Similarly, policy E2 of the draft NDP is superfluous as the two stated criteria are integral aspects of the LPA process i.e. it is inconceivable that the LPA would grant consent to a new business on land already in commercial use that had “*significant harmful effects on the amenities of the adjoining areas*” or “*where the proposal would not have unacceptable impacts on the local road network*”

Critically, the policy objectives and specific policies within the draft NDP do not appear to recognise the vital importance to the local economy of Newport’s town centre where there are already well over 1,000 people employed in the retail and service sectors.

This new policy framework does not seek to influence an inevitable evolution in the type and structure of employment in Newport’s town centre.

In our view this omission offers no comfort to existing businesses investing in their futures and it potentially undermines aspirations to develop Newport’s tourism & leisure offer. Critically, in the medium-term it will inevitably lead to significant decline in the maintenance, repair and quality of many town centre buildings that are also the town’s heritage assets.

TOURISM & LEISURE

Strategic Policies

Understandably, the primary focus of this part of the draft NDP is the opportunities presented by the outstanding work of the Shrewsbury and Newport Canals Trust.

The 'town team' fully endorse their work and are committed to working cooperatively with them to achieve their aims insofar as they enhance opportunities for Newport.

Furthermore, the draft NDP ignores several other really important opportunities to shape Newport's future tourism and leisure offer including:-

17. Opportunities linked to a plethora of high quality heritage buildings throughout the town centre (St. Nicholas Church, the Guildhall, the Market Hall, and many individual shops & business premises);
18. Opportunities for linked heritage visits to Newport with the World Heritage Site(s) of Ironbridge, the historical towns of Shrewsbury & Stafford, and a host of market towns in near proximity to Newport with similar heritage assets and opportunities;
19. natural links to adjacent countryside including easy access to footpaths, bridleways, towpaths and the former Stafford to Newport railway line;
20. A complete absence of narrative and policies to address Newport's very limited cultural offer.

In summary, whilst the town team fully supports Policy TL1 (comprising six sub-points) we believe opportunities to considerably strengthen this policy area have been missed.

NEWPORT AS A RETAIL AND SERVICE CENTRE

Strategic Policies & Policy Objectives

Whilst the 'town team' supports in principle the policy objectives and draft policy RS1 (comprising 3 sub-points) their effect is very limited and in our view they leave this important policy area wanting.

We are concerned to note the omission of any policies that would seek to control both the extent and type of edge-of-town commercial / retail development. Edge-of-town retail development is not sustainable in that it generates additional car journeys (as both Mere Park Garden Centre and the Aldi store already do). Whereas a good proportion of people employed in the town centre and many of those who choose to shop there regularly walk or cycle as a preferred mode of transport.

Separately, we are especially concerned to note a complete absence of pro-active policies to support and enhance Newport's commercial heart for retail and services where people have gathered for business, shopping and leisure purposes over hundreds of years – despite huge changes in the ways commerce is conducted and in the means of communications this *social hub* remains as relevant today as it ever has in Newport's long history.

In our view and our experience there is clear evidence that a town centre retail and service offer is adversely affected by competition at the edge-of-town. Some recent local examples include:-

21. the rapid demise and ultimately closure of the Royal Victoria Hotel following development of a Premier Inn alongside the A41 by-pass;
22. the future of the Coop / Budgen supermarket, held in balance for many months, was finally resolved upon arrival of the Aldi store;
23. arrival of a new hard-ware store (Home Essentials) in Newport's town centre shortly after closure of the edge-of-town Focus store;
24. establishment of TFM close to Newport's town centre confirmed within several months the decline and closure of the edge-of-town Countrywide store;
25. the extensive giftware and clothing offer at Mere Park Garden Centre which adversely affects the town centre giftware and clothing offer.

These examples, alongside findings set out in reports from the 2013, 2014 and 2016 Newport town centre benchmarking surveys, show that many businesses are firmly established for the future but a significant proportion of traders, maybe as many as 25% of town centre businesses, remain marginal leaving a 'fragile high street'.

Further evidence collated by the town team confirms that over 60 businesses have failed and left Newport's town centre since April 2013. Thankfully, commercial property closures in the town centre tend to be relatively short-term (typically 2 to 3 months) before new businesses emerge in place of those departing.

Whilst the 'town team' acknowledge that competition is good for consumers we believe that it is also important to acknowledge the wider implications of such policies and the longer-term implications where they are less than robust.

For example, edge-of-town retail and service developments are invariably housed in "tin sheds" with a life expectancy typically around 40 years. Retail and service businesses established in Newport's town centre occupy in the main some superb heritage buildings often 100 years and in some cases 200 or more years old.

Observations from many midlands and northern market towns show that edge-of-town commercial developments result in town centre closures where heritage buildings then often fall into terminal decline.

As a forecast, it is highly likely that the tin sheds on the edge-of-town will lie derelict or have been replaced in forty years whereas our town centre heritage assets may by then have gone forever.

Conclusions

In our view, policies set out in the draft NDP relating to “Employment & Jobs”, “Tourism & Leisure”, and “Newport as a Retail & Service Centre” are under-developed, are not sufficiently integrated, and lack robustness in context of rapidly changing technologies for communicating, doing business and socialising.

Critically, there is a policy vacuum for the town centre which in our view demonstrates that the draft NDP is not sound, and therefore not fit for purpose.

Mike Atherton

For and on behalf of Newport Town Team

21st January 2018

From: [REDACTED]
Sent: 19 January 2018 15:58
To: DevelopmentPlans
Subject: T&W Formal Consultation of Newport Neighbourhood Development Plan
(Regulation 16 Consultation)

I am Peter Chadwick of [REDACTED]. I can be contacted by email or by post.

I am a member of Newport and District Civic Society. The Society submitted evidence over a number of years both to the Local Plan process as well as to the Newport Neighbourhood Development Plan (NNDP) process.

I support and endorse the submission from Janet Clarke below.

I would add that I attended both T&WC Plans Committee meetings held August 2017, when the public consultation on the Major Modifications issued by the Local Plan Inspector was taking place. After the consultation period expired, even though the Inspector was aware that T&WC officers had recommended outline planning approval for houses on the H13 site and Plans Committee had followed the officer recommendation, the Inspector nevertheless, in his final Major Modifications that were adopted by T&WC Full Council on 11th January 2018, exclude site H13 and 3 other sites from the T&WC housing site allocations list. Per the reasons set out in his note to T&WC of 30th March 2017, the Inspector said that T&WC had included sites owned by T&WC to the exclusion of sites in private ownership and that he could find no support for this in the NPPF. As T&WC were unable to provide evidence as to how the various sites had been selected or rejected, the Inspector requires T&WC to produce a Sites Allocation Local Plan in due course to provide evidence of any further housing need and any additional sites over and above those in the current sites allocation list. T&WC have said they unlikely to go through this Sites Allocation Local Plan process until past 2020 at the earliest.

As site H13, which includes the land at Baddelys Wells, is now excluded by the Local Plan Inspector from the approved site allocation list in the adopted Local Plan 2011-2031, it can be reinstated in the NNDP as to do so causes no conflict with the adopted Local Plan.

Regards,
Peter Chadwick

**T&W Formal Consultation of Newport Neighbourhood Development Plan
(Regulation 16 Consultation)**

**I am Janet Clarke of [REDACTED]. I can be contacted
by email or post.**

**I have been a member of the Steering Group of the Newport Neighbourhood
Plan since its formation representing Newport and District Civic Society.**

**I had a particular interest in 'green spaces' and together with another member
of the Steering Group, we surveyed sites in Newport and reported at various
times to the Steering Group the relevant details for each green space site.**

**Subsequently, the details of each of the 'green spaces' was included in the
draft NDP.**

**However, as you will see from my emails below to the Newport Town Clerk and
the Deputy Clerk, the site at Baddely Wells has been omitted from the draft
NDP due to what was mistakenly thought to be a potential conflict with what
was the emerging Local Plan (eLP) for Telford and Wrekin Council (TWC).**

**Subsequently, this has been shown not to be the case as the Inspector had
removed the Baddely Wells site from the TWC housing site allocations. This
removal is now confirmed in the Local Plan 2011 –2031 which was adopted by
TWC Full Council on 11th January 2018.**

N15 - Peter Chadwick

The relevant extract in the Local Plan which relates to Baddely Wells (H13) site can be found in reference MM 92 of Appendix 2 –the Main Modifications to the Local Plan.

In the light of the above and the below, I would ask that Baddely Wells is reinstated to the draft NDP as a recognised green space.

If you require any further information from me regarding any questions you may have arising from this submission, I would be happy to provide.

17/11/17 at 8:52 AM

To Enquiries@newportsaloptowncouncil.co.uk

Lee,

Following our call on Monday, I have to say that I am surprised and disappointed that the NDP was delivered to T&W so quickly following the NTC meeting particularly in the light of previous views from T&W and Michael Barker to the effect that NTC might want to review the NDP following the publication by the Planning Inspector of his final report on the Major Modifications for the emerging Local Plan (eLP). Ironically, the report from the Inspector was published by T&W last Friday morning i.e less than 48 hours after the NTC meeting.

It seems that I will now need to respond to the T&W public consultation on the NDP as regards the important conclusions from the Inspector as regards site H13 and on other matters.

Thank you.

Janet Clarke

Newport and District Civic Society

From: Janet Clarke

Sent: 07 November 2017 12:36

To: Sheila Atkinson <Sheila@newportsaloptowncouncil.co.uk>

Subject: Newport Neighbourhood Development Plan update - Town Council Meeting 8 November 2017

Sheila,

With reference to the agenda item above, I would ask that you bring to the attention of NTC the statement following from me, as a member of the NDP Steering Group :-

With regard to the NDP, I would ask that the land at Station Road, known as Baddely Wells, and previously as Site H13, be retained as 'green space' in the NDP that is to be submitted to Telford and Wrekin Council.

The reason is that, as members may recall, earlier this year Mr Barker advised that Baddely Wells (Site 12 in the NDP Evidence Review) could not be retained as green space in the NDP because it was identified as a housing allocation site (H13) in the emerging Local Plan. However, following the removal of this site by the Inspector, and following the Reg 14 Public Consultation, the Process Management Group reported to the Steering Group on 26th July that Baddely Wells would now be shown as green space in the NDP.

The Councillors speaking at Planning Committee on 30 August drew attention to this in objecting to the application for housing on the site - planning application TWC/2015/0057. TWC have only passed a 'resolution to grant' on land which currently remains deleted from housing site allocations. H13, together with other deleted sites, awaits the decision from the Inspector to the response to consultation on the Major Modifications, which he is considering at present. This issue is not just about H13 but other sites elsewhere in Telford.

As the largest number of responses from Newport people on the Neighbourhood Plan referred to green space at Baddely Wells, I would ask that this site is retained, or referenced in some way, as intended, in the NDP to reflect the fact that it has been identified as existing green space since the initial gathering of evidence, way back in 2014, as those Town Council members on the Steering Group will recall.

Furthermore, as Mr Barker, when Head of Planning, will recall, Baddely Wells (i.e. H13) is described in his own 2008 and 2012 Open Space Studies as "natural and semi-natural OPEN SPACE in which Newport is deficient".

Nothing has changed, the description still fits, it is still open and it is still green - the fields, the woodland with a winding path created by TWC, the copses and hedgerows, the beautifully enhanced entrance created by Newport in Bloom, the public footpaths still widely used, particularly as a link between Church Aston and south Newport. - this should continue to be identified as existing now, whatever the future may hold. To simply say nothing is to negate the views of the majority of those local people who cared enough to respond to the NDP.

N15 - Peter Chadwick

With NTC seeking to continue with its previous application to extend the town boundary to the A518 by 2019, the whole of Baddely Wells would come within the town boundary.

Thank you,

Janet Clarke

Newport and District Civic Society

Our Ref: JBB7998

11 January 2018

Town Clerk
Newport Town Council,
The Guildhall,
1 High Street,
Newport,
Shropshire,
TF10 7AR.

Dear Sir/Madam

Representations to the Newport Neighbourhood Plan

- 1.1 RPS is retained on behalf of St Modwen Developments Ltd and Telford and Wrekin Council (Estates) to represent them in relation to the production of the Newport Neighbourhood Development Plan (NDP). These representations are made on their behalf and specific to their land interests at land to the West of Station Road Newport (also referred to as Land South of Springfields Industrial Estate, Station Road, Newport, Shropshire). As you will be aware the site is the subject of a planning consent (committee resolution TWC/2015/0057).
- 1.2 RPS welcomes the progress of the NDP and will seek to work with the Town Council and others to ensure a NDP is progressed to deliver a sound document which can thereby be appropriately considered by an Independent Examiner.
- 1.3 The following comments should be read alongside our earlier comments made on 13 June 2017.
- 1.4 The Submission Telford and Wrekin Local Plan (June 2016) proposed to allocate site H13 (*also known locally as Baddely's Wells*) for residential uses. The Inspector in his report into the Examination process considered that the *"housing site selection exercise underpinning the Local Plan was flawed"*. He however emphasised *"that this finding does not represent any view on the merits of those sites that have been selected for allocation..."* (paragraph 183). The Inspector therefore *"recommended the deletion of housing site allocations that have been identified through the above-noted site selection process but do not have planning permission or other consent"* (paragraph 185). Therefore, this included the deletion of four sites, which were made through the Proposed Main Modifications. Whilst these four sites included H13, the Inspector emphasised that *"he took no view about the acceptability or otherwise of these allocations on an individual basis"* (paragraph 186). He also explained that he had not determined the site's particular merits but that this was a matter to be determined elsewhere (paragraph 139).
- 1.5 The Regulation 14 Consultation Neighbourhood Plan for Newport, consulted on from 2 May to 16 June 2017 referenced that the site (also known locally as Baddely's Wells) was not included as open space in the Newport Neighbourhood Development Plan as it was allocated as a housing site (H13) in the Telford & Wrekin Local Plan (p14). Paragraph 4.6 of the Committee Report (9 August 2017) makes it clear *"that the NNP does not include the H13 site as open space or any other designation"*.

- 1.6 The Inspector's report on the Examination of the Telford & Wrekin Local Plan 2011-2031 (dated 6 November 2017) refers at paragraph 139 that *"Representors seeking to include land at Station Road, Newport within the Green Network are also objecting to the principle of the land's identification as a housing site (H13)". The Inspector went on to state at paragraph 13 that:*

"while local residents say that access to the whole site was previously possible, there is no evidence that a formal right of access not applies over and above the right of way..." The Inspector also recognised that it was ***"the Council's view that the site's existing – and indeed potential – open space value is not sufficient to merit inclusion within the Green Network"*** (paragraph 140).

- 1.7 Application TWC/2015/0057 was considered at planning committee on 9th August 2017 but was deferred to address a late representation from Shropshire Wildlife Trust and so was further considered on 30 August 2017. The Committee report under the heading 'Local Plan and Removal of Allocated Site H13' makes it clear that the *"Inspector has not suggested to the Council that it should consider a new designation on the land, such as the Town Council's suggestion for open space"* and that *"this does not preclude or prevent consideration of this planning application for housing development"*.

- 1.8 The Planning Committee report (30 August 2017) under the heading 'Open Space' comprehensively sets out why the site should not be allocated as open space. This includes setting out that the Village Green application was rejected. A Village Green Application for the site was made on the 16 December 2011 by Mr J. Rudd on behalf of local residents. A non-statutory inquiry in respect of the proposal for Village Green status took place in October 2012. The Inspector, in his report dated 18 January 2013, recommended that the Village Green Application should be rejected by the Registration Authority, concluding that:

"...the Applicant has failed to prove his case and that none of the Application Land qualifies for registration as a town or village green under section 15(2) of the Commons Act 2006. It has not been shown that a significant number of the inhabitants of any locality or any neighbourhood within a locality indulged in lawful sports and pastimes as of right on the Application Land or any part of it for a period of at least twenty years, and continued to do so at the time of the Application."

- 1.9 The Committee Report (30 August 2017) also sets out that f) the planning application is only required to meet its own demands for open space and that k) it is not proper to refuse the application because a different land use is preferred by some people. Under e), the Officer explains that:

"The land is likely to remain as "white land" in the new Local Plan and lie within the proposed built up boundary of Newport". The application was granted subject to S106.

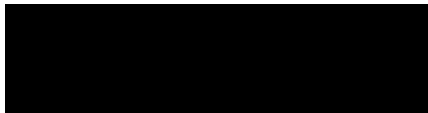
- 1.10 The Regulation 15 Consultation Neighbourhood Plan for Newport, which is being consulted on from 5 December 2017 until 23 January 2018, no longer references site H13 on the basis of the Inspector's recommendations into the Telford and Wrekin Local Plan.

- 1.11 RPS supports emerging policy H1 housing in the Regulation 15 Consultation Neighbourhood Plan, which states that:

“housing development will be supported in order to meet local needs and where the proposed development contributes positively to local character”. The site to the west of West of Station Road Newport would clearly help to support local housing needs.

- 1.12 We trust the above comments are helpful and look forward to being kept informed of all future plan making stages of the NDP.

Yours sincerely



PAUL HILL BA(Hons) MA MRTPI
SENIOR DIRECTOR
Direct Line: 0121 213 5518
Email: paul.hill@rpsgroup.com

Our Ref: JBB7998

13 June 2017

Town Clerk
Newport Town Council,
The Guildhall,
1 High Street,
Newport,
Shropshire,
TF10 7AR.

Dear Sir/Madam

Representations to the Newport Neighbourhood Plan

RPS is retained on behalf of St Modwen Developments Ltd and Telford and Wrekin Council to represent them in relation to the production of the Newport Neighbourhood Development Plan (NDP). These representations are made on their behalf and specific to their land interests at land to the West of Station Road Newport.

RPS welcomes the progress of the NDP and will seek to work with the Town Council and others to ensure a NDP is progressed to deliver a sound Regulation 15 document which can thereby be appropriately considered by an Independent Examiner.

To this end it is acknowledged that the NDP should adhere to strategic policies of the local plan, not promote less development than set out in the Local Plan and more importantly in relation to Newport be based on a sound and credible evidence base. It is acknowledged that at the present time some uncertainty exists regarding the future direction of the Local Plan following the initial Examination sessions and the Inspector's initial note of March 2017. The Planning Authority has indicated that by 3rd July the Council intend to publish its re-appraisal of the Local Plan evidence base.

It is also noted that on 9 June, the Council published additional information including Examination Documents F10b and G24, which follows the Inspector's conclusion's that the Local Plan's Housing Requirement for the Authority should increase from the 15,555 requirement in the submission plan to 17,280 dwellings as indicated by the Kestrel Close Inspector.

In relation to the NDP we note that the Housing Policies (Chapter 4) addresses my clients land interests to the West of Station Road and states the following:

Telford & Wrekin Local Plan Site H13, also known locally as Baddely's Wells, was the subject of considerable debate by residents. This site was considered by some to be a long-standing open space. However, Telford & Wrekin Council's position is clear in the Local Plan that is that the site H13 is both suitable and available for development. Consequently in order to meet the Basic Conditions requirement for the Neighbourhood Plan to be in conformity with the local Development Plan Strategic Policies the Neighbourhood Development Plan must recognise site H13 as an allocation for housing and therefore it is not included as an open space in the Newport Neighbourhood Development Plan.

Irrespective of the direction in which the Local Plan eventually chooses to proceed regarding site allocations, that the NDP seeks to exclude H13 from being identified as 'Open Space' is supported and will continue to be appropriate for two principal reasons:

Firstly – The NDP Development Plan Boundary as indicated by Plan 1 of the 2017 NDP excludes the majority of Local Plan site H13, so in effect it is not within the gift of the NDP to consider whether site H13 of the Submitted Local Plan should or should not be included or excluded as Open Space within the NDP as indicated in the paragraph above. The part of H13 which is included within the NDP boundary (principally to the west of Badleys Wells Pumping Station) is simply an agricultural field and in no way can be considered 'long standing open space', despite the paragraph associated with Chapter 4 not defining what 'open space' actually constitutes.

Secondly – Despite the NDP indicating that the site 'was indicated by some' to be open space, there is no credible evidence base for considering the site constitutes open space to an extent that it merits a related designation in the NDP. In contrast there is substantial evidence which demonstrates the opposite:

- It is contrary to the Local Planning Authority's own evidence base on Open Space provision in Newport and in particular its recent submissions¹ to the Local Plan Inspector, where it was clearly stated by the LPA that Site H13 is not designated as an OL6 (Open Space) site on the Proposals Map of the existing Wrekin Local Plan and the site is not well used apart from rights of way across it a positioned backed up by the Council's own ecologist;
- The most recent December 2012 Roger Tym/Peter Brett Report on Open Space in Newport which concludes:

"We therefore consider that in summary, Newport is adequately provided for in terms of the quantity of space it can avail of in most of the identified categories. Notwithstanding this general conclusion, there is a need to address provision of open space for allotments and children's play in the context of future development."

- A Village Green Application for the site was made on the 16 December 2011 by Mr J. Rudd on behalf of local residents. A non-statutory inquiry in respect of the proposal for Village Green status took place in October 2012. The Inspector, in his report dated 18 January 2013, recommended that the Village Green Application should be rejected by the Registration Authority, concluding that:

"...the Applicant has failed to prove his case and that none of the Application Land qualifies for registration as a town or village green under section 15(2) of the Commons Act 2006. It has not been shown that a significant number of the inhabitants of any locality or any neighbourhood within a locality indulged in lawful sports and pastimes as of right on the Application Land or any part of it for a period of at least twenty years, and continued to do so at the time of the Application."

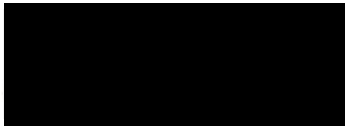
- A current planning application for the site has been informed by landscape and ecological assessments and demonstrates how elements of the site (along the northern boundary) can be retained for recreational use and assimilated into off-site areas of open space, but the majority of the site (the pony paddock and open field) is entirely suitable for residential development and effectively represents a filling in of a scheme which is already committed and therefore appropriate and deliverable, having regard to the provision of the necessary infrastructure and facilities, and taking account of environmental constraints.

¹ Matter 8 EIP Ref: K19a

We trust the above comments are helpful in demonstrating the current proposals within the NDP in relation to the site are entirely appropriate and sound based on a substantial and credible evidence base. Given the above, should the NDP propose any related amendments seeking to alter the plans current approach to the site then this would not be based on sound and credible evidence and would be strongly resisted by my clients at all future stages of plan making.

We look forward to being kept informed of all future plan making stages of the NDP.

Yours sincerely



PAUL HILL BA(Hons) MA MRTPI
SENIOR DIRECTOR
Direct Line: 0121 213 5518
Email: paul.hill@rpsgroup.com

07 February 2018

Our ref: Telford & Wrekin 6

Dear Sir/Madam

Newport Neighbourhood Development Plan (Regulation 16 Consultation)

Thank you for the opportunity to comment on your consultation. We currently have no specific comments to make, but please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Rebecca McLean

Lead Catchment Planner

growth.development@severntrent.co.uk