

Examiner's Comments/Questions

Comment	Steering Group response
<p>Introductory Remarks</p> <p>1. As you will be aware, I have been appointed to carry out the examination of the Newport Quendon and Rickling Neighbourhood Plan. I have now carried out my initial review of the Plan and the accompanying documents that I have been sent. I am grateful for both Parish Councils for responding to my Initial Comments document and confirming that Newport Parish Council is the Qualifying Body.</p> <p>2. I visited the plan area on the afternoon of Monday 11th November, when I experienced the traffic conditions at the end of school at Joyce Frankland Academy. I returned early the next morning and I was in position to observe for myself from about 7.15am, the pattern of queueing and traffic volumes, at the junction of Wicken Road and Newport High Street. I was there for close to an hour and I was then able to experience conditions at both school entrances at the start of the day, as well as seeing the traffic congestion at peak conditions on the B1038. I spent the rest of the morning, driving and walking around all three settlements before having a late morning coffee at the Cricketers Arms in Rickling Green.</p> <p>3. My preliminary view is that I should be able to deal with the examination of this Plan by the consideration of the written material only. However, I do still have to reserve the right to call for a public hearing, if I consider that it will assist my examination, and that decision may to a large extent, depend upon the responses I receive from the questions I raise in this note.</p> <p>4. Set down below are a number of matters that I wish to receive either clarification, responses to my questions or further comments from the Steering Group or in some cases from Uttlesford District Council (UDC). Such requests are quite normal during the examination process and will help me prepare my report and come to my conclusions.</p>	<p>Introductory remark – no response required</p> <p>Introductory remark – no response required</p> <p>Introductory remark – no response required</p> <p>Introductory remark – no response required</p>
<p>Regulation 16 Comments</p> <p>5. Firstly, I would like to offer the Steering Group the opportunity to</p>	<p>See separate document - Appendix 1</p>

<p>respond the comments made in the representations submitted at the Regulation 16 stage. I would be particularly interested in the response to Essex CC's comments on the workability of the Primary School Places policy but many other representations including those from parties promoting other sites, deserve a response.</p>	
<p>Emerging Local Plan 6. Can UDC give me an update on the Local Plan Examination – has a time frame been set for the next stage, clearly dependent upon the Local Plan Inspectors being satisfied that the plan can move beyond Stage 1? Is there a likely date for adoption, depending on examination outcome? I am working on the basis that the matters dealt with at stage 1 are not directly relevant to my examination particularly with regard to housing numbers in the Key Villages and the Class A and B Villages.</p>	<p>UDC response</p>
<p>Outstanding Planning Applications 7. Can UDC inform me whether the public inquiry into the Gladman appeal has been held yet, and is there any indication as to when a decision is anticipated</p>	<p>UDC response</p>
<p>Status of Neighbourhood Plan Recommendations 8. The Secretary of State requirement is that a neighbourhood plan should contain planning policies for the use and development of land. This plan includes not just policies but what it terms Recommendations; some of which appear to relate to land use matters. The PPG states that: "Wider community aspirations than those relating to the development and use of land, if set out as part of the plan, would need to be clearly identifiable (for example, set out in a companion document or annex), and it should be made clear in the document that they will not form part of the statutory development plan."</p>	<p>To clarify this, the Steering Group have defined the two terms:</p> <p>A Policy is to be used in the determination of planning application decisions, and the setting of conditions, by the LA.</p> <p>A Recommendation is to be used to inform planning decisions which are determined by other bodies (for example the County) or to make recommendations and support aspirations which may involve land use but are not necessarily related to planning applications</p> <p>Examples of Recommendations are TR8 Joyce Frankland expansion, which would be an Essex County Council decision, SE6 Sewerage systems, which is development related but not within the LA's power to mandate, AQ3 which is to support further NO2 monitoring and TR6 which is a Highways and parish council responsibility, not related to a specific planning decision.</p> <p>It would be helpful to have the two definitions included in the Plan, probably on the contents page</p>

9. There is a lack of clarity how a decision maker or an applicant would view what is described as a “Recommendation”. One particular planning policy, which are patently intended to be development plan policy, include reference to matters that are set out in what is a recommendation. See NQRAQ1 which cross references to NQRAQ3. Policy NQRSL2 refers to a levy that is not part of the policy.

AQ1 is about actions relating to a planning application. AQ3 is a Recommendation because it is not directly a land use policy (it says declare an AQMA when near the to the legal limit, not when it was already exceeded, over a year earlier) The text about being within 5 microgrammes of the limit could have been incorporated into AQ1 and the cross reference not used. However it was considered better to integrate the two. AQ3 informs AQ1

For SCL2, it is suggested that the last sentence of SCL2 first paragraph should be deleted and the table on p95 renamed to say it was the levy proposed by UDC in 2012. It is considered useful to publicise the figures to set some expectation of what might be requested. The table is information, not a policy or recommendation

10. Furthermore, a number of the recommendations cover matters that are actually related to the “use and development of land” and which may, or may not, be considered material to the determination of a planning application. For example, NQRTR8 recommends “that no further expansion of JFA be permitted unless solutions are implemented to the problems caused by the school transport”. Where matters are relevant to the determination of a planning application, then is it not appropriate that these should be set out as a planning policy, and where the issue is not relevant to the determination of a planning application, they are identified as Non-Planning Recommendation or Community Aspirations. It is clear from the Regulation 16 representations that some consultees do not appreciate the status of the recommendations.

It is assumed that there is a surplus ‘not’ in ‘Where matters are relevant to the determination of a planning application, then is it not appropriate that these should be set out as a planning policy,.....’

The comments from ECC are that the LA, and therefore the NhP, has no decision role in County matters. The LA and PCs would be consultees and could quote the NhP recommendations. So TR8 is to cover where there is an issue to be considered, but the NhP cannot mandate. (The issues in TR8 have been a running sore for many years, now made worse by the large scale of development feeding traffic through the school. Several solutions have been proposed. The ECC reg 14 response was ‘*Any physical expansion of JFA would require planning permission, with the need for additional school places and access issues being given appropriate consideration as part of the planning balance.*’ However, the application for the current year group expansion and associated building just looked at access to the new buildings, which was not the issue. TR8 is to seek to have a long standing problem addressed should further expansion be planned. No new secondary schools are included in the LEA 10 year plan)

Air Quality

<p>11. The following matters are principally directed to Uttlesford's Environmental Health Officers as the PPG places importance to having their input into the neighbourhood plan process, in the area of air quality.</p>	<p>UDC response</p>
<p>12. I note that Newport, nor the rest of the neighbourhood plan area is not an AQMA. Would the results of air quality monitoring, indicate that conditions currently warrant AQMA designation or would the level of development currently anticipated likely to lead to conditions, where designation is justified. How close are the levels of pollution to be breaching EU limits? What is the process for designating AQMA and what are the types of measures that are likely to be included in an Air Quality Action Plan for an area such as Newport?</p>	<p>UDC response</p>
<p>13. I have noted that the District Council's threshold for requesting an Air Quality Impact Assessment, as set out in the District Council's Local Validation Checklist, is development within the Saffron Walden AQMA or development elsewhere of 200 or more residential units. Is having a threshold at 10 units deliverable, in terms of what documents can be required to be submitted with a planning application and is a lower threshold justified on the basis of air quality in the plan area?</p>	<p>UDC response</p>
<p>14. Do the EHOs consider that the air quality is reaching the levels envisaged by emerging Policy EN15 which references "significant adverse effects on health"?</p>	<p>UDC response</p>
<p>15. I would be interested in both the LPA and the Steering Group's views on what conclusions I should draw on air quality issue, bearing in mind the Inspector's comments made when he determined the very recent appeal proposal for up to 150 dwellings on the land south of Wicken Road, where he states: "However, on the basis of the evidence before me, I have no reason to conclude that the proposal would give rise to unacceptable levels of air quality to the extent that there would be demonstrable harm to human health".</p>	<p>In the previous sentence the Inspector wrote '<u>The Council's concerns are not without merit</u>' and the areas of disagreement between the parties mainly relate to assumptions made within the respective modelling. (Underline added) An unresolved issue at the appeal is that the AQ modelling assumes (falsely) that all engines and exhaust systems are working at full temperature. With new commuter estates built/applied for close to the Newport village centre outgoing vehicles will have cold engines running on rich mixture and with catalytic convertors not functioning. MOT's are done on hot engines otherwise they would fail. Scientific evidence was presented to the Inspector supporting this</p>

<p>16. I would invite the Steering Group to consider the apparent discrepancy between on the one hand, Policy NQRAQ2 which refers to “developments of any scale will not be supported without consideration of the cumulative impact of related vehicle movements” when applicants are only required to</p>	<p>The Inspector had other strong reasons to refuse and the AQ evidence was complex. Another developer is seeking to make a large application to the east of the village which would feed substantial cold start traffic into the ‘canyon’ areas where pollution pools. The village is in a valley and NO2 is heavier the air. There are also appeal results awaited for 98 houses and nothing to prevent a smaller or different re-application on the site refused</p> <p>There is further detail in the Steering Group response to one of the developers on how cold start can be incorporated into the models, and attached is a statement on cold start made to the Gladman appeal. The statement particularly notes that the AQ model purporting to calculate the existing conditions had to have its outputs multiplied by 2.4 to reach the current NO2 concentrations. This casts severe doubt on the model or how it was used. The model ignores cold start and it is considered that this is the reason for its clear failure to get anywhere near to predicting the current reality. It is of further concern that the ‘current NO2 concentrations’ are after raw data results were reduced by 23% following UDCs failure to maintain the equipment for local validation of the tubes. When the local equipment was working the adjustment was 6%. This failure caused Saffron Walden’s AQMA readings, despite increased traffic from developments, to all instantly to become compliant. The UDC annual AQ report made no comment about this apparent dramatic improvement in air quality and the Govt has asked UDC how they had managed to achieve it. The validation equipment is now working but results are not available yet. It could change the reported AQ figures significantly. If the 6% adjustment had been applied to the figures quoted in the UDC response the levels at Wicken Rd/ High St would be 36.7 for 2018 and 38.2 for 2017, the legal limit being 40.</p> <p>AQ concerns remain - see Appendices 2a, 2b and 2c</p> <p>AQ2 is aimed at avoiding the issues on Whiteditch Lane, Bury Water Lane, and their traffic overspill to School Lane and Wicken Rd. Apart from the two large applications in 2013 (Wicken Lea and the care home complex), cumulative assessment has not been required or been done for all other</p>
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<p>undertake an Air Quality Impact Assessment on schemes of ten or more dwellings.</p>	<p>developments on the two lanes. However, now that both Highways and the LA accept this was years of mistakes, two recent applications on Whiteditch at less than 10 houses were given officer refusal on grounds including cumulative traffic impact. The issue is that developers are routinely taking refusals to appeal, at cost to all of us, and without some policy back up for decisions the LA and PC may forever have to re-present the data and effectively do their own assessment rather than this being the applicant's responsibility</p> <p>However, it is accepted that AQ2 looks odd contrasted with AQ1. As the first part of AQ2 is to deal with an issue in, and emanating from, one zone, it might be better to specify it as a zonal policy. This would avoid it being onerous outside of the zone. The zone could be specified by lane names or a map</p> <p>It is also noted that 'development of any scale' could include for example a small extension. It would be clearer to say 'applications for new residential or commercial buildings'</p>
<p>Travel Plans</p> <p>17. One of the tests, under the basic conditions, is the extent that the plan's policies have regard to Secretary of State policy and advice. Relevant advice is found in the section of the Planning Policy Guidance (PPG) dealing with the question "What are Travel Plans" - Para 003 Ref ID 42-003-20140306. Is the thrust of the plan's approach to Travel Plans consistent with that advice? In particular, I am anxious to understand what is meant by the sentence in Policy NQRAQ2 "Travel Plans may be given weight in considering development applications ifthey provide information not obvious to residents". Is the statement that Travel Plans will not be given material weight, inconsistent with national policy?</p>	<p>There is nothing in the guidance which says a Travel Plan must be considered at the application stage. It says having it done at that point is a 'nice to have'. So it is not required to exist at the decision point. Even if it is available at the decision point the PPG does not give any guidance as to how much weight it should be given. NPPF para 111 is the same. No statement could be found that TP's be given weight or that their accuracy or potential effectiveness be considered. One for Newport was set as a condition and produced later. The Countryside application invented a non-existent bus service to Cambridge and a direct train service from Newport to Stansted Airport (a change of trains is needed and there is no timetable coordination). Therefore, the accuracy, plausibility or potential effectiveness of it was not in the decision process. It is considered that saying 'a TP was produced, or will be produced' is box ticking, not assessing and giving appropriated weight to what should be a key part of addressing climate change and having sustainable development</p>

	<p>The policy is saying to a decision maker ‘give it weight according to how much difference you consider it would make, from a baseline of what a buyer is likely to already know and do’</p> <p>It is considered that TPs should be scrutinised by officers and, as necessary, available to the committee and at appeal</p> <p>There is further detail, and an example of what might be included, in the responses to the developers.</p> <p>It is implicit in AQ2 that a TP must be available at the decision point but the Steering Group would welcome a sentence added to say this explicitly</p>
<p>Business Zones</p> <p>18. Can the Steering Group provide me with a plan showing the actual properties which are covered by the policy in Map 2, as the trapezium shaped annotations seem to cross through buildings, rather than covering the whole site. A clearer plan would aid the implementation of the policy at development management stage.</p> <p>19. Can the Steering Committee clarify, how a decision maker would be satisfied that a change of use of a shop or community facility was justified, on the basis that “the need for the proposed use is clearly greater than the need for continued use as an employment site”. Perhaps it could give an example of how this criterion may be used.</p>	<p>This is being done.</p> <p>This is the balance between housing need and employment need. At the small scale of what likely in the plan area it is unlikely that a proposal would have a significant impact on the district housing supply</p> <p>‘Need’ is a different criterion to ‘viability’. Examples are change of use of an art deco antique shop to residential. The ‘need’ would carry no weight. Similarly, businesses overtaken by change of retail pattern (eg Newport had two electrical retailers and repairers) would also not have weight given to need. If there is no ‘need’ then viability steps in asking ‘can this be used for alternative employment?’</p> <p>However, closing the petrol station, pharmacy or village shop are examples of where need in current use would carry significant weight vs housing</p>
<p>Views Sensitive to Change</p> <p>20. I note that the way that views are displayed, are different between the Newport and Quendon Maps. Can I ask that the Quendon map, Map 17 be</p>	<p>This has been done and will be attached - see Appendix 3</p>

<p>changed to use an arrow which points away from the viewpoint, in the direction that it is seeking to protect. I found the way the view is identified on the Quendon Map somewhat confusing.</p>	
<p>Policy on Development Limits</p> <p>21. If Policy NQRHA1 includes a presumption against development outside of the development limits, why is it necessary to have a separate policy presuming against development in two specific locations, as set out in Policy NQRHA3 and would such locations be acceptable for development deemed suitable for areas outside of the development limits, that need a countryside location for example an agricultural building?</p> <p>22. Policy NQRHA4 is titled “Buildings in the Countryside” but it applies to “planning applications in the Plan Area” - should the policy only be focussed on buildings outside the development limits?</p>	<p>HA1 supports three categories of development outside of limits So, HA1 would for example support building of agricultural sheds, planting a forest, or a tank driving course.</p> <p>HA3 is specific to two highly valued areas where no development would be supported. The first sentence (‘To retain..’) leaves it open to an applicant to show how they would retain the connection and views.</p> <p>Yes. In practice it would be the same thing, however titling it, ‘Building in the countryside outside development limits’ would give an exact line and so avoid uncertainty.</p>
<p>Housing Policy</p> <p>23. Can UDC give me an update on the current housing supply for Newport. I see from the figures in the emerging Local Plan, a figure of 94 unit are required for the period, since April 2017. In view of subsequent consents granted, what is the current residual requirement? Also, can I be advised as to what the current residual number is for Type A and Type B villages, which the allocations at Quendon will relate to. Is the LPA able to give an indicative housing figure or is it able to confirm the statement in the Neighbourhood plan that “the policies and site allocation in the Plan meets the housing requirement figure given by the LPA in the ELP”? Do all the housing allocations in this Plan area identified in the emerging local plan now have planning permission and how many have actually been implemented.</p>	<p>The UDC response appears to consider that ‘residual’ includes sites with permissions already granted. The Steering Group read this as asking what is left from the ELP requirement not already with permission, or otherwise unallocated.</p> <p>All requirements from the ELP have permission or have already been built. (Plus more on top). The answer to ‘Do all the housing allocations in this Plan area identified in the emerging local plan now have planning permission?’ is Yes. A partial exception is Foxley 2 permitted at 9, ELP allocation 19.</p> <p>The table in the UDC response has not been checked in detail by the Steering Group, but Reynolds Court is net 10 not the 7 shown (41 built and 31 were demolished). Not material, but different to the Nhp spreadsheet. The UDC type A and B figures for the 42 villages are not understood. Regulation 19 table 5 says the total 2011-2033 is 737. The UDC response</p>

24. I am trying to assess the weight to be given to these housing figures for the reasons as set out in paragraph 65 and 66 of the NPPF (2019). Based on the debates that have so far taken place at the Local Plan Inquiry, including outstanding objections, is it likely that these numbers are likely to be changing. I am aware that the overall housing figure is expressed as a minimum figure.

shows that figure as 993.

The 737 is definitive and in the UDC response the built plus the permissions totals 846. So it looks like an oversupply of 109 vs the ELP requirement.

Most are now built, but the largest exception is the 94 house Ellis site on London Rd. Ellis lost their contractor, but have now appointed a new one which has had meetings in the village. They have asked to meet parish and district councillors which we are keen to do as we have improvements we would like. The UDC senior planning officer has indicated that if we all agree reasonable changes they will facilitate getting permission for minor amendments.

The 40 bed care home is not complete and many of the 81 flats associated with it are not finished or not occupied (UTT/16/0459/OP). Various smaller developments around Whiteditch and Bury Water Lanes are nearing completion. Bricketts (11 houses) has not been started.

A full listing of Newport permissions since 2011 is attached. There is a filter for ELP ones. See **Appendix 4**

The ELP was submitted before the new affordability based targets were implemented. So, it was a paper produced by a consultant. The Chair of the Steering Group submitted a detailed response to regulation 19 (as a Chartered Accountant, not NhP) showing that the figures are overstated by about 2800. The document and a spreadsheet are available if requested

As simple example is that 500 care home rooms were included at a late stage and counted as houses. These are probably better as a separate category but if not, guidance is to divide rooms by two to get 'houses'. The supply of care home rooms since 2011 was also not included. UDC have agreed these are errors

The over statement claim was backed two other accountants.

The ONS household projections for two (?) years in a row showing reductions have not been factored in

<p>25. Could the Steering Group assist me by pointing me to where an applicant would be likely to gather the information required by Policy NQRHD4, as to what the local demand for the respective sizes of affordable and market housing, as the policy refers to “evidenced local demand” or refers to “greatest demand”? What type of body would be likely to be judged to providing “independent evidence”?</p> <p>26. Could the Steering Group comment on how the density policy for development outside of the development limits, which is expressed as a maximum density, sits against the Secretary of State’s policy as set out in paras 122 and 123 of the NPPF, regarding the need to be “making efficient use of land”?</p>	<p>There is a possibility that if the Inspectors are generally minded to support the ELP but feel the scale of ambition is too great they might assist by allowing a lower figure in order to cut out one of the settlements. This is of course speculation.</p> <p>As it stands the district would need to build two settlements larger than Poundbury is now. However, the administration has councillors with strong legal and technical abilities, and is on a mission to deliver the Plan. There is huge pressure from residents to stop yet more unplanned developments, with little or no infrastructure, and take a strong measure of control</p> <p>Rightmove provide analysis by postcode at the ‘CB11 3xx’ level comparing enquiries which are taken through to contacting the seller vs current housing stock. It gives a clear indication of ratio of demand by house size to supply by house size. It is not expensive, and a developer might use it also as an indicator of what will sell more quickly. A report was done for Saffron Walden NHP and is on the NQRP website</p> <p>Setting targets at district level is broad brush. This tool takes it down to NhP level</p> <p>It does not include affordables, but there are set rules for those</p> <p>NPPF 122 also says we must take account of ‘d) <i>the desirability of maintaining an area’s prevailing character and setting</i>’</p> <p>If building new settlements, as envisaged in the ELP, it is probably desirable to build to the same high density throughout. For a new settlement all infrastructure and open space is designed to support the (high) density, and such design will encourage a more cohesive community than a low density where neighbours may even avoid contact with each other. New settlements are typically of a round shape, not linear along existing roads.</p> <p>Newport is of medieval origin, unplanned and with high density at the</p>
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<p>27. Does UDC consider that Policy HQRHD5 dealing with the allocation of social housing to be a housing allocation policy, administered by the Housing Authority, rather than a land use policy?</p>	<p>centre and reducing to the village boundaries. Following NPPF (d) it is therefore appropriate that development beyond the boundaries reflects the nearby densities. There is recent support for this from the UDC planning committee. An application for 'Bricketts' at the south end of Newport development limit (but still in it) to increase a permitted development from 11 to 20 houses on a plot of just under one hectare was rejected on grounds of being overly dense at the extremity of the village. The refused application involved creating a roadside terrace as the first structure to be seen on the way into the village, in a location where it is mostly individual houses set in gardens. The applicant has now reapplied for 13 houses.</p> <p>Quendon can be described as mostly low density throughout and so NPPF 122(d) also applies</p> <p>The 20 per ha figure is based on the Essex Design Guide 2018 para 1.89 which considers normal urban densities to be above 20 houses per hectare. The Plan area is not urban. However, NQRHD2 does not prevent higher density applications coming forward as envisaged in ELP policy H1, but an application would need to make its case</p> <p>The adopted Local Plan has nothing to say about densities</p> <p>UDC to Comment</p>
<p>Planning Obligations</p> <p>28. Can UDC clarify whether residential schemes of under 11 units, are required to make contributions to local services and infrastructure via Section 106 agreements, beyond the need not to be delivering affordable housing?</p> <p>29. Could UDC and the Steering Group comment as to how the neighbourhood plan policy, as set out in Policy NQRSL2 differs from what would be sought under a district wide policy and has there been any</p>	<p>UDC to Comment</p> <p>The UDC ELP policy is INF2. It does say in general terms the same but the reader must go to line 27 to find it. SCL2 adds to INF2 by putting in a locational requirement, which is absent from INF2. The practicality is that</p>

<p>viability testing of the impact of the NQRSSL2 Levy, alongside other contributions. In view of the need for the obligation, being required as a result of the development, why is it justified that affordable housing development should not be contributing to additional sports and leisure services as surely, their residents would be expected to be able to access the facilities?</p>	<p>the plan area has received no sport funding at all in recent memory (until Quendon PC recently leveraged the draft NhP re Foxley 2 to obtain a contribution). This is despite a strong request to UDC to require a contribution from the 94 house Ellis development, which was ignored. In the end the village did not even get the shared use car park which would have benefited the Recreation Ground users</p> <p>A viability assessment on the figures has not been done. This would be part of the CIL design now in progress by UDC. The change of political control of UDC in May 2019 has resulted in CIL being the favoured option, and has somewhat overtaken the NhP text.</p> <p>BNP Paribas Real Estate reviewed CIL for UDC and their letter of 21 January 2013 said ‘CIL is not levied on affordable, so we have assumed that it will not be levied on 40% of the housing pipeline.’ The Steering Group therefore assumed this is part of the CIL regulations, although have not checked. However, ‘affordables’ are still profitable so a lesser rate of CIL might be justified rather than exclusion from all liability</p> <p>Overall SCL2 has a stronger and more specific wording than INF2</p>
<p>30. In Policy NQRTR2, can the Steering Group say whether there is a threshold of size of schemes, where developers will be required to address the impact of traffic including on air quality, and how does that relate to the threshold set out in Policy NQRAQ2 dealing with the cumulative impact of traffic on air quality and traffic congestion?</p> <p>31. What is the timescale of the District Council’s consideration as to whether to introduce a Community Infrastructure Levy Scheme?</p>	<p>A threshold of 10 houses had been discussed. However, recent experience of having a 9 house development contribute for a traffic and safety review, consistent with TR2, brought a rethink. Had the threshold been present the developer could have claimed exemption. The policy says ‘for delivery through s106 funding’. The three s106 conditions are very stringent and so nothing unreasonable could be imposed on say a one house application. None of the developer consultees objected to TR2.</p> <p>Funding for the CIL development was agreed by council members. UDC can comment on progress to date</p>
<p>Flooding</p> <p>32. I assume that Policy NQRGSE 1 only relates to surface water drainage rather than foul drainage, which will be via the sewage system although it will eventually discharge into a watercourse itself. Can UDC confirm whether Sustainable Urban Drainage Systems (SUDS) area are appropriate</p>	<p>Yes it relates to surface water. All the big schemes in the area have SUDS. The issue is over creating totally new discharges. Regardless of whether an outlet is from a SUDS, if the discharge is new then it cannot be less than or equal to current run off.</p>

<p>in areas such as the plan area, as I am aware that some area's geology prevent their use?</p>	<p>UDC response on geology</p>
<p>Concluding Remarks 33. I am sending this note direct to Newport Parish Council, as well as Uttlesford District Council. I would request that both parties' responses should be sent to me by 5 pm on Friday 6th December 2019.</p> <p>34. I will be grateful, if a copy of this note and any subsequent responses are placed on the appropriate neighbourhood plan websites.</p>	<p>Info – no response required</p> <p>Info – no response required</p>