

Newport, Quendon and Rickling Neighbourhood Plan Consultation Responses:

Consultee:	Context	Page
<ul style="list-style-type: none"> • Anglian Water 	Statutory Consultee	2
<ul style="list-style-type: none"> • ECC 	Statutory Consultee	
<ul style="list-style-type: none"> • National Grid 	Statutory Consultee	
<ul style="list-style-type: none"> • Historic England 	Statutory Consultee	
<ul style="list-style-type: none"> • UDC 	Statutory Consultee	
<ul style="list-style-type: none"> • LITCHFIELDS on behalf of Taylor Wimpey 	Developer, option on land Debden Road / Chalk Farm Lane, awaiting planning application.	
<ul style="list-style-type: none"> • Mr D Hills c/o Sworders 	Land Owner, sold land for Cala development, proposed development via Gladman on Wicken Road currently at appeal.	
<ul style="list-style-type: none"> • Chris Anderson, Residential Land Agent Ltd 	Developer, specific interest unknown	
<ul style="list-style-type: none"> • Colin Challenger, Ellis Trust 	Land Owner, Ellis Trust own the 94 house development plot on London Road and part of the Wicken Water Marsh	
<ul style="list-style-type: none"> • Colin Campbell, Hill Residential and Joyce Frankland Academy 	Developer, proposed development at Joyce Frankland Academy Newport, currently at appeal.	

Response relating to several comments where there may be confusion as to what is a Policy and what is a Recommendation:

A Policy is to be used in the determination of planning application decisions, and the setting of conditions, by the LA.

A Recommendation is to be used to inform planning decisions which are determined by other bodies (for example Essex County Council) or to make recommendations and support aspirations which may involve land use but are not necessarily related to planning applications.

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.

It would be helpful to have the two definitions included in the Plan, probably on the contents page

ANGLIAN WATER

Section	Comment	Response
<p>Recommendation NQRGSE6 – Sewerage systems</p>	<p>Policy NQRGSE6: We note that the Neighbourhood Plan includes a recommendation that Anglian Water increase capacity at Newport Water Recycling Centre for additional growth, improve the quality of its output and install a storm tank. Water and sewerage companies including Anglian Water prepare business plans on a 5 year investment cycle. Customer charges will be set following submissions from Anglian Water about what it will cost to deliver the business plan. Anglian Water’s business plan for the next Asset Management Plan period (2020 to 2025) has been submitted and is expected to be approved in December 2019 by our economic regulator Ofwat. The submitted business plan has been informed by our Water Recycling Long Term Plan which sets out a long term strategy to identify the need for further investment by Anglian Water at existing water recycling centres or within foul sewerage catchments to accommodate the anticipated scale and timing of growth in the company area. 8 Page In relation to Newport WRC we have identified a need for further</p>	<p>Context only</p> <p>The comments are statements of Policy/Strategy supplied for information</p> <p>Hyperlink for water recycling policy has a typo. Link should be https://www.anglianwater.co.uk/siteassets/household/in-the-community/water-recycling-long-term-plan.pdf</p> <p>Percentage growth of the village shown in the Water Recycling Policy is underestimated for the period 2020-2025, on pg 68 of the document, at only 10%. Similarly, Anglian Water anticipate only a 33% increase for the period 2025-2045.</p> <p>Current approved growth stands at 54% increase since last census in 2011. There were 974 houses in 2011, since then a further 522 have been approved. 25% of the 54% approved growth has already been completed (247 homes), 15% commenced (142 homes) and</p>

	<p>investment by Anglian Water to accommodate anticipated growth in this catchment. Further details of which are set out in our Water Recycling Long Term Plan which is available to view at the following address (please refer to page 72 of the document). https://www.anglianwater.co.uk/siteassets/household/inthe-community/water-recycling-long-term-plan.pdf In relation to improving the quality of discharge from Newport WRC – we have a number of drivers for further investment by Anglian Water as part of our business planning process including through the Water Industry Natural Environment Programme (WINEP). This is where Environment Agency (EA) directs Anglian Water to undertake actions in relation to our environmental obligations including water quality. Further details of the actions specified by the EA (which are subject to confirmation from the current business plan process) are available to view at the following address: https://data.gov.uk/dataset/a1b25bcb-9d42-4227-9b3a34782763f0c0/water-industry-national-environmentprogramme.</p>	<p>13% not yet begun (133 homes).</p> <p>The NQRSG believe that the infrastructure within the village is insufficient for the scale of development approved and that the Anglian Water’s plans for growth and consequent investment are inadequate.</p> <p>The newest developments on Bury Water and Whiteditch Lanes continue to struggle with poor water pressure and frequent water supply outages, despite emergency works during the summer of 2019 to connect a new supply to Bury Water Lane from the Wendens Ambo feed.</p>
	<p>We would therefore ask that the wording of the Neighbourhood Plan reflect the current position in relation to future investment by Anglian Water to accommodate further growth and schemes currently identified in WINEP as set out above. Newport WRC does not currently have a storm tank as it is a ‘treat all flows’ site.</p> <p>Water Recycling Centres: the text refers to the findings of Uttlesford District Council’s Water Cycle Study published in 2010. The District Council has commissioned a more recent Water Cycle Study which has been used to inform the submitted Local Plan. We would ask that the text is updated to reflect the findings of the most recent study</p>	<p>Disagree</p> <p>No detail has been supplied of investment by AW at Newport</p> <p>The Water Cycle updates published in 2018 and 2019 are in the Local Plan evidence on the UDC website and were reviewed by the Steering Group. The updates do not go to the level of detail in the 2010 report, but repeat in brief summary the evidence from 2010 (that the Newport works fails on capacity and lack of dry weather flow (DWF) in the Cam). The 2018 report additionally states that the DWF consent at Newport will be exceeded by 30% with planned development.</p>

		<p>The new reports also carry forward out of date material eg. Intentions to improve the quality of NhP area watercourses ‘by 2015’, and a factual error from 2010 in saying that Debden Water is of moderate quality, when it usually a dry bed and has not had any regular flow for many years, whereas it should be contributing to the flow in the Cam at the sewage works.</p> <p>Therefore, the existence of the new updates is noted, but does not alter any of the evidence</p> <p>Detailed evidence of investment at Newport would be most welcome but none of the new evidence, or documents on the links in AW’s response, provide this. It is worrying that the planned housing development noted in the 2010 report, plus significantly more, has been permitted or is already occupied, but no evidence is supplied of any work having being done to resolve the water treatment issues. It is believed that nothing has been done.</p> <p>The comment about Newport being a ‘treat all flows’ works is understood and is of particular concern as most of the village is a combined storm and foul sewer system. This was highlighted as a failure in the 2010 Hyder report but omitted from later updates. After heavy rainfall the works does not cope and polluted water (grey and musty smelling) enters the Cam. It is believed that there is no permanent equipment to monitor the quality of the outflow and so AW will, unless by chance the portable monitor is in place, have no data to record pollution resulting from high rainfall. The new developments to the north-west of Newport have been connected to the existing 4” (?) local sewer. In 2019 there have been three sewage spillages into Wicken Water from that sewer involving Environment Agency attendance, and pumping and flushing by AW.</p>
	<p>In relation to any issues relating to any issues relating to odour from Newport WRC we would ask that customers contact Anglian Water direct on 03457 145 145 so that these can be investigated further.</p>	<p>Response not required Information Only</p>
<p>NQRHA6 – Foxley House,</p>	<p>In our previous comments on the Neighbourhood Plan we had</p>	<p>Disagree</p>

<p>Quendon, site allocation. (Ref '2 Que 15')</p>	<p>suggested the allocation sites including Foxley House, Quendon include reference to the need to make improvements to the public sewerage network accommodate the foul flows from the site. It is therefore suggested the following text is included in the site specific requirements for Policy NQRHA6: 'Be informed by assessment and suitable mitigation relating to sewerage infrastructure''</p>	<p>Permission for this site has been given and it is assumed that water company conditions are included in the published conditions.</p>
---	--	--

ECC

<p>Requirements of Neighbourhood Plans and Links to emerging Uttlesford District Local Plan (2011-2033)</p>	<p>ECC notes that the National Planning Policy Framework (NPPF) provides a clear guidance on the role of the statutory Development Plan (Uttlesford Local Plan) and the Neighbourhood Plan. It states that “the development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area” (MHCLG, 2018, paragraph 17).... “Policies to address nonstrategic matters should be included in local plans that contain both strategic and nonstrategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies” (MHCLG, 2019, paragraph 18). ECC has been fully engaged with Uttlesford District Council in the preparation of the emerging Local Plan, including responding to all consultations and actively participating in the Stage 1 Examination in Public throughout July 2019. It is noted that the Regulation 19 Uttlesford Local Plan (2019) includes a settlement hierarchy where Newport is identified as a key village. A key village is one that has existing facilities and services, these include “day to day shopping, GP services, primary education, public houses, community halls and regular bus services to other key villages, nearby towns and London Stansted Airport. Key villages are a major focus for development in the rural areas – suitable for a scale of development that would reinforce their role as provider of services to a wide rural area” (UDC, 2019, para 3.36). Quendon and Rickling are defined within settlement hierarchy as Type A Villages. “These villages have a primary school and some local services e.g. village hall, public house or shop. They act as a local service centre and are suitable for a scale of development that reinforces their role as a local centre” (MHCLG, 2019, para 3.38).</p>	<p>Mostly context but disagree on classification of Newport because it is out of date</p> <p>The classification of Newport as a ‘major focus for development’ originated eight years ago at the start of the ELP process. Since then it has taken very significant development and in excess of that anticipated in all iterations of the ELP, including windfall. With almost no infrastructure, public transport or service additions and with the constraint of being in a valley it is considered that its ability to be a ‘major focus’ for further extensive development has been ‘used up’ by the scale of permitted development since 2011. This is why the regulation 19 ELP requires no further allocations in Newport</p> <p>ECC are responsible for highways infrastructure and the only upgrades have been two passing places on School Lane.</p> <p>The level of development already taking place in Newport is as relevant to this plan as was the similar and analogous situation considered by the Inspector in the Takeley appeal decision APP/C1570/W/18/3213251, where he stated in paragraph 75 that:</p> <p>“Furthermore, the Council are progressing an eLP, which seeks to identify, amongst other allocations, three new garden communities to support the delivery of their housing requirement for the period 2011 to 2033. Some 5,751 dwellings remain to be allocated. As a consequence, while Takeley is identified as a key village and a major focus for development, it has had very significant development to date, with 616 dwellings delivered so far within that plan period, and the eLP identifies only 22 remaining from former allocated quantities and 20 to be delivered in the plan allocation. This plan is in examination at the</p>
---	---	---

		<p>moment, and while I acknowledge there are objections to this strategic approach, it is also true that the appeal site, and the requirement for the village of Takeley, has been subject to assessment, resulting in the rejection of the site as a suitable location for housing and the acknowledgement of the relatively low remaining delivery for a village that has received very significant housing development over the past plan period.”</p>
<p>Transport</p>	<p>ECC notes that page 30 refers to cumulative development and questions to what extent development within Newport has considered the cumulative impacts. ECC considers it important that the Parsh Council is mindful that the larger developments were supported by Transport Assessments, the scope of which was agreed with the Highway Authority and met with the current requirements contained in the NPPF through this process 70% of the dwellings were subject to cumulative impact assessment.</p>	<p>Context</p> <p>The issue is primarily around the north west sector of Newport. The two largest developments were the first ones in that area, permitted in 2013. The secondary school funded a professional assessment as it had concerns about traffic through the school. Summarising, it disagreed with the developers favourable assessments, but was not commented on by Highways. Since then every other development in that area has been below the currently required threshold.</p> <p>The concern arises from the cumulative impact of many medium and small size developments. As at October 2019 Newport had 522 applications permitted (with a further 98 awaiting determination at appeal) since 2011 (after deducting the 150 Countryside appeal refusal). Those of 50 or less made up 223 houses ie 43% of the total had no assessment. Many of these developments are on Whiteditch and Bury Water Lane. It has now been accepted by UDC and Essex Highways (and the chair of the Planning Committee) that failure to consider the cumulative impact of traffic in that area was a serious mistake. Whiteditch Lane is now quoted by the UDC Planning Dept as a case study showing what should not be permitted. Two recent small applications on Whiteditch Lane have had officer refusal on grounds including cumulative traffic impact, but without policy support for this they may be subject to appeal. The policy to</p>

		reduce the threshold to ten houses is therefore based on local experience and to avoid a repeat of the mistakes made. Had the policy been in place from 2011 it would in Newport have required assessments covering 158 houses from 9 developments, thus capturing another 26%.
	ECC also wishes to clarify with regards to the appeals referred to on page 31. It is noted that the appeal against the refusal of 150 dwellings UTT/17/2868/OP was dismissed, therefore at October 2019 100 houses (not 250) may impact on the Wicken Road and Bury Water Lane junctions.	Context The Gladman result is also expected shortly. Circumstances may change at any time as new applications come in. It is suggested that a 'Stop press' paragraph could be inserted prior to the stage at which updates must cease
	ECC notes that the transport study, submitted as evidence to support this NP, indicates that there will be an impact on the Wicken Road and Bury Water Lane junctions. It is also understood that these junctions will reach working capacity before 2034, but neither are forecast to reach full capacity by 2034.	Disagree The implication is that there will be no problem Assuming that 'working capacity' means an RFC of up to 0.85 and 'full capacity' means anything above that. Above 0.85 is the volume at which a junction ceases to work smoothly. Table 8.1 shows RFC above 0.85 with committed development for all years to 2034 for the Bury Water Lane AM peak, and for Wicken Rd by 2034. The queue length for BWL is forecast at 9.5 car equivalents and 122 seconds. This would stretch back to the school entrance.
	ECC does not support the statements set out in page 31 in relation to Travel Plans and recommends that this be removed. Travel Plans are identified as a tool in the NPPF for promoting sustainable travel. While ECC as the Highway Authority did not take into account the possible role of travel plans in reducing the impact of traffic generated by the planning applications within Newport, they can be an effective means of reducing single person trips if implemented properly. If clarification is required concerning the role of travel planning, ECC would happily assist in ensuring that the Parish Council's understand the role that travel planning performs in Essex.	Disagree ECC do not challenge any of the issues noted with travel plans (policy AQ2) in the NhP area as explained on p31. The issues are specific to a rural area where public transport is limited or does not exist to many destinations and where the limited options for non-car travel are obvious. (One station, one limited bus service, no cycleways). Local planning applications have claimed weight for travel plans which are unrealistic and are not achievable. Nevertheless, officers have to note them. In one case in Newport the TP was set as a planning condition post approval and therefore did not inform the decision. The NPPF para 111 says TPs should be produced but gives no

		<p>guidance on content or weight to be given to them. The NPPF glossary definition is : <i>A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.</i></p> <p>The TPs we have seen bear little resemblance to the high standard set in the definition and are never reviewed. They are given to new purchasers and then the developer leaves and is not heard from again</p> <p>Policy AQ2 supports weight being given to TPs if they add value. And conversely if they don't then they will not be given material weight. Note AQ2 does not say they will be given no weight. AQ2 therefore is consistent with the NPPF and fills in what the NPPF does not cover, particularly in relation to the circumstances in the Plan area</p> <p>The examiner is invited to add a further requirement that TPs be produced at the application stage</p>
	<p>ECC's previous comments recommended that reference to 'Essex Highways' be replaced with 'the Highway Authority' this demonstrates the statutory role that the County Council performs. To assist in amending accordingly the following references should be amended – - Page 77 – “the B1383 is not a national road and is an Essex Highways responsibility” should be amended to read “the B1383 is not a national road and is a Local Highway Authority responsibility”.</p> <p>- Page 78 – “Mini roundabouts may be a traffic calming measure at certain locations, however the Essex Highways projects officer” should be amended to read “Mini roundabouts may be a traffic calming measure at certain locations, however the Highways Authority”.</p> <p>- Page 79 – “Quendon & Rickling PC have previously consulted local residents and approached Essex Highway Authority” should</p>	<p>Agree</p> <p>The corrections from 'Essex Highways' to the 'Highways Authority' are agreed.</p>

	<p>be amended to “Quendon & Rickling PC have previously consulted local residents and approached the Highway Authority”.</p> <p>- Page 81 - “Essex Highways confirm that a 3m width is needed for a combined foot and cycle way” should be amended to read – “The Highway Authority confirms that a 3m width is needed for a combined foot and cycle way”.</p>	
	<p>Policy NQRTR1 - Extension of speed limits and footways – ECC recommends that the wording of the policy be deleted and amended to – “All proposed extensions of speed limits will be considered by the Highway Authority with reference to the Essex Speed Management Strategy and are subject to a statutory consultation process.</p>	<p>Disagree</p> <p>It is considered that the wording ‘as agreed with The Highways Authority’ covers the suggested wording and it is not necessary for the policy to detail internal validation processes and strategies and which may be subject to change. However, the policy probably should say ‘by’ rather than ‘with’ as the decision lies with the Highways Authority.</p> <p>Not to be included in the Plan, but the Steering group and parish councils do not agree with the blanket Essex Strategy which states that 30 speed limits should only exist where there is development on both sides of the road. This is considered too inflexible and would make significant sections of the B1383 and B1038 which currently have much needed 30 limits non-compliant. Note that speed limit extensions north of Newport and south of Quendon have been agreed in principle by the Local Highways Panel despite being contrary to the Essex Strategy. For the Bricketts application south of Newport, the applicant was willing to fund an extension of the 30 limit, it was requested by the PC and supported by this Plan. Nevertheless, the Highways officer, without reference to any site evidence, dismissed it on Strategy grounds. (But commented that it might still need moving because the sign was too close to the access)</p> <p>The timescales associated with making the changes have been excessive and have only occurred because of extensive lobbying. Suggest further development outside the speed limit areas should require the relocation of the signs prior to occupation to ensure the safety of residents.</p>
	<p>ECC notes that the following have now been amended to</p>	<p>Noted</p>

	recommendations, rather than policies as they were in the Regulation 14 NP.	
	Recommendation NQRTR4 - Cycleway – ECC reiterates our previous response, which stated that there is no guarantee that the cycleway (along the B1383 route) is deliverable between the villages, and no evidence is provided by the NPWG that it can be delivered. This therefore cannot be included in the Uttlesford Cycle Strategy, which has already been completed, with no funds for further investigation at this point in time. Whilst ECC supports in-principle further dedicated cycle infrastructure and cycling and welcomes proposals to achieve this, this particular proposal would need to be considered and treated as an aspiration.	A recommendation is an aspiration so no change required
	Recommendation NQRTR5 – Impact of Development of Carver Barracks – ECC reiterates our previous response concerning a link to the 'national' road network for Carver barracks. The evidence available to ECC indicates that this is unlikely to be deliverable, i.e. another vehicular connection to the M11 and as such should be removed as this would effectively mean that no additional development could come forward for this site. Even if carried forward in any way it should only reflect additional demand over and above existing demand. It should be remembered in this context that the B1383 (having been downgraded in the network route hierarchy) was the original A11 prior to the M11 and used to carry more traffic than it does now	Disagree This comment was responded to in detail at regulation 14. Reference to the B1383 being previously the A11 would be 50 years out of date by the end of the Plan period, which is possibly when such development might take place. In the reg 14 response it was commented that ECC provided no evidence that the B1383 carried more traffic pre M11 (1980) than it does now. For the record the Essex 7 day traffic count Sept 2018 showed 92,739 vehicles on Cambridge Rd Newport. TR5 says a new road or other resolutions. The last word of TR5 should say 'this Plan' not 'this Policy'
	Recommendation NQRTR6 – Speeding and Crossing the Road - ECC reiterates our previous response. This recommendation appears to propose the removal of white lines in the centre of the road. This works best where roads are much narrower than the B1383. Parallels might be drawn with a Norfolk scheme, with the reference to Starston being a small village on a country lane with vegetation adjacent to the road and properties, is a very different environment and therefore should be removed.	Disagree This is one suggestion, which was put forward with significant evidence, in one of the Plan consultations. It was the local Highways Projects Officer who suggested not repainting after resurfacing, which would provide a no-cost trial. However a full professional assessment as recommended in TR6 is now going ahead. It is funded out of the Foxley application, and the NhP Steering Group has coordinated with the parish council and Essex to set the terms of reference.
Public Rights of Way	ECC note that the policy wording refers to 'adverse impacts'. ECC	Agree

<p>(PROW) Policy NQRGSE3 - Footpaths and access to the countryside</p>	<p>share the view that 'boxed in' paths are to be avoided and may in some circumstances request width of greater than 2m (the ECC standard for footpath diversions) for diverted routes which will be bound (by closed fence, wall, tall hedge etc.) on either side to avoid the creation of an alleyway-type path with the potential anti-social issues that can then arise.</p>	<p>The comments are welcomed and we invite the examiner to propose addition to or alteration of the wording to incorporate them.</p>
	<p>It is important to note that diversions onto routes bound on either side cannot be ruled out entirely and the main requirement of Town Country Planning Act 1990 diversions orders is that the proposed diversion is required for development to take place.</p>	<p>Comment only – no change required</p>
	<p>ECC recommends that developers be encouraged to consider PROW at an early stage to design in retention of existing PROW routes or diversion routes/routes of another status but equitable access to avoid such issues arising</p>	<p>Comment only – no change required</p>
	<p>ECC also recommends that the policy considers other tangible effects that should be considered for PROW users for instance noise, unpleasant emissions and adverse drainage effects.</p>	<p>Agree The comments are welcomed and we invite the examiner to propose addition to or alteration of the wording to incorporate them.</p>
	<p>It is important to note that in terms of fragmentation of the PROW network, proposals which would sever a useful/usable PROW network would not be acceptable without equitable access provision</p>	<p>Comment only – no change required</p>
<p>Local Education Provision Policy NQREH2 - Primary School Places</p>	<p>ECC recommends that further consideration be given to the first part of the policy as it is inoperable. The first part states "Granting of planning permissions for new homes should be conditional upon the EA confirming that places will be made available, at the nearest primary school in the NQR Plan area, on the date of first occupancy, for the whole of the permitted development". It is important to note that annual admission to all schools is governed by the Admissions Criteria of the school in question. ECC as the Education Authority do not have the power to hold places for children that may move into a particular development</p>	<p>Disagree but accept that the policy is controversial. ECC appears to be saying that it cannot fulfil its statutory duty.</p> <p>Context</p> <p>The intention of the policy is to avoid primary age children being required to commute, with the resultant personal, health, parental and environmental disadvantages. There is sympathy with the LEA being the statutory provider and where in the case of academies the LEA has limited power to enact their statutory duty. Nevertheless, it is the LEA which responds to planning applications (maybe the legislation needs altering so the</p>

		<p>academies are responsible and not the LEA?) and invariably says Yes when the reality is it may effectively be sanctioning commuting. This is being confirmed in recent applications when the LEA quotes the current and /or predicted shortfall in places at the same time as raising no objection.</p> <p>The Essex 10 Year Plan 2019 – 2028, despite showing deficits in every year from 20/21 onwards, even when all three primaries are grouped (and so disguising deficits at individual schools) has the projects pipeline as ‘tbc’. Neither the Head, nor the Cabinet member for Education, nor the governors are aware of any plan for expansion of the Primary School.</p> <p>The policy seeks a wording which will assist in enforcing the LEA’s duty. It is also considered that the LEA grouping policy which may be acceptable in an urban area is not acceptable in a rural area where there is significant distance between schools. The principle is understood to be accepted by the DofE, but it is the LEA which sets the groups.</p> <p>If the examiner considers this policy either not viable (or only if modified to reflect largely what already happens) then a substitute policy requiring that s106/CIL education contributions must be applied in the villages where the contributing development is happening would give some benefit. As it stands funding from a large development in one NhP village could be used to fund expansion in Clavering, which is four miles away from both Newport and Quendon. As Newport and Rickling primaries are now hemmed in on all sides by developments and Clavering backs on to a field, this is a possibility.</p>
Policy NQRTR8 Joyce Frankland Academy Expansion	– ECC considers that this policy is imprecise in its intention and conflicts with the performance of our statutory duty to ensure sufficient school places. i.e. ‘It is recommended that no further	Disagree, but happy to supply further explanatory text There are two photos showing the ‘problems caused by the

	<p>expansion of JFA be permitted unless solutions are implemented to the problems caused by the school transports (sic)'. It is unclear what these problems are or whether they are directly related to the number of pupils or the provision of school transport. Expanding JFA would not generate a need for extra school transport if the expansion is to serve new homes within walking distance of the school</p>	<p>school transports' on Bury Water Lane. The peak time traffic problems are well known to Essex Highways and the school and are a frequent source of complaint from residents. However, the Plan does not give great detail and if the examiner would like further paragraphs added to support the recommendation this is readily available. Reference may also be made to the Transport Study in the evidence base.</p> <p>The extensive new development in that area feeds peak traffic through the school at the same time that the many school buses block the lane. A voluntary one-way system is operated, which non-locals and delivery drivers with large vehicles are not aware of. The problems have been raised many times with Essex. JFA is part way through a year group addition which will cater for growth in demand from walking distance applications. It does however have a wide catchment and Newport residents are, and will be, only a small percentage of the total. There are many complex school travel issues, originating from funding cuts, which it is not for the Plan to resolve. These have resulted in more parents driving their children, thus adding to the congestion at JFA. The Recommendation, not a Policy, seeks to address the traffic consequences in the Plan area and specifically on the narrow lane through JFA, should further school expansion be considered.</p> <p>The Recommendation wording could be switched to a positive version eg 'should further expansion be proposed then the problems caused by the school transports must be addressed'. The result would be the same.</p>
<p>Policy NQRSC5 - Improve the facilities at Newport Recreation Ground</p>	<p>– ECC does not support the policy with regards to "Alter the Ellis Trust plan to move the Primary School car park to the west, accessed off the existing vehicular access to the Recreation Ground. The car park to be shared use between the school and the recreation ground". The additional space is required as part of the</p>	<p>Disagree</p> <p>This is a Recommendation not a Policy.</p> <p>It would not increase traffic flow as the recreation ground is</p>

	<p>overall school site area and therefore should be retained. The above policy wording should be deleted. Whilst the school may support some public use outside of school hours it is required for staff parking during the school day. Access via the existing recreation ground entrance was rejected as this would increase traffic in front of the school and require rights over a track owned by an unknown third party. The policy also states the recreation ground should 'Provide direct access into the school off the car park and ensure there is drop off space'. This would likely encourage car use and could make the school site less secure.</p>	<p>already used as a drop off.</p> <p>The "track" is a registered Bridleway and access rights already exist to the Recreation Ground</p> <p>The recommendation is included in order to give general support to the school, parish council and Sports Committee to improve the facilities and access and car parking. Grant applications will be needed. There is more complexity than is explained in the Plan (p90 gives some background). The original application submitted for the site was very beneficial, with access to the proposed car park being off the bridleway. This part of the application had universal support. However, Essex Highways objected because Ellis Trust did not own the full width of the bridleway. It has been in daily use to access the recreation ground (which is owned by the parish council) for several decades, and is maintained by the PC.</p> <p>The land owner then had to submit a new application with access via its new estate. The car park as now planned would be unused for most hours of the year. Those finding the current school car park full would be unable to access the new car park without reversing out and driving back out to the B1383 and then through a housing estate. And vice versa. It would not resolve issues with the current drop-off which is messy and potentially dangerous, particularly as part of the Early Years provision is further down the track. As originally submitted a safe and segregated drop-off would be provided. A gate from the drop-off directly into the school, for school hours only or as determined by the school, could be provided. The use by sports clubs would be at different times to school use, and the extra capacity would allow the rebuild of the recreation ground facilities to use part of the current car park without cutting into any playing field area. The land owner is still willing to revert to their original plan if this can be achieved.</p>
--	---	--

		New housing developments have been permitted in the village beyond primary age safe walking distance involving busy roads to be crossed. It is considered that no alteration to arrangements at the school will make any material difference to internal vehicle school commuting, which is happening now.
Early Years and Childcare (EYCC)	ECC notes that there does not appear to be any reference to EYCC within the NP. It also needs to be recognised that any potential growth of Newport and Rickling will require additional EYCC to ensure that parents living in the villages can work or study safe in the knowledge that their children are in good or outstanding childcare provision. The NPWG should contact ECC to determine appropriate wording in this regard.	Disagree Building of education facilities is a County matter and not in the direct remit of the LA and therefore the NhP. It is considered that there is nothing which could be included in the Plan which would further inform the duty of the LEA to make provision. It is assumed the LEA would never require commuting by this age group of children. However, the Steering Group would be happy to include asuggested wording if agreed by the examiner.
Minerals and Waste	Glossary of Terms – ECC notes and welcomes that the glossary defines ‘development’ as excluding ‘the County matters of minerals and waste’.	Noted
	ECC recommends that the NP be submitted with a Basic Conditions Statement that sets out that its policies do not apply to ‘excluded development’ (e.g. minerals extraction, waste development) as defined in the Town and Country Planning Act 1990 (as amended). This definition aids compliance with this requirement.	Agree Happy to have the suggested wording included
	Chalk Farm Quarry, Newport - ECC in its role as Minerals and Waste Planning Authority, previously issued a holding objection against the allocation of this site. ECC also submitted the following to the Regulation 14 NP consultation. The Chalk Farm Quarry, Newport site “is in the Essex Waste Plan as suitable for inert landfill, leading to eventual reinstatement of the chalk grassland” and “is in the Essex Minerals Local Plan as a safeguarded site”. The site is therefore safeguarded by virtue of Policy S8 of the Minerals Local Plan 2014 and Policy 2 of the Essex and Southend-on-Sea Local Plan 2017. These policies safeguard existing minerals and waste developments and allocations from proximal development that	The site referred to is no longer in the allocations or the site assessments and the Essex comments seem to refer to regulation 14 which is superseded.

	<p>may compromise their ability to operate as minerals and waste developments now and/or in the future. The Minerals and Waste Planning Authority are likely to object to any non-mineral and/or non-waste development which would potentially compromise existing or allocated minerals and waste development sites.</p> <p>The site description for Chalk Farm Quarry (under NEW1) in the NQR Reg 14 NP stated that “a combination of inert landfill and housing, or mixed commercial and housing, is considered viable, beneficial and a good use of the site and would give partial implementation of the Essex and Southend Waste Local Plan as well as this Plan.”</p> <p>The Essex and Southend-on-Sea Waste Local Plan 2017 is an adopted, strategic plan which forms part of the Development Plan for the area. A policy approach that advocates a ‘partial implementation’ of that already adopted is contrary to the Development Plan. It is subsequently considered that the NP test of needing to be “in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)” is not met.</p> <p>The Waste Local Plan 2017 states in Table 16 that the waste operations will be in effect until 2042. Whilst the NP does not include timescales for delivery of Site NEW1, it is noted that 2042 is beyond the stated time horizon of the NP.</p> <p>Chalk extraction was last approved at the site in November 2017 (ESS/32/17/UTT) and any allocation and/or proposals which run contrary to this and the restoration scheme, as approved, will likely be opposed on the basis that they may sterilise permitted chalk reserve and/or jeopardise the restoration scheme for the quarry.</p>	
--	--	--

	<p>Following this objection, the NPSG issued a response on this matter. It was noted that “The Steering Group has discussed the matter again with the owners. They wish to keep open all options but are not at present ready to negotiate with ECC within the timeframe needed for inclusion in the Neighbourhood Plan. Therefore the Steering Group has agreed with the owners that we will carry forward the site as a Recommendation not a Policy”</p> <p>On this point, it is noted that the site remains allocated for its existing minerals use and allocated for its future waste use until such a time as the owners (or their representatives) contact ECC to formally state that they no longer intend to bring the sites forward as allocated. As this has not transpired, this site remains allocated within the Development Plan and is not available for allocation in the NP as the site is not deliverable as a housing allocation.</p>	
	<p>Policy NQRHA2 states that ‘To support local and national policy to use brownfield first, commercial and / or housing development on previously used land such as the redundant quarries and glasshouses will be supported’. This statement is considered to be in conformity with National Policy and therefore the principle is supported.</p> <p>However, in this regard it is noted that the chalk extraction site at Chalk Farm is already allocated for inert landfill following the cessation of mineral extraction and therefore it is not available for housing development. Any housing application made on the site will not be in conformity with the Development Plan and would be strongly resisted by the Minerals and Waste Planning Authority unless the current landowner and/or their agent formally request the site is deallocated for mineral and/or waste uses.</p> <p>ECC recommends that if the NP wish to continue to promote this site for non-mineral and/or non-waste development, the Minerals and Waste Planning Authority will require entering into dialogue</p>	<p>As above. This refers to something not in the regulation 16 Plan</p>

	<p>with the landowner or an advocate to understand their intentions for this site. Should such dialogue result in changes to the viability of the site as a mineral and/or waste development, the policy context of the site would change and the holding objection potentially removed.</p> <p>Until such a time that the operators confirm that they do not intend to bring the site forward for waste development, and confirm that they do not intend to continue mineral development on the site, the site is not deliverable for housing and therefore cannot be allocated or counted towards current or future housing supply</p>	
--	--	--

NATIONAL GRID – No changes requested

HISTORIC ENGLAND

<p>No additional comments to those made on Reg 14</p>	<p>The HE regulation 14 response, was general and useful advice for further actions.</p> <p>However they noted, and it is agreed, that ‘The heading on p.46 (now p 52 and the title of the section) should be ‘Historic Environment’ rather than ‘heritage’, to reflect the current NPPF terminology and also the more holistic nature of the historic environment than just those buildings or sites that are designated either locally or nationally.’</p> <p>The Reg 14 response also encouraged the Plan ‘to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base.’</p> <p>This at the time was considered too large a task to undertake and reliance could be made on existing Conservation area, Local Plan and NPPF protections. However, in a recent planning appeal for 24 houses (map 18 p 107, Hill Residential) houses with no apparent local reference</p>
---	--

	<p>were claimed to follow the local vernacular and to be an enhancement to the adjacent Conservation Area. The Plan makes general reference to the Essex Design Guide, which in ‘Design Details - Architectural Details V.1’ gives great detail on what houses in the area may look like. (It doesn’t mention pargetting which is a significant feature in Newport but not Quendon)</p> <p>To respond to the Historic England comments, a short paragraph summarizing the local vernacular and referring specifically to this EDG pdf would be very useful in guiding planning applications and could be inserted in this section if the examiner requests.</p>
--	---

UDC

Foreword: Page 6, Paragraph 1, Second sentence	Should read next 15 years since Neighbourhood Plan is 2018 -2033 making 15 years and not next 20 years.	Agree
	The Neighbourhood Plan should not repeat or adopt policies from the Local Plan or any such other document. The Neighbourhood Plan can use some of the Policy wording and add to the text to make the Policy specific to the Neighbourhood Area	<p>Agree</p> <p>The ELP is not approved and so is subject to change Adapting ELP policy is what has been done for example in HA4 on p62. Elsewhere we are happy for the examiner to remove or reduce the supporting text quoted eg on p60. However, it is still considered useful to have the short summaries, for example of SP12, so that users of the Plan can be aware of the relevant LP policy</p> <p>However, we consider ENV13 from the adopted Plan should stay in as it refers to the M11 and is not carried forward to the ELP. Once the new LP is adopted the old plan will have no weight and so putting it in the NhP continues its life.</p>
Relationship to the Local Plan Chapter 1	The Development Plan applying in the Newport Quendon and Rickling Neighbourhood Plan is the Uttlesford Local Plan adopted 2005. However, with a new Local Plan emerging, the neighbourhood plan should make use of the new evidence prepared in support of the Local Plan, representing the most up-to-date position, and thus	<p>Agree</p> <p>It does conform to the adopted Plan. The Steering Group has had to deal with a shifting world with variations on the ELP, a very out of date adopted Plan which is not consistent with the NPPF, and the NPPF itself changed between reg 14 and 16. There</p>

	<p>ensuring a longer 'life' for the neighbourhood plan.</p>	<p>have also been three major planning applications at appeal which if permitted would, and two still could at time of writing, overtake significant parts of the Plan. It is also unhelpful that the Inspectors report on the ELP, which would have given a steer as to whether matters relating to this Plan need altering, originally promised for end of September, has now been delayed by purdah.</p> <p>To address the requirement for compliance with the adopted Plan we have listed the policies from that Plan and could insert them in to the Basic Conditions statement if requested. And add them to the Conformity notes in the body of the Plan.</p> <p>p25 ALP E1, E2, E3 p35 ALP ENV13 (already included as noted in the AQ comments) p45 ALP Gen3, ENV12 p51 ALP Gen6 p64 ALP Env8, ENV7, ENV1, ENV2, ENV9, S7 p76 ALP Gen2, Gen8, H10, H11, Gen7, ENV3 p87 ALP T1, GEN6, GEN1 p95 ALP LC1, LC2, LC3, LC4, GEN6</p> <p>Having participated in the three appeals and witnessed appellant barrister techniques to discredit evidence, we feel it is important that this Plan should show compliance with the most up to date NPPF and ELP, shortly we hope to be the adopted LP. Otherwise we could have a made NhP which immediately loses credibility as not compliant with the adopted Local Plan. We look forward to the examiner's guidance on making the most robust Plan possible.</p>
	<p>Page 7, First Sentence: environmental should be included in the contribution to improvements. The three attributes of sustainability are economic, environmental and social.</p>	<p>Agree</p>
	<p>Page 8, Paragraph 7, First Bullet Point, Last Sentence: The Uttlesford Local Plan 2005 is the adopted local Plan and</p>	<p>Agree</p>

	<p>the Neighbourhood Plan will be tested against the adopted plan. The emerging Local Plan is not part of the Development Plan. However, the reasoning and evidence informing the emerging Local Plan will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. Throughout the plan conformity should also refer to the adopted Local Plan 2005.</p>	<p>The text on page 8 was drafted some time ago when it was assumed the ELP would be in its final stage or adopted.</p> <p>It is suggested that the last sentence of para 7 first bullet point be amended to add ‘...make this Plan conform with the ELP <i>in addition to being in conformity with the 2005 adopted Plan</i>’</p>
Chapter 2	<p>Page 10, Paragraph 3: First Sentence: Policies in the Neighbourhood Plan should not seek to repeat existing Policy, but rather strengthen that, make it more locally specific, or provide new policy where the existing framework is silent on a particularly local matter. The Neighbourhood Plan should not repeat nor ‘adopt’ policies from the draft Local Plan and any other such documents. Once ‘made’, policies in the Neighbourhood Plan will form part of the suite of policies used to determine applications in the area. Government guidance advises that Neighbourhood Plan policies should not duplicate Local Plan policies</p>	<p>Agree</p> <p>However, the ELP is not ‘existing policy’. The point of the ELP section on page 10 is largely to confirm which version of the ELP this Plan seeks to conform with. ELP policies are not copied in their entirety but, as noted in the comment, are built on to cover local matters</p> <p>It is suggested that paragraph 3 that ‘Some of the ‘ELP’’ be deleted.</p>
	<p>Five Year Land Supply Page 10, Paragraph 3: Last Sentence: Note the latest update Council’s Five Year Land Supply is 2.68 years.</p>	<p>As the figure changes every year, and prediction for the ELP is it will immediately restore a five year supply, it would be sensible to remove the sentence.</p>
Chapter 5 Process, Vision, Aims & Objectives	<p>Page 18 Objectives and structure of Newport Quendon Rickling Neighbourhood: The Plan includes, on page 18, ten Objectives. Some of these appear to overlap, or address very similar themes. It would be helpful if the Objectives could be reordered (and perhaps even amalgamated in some instances), and the following policy chapters then reordered to follow the numbering of the Objectives. For example, the first chapter following the Objectives commences with policies that address Objective 10: it would be better to start with policies that address Objective 1 and then run</p>	<p>Disagree</p> <p>A similar comment was made at regulation 14. The Steering Group considered it and decided to stick to what has been agreed (and consulted upon). The chronology was that the objectives were set first. Then the policies to address the objectives followed. It was considered that the order of the objectives and the policies doesn’t matter, and the objectives fit onto one page. Also that it is reasonable that a policy section may address multiple objectives</p> <p>On the Objectives page a cross reference to the policies could be added. However, we have been using the draft Plan in relation to an</p>

	chronologically. In terms of the Objectives themselves, Objectives 2, 5 and 9 all relate to local character and identity. Could these be amalgamated or reordered to follow one after the other? It might be helpful if the key themes the Plan is seeking to address could be drawn out and the Objectives reordered around these.	appeal and users just go to the policy index on p4, then to the policy. Or search the electronic version.
Chapter 6 Policies and Recommendations	A summary of messages from consultation exercises is helpful and informs the narrative of the Plan. However, this should not be solely relied upon as the evidence for the policies: it will be questioned and challenged if not backed up by supporting data	Agree Consultation is only part of the evidence and is not “solely relied upon” but in most cases is supportive.
	Quotes of relevant paragraphs from the NPPF and ELP should not be used as evidence. This information is replicated in the Basic Conditions Statement. The Conformity Statement at the end of the policy boxes suffice to show conformity.	Agree But are informative so are included.
Policies and Recommendations – Business and Local Economy	This section includes a table summarising feedback from consultation. Whilst it is useful to refer to consultation in the main Plan (and which helps ‘tell the story’ of the Plan), it is not necessary to include a breakdown of survey results in this. Rather, these can be included within the associated Consultation Statement which will need to be submitted alongside the Neighbourhood Plan ahead of the examination stage. This applies to all subsequent sections of the Neighbourhood Plan.	Disagree Inclusion of selected Community Consultation comments in the body was adapted from the example of the Stanwick NhP. The full records are in the Consultation Statement (and are voluminous). Only extracts are included in the body of the Plan. The logic is that a user who may be in doubt about how to apply a policy (where maybe an unforeseen circumstance has arisen) could be helped by understanding the purpose of the policy as perceived by the community. Once the Plan made, no-one will look again at the Consultation Statement, particularly as on its own it does not cross reference to any policies.
Policy NQRBL1 Support of new and existing businesses:.	includes reference to an existing core business area. The map is at too small a scale to clearly delineate the core business zones. Larger scale inset maps showing each of the core business zone might be more helpful to readers and planning officers	Agree The map is being recut. These are mixed residential and business areas. Mixed areas are supported in the ELP but only in new settlements - there is no policy promoting them in the rest of the district. Mostly the business policies relate to individual properties, not zones. The exception is BL3 for

		parking. Map 2 could be used to indicate where parking restrictions could be a problem for businesses. Use of that policy would depend on the specific restriction proposals (in support of development).
Policy NQRBL2 Change of use on upper floors:	reference to Local Plan viability test conditions is vague not very clear and not evident how a decision maker should react to development proposals. What is the Local Plan Viability test? The tests should be included in the policy for clarity	Agree This needs to be altered to 'where the criteria in the Marketing Assessment Information for conversion...' and the heading beneath the policy table needs to say 'policies NQRBL1 and BL2'
Policy NQRBL3 Business parking:	The phrasing of this policy is ambiguous and not very clear on how a decision maker should react to a development proposals. The policy might be better phrased to say that where businesses propose new parking space, this should be provided in line with existing parking standards (See Essex County Council guidance)	The first sentence could have added to it: 'and is in accordance with the Highways and Local Authority guidance'. This was assumed, as all applications are subject to these parking policies.
Policies and Proposals – Air Quality	Page 27 Paragraph 6: "Recordings from UDC of NO2 at the Wicken Road B1038 – High Street B1383 junction show high levels. The figures are in the UDC Air Quality Annual Status Reports dated 2018, which covers 2017 and is on https://nqrplan.org/evidencedocuments , and the UDC website. Below is an extract of the raw NO2 readings prior to the calibration adjustment noted below" This paragraph refers to the 2017 data yet goes on to display 2018 data, which is misleading. It would be less misleading to display the 2017 data as shown below, with the annual figure adjusted against more accurate data, and annualised to correct for the less than 12 months data collection. Alternatively the data for 12 months of 2018 could be displayed, including the adjusted annual mean. However, although the initial data has been forwarded to the author of the report, it is not yet in the public domain as the ASR 2019 has not yet been published. SEE TABLE	Context The 2018 data is now published in the UDC Air quality Annual status Report '2019' and is identical to that on p27. A further sentence should be added that after the calibration adjustment the reported NO2 concentration is 30.1. The figures are quoted just to give readers a general idea. There doesn't seem any point in quoting older figures (all earlier figures are on the UDC website). The issues highlighted are failure by UDC to maintain the calibration equipment (now resolved for 2019 data) and that although below the AQMA trigger level, the readings are still of concern. And that once development is permitted which may trigger levels over the limit it is too late.

	<p>Page 28, Issue 3: “Raw NO2 readings from tubes are calibrated using more accurate recording equipment. DEFRA prefer this accuracy to be checked locally. See https://laqm.defra.gov.uk/documents/LAQM-TG-(09)-Dec-12.pdf. Para 3.25 ‘The precision of diffusion tubes can be calculated from duplicate, or preferably triplicate tube exposures, ideally from a site that is co-located with a chemiluminescence analyser so that a local biasadjustment factor can be derived.’ In 2017 UDC failed to maintain the local calibration equipment and so had to switch to a national standard. In 2016 while the equipment functioned, the adjustment against raw readings was -6%. In 2017 on national figures it was -23%. The validity or otherwise of this large swing is not commented on in the UDC report. There is concern therefore that current NO2 concentrations, used as a basis for forecasting, may now be under reported”.</p>	<p>The comment is a copy of the NhP text and no issue is raised. It is background information on the air quality recording process.</p>
	<p>Page 30, First Paragraph: “There is currently no monitoring in Quendon. Being a more open location typically without queuing traffic it is not likely to have dangerous levels of pollutants. However it would still be advisable to extend monitoring to all built up areas along the B1383”.</p> <p>Monitoring is already taking place at four built up locations in Newport along the B1383 and due to the low levels recorded, other than at the Wicken Road junction, it is unlikely this will be extended further.</p>	<p>Context There is concern over pollution levels in Stansted, which drivers on the B1383 from the Plan area visit and pass through. A major planning application in Elsenham was recently objected to by Env Health on grounds including pollution from traffic connected with permissions granted in Newport. The comment seems reasonable as we live off the same road (B1383).</p>
<p>Policy NQRAQ1, Air Quality impact of development proposals</p>	<p>Policies should not be overly onerous and unduly restrict development. As there is no AQMA in the Neighbourhood Area and the recent appeal decision (Land to the South of Wicken Road Ref. No. 18/00048/Ref) did not highlight Air Quality issues it is not clear that this policy is reasonable.</p>	<p>Context The Inspector for the Countryside appeal (Land to the South of Wicken Road Ref. No. 18/00048/Ref) wrote in para 79. ‘<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. However, on the basis of the evidence before me I have no</p>

	<p>Requirement of Transport Assessments of ten or more dwellings does not meet the Essex County Council threshold of more than 50 residential units or 20+ employees and without justification the requirement is not considered appropriate.</p>	<p>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. Consequently, there would be no conflict with Policy ENV13 of the ULP or Policy EN15 of the ELP.’</p> <p>(Underline added)</p> <p>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>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 appeals awaited for 98 houses and nothing to prevent a smaller or different re-application on the site refused.</p> <p>AQ concerns remain.</p> <p>The Transport Assessment comment was covered in the response to ECC.</p> <p>If the examiner considers that the threshold should remain at the ECC level then it is requested that consideration of cold start emissions should remain.</p>
<p>Green Spaces and Environment Policy</p>	<p>As per the our response to the Regulation 14 consultation, UDC maintains that the Environment</p>	<p>Context</p>

<p>NQRGSE1, Discharge into watercourses -</p>	<p>Agency has a duty to review such matters, and has been engaging with the Council through production of the new Local Plan and supporting evidence. The District Council's Strategic Flood Risk Assessment and updated Water Cycle Study include information with regard to flooding and discharge and should be reviewed and referenced as appropriate in the Neighbourhood Plan.</p>	<p>The Local Plan evidence noted does not go to the level of detail considered necessary for this Plan area, hence the need for the policy. The policy does not seek to override whatever the EA may say in response to applications.</p> <p>The SFRA is largely a record of previous floods and the maps are the EA maps but not to the level of detail of the flood maps included in this Plan. (A history of Newport 'A Village in Time' lists many more flood events around Bridge End than are recorded in the SFRA). The Water Cycle Study is primarily about foul sewerage and water supply. As previously noted the updates are largely summaries of the 2010 Hyder report.</p> <p>The issue is there have been two large planning applications intending to create new flows into watercourses (Hill Residential 24 houses and Ellis 94 houses. They both claim that Suds systems will restrict flows to less than or equal to greenfield run off. However as the flows currently do not exist the Suds argument fails. (Ellis is more complex, given on appeal, and two years on there is no construction and the drainage plan remains unresolved. Evidence on flooding presented by residents was discredited by the appellants barrister as not coming from an 'expert')</p>
<p>Policy NQRGSE2, Locally supplied evidence of flood risk -</p>	<p>As per our response to the Regulation 14 consultation, UDC maintains that residents can submit information/comments on an application and these are considered accordingly. However more material weight cannot be given to local residents over a statutory agency such as the Environment Agency. This should be included in the text rather than as a policy.</p>	<p>Disagree – the comment is inaccurate</p> <p>The policy states “weight is to be given” and is not stating “more material weight” as suggested. Our experience is that resident submissions are frequently ignored.</p> <p>It is there to address what happened at the Ellis appeal, noted above. It is to reinforce that residents evidence be given some weight. To give two more examples, the parish council objected to the Granta Mead development (p107 second large site from the north) as it floods. It is built on the Cam floodplain. The PCs evidence was ignored. Between outline permission and reserved matters it flooded from the Cam. The committee sought to reverse the permission but the legal officer said they could not. ECC, the EA, UDC and the developer were all fully aware of the flooding and the site remained with standing water for</p>

		<p>months (including while under construction – photos available, the builders joked about trench foot), but no agency stepped forward to force a reconsideration.</p> <p>The second example is Hill Residential 24 houses, recently at appeal. Due to an admin error by PINS the appellants flood consultant, who wrote the flood strategy, did not receive the photos showing the extent of flooding on the site which happened in 2014. The Inspector however did have the photos, which were supplied by residents. It became obvious that the consultant had relied only on the EA maps and computer model and had no idea of the scale of the problem. Or that his design would put a new flood sewer directly into the worst area. The evidence was already in the public domain from the original application but had not been looked at.</p> <p>The appeal was left open while the appellant considered the flood evidence.</p> <p>NhP’s are about locality and the policy is to ensure that local evidence is considered.</p>
<p>Policy NQRGSE3, Footpaths and access to the countryside</p>	<p>The first paragraph of the policy will depend on the scale of the development and whether there is a direct impact from the scheme</p>	<p>Disagree It depends on the location of the development as well as the scale.</p>
	<p>The second paragraph of the policy requires the view to be strategic otherwise there is no right to a view. Maps 16 and 17 may require reassessment to ensure that the views are strategic.</p>	<p>Disagree The phrase “requires the view to be strategic” is not in the policy The views are all from public spaces or rights of way. They are not views from individual houses. ‘Strategic’ is not understood as a description for a valued view from say a footpath, but they are all considered of significant value to locals and visitors, and vehicle passengers. Each view has a description picking out the key elements of value and interest, such as the views of St Mary’s church tower, and reference is made where appropriate to the UDC and Essex landscape assessments and Conservation Area reports.</p>

	<p>Third paragraph of the policy: Essex County Council deals with footpath diversions and not dealt with at District Council level.</p>	<p>Noted ECC have proposed text to strengthen the policy, see above</p>
<p>Education and Health Policy NQRHE2 Primary Schools:</p>	<p>Uttlesford District Council cannot control this matter as it is an Essex County Council function as the Education Authority.</p> <p>Any conditions related to school provision should reflect that set out in guidance established by Essex County Council in their Developer Contributions guide. Any conditions within the policy should not unduly restrict development.</p> <p>It should be noted that the new Local Plan being prepared by the District Council includes an allocation that provides for expansion of Newport Primary School</p>	<p>Noted</p> <p>The policy is not concerned with developer contributions See response to ECC comments. Note that the expansion of Newport primary is shown as 'tbc' in the ECC 10 year plan.</p>
<p>Housing Allocation Policies Page 59, ELP:</p>	<p>"SP2 The Spatial Strategy 2011-2033 says – "For Newport, classified as a Key Village, no further houses are required additional to those already permitted."</p> <p>The above statement is incorrect as SP2 states that, "Key Villages will be the major focus for development in the rural areas reflecting their role as provider of services to a wide rural area." (Regulation 19 Local Plan page 26). Furthermore Policy SP3, The Scale and Distribution of Housing Development indicates that 1,120 dwellings are to be provided by on small unidentified sites. Windfall sites can be anywhere within the District and Newport will not be exempt from windfalls.</p> <p>This sentence on Page 59, ELP should be deleted and replaced with a correct statement.</p>	<p>Agree that the quote is overtaken by the later version at regulation 19. Disagree with the 'major focus' as also overtaken by the scale of development since the original designation</p> <p>The quote was from regulation 18 and should have been updated. (P29 of reg 18 said 'No allocations are proposed at Newport'). Regulation 19 just added in the 94 house Ellis site, given permission, which was excluded at reg 18 to avoid compromising the appeal.</p> <p>Suggested wording: ' The ELP in policy SP2 identifies Newport as a Key Village and says "Key Villages will be the major focus for development in the rural areas reflecting their role as provider of services to a wide rural area"</p> <p>However table 5 in SP2 requires no further site allocations for Newport additional to the sites already permitted.</p> <p>The classification of Newport as a 'major focus for development' originated eight years ago at the start of the ELP process. Since then it has taken very significant development and in excess of that anticipated</p>

		in all iterations of the ELP, including windfall. With almost no infrastructure, public transport or service additions and with the constraint of being in a valley it is considered that its ability to be a 'major focus' has been 'used up' by the scale of permitted development. This is why the regulation 19 ELP requires no further allocations in Newport'.
Policy NQRHA1 – Coherence of Villages	Page 62, Bullet 3, where it says (see maps section) should be replaced with (see Maps 13 and 14) to provide clarity	Agree
Policy NQRHA2 – Building on Brownfield Sites:	these brownfield sites are beyond the Development Limits and does this mean that there is some support beyond Newport's Development Limits?	One of the sites supported by the plan is the Carro's glasshouses, but which the owner declined to have as a site allocation. It is adjacent to Newport development limits. Apart from Newport quarry, which is allocated for waste use by ECC, no significant other brownfield/previously used sites are known. However, adding in to the policy "if adjacent or close to development limits' would be sensible to avoid unintended consequences.
Housing Planning and Design Policies Policy NQRHD1 Parking Standards	Basing parking arrangements requirements on the emerging UDC ELP Policy D2 which is currently under Examination may have potential problems as the emerging Local Plan is liable to changes and there is no guarantee that the emerging Local Plan will be adopted. The NP can copy some of the Policy D2 text relating to parking arrangements and add the Essex Parking Standard 2009 and UDC Residential Parking Standards 2013.	Agree The key point is triple tandem parking. Suggest remove the first line as compliance with UDC and Essex rules is mandatory anyway, whatever they may be amended to. And make the next sentence 'In addition to compliance with Essex and UDC parking standards, in-line parking....'
Policy NQRHD2 Housing Design	The last sentence in the policy requires applications to show compliance with the Essex Design Guide. The Policy should require developments to have regard to the Essex Design Guide rather than compliance	Agree
Roads and moving around Policy NQRTR1	Page 86 – The second require for extensions of speed limits will depend on the Highways Authority and the extensions might not be required. This sentence should be made into a Recommendation.	Disagree. But noted in the response to ECC that the policy should say as agreed 'by' the Highways Authority not 'with' as the decision lies with the Highways Authority. In a recent planning application south of Newport the developer responded to the draft Plan policy by agreeing to fund

		<p>the extension. The extra weight of being a draft policy was considered beneficial in getting agreement. (The application was refused for other reasons, and Highways were unclear as to whether they wanted the extension. The application may now revert to a previous smaller permission where no agreement was reached for funding of the speed limit extension).</p> <p>It is considered that developers will be keen to financially support speed limit extensions as beneficial to both their own development and the community.</p> <p>The policy is primarily about getting the funding. This is to address what happened in Quendon when the speed limit was not considered in the applications for two southern extensions and so funding was not requested. New residents immediately protested that the matter should have been dealt with. It is now being done, but paid for by the taxpayer when it could have been a s106 and should have been implemented prior to occupation</p> <p>The policy is about a) ensuring the matter is considered and b) who pays for it if it is required</p>
Sports, Community and Leisure	Page 91 Funding – This paragraph does not add value to the plan. However, the Council is currently looking into CIL. The Sports Facilities and Recreation Strategy Assessment Report (December 2018 – May -2019) provides strategies for securing S106 contributions, protecting and enhancing existing facilities ensuring better facilities through re-development and creating sustainable communities by directing sports provision to areas of planned growth. The Funding paragraph should be updated based on the Sports Facilities and Recreation Strategy Assessment Report (December 2018 – May - 2019).	<p>Context</p> <p>The paragraph is a statement of fact and is relevant. It shows that from the NhP area the district has lost out on £1.7m of funding, and has obtained nothing at all. It notes the differences between s106 and CIL eg that CIL applies to every application not just large ones. The last sentence needs update as creating a CIL is now UDC policy and a consultancy contract has been agreed to work out the details. At the recent Foxley 2 planning application, despite full agreement between the developer, the parish council and the district councillors for a sports contribution of £15k, the UDC officer declined to include this as a s106. The developer did a unilateral agreement instead. In such circumstances where we struggle to obtain</p>

		<p>contributions even when we do all negotiations ourselves, it is felt useful to have CIL background in the Plan</p> <p>Apart from the original 2012 document, none of the 17 sport strategy documents published on the UDC Plan web page answer the funding question. The latest update includes only a list of grant giving bodies easily obtained from an internet search.</p> <p>Funding is not covered in the ELP</p>
Policy NQRSL2 - Financial contributions from development -	De (sic) sets out a 'levy' on development for spending on sports facilities. It is not the place of the Neighbourhood Plan to do this. The District Council is currently in the process of preparing a 'Whole Plan Viability Study', which will assess the policies in the emerging Local Plan and the impact of these on development viability. This will inform any future Community Infrastructure Levy if introduced the District Council. In the meantime, other contributions are made through s106 agreements	<p>Disagree</p> <p>The policy refers to being based on UDC updates so remains relevant. It does not mandate a levy but says s106 or a levy</p> <p>There have been no financial contributions to Sport and Leisure through s106 certainly since 2011 and probably since the expansion of Newport in the 1970's'. The existence of this draft policy has already resulted in the first sport contribution in the Plan area from a developer.</p> <p>However, it would be better if the last sentence of SCL2 first paragraph was 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.</p>

LITCHFIELDS on behalf of Taylor Wimpey

Policy NQRGSE3 – Footpaths and access to the countryside	<p>Taylor Wimpey supports the maintenance and enhancement of existing footpaths and rights of way and would seek to retain these in any development proposals.</p> <p>It is not, however, considered necessary for this this policy to incorporate consideration or the degradation of rural views and views towards the villages and landmarks as part of this. This makes the policy overly restrictive</p>	<p>Disagree</p> <p>UDC have confirmed that neither the 'Landscape Visual Impact Assessment (LVIA) prepared by Barton Willmore' nor any other documentation was supplied in the consultation, so we are unable to comment on it.</p> <p>The policy has been worded as 'an adverse impact' without qualification such as 'material'. Views are subjective and it is felt not productive to have a wording which opens up materiality or mitigation</p>
--	---	--

<p>and does not support the objectives of sustainable development as set out in paragraph 8 of the National Planning Policy Framework (NPPF, 2019). The policy does not make an allowance for the mitigation of views through appropriate design, landscaping and planting. It also identifies sensitive views (Map 16) across the whole site. This should be a consideration for detailed design and not for planning policy.</p> <p>The Landscape Visual Impact Assessment (LVIA) prepared by Barton Willmore identifies that, with the exception of the elevated slopes of the northern parcel (immediately south of Debden Road), the remainder of the site is visually enclosed and strongly influenced by the existing built form of Newport. This policy therefore needs to reduce the weight applied to any change of rural views and views of villages and landmarks through providing more flexibility to mitigate the visual impact of development in order for support sustainable housing development.</p> <p>It is suggested the policy is amended as follows: “In order to maintain and enhance access to the countryside, links to existing footpaths and rights of way, as well as improvements to footpath surfaces and signage, will be sought in connection with new development. Development resulting in an adverse impact on the amenity of existing footpaths and rights of way, including degradation of rural views and views towards the villages and landmarks such as churches, [remove will not be supported] insert should demonstrate that this impact has been suitably mitigated. This includes views identified as sensitive to change, as shown in the appendices published on</p>	<p>arguments which cannot be defined in a policy which must cover all circumstances. Such arguments, if at appeal, can be very expensive, and inconclusive.</p> <p>The interpretation of a policy where there is some conflict between the proposal and the policy is subject to the applicant demonstrating that they can reduce the lack of compliance to a level which may be considered acceptable in the overall balance. This is a given for all policies and does not need to be stated.</p> <p>Many successful applications are in contravention of at least one policy. It is considered better in this case to have a Yes/No policy, with the weight then to be given, in the case of non-compliance, by the planning officers and the process in the overall consideration of the application. Put another way, it is better to have one point of decision rather than two.</p> <p>Context At the recent appeal hearing for Hill Residential for 24 houses to be built around the school cricket ground, the appellant claimed that the failure of the 2007 Historic Character assessment to specifically include the view of the cricket pavilion which would be blocked, meant that it was considered to have no particular value.</p> <p>The inclusion of specific examples of views considered sensitive to change is vital, and was recommended to be included by the UDC consultant assisting the Steering Group.</p> <p>See for example the Debenham NhP, which even ranks the views.</p>
---	--

	<p>https://nqrplan.org/evidence-documents and on maps 16 and 17 in this document.</p> <p>Footpath diversions will need to be of at least equivalent quality to the path being replaced.”</p>	
<p>Policy NQREH2 – Primary school places</p>	<p>We previously commented on this policy as part of representations made on the NQRNP Regulation 14 consultation (previously Policy EH2). However, although the wording of the policy has been amended, we consider that our previous concerns have not been properly addressed.</p> <p>As set out previously, Taylor Wimpey recognise the importance of ensuring available primary school capacity in the area. The required contributions to education infrastructure are currently determined at the planning application stage in accordance with ECC (the authority responsible for education) formulas and then secured via Section 106 planning obligations. This approach ensures that financial obligations are secured, and dates of payment specified. Changing this up-front approach to require confirmation of school places prior to first occupation, which is much later in the development process, could result in much needed homes being left empty due to circumstances outside of a developers’ control as the provision of school places is the responsibility of ECC. Paragraph 94 of the NPPF makes clear that widening the choice of education is the responsibility of the Local Authority. Pg 5/7 17921466v1 The requirement for such pre-occupation conditions would place an unacceptable burden on developers, threatening the viability of new housing and preventing the sale of new homes until a situation outside of their control had been addressed by ECC. Given that the S106</p>	<p>This is dealt with in detail in our response to ECC. To address points not raised by ECC:</p> <p>The policy does not cover funding for schools, and that is not the issue. It seeks to place the burden on the LEA, not the developer, to ensure that primary age children have places at their local school and are not as a matter of course required to commute.</p> <p>At present the LEA is saying Yes to every application in Newport at the same time as showing it will not have capacity and its 10 year plan shows expansion plans as ‘tbc’.</p> <p>Para 94 of the NPPF is a statement of the responsibilities of an LEA, not developers</p> <p>Para 73 is about strategic policy for housing supply and mentions neither education nor viability.</p>

	<p>contributions paid towards the creation of new school places are paid for by the sale of homes, the effect of this policy could be to delay the availability of new homes and improvements to local schools. Policy NQREH2 is not consistent with national policy as it would be an unacceptable burden on development, threatening viability. The policy, as currently worded, does not meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as it does not have regard to national policy on viability (NPPF paragraph 73) and education provision (paragraph 94). Furthermore, it would place in jeopardy the ability of the district to meet its urgent housing need</p>	
<p>Policy NQRHA1 – Coherence of the villages</p>	<p>Taylor Wimpey supports this policy insofar as it recognises the importance of development being located in sustainable locations and in particular preventing the linear development of Newport further to the north and south.</p> <p>However, it is considered that the development limits around Newport are too restrictive and the policy should recognise that sustainable locations do exist for residential development in Newport which could deliver much needed housing in the neighbourhood plan area and could contribute to the vitality of local businesses and contribute to infrastructure improvements. Uttlesford District Council (UDC) recognises that greenfield sites will need to accommodate some of the District’s identified housing requirement and this should therefore be reflected in this policy.</p> <p>This policy is not considered to be in accordance with paragraph 127 of the NPPF, which seeks that policies ensure developments are sympathetic to landscape</p>	<p>Disagree It is false to quote paragraph 127 as implying that development limits should be disregarded</p> <p>Para 127 is a generic statement of what good development should aspire to. It does not mention building on greenfield or opine on where development should be or mention development limits. Almost every planning application in the district is outside development limits and each one must be considered on its merits and applicable policies and the balance of housing need and the 5 year supply.</p>

	<p>setting without preventing or discouraging appropriate innovation or change.</p>	
<p>Policy NQRHA3 – Connection with the countryside</p>	<p>Representations were previously made to this policy at the Regulation 14 stage and it is noted that although the wording has been amended, the overall intention of the policy has not changed. As previously stated, Taylor Wimpey supports the aim to maintain visual connection with the countryside. However, it is reiterated that this should not rule out all new development as the landscape impact will depend upon the location and design of any development. Consideration of this is a matter for detailed design. There is no clear evidence which justifies specifying the land to the east of Newport should not be developed on, as Policy NDRHA3 does.</p> <p>Neighbourhood Plans must not constrain the delivery of important national policy objectives (Planning Practice Guidance, Reference ID: 41-069). Delivering a step change in housing delivery is a key element of the NPPF and supports making optimal use of sites well served by public transport (paragraph 123). Given that Uttlesford has very limited brownfield land suitable for residential development the prevention of development on greenfield sites that are close to the railway station and local businesses should be reconsidered. The aim of the policy – ensuring a connection with the countryside – could be met by amending the policy so that it does not preclude housing development and remains compatible with the requirements of national policy.</p> <p>The LVIA prepared for the land east of Newport demonstrates that through developing below the 75m contour line and retaining the visually sensitive part of the site as strategic open space, new built form could be</p>	<p>Disagree</p> <p>As noted above, Taylor Wimpey have not supplied the report referred to or any detail of what they may intend to apply for on their land. It is therefore not possible for the Steering Group to comment.</p> <p>A site assessment was carried out and is in the evidence base (NQR2). It gives a summary of the evidence concluding that the site should not be built on. It is noted that Taylor Wimpey has not responded to the several site-specific issues in the assessment.</p> <p>The connection with the countryside is a fundamental part of being a village. The views out are of particular value and noted in the CA assessment, and the Historic Character assessment says much the same about the inward views.</p> <p>The response above concerning NQRGSE3 about meeting a policy requirement, or reducing non-compliance, apply here. It is not considered viable to specify in a policy exactly what an applicant may wish to do to comply in circumstances which will be specific to each application.</p>

	<p>accommodated within the Cam Valley landform and have a strong relationship to the existing settlement pattern of Newport. As such, the policy wording should be amended to support this approach.</p> <p>It is suggested the policy is amended as follows: “To retain the close connection with, and views of, open countryside: • Proposed development must be sensitive to the setting of Newport within the surrounding countryside. The design and layout of any new development must take into account existing views into the countryside and ensure that the visual connection to the countryside is not lost.</p> <p>Suggest delete “ development will not be supported in these locations: • Up the valley side on the east of the railway at Newport • On the fields separating the developed area to the south of Wicken Rd from the newly developed area to the north of Bury Water Lane.” The amended wording sets out the aim of the policy clearly but would not preclude the possibility that detailed design and carefully considered landscaping could ensure that development retains the connection with the countryside.</p>	
<p>NQRHA4 – Building in the countryside</p>	<p>Similar to the above policies NQRGSE3 and NQRHA3, consideration should be had for the location and design of development which could have an impact on landscape. As noted, the LVIA for the land east of Newport demonstrates that this approach mitigates any impact on the landscape. As a result, it would be possible to deliver housing in a sustainable location which could support the delivery of infrastructure and recreational facilities.</p>	<p>Disagree</p> <p>As noted above the document referred to has not been supplied and cannot be considered. However, it is inconceivable that a housing estate on a prominent hillside overlooking almost the whole of Newport could be designed so it ‘mitigates any impact on the landscape’</p> <p>The same comments as above apply with respect to the ineligibility of</p>

	<p>In defining an area of land outside of the Cam Valley where development will not be supported (except in accordance with Policy NQRHA1) this policy is overly restrictive of development. This does not support the aims of NPPF paragraph 127 that planning policies ensure developments are sympathetic to the surrounding landscape setting, but do not discourage appropriate innovation or change.</p> <p>As such, the policy wording should clarify that although the surrounding landscape setting of Newport does have value, development which can appropriately mitigate against its impact on the landscape should be supported. This will therefore support the delivery of much needed housing against Uttlesford's housing requirement</p>	<p>para 127.</p> <p>The evidence of the outside of Cam valley development already permitted demonstrates very strongly why the policy is needed. The Inspector for the Countryside site appeal described it thus: <i>Although, I have described the character of such views of the appeal site above, views to the north east are also dominated by the incongruity of the Wicken Lea development which, owing to its urban form and materials, appears as a disjointed protrusion into the rural landscape and displays little integration with the rest of the village. Although this development faces east towards the village, its incongruity serves to emphasise my concerns at the sensitivity of the landscape to change and the harm that can be created by a relatively large-scale modern development that fails to integrate into its surroundings.</i></p> <p>It is difficult to see how any development outside the Cam valley could 'integrate into its surroundings' as it would be separate from the village.</p>
<p>NQRHD2 – Housing Design</p>	<p>NQRHD2 – Housing Design Taylor Wimpey has previously commented on this policy as part of the Regulation 14 consultation. We note that the policy still includes that a maximum of 20 dwellings per hectare (dpha) outside of development limits is supported.</p> <p>We would reiterate that this restriction is unnecessary and may prevent the most efficient use of land. Policy NQRHD4 now sets out support for 15% one-bedroom affordable homes. The densities included may not be compatible with this requirement. It is considered that although density is an important consideration it is also interrelated to other aspects of design. As such, the 20dpha threshold is overly prescriptive and would preclude the type of detailed design review which criterions (a)-(e) require. We consider that if these</p>	<p>Disagree</p> <p>It is not a restrictive policy to support lower density development outside development limits. 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 with a plot size of just under one hectare was rejected on grounds of being overly dense at the extremity of the village. The applicant has now reapplied for 13 houses.</p> <p>Assuming that the criteria referred to are those in para 127 of the NPPF, it is only one criterion which refers to density: c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);</p>

	<p>criteria were met, the density of development would be appropriate.</p> <p>As previously set out, this policy is contrary to draft Policy H1 (Housing Density) of the emerging Uttlesford Local Plan which proposes a range of 30-50dpha for any development adjacent to a settlement. The NPPG (Reference ID: 41-009) advises that consistency between Local Plans and Neighbourhood Plans which are being prepared at the same time is important, particularly in relation to housing need. Placing a cap, which is significantly lower than that contained in the Local Plan, on development would lead to inefficiently utilised Pg 7/7 17921466v1 land which would be contrary to the Government’s ambition to make optimal use of sites well served by public transport (NPPF paragraph 123).</p> <p>The part of the policy on density should be deleted, as it is unnecessary in addition to the other requirements of the policy and is inconsistent with the emerging Local Plan and national policy</p>	<p>It is considered that NhP policies strongly support this criterion.</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.</p> <p>The NhP is required to be compliant with the adopted 2005 LP, which does not specify housing densities. NQRHD2 does not prevent higher density applications coming forward as envisaged in ELP policy H1.</p>
<p>Policy NQRHD4 – House sizes</p>	<p>As set out in our previous representations, Taylor Wimpey supports the requirement for a range of housing sizes. The requirement that 15% of affordable houses be 1-bedroom dwellings is overly prescriptive and does not allow for future change in demand and is not consistent with the emerging Local Plan. As such a high proportion of 1-bed dwellings would be provided as flats, it would also be incompatible with NQRNP draft policy NQRHD2’s proposed 20dpha density threshold.</p> <p>Draft Policy H2 of the emerging Uttlesford Local Plan prioritises the delivery of 3 and 4+ bedroom market housing and 2 and 3-bedroom affordable housing as evidenced in the 2015 SHMA. Appendix 2 of the Local</p>	<p>There are no appendices to the 2015 SHMA and we have been unable to track down the ‘Appendix 2 of the Local Plan’ – Google searches on the text went to Rightmove, so are unable to comment on the detail</p> <p>The 15% of one-bedroom affordable houses is not stated in the policy as a requirement. It is phrased as ‘will be supported’. The evidence for it is from the UDC housing list, which is also used as the condition for eligibility for the (very successful) housing association developments in the district. Quoted on p69. In relation to a developer enquiry in the plan area we recently rechecked these figures and the strong preference for one bedroom accommodation is unchanged. The ONS household predictions also continue the trend to smaller households throughout the plan period. There was also support for 1 and 2 bedroom properties in the community consultation (p72)</p>

	<p>Plan sets out the following monitoring targets for the delivery of housing:</p> <ul style="list-style-type: none"> • 1-bed flats – 4% • 2-bed flats – 3% • 2-bed houses – 12% • 3-bed houses – 43% • 4+bed houses – 38% <p>The requirement for 15% 1-bedroom affordable housing is therefore considered inconsistent with the emerging Local Plan and its evidence base and does not meet the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and County Planning Act 1990.</p>	<p>Our conclusion is this is a non-restrictive policy supporting evidenced local need and preference. This is surely the function of a Neighbourhood Plan</p>
--	---	---

Mr D Hills c/o Sworders

<p>NQRGSE4 – Developments bordering hedgerows</p>	<p>This recommendation places unacceptable burdens on applicants which are not required by national or local policy. This requirement is onerous and may frequently be undeliverable.</p>	<p>Disagree</p> <p>This is a recommendation not a requirement. We strongly disagree that it would be burdensome, onerous, undeliverable or that such an environmentally supportive recommendation is not supported by national or local policy.</p>
<p>NQRGSE5 – Wicken Water Marsh Local Wildlife Site – maintenance and access</p>	<p>We objected to the Regulation 14 Plan equivalent of this recommendation on the basis that part of the site is privately owned by Mr Hill and the recommendation was therefore undeliverable.</p> <p>At Regulation 14 stage Mr Hill had not been approached regarding the proposals set out in this policy, including the aspiration for public access. The NPPG (Paragraph: 080 Reference ID: 41-080-20150209) states that when preparing a Neighbourhood Plan, the qualifying body should engage and consult those living and working in</p>	<p>Agree.</p> <p>As not a key part of the Plan this escaped scrutiny to ensure that all necessary modifications were included. We are happy to provide an additional map showing the ownership and noting that the Hills have declined to participate. (The map on p41 is from the 2007 Wildlife Review and so is not ours to modify)</p>

	<p>the neighbourhood area and those with an interest in or affected by the proposals and talk to land owners and the development industry.</p> <p>Following comments made on behalf of Mr Hill at Regulation 14 stage, we were contacted to provide details of ownership, 7 Page NQRGSE6 – Sewerage systems but there have been no discussions regarding Community Land Trusts, management or public access.</p> <p>In response to our objections the NPSG stated as follows: “As a recommendation, this is aspirational. This aspiration is independent of ownership issues. Consultation regarding the Neighbourhood Plan has been carried out according to the guidelines. The steering group was misinformed about ownership and the Plan will be amended. The area owned by the Hills will be excluded.” Whilst we welcome the change to the supporting text to recognise that only the east side of the site is intended to be part of a Community Land Trust, and not the western side owned by Mr Hill, this is not made clear in the recommendation which still refers to the site as a whole. To be clear, the owner of the western part of the site does not intend to set up a Community Land Trust or allow public access to the site. This recommendation should therefore be amended to refer to the eastern side only.</p>	
<p>NQRHA1 – Coherence of villages</p>	<p>We object to this policy as it is overly restrictive of development outside of development limits. This restriction is extremely onerous, unjustified and fails to have regard to the national policy presumption in favour of sustainable development.</p> <p>It also lacks clarity as the bullet points do not appear to</p>	<p>Disagree</p> <p>The first paragraph does not contain detail which can be responded to.</p> <p>The walking distances are in HA1 to be noted as used in the site assessments. It was considered sensible to establish them in a policy. (Not questioned, but they are copied from the Debenham NhP as</p>

	<p>relate to the preamble. The description of walking distances are quantified as being “poor”, “moderate” and “favourable” but the bullet points refer to “good” and “convenient”.</p>	<p>prepared by the consultants Aecom, who also worked on the sustainability assessment for the UDC ELP)</p> <p>The ‘good’ refers to vehicle access, not walking distance, and ‘convenient’ is not the same as (short) distance. At the Hill Residential (no connection) appeal there was criticism of a proposed footway as it zig zagged away from the desire line and would be little used and not fulfil its safety function. It might meet a distance criterion but would not be convenient.</p>
<p>NQRHA3 – Connection to the countryside</p>	<p>We object to this policy which states that development will not be supported on the fields separating the developed area to the south of Wicken Rd from the newly developed area to the north of Bury Water Lane, as defined on Map 19. These fields are also protected by policies NQRHA1 and NQRHA4; we do not consider that any of these three policies are justified of the imposition of a triple layer protection is unnecessary and unreasonable.</p> <p>Furthermore, this policy effectively contains all types of development on these fields. As it restricts “development” without specifying what type of development will be restricted or permitted, this wording will therefore prevent all development. This is exceptionally onerous and would afford the land greater protection than Areas of Outstanding Natural Beauty (AONB), Local Green Space (LGS) and Green Belt designations, in which certain types of development are considered appropriate and development is permitted in certain circumstances.</p> <p>As drafted, the policy would prevent all forms of development, including agricultural buildings and operations which would place a disproportionate burden</p>	<p>Disagree</p> <p>HA1 and HA4 state that development appropriate for a countryside location is not excluded, and HA1 lists what that may be and leaves open ‘other uses’. Both policies quote examples of how development could be supported.</p> <p>It is incorrect to state that these policies would prevent all development.</p> <p>HA3 covers two areas very close to the village of high sensitivity where no development, including agricultural buildings, would be supported.</p> <p>The AONB and Green Belt arguments have been presented by appellants at all three appeals for Newport sites noted on p107. They carried no weight in the dismissal of the Countryside appeal on landscape grounds. The appeal dismissal notes that adopted policy S7 (which despite being out of date this Plan is required to be consistent with) is specifically to protect countryside outside the Green Belt. The function of Green Belt is to prevent urban sprawl around large settlements.</p> <p>Green Belt designation is specific to areas around conurbations and makes no inference that countryside further away is of lesser quality. There is no AONB anywhere in the district and the high protection it gives elsewhere similarly makes no statement or inference that other landscapes lack value. It is a false argument to imply that the presence</p>

	<p>on landowners and severely restrict their ability to continue to use the land as part of their agricultural unit. For example, they may wish to lay an area of hardstanding or erect a new agricultural building. This is contrary to paragraph 83 of the NPPF which supports a prosperous rural economy including “the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings...”</p> <p>This policy is overly restrictive and negatively worded. It is therefore contrary to NPPF paragraph 11, the presumption in favour of sustainable development, and paragraphs 15 and 16 which require plans to be prepared positively</p>	<p>of different types of countryside protection elsewhere prevents this area also having policies to reasonably control development in the countryside.</p> <p>Our local landscape value is supported by the Essex Landscape Assessment, the Historic Character Assessment and this Plan’s analysis of views sensitive to change, and which are considered valuable by the local community.</p>
<p>NQRHA4 – Building in the countryside</p>	<p>We object to the inclusion of a list of evidence base documents which are stated as those which should inform planning decisions. These documents are quite dated (2003 and 2007) so prepared prior to the current (and indeed previous versions of) NPPF. It is probable that during the life of the Neighbourhood Plan, these documents will be updated. Including specific reference to them reduces the flexibility of the Plan to respond to new evidence.</p> <p>Planning law requires applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. Material considerations can be wide and far reaching and include up-to-date evidence documents, the advice of statutory consultees and the NPPF itself. We do not consider that the Neighbourhood Plan can be used as a tool to elevate some material considerations above others.</p>	<p>Disagree</p> <p>The documents from 2003 and 2007 are description of landscape and the local area and Newport Conservation Area. They are not NPPF dependent and the landscape assessments do not become out of date. A Plan must be based on evidence available at the time and that is what has been done</p> <p>No basis is given for what evidence is considered to be ‘elevated’ so it is not possible to respond.</p> <p>The comment notes that reasons for not supporting development in various areas are ‘defined and evidenced in Map No15’. However, no reason to disagree with the evidence is provided to enable the Steering Group to make comment, or amplify the reasons, or to agree a modification.</p> <p>The comment also correctly notes that development appropriate for a countryside location as defined in policy HA1 is not excluded.</p>

	<p>We also object to the element of this policy which states that development will not be supported outside of the Cam valley, as defined and evidenced in Map No15, except for development appropriate for a countryside location as defined in policy HA1.</p> <p>The areas of land covered by this policy are extensive. Whilst the “Cam Valley” has been divided into smaller parcels and description added to Map 15, presumably in response to similar objections made at Regulation 14 stage, this change does not fundamentally change the operation of the policy. It still places a blanket restriction on development on all land to the north, west and south of Newport.</p> <p>There is nothing in national policy or guidance, or in the adopted or emerging local plans which suggest that a blanket restriction is necessary or appropriate. We welcome the addition of wording to allow development appropriate to a countryside location, in response to our comments made at Regulation 14 stage.</p>	<p>Context;</p> <p>It may in the past have been considered that some of the areas on map15 are so inappropriate that they could never be proposed, and therefore there would have been no reason to mention them in a planning document. However, at a recent appeal an appellant argued that because a site had no specific mention in a planning document that somehow this implied that development was supported, or at least not objected to. It is felt necessary for the Plan to comment on a wide range of options, even if currently unlikely to come forward for development.</p> <p>The policy is not ‘blanket’. It does not exclude all development and is reasoned and the reasons have not been challenged.</p>
--	---	---

Chris Anderson

<p>Whole Document</p>	<p>The NTS should not be considered a material document as it is flawed. Conclusion: The NTS confirms that the junctions currently operate within their theoretical capacity, but once committed development and background traffic growth is applied, the junctions exceed the acceptable operational limits and the cumulative impacts are determined as being severe.</p>	<p>Disagree The scope of the Transport Assessment was to assess the impact of permitted and proposed development within the village. It is not considered reasonable for this assessment to speculate what scale of development ‘might’ be appropriate within the village without exceeding the capacity of the local highways network.</p> <p>That decision, as stated/supported by Essex Highways is to be assessed</p>
-----------------------	--	---

	<p>However, notwithstanding this overall conclusion within the NTS, it is apparent that the affected junctions could accommodate some level of additional development, but that the study does not specify what level or distribution of development could be acceptable.</p> <p>It is considered that, in isolation, the level of traffic generated by developments of fewer than 10 dwellings in the west of Newport is likely to be well within the daily fluctuation of traffic levels and the impacts would, in reality, be imperceptible.</p> <p>For this reason, the scope of the NTS is considered to be inappropriate to determine the traffic impact of such developments in isolation, and that the traffic impact of such developments should therefore be considered on their merits, not as part of the overall cumulative impact unless the scope of the NTS is widened to determine the number and distribution of dwellings that can be accommodated within Newport without the capacity of the local highway network being exceeded.</p>	<p>as part of each individual application.</p> <p>The Transport Assessment has also been reviewed by Essex Highways, who concluded that: “The nature of all transport assessments is that they are a snap shot in time and conditions in the study area may change as planning decisions and appeal decisions are made.</p> <p>It is noted that the impact from the committed development brings the RFC of the junctions up to 0.78 (Wicken Road) and 0.86 (Bury Water Lane) in the AM peak in 2024. Beyond that background traffic growth impacts on both junctions bringing them almost to capacity, the background growth from TEMPRO assumes another 345 dwellings in the wider area. The report notes that with only committed development modelled traffic queues are not long, although they are likely to increase as the junctions approach capacity. Impacts on pedestrian amenity and safety are noted and it is noted that they will increase as traffic increases.</p> <p>The sensitivity test looks at all three refused developments together and concludes that further significant development particularly in the west of Newport is likely to lead to severe impact on queues and safety.</p> <p>The report mentions mitigation but does not specifically identify any measures. The highway authority assesses planning taking into account any mitigation measures including measures to promote sustainable transport. These measures must meet the 3 tests</p> <ul style="list-style-type: none"> a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development <p>This document is being submitted as part of the Neighbourhood Plan,</p>
--	--	--

		<p>which will have weight when the planning authority considers an application and therefore will be taken into account when planning applications are considered by the highway authority. However the highway authority has the duty to look at each application on its own merits against published criteria contained in National Planning guidance and come to a conclusion as to whether that particular development should be prevented or refused on highways grounds because it has an unacceptable impact on highway safety, or the residual cumulative impacts on the road network will be severe.”</p>
--	--	--

Gladman

<p>NQRAQ1: Air quality impact of development proposals</p>	<p>5.3.2 The above policy requires development proposals of ten or more dwellings to be accompanied by a Transport Assessment and Air Quality Impact Assessment to address the impact of vehicles cold- started within the villages as they queue to exit at various pinch points. The policy further states that development of any scale will not be supported without consideration of the cumulative impact of related vehicle movements.</p> <p>5.3.3 Gladman question how this policy will be applied consistently through the decision making process as it would require an air quality assessment to address the impact only of vehicles cold-started within the village with no correlation to the already cold-started vehicles that are passing through it.</p> <p>11 Gladman would question how this assessment would be practically undertaken and how it could account for vehicles which are driving through the settlement as</p>	<p>By definition, vehicles passing through will not have cold engines. The villages being surrounded by countryside means that there are no local starting points of significant population from which vehicles could arrive without their pollution control systems working. Newport has few roads (which is the problem) and 24/7 traffic surveys at the entry/departure points and junctions are standard practice</p> <p>We see no problem with modifying the AQ modelling to cater for this. The current monitoring includes all traffic movements and therefore includes the effect of cold start from vehicles from existing houses. Traffic assessments for new developments identify the new movements which will be cold start. The ratios to be applied between cold and warm are publicly available: https://www.emissionsanalytics.com/news/can-driving-styles-prove-the-smarter-route-to-better-fuel-economy-and-emissions-lr5c2</p> <p>The table on the link above states that for a petrol engine after 1 minute (which would be the approximate time taken from the Gladman site to reach the Wicken Rd queue) an uplift of 422% should be applied to NO2 emission compared with a warm engine</p>
--	--	---

	<p>opposed to vehicles starting journeys from within the settlement. The current nationally agreed methodology of assessment would require a policy change nationwide to achieve this aim and where air quality monitoring stations are located and collect data.</p> <p>5.3.4 The evidence supporting this policy appears to be largely based on the evidence provided for in relation to a recent planning appeal². It should be noted that the Inspector dismissed this appeal on landscape grounds and considered that based on the use of the appellant’s modelling methodology, that as the development related traffic flows and emissions are so low, the impacts of these emissions would be expected to remain negligible and the effects on annual mean NO₂ concentrates would not be significant³.</p> <p>5.3.5 Furthermore, this approach does not have regard to the Policy EN15 of the ELP which indicates that development will be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment or amenity from emissions to air.</p> <p>5.3.6 Gladman consider that this policy is contrary to basic conditions (a), (d) and (e) and should be deleted as it is contrary to paragraph 16(d) of the Framework and would place a restrictive policy tool on development and would not be evident on how a decision maker should react to development proposals. Gladman recommend that this policy is deleted.</p>	<p>(There is nothing new about this – the research goes back over 20 years https://trl.co.uk/sites/default/files/TRL270.pdf and for example the US government scientific paper presented at the Countryside appeal detailed the research evidence)</p> <p>Responding to ‘current nationally agreed methodology of assessment would require a policy change nationwide’ ; there is the national process for recording air quality, which is not at issue. The comment does not say what nationally agreed methodology of assessment or policy specifies how future vehicle emissions must be predicted. We are not aware of this being quoted by any of the AQ consultants at Newport’s various appeals</p> <p>This was addressed in the response to UDC on policy AQ1 The policy says ‘where adverse air quality impacts are predicted’ which means ‘where the favourable condition in EN15 is not met’ and therefore it is consistent with EN15</p> <p>(a) Is regard to national policy, (d) is sustainable development and (e) is the Local Plan and 16 (d) is that policies be clearly written and unambiguous</p> <p>It is considered that all of the above are fulfilled by this policy. It is the applicants responsibility to provide the evidence of future compliance on which a decision can be made</p> <p>Responding to ‘restrictive’ it is suggested the policy be modified to replace ‘bring levels of predicted pollutants back to pre-development levels’ with ‘ensure levels of predicted NO₂ resulting from the development do not exceed the legal maxima’.</p> <p>The key issues for this policy are a) consider cold start, and b) act before levels exceed the legal limit.</p>
NQRAQ2: Cumulative	5.3.7 Policy NQRAQ2 states that in order to address poor	Disagree

<p>impact of developments on clean air and traffic congestion</p>	<p>air quality caused by traffic, and congestion within Newport village centre, and its feeder roads to the B1383, development of any scale will not be supported without consideration of the cumulative impact of related vehicle movements and must include the impact of other permissions in the Plan area, plus the effect on Newport of development in the wider district.</p> <p>5.3.8 The policy goes over and above the requirements of the NPPF (2019) which makes clear at paragraph 109 that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p> <p>5.3.9 Furthermore, the policy should not relate to any development beyond the neighbourhood area and reference to the wider district should be removed from the policy wording. 2 Ref: UTT/17/2868/OP 3 PINS Reference: APP/C1570/W/18/3209655 Paragraph 77</p>	<p>This is a misreading of AQ2. It says cumulative impact must be considered (in order to determine compliance with para 109). The issue, as detailed in previous responses is that Newport has been subject to considerable development where cumulative impact has not been assessed.</p> <p>Disagree Traffic assessments eg for the Local Plan always consider district wide/ general traffic volume changes, to be added to those generated locally. This was done for the NhP Transport Assessment, which has been reviewed and accepted by Essex Highways. The policy does not refer to any specific developments outside the Plan area.</p>
<p>NQRAQ3: Air quality monitoring and remediation</p>	<p>5.3.10 NQRAQ3 states that an Air Quality Management Area should be designated for the affected area of the Neighbourhood Plan and an Action Plan produced if results demonstrate that mean levels are within 5 µg m³ of the legal maximum. Whilst this is listed as a recommendation and not a land use policy, it would be more appropriate if such recommendations were included as an appendix to the Plan in a separate document which contained the full list of community aspirations to help condense the policies in the Plan.</p>	<p>It is air quality so we put it the air quality section.</p>

<p>NQRGSE2: Locally supplied evidence of flood risk</p>	<p>The above policy relates to assessing applications for development and the weight to be given to locally supplied evidence such as photographs, historical evidence, maps and statements made by residents and the parish councils. Gladman reiterate the fact that this is not a land use policy and should be removed from the NQRNP. Notwithstanding this, residents will still be able to provide consultation responses to the local planning authority which will be taken into account through the decision making process.</p>	<p>Disagree</p> <p>It is a policy for ‘assessing applications for development’. It is therefore a policy to be used in determination of land use.</p>
<p>NQRGSE3: Footpaths and access to the countryside</p>	<p>Opinions on views and visual amenity are highly subjective, it is therefore important that the policy has regard to national policy and that protection is commensurate with their status and gives appropriate weight to their importance and contribution to wider networks. The policy should be reviewed in order to allow a decision maker to come to the view as to whether particular views contain physical attributes that would ‘take it out of the ordinary’ rather than seeking to protect the character and views of the area identified by local community members which may not have any landscape significance.</p>	<p>The issue of ‘status’ (the implication that the area is not Green Belt or AONB and so of no status) is responded to in Hill/Sworders on HA3</p> <p>It is disagreed that ‘local community members’ are not capable of identifying attractive and interesting landscapes and views and documenting their character. These include views of the built environment, the natural features such as rivers and woodland, hedgerows and distinctive open space. The qualities and importance of each view are explained, and reference made as appropriate to the Essex Landscape Character Assessment, the Historic Settlement Character for Newport and the Conservation Area reports.</p> <p>It is noted that no element of the views document is challenged.</p> <p>Due to the closure of multiple footpaths in Newport by Network Rail those that remain are precious to the village community. Whilst they may not be “valued” in national landscape terms they certainly have “value” to residents and also to walkers and the wider community. Walks around Newport’s footpaths were recently featured in The Times.</p> <p>The Inspector’s determination in the Countryside Appeal Decision APP/C1570/W/18/3209655</p>

		<p>addresses this issue:</p> <p>Para 37: Whilst the term ‘valued landscape’ is not defined in the Framework, paragraph 170 does seek to protect and enhance them ‘in a manner commensurate with their statutory status or identified quality in the development plan’. The site and surrounding landscape is not covered by any statutory or local landscape designation. Neither is it identified within the development plan for its particular landscape quality.</p> <p>Para 38: Based on the evidence submitted and my own observations, I agree that the appeal site, has value both in its own right and as part of the wider landscape. In addition, I acknowledge that local residents clearly value the site and the surrounding countryside. However, this does not necessarily mean that it is a valued landscape in the context of the Framework. The site provides an important part of the setting of Newport and is typical of the landscape character of the area. However, its character is not particularly rare.</p> <p>Para 39: Overall, based on the available evidence, I find that the attributes identified by NPC as contributing to the valued landscape are not unduly unusual and are generally representative within the wider countryside in the area. I find that, in this instance, they are insufficient, individually or in combination, to demonstrate that the landscape is valued within the meaning of paragraph 170 of the Framework.</p> <p>Para 41: However, the above conclusion on ‘valued landscape’ does not mean that the site has no value. The appeal site shares some of the characteristics of the character area in comprising part of the rolling open landscape and offers wide views of the surrounding countryside from the higher ground. As such, it makes an established contribution to the character of the local landscape and the setting of the village which are important characteristics recognised in the LCA.”</p>
--	--	--

<p>NQREH2: Primary school places</p>	<p>It is unclear how this policy will be applied in practice as it requires planning permission for new homes should be conditional upon the Education Authority confirming that places will be made available, at the 'nearest primary school' in the NQR Plan area.</p> <p>5.3.15 It is made clear in the supporting text that the Education Authority considers the primary schools at Rickling Green, Newport and Clavering (outside of the Plan area) are 'one school' for the purposes of having 'available' places. The grouping of schools by the Education Authority is applied throughout the district. Accordingly, Gladman consider that the application of the Education Authorities standards should continue to be applied and the Plan should not be seeking to apply an exception to the rule.</p> <p>5.3.16 Gladman recommend that this policy is deleted.</p>	<p>This is responded to in the ECC section under EH2</p>
<p>NQRHA1: Coherence of the village</p>	<p>5.3.18 Gladman do not consider the use of Development Limits to be appropriate planning tool if they would limit the ability of sustainable development opportunities from coming forward. Indeed, the approach taken is highly restrictive in terms of development along the B1383 or development outside the Development Limit as it fails to take into consideration the site characteristics and the benefits of development. Indeed, the limited exceptions provided for development beyond the Development Limits are more consistent with the approach taken in former national policy PPS7 which took a restrictive stance to development in the countryside. The Framework is clear that development which is considered sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. Accordingly, Gladman recommend that this policy should be modified so that it allows for a</p>	<p>Disagree</p> <p>Development limits are a fundamental part of local Plans. This Plan is consistent with the limits in the ELP.</p> <p>The process described is what happens with all development applications outside of limits and nothing in the Plan alters that. The comment says the Plan should repeat what is in the NPPF, which is not necessary.</p> <p>It is noted that Taylor Wimpey support the Plan approach to further development along the B1383. It is for sustainability reasons, as set out in the Plan.</p> <p>In reference to the specific wording suggestions:</p> <p>'Provide new homes including market and affordable housing' All</p>

	<p>degree of flexibility. The following wording is put forward for consideration:</p> <p>“When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they:</p> <ul style="list-style-type: none"> - Provide new homes including market and affordable housing; or - Opportunities for new business facilities through new or expanded premises; or - Infrastructure to ensure the continued vitality and viability of the neighbourhood area. <p>Development adjacent to the existing settlement will be supported provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”</p> <p>5.3.19 This is of further importance due to the status of the emerging Local Plan. It may yet become apparent that the quantum of housing Newport is required to deliver in supporting the delivery of the Council’s housing needs may increase given the issues surrounding the delivery of the Garden Villages which are subject to outstanding objections raised through the course of the eLP EiP. Namely, Historic England has raised a principle point of objection in relation to the North Uttlesford Garden Village and the concerns relating to the delivery of West of Braintree Garden Village which is contingent on a strategic site coming forward in the neighbouring local authority. In this circumstance this restrictive policy approach would clearly conflict with policies of the Local</p>	<p>housing application do that, subject to the affordable housing local Plan policy, so it would be redundant to include this.</p> <p>‘Infrastructure to ensure the continued vitality and viability of the neighbourhood area’ - This is false. Developers are only required to pay (and only do pay) according to the three s106 principles, which are to mitigate the demand created by their own development, not to fund on top of that for the local area. As noted elsewhere in the responses, the large scale of development in the Plan area since 2011 has resulted in no significant infrastructure improvements but is overwhelming the sewerage system, water supplies, the doctors surgery, the schools and increasing traffic congestion and air pollution.</p> <p>The location already has vitality and viability, and the scale of development since 2011 has reduced viability.</p> <p>We cannot anticipate the outcome of the emerging Local Plan.</p> <p>The key village status in support of significant further development is considered out of date and overtaken by permitted development in excess of the requirement of all variants of the ELP. This point is addressed in detail elsewhere within this response.</p>
--	--	---

	<p>Plan and would be superseded. Flexibility is essential to avoid this outcome. Indeed, this approach was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner’s Report states: “...Policy GMC1 should be modified to state that “Development...shall be focused within or adjoining the settlement boundary as identified in the plan.” It should be made clear that any new development should be either infill or minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development.”</p> <p>5.3.20 The scale of development would however need to be considered in the context of the settlement given Newport’s identification as a Key Village and the role it plays to the wider rural areas.</p>	
<p>NQRHA2: Building on Brownfield Sites</p>	<p>Policy NQRHA2 is not in accordance with national policy and is therefore inconsistent with basic condition (a). National policy does not require the use of brownfield land first, it only seeks to encourage the delivery of development on brownfield land and does not seek to prioritise it. This reference should therefore be deleted.</p>	<p>Disagree</p> <p>The comment is wrong - NPPF para 117 says <i>‘Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land’</i></p> <p>This is almost exactly the wording in HA2.</p> <p>The ELP para 3.4 reiterates the NPPF ‘This includes: making efficient use of land by promoting previously developed (brownfield land)...’</p> <p>The ELP allocates 18 brownfield/part brownfield sites which in an area considered short of such sites is highly commendable.</p> <p>It is regrettable that a developer should seek to have a Plan not support what is so obviously the best for our environment.</p>

<p>NQRHA3: Connection with the countryside</p>	<p>The above policy seeks to retain views of the open countryside and states development will not be supported on the fields separating the developed area to the south of Wicken Road from the newly developed area to the north of Bury Water Lane.</p> <p>5.3.23 Gladman consider that the areas identified cover extensive areas of the neighbourhood area and are seen as an attempt to impose a blanket restriction on any development in these locations rather than seeking to ensure new development opportunities respond to the local character of the surrounding area.</p> <p>5.3.24 Paragraph 127(c) of the NPPF states that: “Planning policies and decisions should ensure that developments... c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).”.</p> <p>5.3.25 In addition, the PPG is clear that a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness⁴. We do not consider that the evidence set out in the ‘Newport Views with low capacity for change’ document justifies the protection of the views identified, as it only provides a brief description of each location rather than a comprehensive assessment which one would expect to be undertaken such as a LVIA. Further, the above policy fails to consider what forms of development would be acceptable within this location. As such, it is highly restrictive and not in accordance with</p>	<p>The planning appeal determining the outcome of the 74 house planning application north of Wicken Road was due to have been announced on the 22nd November 2019. The Planning Inspectorate have determined to wait until after the General Election before making this announcement. However, the outcome will certainly be known before the plan goes to final referendum and consequently the determination will need to be incorporated into the plan.</p> <p>The policy to not support development in the locations on map 19 is supported by the Historic Settlement Character. The Conservation Area assessment also notes the importance of the outward views, which includes to these areas. (There is also a very significant access issue for development east of Newport, and being segregated by the railway and the river).</p> <p>Disagree</p> <p>Here is an example of one view assessment (accompanied by a photo and the map location and view direction) <i>‘From the footpath rising east of Chalk Farm Lane, looking W back down the path, towards Newport. It is views 1 and 2 combined. It illustrates the tree lined edge to the village, Debden Rd to the right and the upland views beyond, and with the village set in the Cam valley. An attractive mix of village scape in the medium distance, with trees and hedging along the valley floor and the skyline softening the impact of the built-up area. The view provides an understanding of the historic and landscape character of Newport, with later C20th buildings central, Victorian and Edwardian to the left, and shortly C21st to mid left, site 06New15, and St Mary’s church C13th to C19th to the right. It is considered a particularly sensitive view.’</i></p> <p>Neither this nor any other of the view assessments are commented on as incorrect or that the importance of the features highlighted is invalid.</p>
--	---	---

	<p>the presumption in favour of sustainable development and will likely lead to conflicting decisions being made through the decision making process and is therefore contrary to paragraph 16(d) of the NPPF.</p> <p>5.3.26 Evidence presented by the Gladman expert witness at the recent appeal in respect of land North of Wicken Road concluded that with high quality design and greenspaces, the development of the site could make a positive contribution to the settlement. The views through and alongside the development to the church tower, and to the woodland and valley bottom at Wicken Water could be provided. Furthermore, the site itself contains few features of intrinsic landscape merit and does not have any specific landscape designations. Moreover, whilst it is acknowledged that the site does provide an open area of agricultural land adjacent to the edge of the village, which makes some contribution to its character, it is influenced on three sides by development and therefore represents a logical and appropriate location for well-planned and designed residential development with the potential to provide landscape enhancement.</p> <p>5.3.27 In addition, it should be noted that Map 19 fails to truly represent the site’s locational and landscape setting as it fails to show the full context of the M11 motorway located to the west, the significant quantum of development north of Bury Water Lane and the housing fronting school lane to the east.</p> <p>5.3.28 Gladman recommend that this policy is deleted in its entirety as it is in conflict with basic conditions (a) and</p>	<p>We would have been happy to respond if specific comments had been made regarding the landscape evidence in the views documents.</p> <p>This commentator (and Taylor Wimpey) have had landscape consultants on site but have found nothing to say on the substantive issue of the value of the views in the evidence. An LVIA is for a specific development, and is to be provided by the applicant. It is unreasonable to expect a NhP to do LVIA’s for every location ‘to consider what forms of development would be acceptable within this location.’ The Plan gives guidance on which views are considered sensitive (and therefore if subject to an application, an LVIA would be expected)</p> <p>Concerning the appeal site, the UDC landscape consultant Michelle Bolger http://www.michellebolger.com/about presented a very strong contradictory case, and the UDC Landscape and Conservation officers were similarly minded. The application was given officer refusal, before the Countryside result was known. The Steering Group would be happy to add Michelle Bolger’s LVIA’s for the Countryside and Gladman appeals to the evidence base.</p> <p>The purpose of the map is to accurately identify the areas. Several other maps are included within NhP demonstrating the plan area, including on the front cover.</p>
--	--	---

	(d).	
Policy NQRHA4: Building in the countryside	<p>Policy NQRHA4 lists a number of reports that should be used to inform planning applications in the neighbourhood area. It then sets out a list of principles where development will be permitted provided that they do not result in material harm to the landscape pattern of the settlement, panoramic views of the plateau and views to landmarks such as St Mary’s Newport and All Saints Rickling. Additionally, development outside of the Cam Valley, as defined and evidenced in Map 15, will not be supported except for development appropriate for a countryside location.</p> <p>5.3.30 Further to the comments made in response to NQRHA4, as set out in case law, for a view to be identified for protection there should be demonstrable physical attributes that elevate its importance out of the ordinary, rather than seeking to protect views of the open countryside due to its pleasant sense of place.</p> <p>5.3.31 Gladman are concerned that this policy will seek to prejudice the delivery of potential sustainable development opportunities from coming forward given that the emphasis of the policy is very much on maintaining the existing landscape/views identified rather than seeking to integrate new sustainable development opportunities within the existing landscape and character of the local area. Indeed, the PPG requires proportionate and robust evidence to support such designations and policies should set out criteria against which proposals for development affecting these areas will be assessed and how development can come forward using appropriate design principles and visual screening methods</p> <p>5.3.32 Gladman reiterate the fact that opinions on</p>	<p>The Inspector’s determination in the Countryside Appeal Decision APP/C1570/W/18/3209655 addresses the issue of development in the countryside:</p> <p>Para 19: “Policy S7 is a countryside protection policy with the countryside to which this policy applies being defined as all those parts of the Plan area beyond the Green Belt that are not within the settlement or other site boundaries. The policy indicates that in the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area. There will be strict control on new building and development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set.</p> <p>Para 23: Whilst the Framework takes a positive approach, rather than a protective one, to appropriate development in rural areas, Policy S7 is identified by the Council as being the only policy in the ULP that deals with development in the countryside. It seeks to protect and enhance the natural environment, an important part of the environmental dimension of sustainable development in the Framework. Taking into account these factors, I consider that Policy S7 should be afforded significant weight when considering development proposals in the countryside.”</p> <p>With particular regard to development outside of the Cam Valley:</p> <p>Para 41: “The proposed development would be located to the west of the ridgeline that separates the Cam Valley to the east and the Wicken Water Valley to the west. Historical evidence provided at the Inquiry demonstrates that Newport has evolved in the Cam Valley by expanding westwards beyond the valley floor and up to the western</p>

	<p>landscape are highly subjective and without robust evidence to demonstrate why these areas are considered important, beyond the fact that they are considered valued by local community members, will likely lead to conflicting decisions through the development management process.</p> <p>5.3.33 Furthermore, it is considered that development outside of the Cam valley is too onerous and the evidence at Map 15 does little to indicate why this area is worthy of protection nor does it clearly define the boundary of the Cam Valley on the associated map. As such, this policy is inconsistent with paragraph 16(d) of the NPPF (2019) and basic conditions (a) and (d).</p>	<p>(east facing) slope of the valley. All development on the valley slopes of Newport has been consistent with that pattern, being east or south-east facing towards the core of the settlement rather than away from it. The proposed development would be the first in Newport to face westwards towards the open countryside and away from the village core.</p> <p>Para 42: The existing properties on Frambury Lane are effectively located on the ridgeline between the Cam Valley and the Wicken Water Valley. As such, views of this part of the village and across the Wicken Water Valley from the wider countryside to the east are predominantly of a rural landscape comprising agricultural land and tree belts with the roof tops of some properties on Frambury Lane being visible on the ridge line. All of these features contribute to the agricultural landscape setting to the south west of the village and is shown in the appellant's viewpoint 167 and NPC landscape witness viewpoints C1/C28.</p> <p>Para 43: The proposed development of up to 150 dwellings cannot be considered as being small scale. It would transform part of the previously undeveloped eastern slope of the Wicken Water Valley from a rural to an urban landscape which would be visible in views from the west and, in particular, from the nationally supported Harcamlow Way public footpath. Such development on the eastern slope of the valley would have a significant negative effect on the setting of the village in the rural landscape. The urbanisation of the eastern valley side of the Wicken Water Valley would result in cross valley views failing to be maintained. Furthermore, in being the first development beyond the ridgeline that currently marks the edge of the settlement, it would fail to respect the settlement pattern of the village. All of these factors are contrary to the guidance provided in the LCA.</p> <p>Para 44: The Land Use Plan shows development adjacent to the northern end of Frambury Lane and close to the ridgeline. This would have the effect of increasing the prominence of development in</p>
--	--	--

		<p>localised views of the skyline over Frambury Lane in views from the west.</p> <p>Para 45: The plan also shows that to the south of the footpath that runs through the centre of the site development would be located approximately 50m9 from the existing urban edge. Intervening public open space would be located between Frambury Lane and the proposed new houses. Whilst I recognise that this is to avoid development close to the high point of the site, the consequence is that the development to the south of the footpath would appear as being unacceptably isolated in the countryside both in local and distant views.</p> <p>Para 46: As a consequence of the above, I consider that the proposed development would not acceptably visually integrate into its surroundings. It would appear as a significant standalone extension to the village that, owing to its extent and suburban form, would significantly and adversely change the character of the approach to the village.</p> <p>Para 47: Overall, in considering the landscape impacts of the proposal, the development would be contrary to the guidelines provided in the LCA. It would intrude negatively into the landscape by eroding part of its open rural character. As a consequence of the surrounding topography, the landscape impacts would not be wholly successfully mitigated and the part standalone nature of the development would not successfully integrate into the morphology of the existing village. Overall, I consider this harm to a high/medium sensitivity landscape to be substantial.”</p> <p>Although the Inspector was dealing with the appeal in front of him, we consider his points are of general application to the surrounding areas, which are the same landscape type. He also made clear his strong disapproval of Newport’s north west sector developments, which are in the same local and wider landscape.</p>
--	--	---

<p>NQRHA6: Foxley House, Quendon</p>	<p>Whilst Gladman recognise that the site has been identified through the eLP process it is not considered appropriate to consider it an allocation within the emerging NQRNP as it results in unnecessary duplication of policies. If this policy is to be retained, then the site should instead be referred to as an existing commitment as opposed to an allocation within the draft Plan.</p> <p>5.3.35 Notwithstanding this, Gladman is concerned that the draft Plan has not fully considered the need to allocate sufficient housing sites to meet housing needs. No qualitative or quantitative assessment has been used to identify a housing requirement figure despite the acknowledgement in the Plan’s vision and objectives that there is a significant shortage of housing land. Instead the Plan seeks to support a requirement of a further 30 dwellings for social/housing association housing based on the Hastoe development of 34 dwellings. It is unclear why this figure is considered appropriate. The Steering Group has not considered what the housing need is for individual settlements nor has it requested such a figure from the local planning authority despite the guidance contained in the PPG6. Accordingly, Gladman has significant concerns that the Plan is not positively seeking to identify additional housing land for development to ensure the continued viability and vitality of the settlements given Newport’s role as a Key Village which provides a number of services to the wider rural hinterland.</p>	<p>Disagree</p> <p>This Plan is required to be in conformity with the 2005 Local Plan, which did not include that site. The ELP is not yet the adopted Plan. Further, this Plan allocation adds further detail on how the site should be developed to what is in the fairly generic text in the ELP . This has been vindicated as an approved application has fulfilled requests which were in the draft NhP.</p> <p>The emerging Local Plan clearly sets out the expectations for additional housing in Type A villages such as Quendon and Rickling as up to 134 additional properties to be allocated during the entire plan period of 2011-2033. Since 2011 49 additional properties have been permitted in Quendon and Rickling, which is 36% of the total OAN for ALL type A villages in Uttlesford. That’s a very high percentage for one village in a group of 19. The development volumes permitted to date therefore demonstrate that the objectively assessed housing need detailed in the Emerging Local Plan has already been met..</p> <p>The emerging Local Plan clearly sets out the expectations for additional housing in Newport as 390 additional properties to be allocated during the entire plan period of 2011-2033. Since 2011 an additional 522 properties have been permitted. The development volumes permitted to date demonstrate that the objectively assessed housing need detailed in the Emerging Local Plan has already been met.</p> <p>The level of development already taking place in Newport is as relevant to this plan as was the similar and analogous situation considered by the Inspector in the Takeley appeal decision APP/C1570/W/18/3213251, where he stated in paragraph 75 that:</p> <p>“Furthermore, the Council are progressing an eLP, which seeks to identify, amongst other allocations, three new garden communities to support the delivery of their housing requirement for the period 2011</p>
--------------------------------------	---	--

		<p>to 2033. Some 5,751 dwellings remain to be allocated. As a consequence, while Takeley is identified as a key village and a major focus for development, it has had very significant development to date, with 616 dwellings delivered so far within that plan period, and the eLP identifies only 22 remaining from former allocated quantities and 20 to be delivered in the plan allocation. This plan is in examination at the moment, and while I acknowledge there are objections to this strategic approach, it is also true that the appeal site, and the requirement for the village of Takeley, has been subject to assessment, resulting in the rejection of the site as a suitable location for housing and the acknowledgement of the relatively low remaining delivery for a village that has received very significant housing development over the past plan period.”</p> <p>The ‘further 30 dwellings for social/housing association housing based on the Hastoe development of 34 dwellings.’ is in supporting text, not a policy. ‘Based on’ includes the scale, the quality of design, and the genuinely affordable prices to purchasers/renters. The 30 is based on the housing list, which includes people who also say they are happy to live in other areas, and also there are other social houses in the Plan area, so some of the requirement is filled by churn.</p> <p>The housing requirement for the Plan area is set at district level. It is inconceivable that with such a large scale of permitted development in the Plan area there is a quantifiable unmet demand locally for more market value or ‘affordable’ houses. There is evidenced support for social housing, hence the 30.</p> <p>In response to the comment ‘No qualitative or quantitative assessment has been used to identify a housing requirement figure’; this is an unrealistic and pointless requirement. It is simple to do a SHMA calculation. This for Newport would start from 974 houses. The government household projection for the district to 2033 is taken from the ONS spreadsheet and a conversion factor applied to convert from households to dwellings, then a further uplift is added for good measure. This results in a housing growth of 20.0%. This compares</p>
--	--	--

		with the 40.0% required of Newport in the ELP (390 on 974) and is very much less than what is already permitted. The assessment requested is therefore of no help, although the Steering Group can publish the spreadsheet to show the figures if required.
NQRHD1: Parking Standards	<p>Policy NQRHD1 requires parking arrangements to be in compliance with UDC eLP Policy D2, Essex Parking Standards 2009 and UDC Residential Parking Standards 2013.</p> <p>5.3.37 This policy is not in line with the current legislation as it requires adherence to a strategic policy which is still in the process of examination and the outcome of which remains uncertain. It would not be appropriate to require development proposals to adhere to strategic policies until they are formally adopted and become part of the Development Plan.</p> <p>5.3.38 Furthermore, the reference to Parking Standards documents is not considered appropriate as it requires strict adherence to the contents of these documents which are intended to provide guidance to developers promoting development opportunities. They are not policy and as such should not be strictly adhered to. Accordingly, this places an onerous requirement on development proposals and this policy will need to be modified so that developers have regard to these standards.</p>	<p>Agree a modification suggested below</p> <p>Suggest remove the first line as compliance with UDC and Essex rules is mandatory anyway, whatever they may be amended to. And make the next sentence 'In addition to compliance with Essex and UDC parking standards, in-line parking...'</p> <p>Whether the standards are policy or not they are strictly enforced and UDC and ECC refuse applications where parking provision is below the standards. The standards are a simple calculation and there is no uncertainty about what is required. We consider it is reasonable to have a policy requiring adherence to current standards</p> <p>The key point is triple tandem parking.</p>
NQRHD2: Housing Design	Policy HQRHD2 sets out a list of design principles that all proposals for residential development will be expected to adhere to. Whilst Gladman acknowledge the importance for planning policies relating to quality design measures, and the documents sitting behind them, these should not be overly prescriptive and should allow for flexibility in order for schemes to respond to site specifics and the	<p>An amendment to 'have regard to' is agreed.</p> <p>Disagree</p>

	<p>character of the local area. There will not be a 'one size fits all' solution in relation to design and sites will need to be considered on a site by site basis with consideration given to various design principles.</p> <p>5.3.40 It is noted that the Policy requires planning applications of all sizes to demonstrate how they comply with the Essex Design Guide. Gladman reiterate the fact that this document is guidance and not policy and therefore should be modified as follows: "Development proposals for residential development should have regard to practices outlined in the Essex Design Guide".</p> <p>5.3.41 Furthermore, it is noted that housing densities within the development boundary may be allowed at the top end of UDC density range of 50 dwellings per hectare. Outside of the development limit a maximum of 20 dwellings per hectare will be supported. Gladman consider that individual density requirements should be removed from the wording of the policy so as to not prejudice the master planning process, allowing flexibility and to ensure the ability of sites to meet its development potential is optimised in accordance with national policy. Notwithstanding this, there is a clear recognition in the policy wording that development proposals can come forward outside development limits and this should be reflected in the policy wording of NQRHA1.</p>	<p>It is considered reasonable for a NhP to give guidance on densities. It is not clear what 'master planning process' is referred to.</p>
<p>NQRHD4: House Sizes</p>	<p>In principle, Gladman support the inclusion of the above policy which seeks to provide a mixture of housing types to meet the needs of the local community. However, it states that for developments with at least 15% of affordable homes being one bedroom will be supported. For market housing, developments will be expected to provide a ratio of one and two bedroom houses in line</p>	<p>The policy does not specify a requirement percentage for 2 bedroom houses</p> <p>The data to support the 15% is on pages 67 to 69. This shows at 2011 5% of the stock was one bedroom, but 27% of households had only person over 16 years old. It also quotes the ONS projections of falling household size, and the social housing list which is overwhelmingly</p>

	<p>with evidenced local demand.</p> <p>5.3.43 As neither the eLP or SHMA specify a requirement for 1 and 2 bedroom homes it is unclear how these standards have been derived given that they have been simply taken from a questionnaire survey undertaken in 2017 as opposed to a specific study identifying the neighbourhood area's housing needs. As such, the policy requirements proposed are not supported by proportionate and robust evidence as required by the PPG.</p> <p>5.3.44 It is important to note that housing mix will inevitably change over a period of time and this policy should seek to secure a greater degree of flexibility going forward. As housing mix can change over time, there is a real risk that this policy will become outdated as new evidence of local need comes to light and the neighbourhood plan should contain suitable mechanisms (i.e. if up-to-date evidence is provided) so that that it can respond positively to changes in circumstance which may occur over the plan period rather than setting specific requirements which may threaten development viability.</p>	<p>wanting one bed properties.</p> <p>It is correct that no calculation is supplied coming out to 15%. However as this is 15% of the 40% affordable requirement it supports that 6% of the total be one bedroom. (Assuming no market value one beds were in an application). Developments below the ten house affordable requirement threshold are not mentioned in the policy in relation to this.</p> <p>This does not seem an onerous benefit to support. It is worded as 'supported' not mandatory. The consultation shows that developments doing this will be more likely to have local support.</p>
<p>NQRHD5: Social homes and local connection</p>	<p>The above policy seeks to give priority of affordable homes to residents with a local connection to the Parish or the surrounding areas. This is not a land use policy it is a statement of intent and should be removed from the policy wording and included with other non-land use aspirations.</p>	<p>Disagree</p> <p>It is a policy relating to the building of homes. Provision of affordable homes is a policy in the ELP. On the Gladman argument that is not a land use policy as it specifies the cost, not anything about the houses themselves. One policy says 'build for people who are less wealthy' and the other one says 'build for people connected with the area'.</p> <p>This is not unreasonable to have the strength of a policy given the unaffordability of the majority of local homes. It has worked extremely well in the case of social housing developments that have already been completed within Newport being Salmon Field and Bowker Close. Given</p>

		<p>the excellent precedent that they set we consider that this is an appropriate model to follow.</p> <p>It should be noted that of the 522 additional properties approved in the village since 2011 that 68% are market rate. The average house price in Newport is currently £466,890 (according to Zoopla) compared with a local average income of circa £25,000 (according to the Office for National Statistics) – that’s 19 times the local average income.</p>
SITE SUBMISSION	Gladman promoting their site as a sustainable location for additional housing.	To be determined by the appeal.

Ellis Trust

The Plan as Whole	<p>Comments</p> <p>The emerging Uttlesford Local Plan remains at examination and is likely to change. It is inappropriate for the Neighbourhood Plan to proceed ahead of that strategic context. If it were to do so it risks being out of date almost as soon as it is adopted. It is also inconsistent with the Neighbourhood Plan itself for it to proceed ahead of the local plan as it clearly states it is being produced “in tandem”.</p> <p>The plan should await the adoption of the local plan before proceeding so it can be clear whether or not additional development needs to be planned for.</p> <p>Throughout the plan it refers to results of community consultation feedback. The analysis of comments appears to add neutral and like together. It counts those as people expressing an opinion of “Like” and then it ignores “no opinion”. It appears to us that if people are expressing “No opinion” then they are “Neutral” and therefore those 2 categories are the same. We also do not consider that “Neutral” can be taken to mean “Like”. That has the significant</p>	<p>Given that the outcome of the Local Plan is outside our control it would not be reasonable to wait.</p> <p>The survey was done like this so that someone in one village could avoid making comment on matters in the other village if they wished. The full data is shown. The table at the end was added to get figures which add to 100%.</p> <p>Responded to at the start of the responses.</p>
-------------------	---	---

	<p>potential to skew the results of consultation and appears to have done so.</p> <p>The plan includes what appear to be policies in boxes shaded in a peach colour. It then includes Recommendations. It is unclear what is the purpose/status of these Recommendations and whether or not they are policies. That needs to be made clear.</p>	
<p>Chapter 2 Local and national planning policy and Essex Design Guide</p>	<p>Chapter 2 is incorrect in its explanation of the NPPF and the titled balance. The NP states that the titled balance does not apply where the LPA has a 3 year supply. That is incorrect. Para. 14 of the NPPF requires that the titled balance is applied but that in such circumstances the adverse impact of allowing the development is likely to significantly and demonstrably outweigh the harm.</p>	<p>It is three years supply for an NhP, which lasts for 2 years from being adopted.</p>
<p>Chapter 4 Key Issues influencing the Neighbourhood Plan</p>	<p>Inappropriate to rely on 2010 evidence base in relation to water quality. The plan needs to be based on up to date evidence.</p> <p>The plan includes various unsupported suppositions. For example, on page 16 it states that there is no direct public transport to the largest centre of employment “which is Stansted airport”. However, there is direct public transport via the railway to London and Cambridge, both major employment centres and providing far more significant levels of employment than Stansted.</p>	<p>Disagree. See response to Anglian Water. The 2010 is the latest detail report, and suggest add “in the District” to largest centre of employment to clarify the point. Both London and Cambridge are 30+ miles away from Newport and whilst both are undoubtedly major employment centres, it is the intention of the NPPF to encourage living and working in closer proximity to each other as a more sustainable position to work from for future growth, particularly as the limited train services in Newport are over-subscribed at peak periods.</p>
<p>Chapter 5 Process, Vision, Aims and Objectives</p>	<p>Vision – it is unclear what is meant by “conserve” the character of Newport. The plan should be proactive, seeking to enhance the sustainability of Newport for existing and future residents and businesses.</p> <p>The aim to “meet the needs of local residents” is an inappropriate aim for the NP. The proposal is to protect the village for its existing residents. Newport is sustainable location</p>	<p>This is a selective quote of one word. The sentence promotes ‘long-term economic and social growth together with sustainable development’. The vision balances conserving character with growth.</p> <p>The comment stating that there are two secondary schools in the district is incorrect. There are in fact 4 state secondary schools in Uttlesford, being:</p>

	<p>for growth, as recognised in the adopted and emerging local plan. It has a role to play in meeting needs beyond those of existing residents. For example, Newport is home to the Joyce Frankland Academy [“JFAN”], one of only two secondary schools in the district and a major attracter of travel movements. Development in Newport will help reduce the need for travel, particularly by car and bus, to such a key travel destination. Development located further from Newport in other settlements will simply generate more car and bus travel to the school and to other Newport facilities such as the doctors’ surgery.</p> <p>Objective 8 – there is no doubt that the area faces a housing shortage and that there is a chronic issue with affordability in the area. The ratio of median house prices to median incomes stands at 13.67 to 1 in Uttlesford making it one of the most expensive places to live in the East of England. The objective should be re-worded to read “To deliver the new homes that are needed and to meet the full range of housing needs in terms of tenures, types, sizes and affordability”.</p>	<p>Joyce Frankland Academy, Newport Saffron Walden County High School Helena Romanes School and Sixth Form, Dunmow Forest Hall School, Stansted Mountfitchet</p> <p>Therefore, the argument that building elsewhere means a lot more commuting to Newport is invalid. Newport students are and will be only a small percentage of the very wide catchment.</p> <p>The general requirement for housing is set at district level and then cascaded to settlements. This has already been done. Objective 8 relates to additional need for affordable /social housing for locals.</p>
Business & Local Economy	<p>The background recognises that the largest employer in Newport is the JFAN but that most of its staff commute from outside Newport. More new homes and particularly affordable homes in the village would offer the opportunity for staff to live in closer proximity and avoid the need for travel by car.</p> <p>NQRBL1 - Support the approach that existing businesses and commercial premises should be protected to ensure the commercial vitality of Newport.</p>	<p>Please note that a median teacher salary is £38,400. The average house price in Newport is currently £466,890 (according to Zoopla) - that’s 12 times a teacher’s salary. Most mortgage lenders lend on the basis of 4 times your salary, which in this case would be £153,600 – there are currently no properties for sale in Newport under £250,000.</p> <p>68% of the properties that have been approved in Newport since 2011 are market rate properties. Only 32% are “affordable”, social or for retirement / care home use.</p> <p>The lowest priced new build currently on the market in Newport is £595,000 for a 4 bed house, and the highest is £685,000 (Rightmove - 5 December 2019)</p>

<p>Air Quality</p> <p>Air Quality Policies</p> <p>NQRAQ1 – Air quality impact of development proposals</p> <p>NQRAQ2 – Cumulative impact of developments on clean air and traffic congestion</p> <p>Recommendation</p> <p>NQRAQ3 – Air quality</p>	<p>The chapter on air quality needs a fundamental re-visit. The issue of air quality was comprehensively considered in the recent appeal at Wicken Road where the inspector concluded that development would have a negligible impact on air quality. The whole chapter appears to be based on sweeping assumptions unsupported by evidence.</p> <p>NQRAQ1 - We object to NQRAQ1. It is not necessary nor appropriate for all developments of 10 or more to be accompanied by a transport assessment and an air quality assessment. A transport statement would suffice to consider transport issues. Developments of that scale will have a negligible impact on air quality and their submission is not justifiable. It is unclear why residential developments should provide such an assessment yet commercial developments are not required to.</p> <p>NQRAQ2 - It is unclear what is meant by “offer” new off-site travel options. It is also unclear what is expected of applicants given the use of vague terms in the policy such as “alter...a significant number of journey and distance of journeys” and “provide information not obvious to residents”.</p>	<p>These comments have been addressed in other responses, except for not considering pollution from new commercial development.</p> <p>New offsite options could be provision of electric bikes and related facilities. To address climate change it is necessary for all to consider and action (and pay for) alternatives to CO2 emitting transport. Developers should be taking up this challenge!</p> <p>The beneficial impact of a Travel Plan is subjective. 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’ Currently creating a TP of any sort ticks the box. In Newport, telling buyers what the train service is would likely tell them nothing they did not already know. A view on Zoopla or Rightmove highlights transport and the glossy village magazine prints the bus and train timetables on the back page. The line goes the whole length of the village. It can be seen and heard from everywhere.</p>
<p>Green Spaces and Environment Policies</p> <p>NQRGSE1 – Discharges into watercourses</p> <p>NQRGSE2 – Locally supplied evidence of flood risk</p>	<p>It is inappropriate for the NP to be based on a 2010 study. Up to date information is required, as required by the NPPF.</p> <p>NQRGSE2 - It is inappropriate for planning decisions to be based on anecdotal evidence. Decisions should be made based on professional reports assessing impact using recognised methodologies. The AEW application at London Road included expert evidence which was accepted at the Public Enquiry and showed that this development will cause no additional flood risk and will alleviate such risks in London Road and across The</p>	<p>This is assumed to refer to the Hyder report, dealt with elsewhere</p> <p>Disagree</p> <p>The policy does not say ‘based on’, it says local input must be listened to as part of the decision making process.</p> <p>The technical assessment for the flood design did not address</p>

<p>NQRGSE3 – Footpaths and access to the countryside</p>	<p>Common. NQRGSE3 - No technical evidence is presented to demonstrate that the views identified are in fact sensitive to change. The policy is inappropriate.</p>	<p>downstream risk. At present the flows go into an open gully at the south of the Common. This keeps the area wet which is beneficial to the willows and other wet liking flora and fauna.</p> <p>The gully goes to the Cam. After heavy rain the gully floods the Common, which is also beneficial for the ecology and soil structure (at present very heavily cracked because of two years of poor rainfall) and it is a flood plain which should be allowed to flood.</p> <p>The proposed design cuts out the open gully and puts a new pipe discharging direct into the river. It is false to claim that the Suds system will reduce flow to less than current/greenfield run off, because at time of flood the site discharges onto the Common not into the flooded river. It is thus creating a new flow, into a flood prone area.</p> <p>The comment about alleviating flooding on the Common was frequently repeated by the applicant, but residents saying in consultation responses and at the appeal that they want the Common to carry on flooding were ignored. At the appeal the appellant’s barrister got local evidence dismissed not on any factual inaccuracy or lack of plausibility, but on grounds of not being delivered by a consultant.</p> <p>The flooding in London Road is not connected with the site. Highways investigation revealed it needs the road drain rebuilding</p> <p>Nearly three years on from obtaining permission no building has been done and the riparian land owner will not give permission for a new outflow over concern for downstream owners.</p> <p>The policy is to seek to have drainage matters dealt with in a more holistic way.</p>
<p>Education and Health Policies</p>	<p>NQREH1- There are no set standard patient to GP ratios and therefore it is not clear that the capacity of the surgery is 6,423 patients. The national average is 2,087 patients per FTE GP and</p>	<p>The statement about the surgery is incorrect. The capacity of the surgery in Newport and current patient numbers are a direct quote from the WECG response to the Countryside planning application South</p>

<p>NQREH1 – General Practice</p> <p>NQREH2 – Primary school places</p>	<p>therefore the capacity of the surgery would appear to be c8,900. The suggested growth in patient numbers is not evidenced. What is clear is that many residents moving into new homes will already be registered with a GP and many will be registered locally. The community consultation exercise suggests that people have no problem getting appointments with only 20% of people identifying that as an issue.</p> <p>NQREH2- The policy is inappropriate. The education system operates on the basis of parental choice – that is government policy. It is inappropriate to seek to change national policy simply because the parish council does not like it.</p>	<p>of Wicken Road which was recently turned down at appeal. This is the only planning application that WECG have responded to in recent years in Newport. The WECG document states that in 2017 capacity was for 6423. Currently the number of patients on roll at the surgery is 8608, an increase of 410 additional patients in the last three years.</p> <p>https://publicaccess.uttlesford.gov.uk/online-applications/files/44098DD9D4909375B24951C5BF798731/pdf/UTT_17_2868_OP-NHS_PROPERTY_SERVICES_-_RESPONSE_COMMENTS-2594852.pdf</p> <p>Links to the planning portal do not always work so if not this is the planning portal simple search link: https://publicaccess.uttlesford.gov.uk The application reference is UTT/17/2868/OP which is in the document list under NHS Property Services Response Comments from 31 Oct 2017.</p> <p>Responding on EH2; detail responses have been given elsewhere. Parental choice depends on there being capacity at more than one school. The very large scale of development in the district without commensurate school expansion means that at secondary there is no choice at all, and at primary the LEA submissions show that this stage is approaching in this area and they have specified no expansion plan in their ten year plan. Primary parental choice has already largely gone in other parts of the district.</p>
<p>Housing Allocation Policies</p> <p>Policies</p> <p>NQRHA1 – Coherence of villages</p> <p>NQRHA2 – Building on Brownfield Sites</p>	<p>The opening to the chapter commences by quoting objectives 5 and 9 as being relevant. Many of the other objectives are also relevant to this chapter. For example, Objective 10 as housing is critical to retaining and supporting existing facilities within Newport. It is unclear why those two particular objectives have been highlighted and why others have not. In our view, as this chapter deals with the provision and design of new homes, it should set objectives for achieving that.</p>	<p>Disagree</p> <p>The section is about where to put houses. Objective 10 is about supporting businesses. The section doesn't deal with the design of houses, apart from passing reference in the site allocation.</p> <p>As detailed in response to Gladman, housing need is determined at district level and cascaded to localities by the Local Plan.</p>

<p>NQRHA3 – Connection to the countryside NQRHA4 – Building in the countryside NQRHA5 – No Policy NQRHA6 – Foxley House, Quendon, site allocation. (Ref '2 Que 15')</p>	<p>The chapter also includes selective quotes from the NPPF but does not include any of the government’s objectives for delivering the homes needed and significantly boosting the supply of homes. The chapter needs an objective assessment of the issues facing Newport and Uttlesford in terms of housing. This is one of the most expensive places to live in the East of England and is located in an area of strong economic potential. Government policy seeks to support economic growth. It is vital that the homes needed to support economic growth are delivered. Newport lies close to the UK’s economic powerhouses of London and Cambridge. There is no assessment of the housing needs of the area.</p> <p>NQRHA1 -The policy is unimplementable and not achievable. It states various distances that development should relate to facilities and services. But the nature of Newport is that those services/facilities are located across the village, eg the secondary school is to the north, the primary school to the south. It is too simplistic. It seeks to prevent internal vehicle journeys by preventing further development. It ignores that if development is provided outside Newport people will then have to drive into Newport (and sometimes park there) increasing travel distances and carbon emissions. Taking as an example the schools, any additional primary pupils at the London Road development will live within 200m of the school and will walk; similarly secondary pupils will have around a 15 min walk to JFAN.</p>	<p>The SHMA local calculation done to illustrate the response to Gladman shows a much smaller figure for the Plan than allocated in the ELP, and smaller again than already permitted. A local SHMA is only of use if the LP allocation to a NhP area is smaller than prorata to the number of houses in the district allocation.</p> <p>The Steering Group looked at other NhP’s and found no evidence of ‘objective housing needs’ assessments. Thaxted and Debenham did housing needs surveys. We looked in detail at Thaxted, conducted with the help of RCCE. The response rate was very low, and too low to normalise the results to adjust to match to the demographic. The responses were from existing residents, who mostly therefore had no interest in more houses. The survey did not result in any ‘objective’ specification housing need.</p> <p>It was therefore decided not to do a similar survey.</p> <p>Disagree</p> <p>This Plan cannot control development elsewhere, which has to stand on its own sustainability criteria. Newport’s facilities are typically used by people driving through anyway. It is not a shopping hub to which people will drive long distances.</p> <p>This comment is not understood. HA2 is about building on brownfield.</p> <p>Happy to include the latest maps. The only difference is the Ellis site.</p>
--	---	--

	<p>NQRHA2 - The policy contradicts other parts of the local plan which seek to protect employment and commercial premises. That is a key issue identified by the plan, but this NP policy undermines that approach.</p> <p>Map 13 is inappropriate. It identifies the allocations in the Regulation 18 Local Plan rather than the Regulation 19 Local Plan. The Regulation 19 Plan allocates land at London Road for approximately 94 homes. The site at London Road has been held to be a sustainable location for development on appeal and by Uttlesford through its Local Plan process. Given that the Regulation 19 plan was published well in advance of the NP it is unclear why the NP does not show the most up to date position and identify all the allocations made by the Local Plan. As it stands the NP risks not being in conformity with the strategic plan as it shows some Local Plan allocations but not all. We suspect that the failure to include the AEW development in the NP which was granted permission after a public enquiry is an error.</p>	
<p>Housing Planning and Design Policies Policies NQRHD1 – Parking Standards NQRHD2 – Housing Design NQRHD3 – Use of Specimen Trees NQRHD4 – House sizes NQRHD5 – Affordable homes and local connection NQRHD6 –</p>	<p>NQRHD2 Developments should be design-led rather than driven by density. There is no justification for developments outside the settlement limits being only 20 dph.</p> <p>NQRHD4 - We support the need for the provision of a range of house types and sizes. However, we consider that there is not evidence to support the approach set out within the policy. The supporting justification is no more than assertion. Dismissal the SHMA evidence base relies on spurious grounds.</p>	<p>Explanation for the density recommendations is given in an earlier response.</p> <p>House sizes responses have also been given.</p> <p>It is not correct to assert that the Plan dismisses SHMA evidence. It covers the house size categories not specified in the SHMA.</p>

Affordable housing		
Roads and Moving Around Policies NQRTR8 – Joyce Frankland Academy expansion	NQRTR8 – JFAN is one of only 2 secondary schools in Uttlesford. It is inappropriate to propose restricting further secondary school places at JFAN . If additional secondary school provision is needed more probably than not it must be here. The NP throughout in many bemoans a perceived lack of investment in Newport infrastructure yet the plan itself in numerous of its proposals attempts to continue that policy.	This is incorrect. There are in fact 4 state secondary schools in Uttlesford, being: Joyce Frankland Academy, Newport Saffron Walden County High School Helena Romanes School and Sixth Form, Dunmow Forest Hall School, Stansted Mountfitchet There is also Felsted public school The comment is a mis-reading of the Recommendation. It does not seek to stop the school expanding (which is not an LA decision anyway) but to ensure that the problem of school buses blocking the roads is addressed. It could be re-phrased to sound positive eg: ‘any expansion should be conditional on’, but the meaning would be the same.
Sports, Community Leisure Policies NQRSL2 – Financial contributions from development	NQRSL2 - The policy seeks financial contributions towards improved facilities and sets out the sums required. We agree that general principle. However, the plan should be accompanied by an assessment of the impact of the policy on viability as required by the NPPF. There is no evidence in the NP that its approach will not undermine delivery.	Viability would be dealt with on a case-by-case basis. The existence of this policy has already contributed to a developer paying £15,000 for sport provision, which we think otherwise would not have been achieved. £10,000 was also contributed for something else. The community is now well disposed to the developer and the development.

Colin Campbell, Hill Residential Ltd and Joyce Frankland Academy Trust Newport

Many of the comments below are word for word identical to those from the EllisTrust. Steering Group response are not repeated

The Plan as	The emerging Uttlesford Local Plan remains at examination and is likely to change. It is inappropriate for	Replica of comments by Ellis Trust.
--------------------	--	-------------------------------------

<p>Whole</p>	<p>the Neighbourhood Plan to proceed ahead of that strategic context. If it were to do so it risks being out of date almost as soon as it is adopted.</p> <p>It is also inconsistent with the Neighbourhood Plan itself for it to proceed ahead of the local plan as it clearly states it is being produced “in tandem”</p> <p>The plan should await the adoption of local plan before proceeding so it can be clear whether or not additional development needs to be planned for.</p> <p>Throughout the plan it refers to results of community consultation feedback. The analysis of comments appears to add <i>neutral</i> and <i>like</i> together and counts those as people as expressing an opinion of “Like” and then it ignores “no opinion”. It appears to us that if people are expressing “No opinion” then they are “Neutral” and therefore those 2 categories are the same. We also do not consider that “Neutral” can be taken to mean “Like”. That has the significant potential to skew the results of consultation.</p> <p>The plan includes what appear to be policies in boxes shaded in a peach colour. It then includes Recommendations. It is unclear what is the purpose/status of these <i>Recommendations</i> and whether or not they are policies. That needs to be made clear.</p>	
<p>Chapter 2 Local and national</p>	<p>Chapter 2 is incorrect in its explanation of the NPPF and the titled balance. The NP states that the titled balance does not apply where the LPA has a 3 year supply. That is</p>	<p>Replica of comments by Ellis Trust.</p>

<p>planning policy and Essex Design Guide</p>	<p>incorrect. Para. 14 of the NPPF requires that the titled balance is applied, but that in such circumstances, the adverse impact of allowing the development is likely to significantly and demonstrably outweigh the harm.</p>	
<p>Chapter 4 Key Issues influencing the Neighbourhood Plan</p>	<p>Agree that there is a need for improved sports facilities within the village.</p> <p>Inappropriate to rely on 2010 evidence base in relation to water quality. The plan needs to be based on up to date evidence.</p> <p>The plan includes various unsupported suppositions. For example, on page 16, it states that there is no direct public transport to the largest centre of employment “which is Stansted airport”. However, there is direct public transport, via the railway, to London and Cambridge, both major employment centres and providing far more significant levels of employment than Stansted.</p>	<p>Agree!</p> <p>Otherwise replica of comments by Ellis Trust.</p>
<p>Chapter 5 Process, Vision, Aims & Objectives</p>	<p>Vision – it is unclear what is meant by “conserve” the character of Newport. The plan should be proactive, seeking to <i>enhance</i> the sustainability of Newport for existing and future residents and businesses.</p> <p>The aim to “meet the needs of local residents” is an inappropriate aim for the NP. It appears to be simply protecting the village for its existing residents. Newport is sustainable location for growth, as recognised in the adopted and emerging, local plan. It has a role to play in meeting needs beyond those of existing residents. Newport is home to the Joyce Frankland Academy (JFAN), one of only two secondary schools in the district and a major attracter of travel movements. Development close to the Academy will help reduce the need for travel, especially by car and bus. Development located further from Newport, in other smaller settlements, will simply</p>	<p>Replica of comments by Ellis Trust.</p> <p>Hill Residential remove the reference to affordability in the proposed re-wording of Objective 8 as proposed by Ellis Trust.</p>

	<p>generate more car and bus travel to the school.</p> <p>Objective 8 – there can be no doubt that the area faces a housing shortage and that there is a chronic issue with affordability in the area. The ratio of median house prices to median incomes stands at 13.67 to 1 in Uttlesford, making it one of the most expensive places to live in the East of England. The objective should be re-worded to read “To deliver the new homes that are needed and to meet the full range of housing needs in terms of tenures, types and sizes”.</p>	
Business & Local Economy	<p>The background recognises that the JFAN is a major employer, but that staff mostly commute. More new homes in the village would offer the opportunity for staff to live in closer proximity and avoid the need for travel by car.</p> <p>NQRBL1 - Support the approach that existing businesses and commercial premises should be protected to ensure the commercial vitality of Newport.</p>	<p>Replica of comments by Ellis Trust.</p>
Air Quality	<p>The chapter on air quality needs a fundamental re-visit. The issue of air quality was comprehensively considered in the recent appeal at Wicken Road where the inspector concluded that development would have a negligible impact on air quality. The whole chapter appears to be based on sweeping assumptions unsupported by evidence.</p> <p>NQRAQ1- We object to NQRAQ1. It is not necessary nor appropriate for all developments of 10 or more to be accompanied by a transport assessment and an air quality assessment. A transport statement would suffice to</p>	<p>Replica of comments by Ellis Trust.</p>

	<p>consider transport issues. Developments of this scale will have a negligible impact on air quality and their submission is not justifiable. It is unclear why residential developments should provide such an assessment, yet commercial developments are not required to.</p> <p>It is unclear what is meant by “offer” new off-site travel options. It is also unclear what is expected of applicants given the use of vague terms in the policy such as “alter...a significant number of journey and distance of journeys” and “provide information not obvious to residents”.</p>	
<p>Education and Health</p>	<p>NQREH1 – There are no set standard patient to GP ratios and therefore it is not clear that the capacity of the surgery is 6,423 patients. The national average is 2,087 patients per FTE GP and therefore the capacity of the surgery would appear to be c8,900. The basis of growth in patient numbers is not evidenced, however, what is clear is that many residents moving into new homes will already be registered with a GP and may also be registered locally. Indeed, the community consultation exercise suggests that people have no problem getting appointments with only 20% of people identifying that as an issue.</p> <p>NQREH2 – The policy is inappropriate. The education system operates on the basis of parental choice – that is government policy. It is inappropriate to seek to change national policy simply because the parish council does not like it.</p>	<p>Replica of comments by Ellis Trust.</p>
<p>Housing Allocation Policies</p>	<p>The opening to the chapter commences by quoting objectives 5 and 9 as being relevant. Many of the other objectives are also relevant to this chapter. For example, Objective 10 as housing is critical to retaining and supporting existing facilities within Newport. It is unclear</p>	<p>Near-identical to Ellis Trust comment.</p>

<p>Policies</p>	<p>why those particular objectives have been highlighted and why others have not. In our view, as this chapter deals with the provision and design of new homes, it should set objectives for achieving that.</p> <p>The chapter also includes selective quotes from the NPPF, but does not include any of the government's objectives for delivering the homes needed and significantly boosting the supply of homes.</p> <p>The chapter needs an objective assessment of the issues facing Newport and Uttlesford in terms of housing in one of the most expensive places to live in the East of England, and located in an area of strong economic potential. Government policy seeks to support economic growth and it is vital that the homes needed to support economic growth are delivered. Newport lies close to the UK's economic powerhouses of London and Cambridge.</p> <p>There is no assessment of the housing needs of the area.</p> <p>NQRHA1 - The policy is unimplementable and not achievable. It states various distances that development should relate to facilities and services. But the nature of Newport is that those services/facilities are located across the village – the secondary school is to the north, the primary school to the south.</p> <p>It is far too simplistic. It seeks to prevent internal vehicle journey by preventing further development, but that ignores that if development is provided elsewhere people will need to drive to facilities at Newport such as the secondary and primary schools, increasing travel distances and carbon emissions.</p>	
-----------------	--	--

	<p>NQRHA2 - The policy contradicts other parts of the local plan which seek to protect employment and commercial premises – that is a key issue identified by the plan, but this policy then undermines that approach.</p> <p>New policy - A further allocation should be made at the JFAN for residential development to facilitate the delivery of a range of infrastructure projects at the school, including refurbishment of school facilities and the delivery of new facilities. Such an allocation would accord with the email from Cllr Hargreaves to the Chair of Governors (dated...)</p>	<p>The Hill Residential appeal result is awaited, which is to overturn refusal by UDC to allow 24 houses to be built on the cricket ground at JFA.</p> <p>As well as the Conservation Area and landscape issues, there are also issues with flooding as the site would put floodwater into Wicken Water, and road access onto the narrowest part of Bury Water Lane. The application provides no affordable houses or contribution to the doctors’ surgery. This was on the basis that all the profits to the school would go on new sport provision. But this is not the case, and the Head’s speech at the planning committee was about spending on things like heavy maintenance of school buildings, rather than it all being to create new long-term assets. As the UDC financial assessment said that even doing the new sport provision listed in the application would be tight on the cash available, it seems the purpose of the application cannot be fulfilled.</p> <p>It is with great unease that there has to be opposition to this application. But it is not the duty of one village to take a poor housing development to make up for lack of government school funding, or to remedy longstanding maintenance issues which the Academy may have inherited when it took on the buildings from Essex County Council. Meetings have been held with the school to see what help might be offered, and the Chair of the Steering Group also suggested two alternative plans which would be less damaging and might provide the full level of funding the school says it needs (which the proposal at appeal does not). The suggestions would also provide benefit to the village. (It is assumed this is what the Cllr Hargreaves email refers to)</p> <p>A major beneficiary of this development would be Saffron Walden Hockey Club. SWHC expects the school to sell its asset to provide for</p>
--	---	---

		<p>free on its own land a new pitch for the club, which the school would also use. At the hearing it was revealed that neither JFA nor SWHC had applied for sport related grants to pay for any of the work. The Local Plan sport strategy does not support expansion of hockey facilities at JFA, and planning permission has just been granted for a new 3G MUGA at Saffron Walden County High</p> <p>The parish council and the Steering Group have great sympathy for the school and some of us are current parents or past parents of the students. But in the circumstances of such a contrived application it is not felt we can put a site allocation in the Plan</p>
<p>Housing Planning and Design Policies</p>	<p>NQRHD2 - Density – developments should be design-led rather than driven by density. There is no justification as to why developments outside the settlement limits should be only 20 dph.</p> <p>NQRHD4 - We support the need for the provision of a range of house types and sizes. However, we consider that there is not the evidence to support the approach set out within the policy. The supporting justification is simply assertion and the SHMA evidence base is dismissed on spurious grounds.</p> <p>NQRTR8 - We object to the recommended ban on development at JFAN. It runs completely contrary to the plan which asserts that there has been insufficient investment in infrastructure at Newport and the plan then seeks to impose a ban on growth of the Academy.</p> <p>Elements of the Railton transport study are flawed and we do not consider that the transport assessment supports the approach of Neighbourhood Plan.</p> <p>The study claims that there are conflicts between bus, cars and</p>	<p>.The first three comments are identical to Ellis Trust.</p> <p>Disagree - ‘asserts’ implies the statements about lack of investment are dubious. There is no comment as to what investment(s) have been made to dispute the plan evidence.</p> <p>There has been a total lack of cumulative impact assessment on Highways Safety. Permission has been given for 320 houses feeding traffic through the centre of the school from 24 different applications. All have been approved in isolation by ECC and UDC with no cumulative</p>

	<p>pedestrian outside the school. However, there is a dedicated pedestrian crossing which prioritises pedestrians and those movements are safe and the evidence supports the fact that there are no clusters of accidents.</p> <p>Table 5.1 sets out commitments. There appears to be an error in that London Road is stated to be 105 dwellings, when the planning permission is in fact for 94 dwellings. The traffic survey was carried out in June 2019 and a number of dwellings within the committed list have been built and occupied and hence the forecasts are likely to overestimate the impact of committed development.</p> <p>Para. 8.6 incorrectly states that a RFC over 0.85 is over capacity. Capacity is 1, 0.85 is a design capacity. Bury Water lane operates within capacity in the future in both a.m. and p.m peaks.</p>	<p>impact assessment on highway safety completed. The Hill Residential application would be the 25th.</p> <p>The school commissioned a report looking at just two of these applications. It says; ‘neither have identified any measures to mitigate their impact on Bury Water Lane but will increase the vehicle movements during the AM Peak by 41%. This level of traffic will exacerbate the existing safety issues at the school and in turn is considered to increase the probability and severity of an accident occurring.’ This is just from two developments. What about the impact of the other 23?</p> <p>Just because there hasn’t been a cluster of accidents doesn’t mean that the proposed further development within the area will not increase the risk of such an accident occurring. With specific regard to this developer’s application, moving the main car park to within the school grounds as this developer has proposed will route traffic across the only playground within the school – this presents a significant safeguarding issue which was noted by officers from Essex Highways but as it is on private land they did not have any official position to take in their response to this application. The risk is not confined to the road running through the school site.</p> <p>Agree to look at the London Road 94 dwellings quotes as 105. The permission also includes a commercial unit with significant car parking. It may be the extra 11 is to account for this</p>
<p>Sports, Community Leisure Policies</p>	<p>NQRSL2 – The policy seeks financial contributions towards improved facilities and set out the sums required. We accept the general principle that development should help fund infrastructure directly related to it. However, the plan needs to be accompanied by an assessment of the impact of the policy on viability as required by the NPPF. There is no evidence that the approach will not undermine delivery.</p>	<p>The first comment is a copy of Ellis Trust.</p> <p>The 2019 Knight Kavanagh & Page Playing Pitch Strategy May 2019 page 15, on UDC LP evidence, says :</p> <p>There is <i>‘Sufficient supply to meet current demand; however, there are quality issues at Joyce Frankland Academy and Saffron Walden County</i></p>

	<p>Add a new policy allocation JFAN for the development of further sports facilities.</p> <p>The Uttlesford Sports Facilities Development Strategy dated January 2016 supports (at 5.26.1) the need for more all-weather pitches. The Strategy supports the provision of a second pitch at Academy to accommodate the needs of Saffron Walden Hockey Club. That is listed as “Strategic Priority”. The Strategy at 6.5 seeks the provision of a further pitch for hockey.</p> <p>Uttlesford’s May 2019 playing pitch study identifies Saffron Walden Hockey Club has plans for growth of one senior women’s, four more junior boys’ and four more junior girls’ teams. It also identifies that both pitches the SWHC currently use are “currently operating at capacity and as such are unable to accommodate future growth”. It goes on to identify that the distance to pitches at Felsted and Dunmow rule these out as suitable locations for SWHC (see p16 which states these are “unfeasible”). The study also suggest that Dunmow pitch could be converted to 3G, and hence would no longer be suitable for hockey.</p> <p>A further pitch at JFAN is strongly supported by SWHC. Add policy reading</p> <p>“The following provision at Joyce Frankland Academy will be supported:</p> <ul style="list-style-type: none"> • - a further full size artificial turf pitch • - additional netball and tennis courts • - artificial cricket wicket • - ancillary sporting facilities to support the above, if 	<p><i>High School.’,</i></p> <p>and for demand to 2033:</p> <p><i>‘AGP provision being provided in a more accessible location for Saffron Walden HC may be required.’</i> In supporting text it says Felsted and Dunmow are too far away</p> <p>At the appeal it was stated that SWHC had pressed UDC in their submission to include JFA as an allocation. This request goes back a long time and the consultants must have been aware.</p> <p>If the consultant had supported provision of a second pitch at JFA they would have said so and it would have been headlined at the appeal. We feel there can be no other interpretation than that ‘more accessible location’ mean s Newport is not considered accessible. The issue is not just distance, it is driving through the centre of the school, or as has been witnessed, parents drive across the cricket ground as the hockey pitch is at the back of the school.</p> <p>It is not appropriate for one school to pay for and accommodate a district wide need, particularly when that school is painfully underfunded.</p>
--	---	---

	required”	
--	-----------	--