

**Newport Quendon Rickling Neighbourhood Plan Regulation 16  
Representations**

**STATUTORY CONSULTEES**

<b>Representation Number</b>	<b>Name of Consultee</b>
1.	Anglian Water
2.	Essex County Council – Planning, Transport and Development
3.	National Grid
4.	Historic England
5.	Uttlesford District Council

**DEVELOPERS**

6.	Lichfields
7.	Sworders
8.	Residential Development Land Agent Ltd.
9.	Gladman
10.	Sir Arthur Ellis Will Limited (“AEW”)
11.	Hill Residential Ltd and Joyce Frankland Academy Trust Newport



Internal Use Only

Representation Number:

## **Newport Quendon & Rickling Neighbourhood Plan Publication Consultation**

### **Response Form**

**Consultation period ends: Tuesday 29 October 2019 at 5pm**

Uttlesford District Council is inviting representations on the submission version of the Newport Quendon & Rickling Neighbourhood Plan.

Representations must have been received by Uttlesford District Council no later than **5pm on Tuesday 29 October 2019**. Representations after this date will not be considered.

Representations can be submitted by email to:

[planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk) or by post to

Uttlesford District Council  
London Road  
Saffron Walden  
Essex  
CB11 4ER

Respondents do not have to use this form to respond. All responses must be made in writing, either electronically or otherwise.

All responses will be made public with the respondents name and (if applicable) organisation. Anonymous responses cannot be accepted.

## UTTLESFORD DISTRICT COUNCIL – PLANNING POLICY

In accordance with the **General Data Protection Regulation** please complete:

**Section 1** if you are making comments (a representation) on the Neighbourhood Plan

**Section 2** to provide your details

### 1. USE OF PRIVATE DATA WHEN MAKING COMMENTS


**If you do not provide consent, we cannot process your comments and you may not be able to participate in the Neighbourhood Plan examination.**

- Please tick this box to provide your consent to allow Uttlesford District Council to process your data, in accordance with the General Data Protection Regulation and Data Protection Act, so your comments on the Neighbourhood Plan can be processed.

**\*Your name and comments will be made public, but any address, telephone and email address will remain confidential.**

### 2. YOUR DETAILS

Please confirm below your name and email **or** postal address. You are not obliged to provide your details; however we will be unable to process any comments you make.

<b><u>Contact Name</u></b>	Stewart Patience
<b><u>Email</u></b>	
<b><u>Or Postal Address</u></b>	

We will keep a record of your consent for 7 years, after which it will be destroyed. For more information on how we collect, use and protect personal information generally, please visit <https://www.uttlesford.gov.uk/privacy-notice>

## **PRIVACY NOTICE**

The Council will use the information you submit, or have submitted, in all correspondence to the Council to enable the council's planning policy section to consider any information, representation or evidence submitted to assist with the Newport Quendon & Rickling Neighbourhood planning examination.

Further information about Data Protection rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at:

<https://www.uttlesford.gov.uk/privacy-notice> Printed copies of the Council's Privacy Notices can be provided on request.

The Council will:

- Use the information you provide for the purpose of performing of its statutory duties.
- Make any disclosures required by law and may also share this information, both across council departments and with other local authorities and government organisations.
- Check information you have provided, or information about you that someone else has provided, with other information it holds.

The Council will not give information about you to anyone else, or use information about you for other purposes, unless the law allows this.



## 1) Your details

Name	Stewart Patience
Organisation (if applicable)	Anglian Water Services Ltd
Address	Thorpe Wood House, Thorpe Wood Peterborough PE3 6WT
Email	[REDACTED]
Telephone	[REDACTED]

## 2) Your representations

Please specify which paragraph or policy your representations relates to and if you are suggesting any amendments. Please use a separate sheet if you need more space.

The Plan as Whole	Comments
Chapter of the Plan	Comments
<b>Chapter 1</b> What is a Neighbourhood Plan and why does it matter?	

<p><b>Chapter 2</b> Local and national planning policy and Essex Design Guide</p>	
<p><b>Chapter 3</b> Newport, Quendon &amp; Rickling; the villages</p>	
<p><b>Chapter 4</b> Key Issues influencing the Neighbourhood Plan</p>	
<p><b>Chapter 5</b> Process, Vision, Aims &amp; Objectives</p>	

## Chapter 6 – Policies and Recommendations

### Business & Local Economy

#### Policies

**NQRBL1** – *Support of new and existing business*

**NQRBL2** – *Change of use on upper floors*

**NQRBL3** – *Business parking*

**NQRBL4** – *High speed internet connection*

### Air Quality

#### Policies

**NQRAQ1** – *Air quality impact of development proposals*

**NQRAQ2** – *Cumulative impact of developments on clean air and traffic congestion*

#### Recommendation

**NQRAQ3** – *Air quality monitoring and remediation*

### Green Spaces and

**Environment**

Policies

**NQRGSE1** – *Discharges into watercourses*

**NQRGSE2** – *Locally supplied evidence of flood risk*

**NQRGSE3** – *Footpaths and access to the countryside*

Recommendations

**NQRGSE4** – *Developments bordering hedgerows*

**NQRGSE5** – *Wicken Water Marsh Local Wildlife Site – maintenance and access*

**NQRGSE6** – *Sewerage systems*

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.

In relation to Newport WRC we have identified a need for further 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/in-the-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-9d42-4227-9b3a-34782763f0c0/water-industry-national-environment-programme>

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.

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.

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><b>Education and Health</b></p> <p><u>Policies</u></p> <p><b>NQREH1 – General Practice</b></p> <p><b>NQREH2 – Primary school places</b></p>	
<p><b>Heritage</b></p> <p><u>Recommendation</u></p> <p><b>NQRHER1 – Consider Article 4 protections for Quendon &amp; Rickling</b></p>	
<p><b>Housing Allocation Policies</b></p> <p><u>Policies</u></p> <p><b>NQRHA1 – Coherence of villages</b></p> <p><b>NQRHA2 – Building on Brownfield Sites</b></p> <p><b>NQRHA3 – Connection to the countryside</b></p> <p><b>NQRHA4 – Building in the countryside</b></p> <p><b>NQRHA5 – No Policy</b></p> <p><b>NQRHA6 – Foxley House, Quendon, site allocation. (Ref '2 Que 15')</b></p>	<p>In our previous comments on the Neighbourhood Plan we had 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.</p>

	<p>It is therefore suggested the following text is included in the site specific requirements for Policy NQRHA6:</p> <p>‘Be informed by assessment and suitable mitigation relating to sewerage infrastructure’</p>
<p><b>Housing Planning and Design Policies</b></p> <p><u>Policies</u></p> <p><b>NQRHD1 – Parking Standards</b></p> <p><b>NQRHD2 – Housing Design</b></p> <p><b>NQRHD3 – Use of Specimen Trees</b></p> <p><b>NQRHD4 – House sizes</b></p> <p><b>NQRHD5 – Affordable homes and local connection</b></p> <p><b>NQRHD6 – Affordable housing</b></p>	
<p><b>Roads and Moving Around Policies</b></p> <p><b>NQRTR1 – Extension of speed limits and footways</b></p> <p><b>NQRTR2 – Mitigation of traffic impacts</b></p> <p><b>NQRTR3 – Safe access to</b></p>	

*schools and village facilities*

Recommendations

**NQRTR4** – *Cycleway*

**NQRTR5**– *Impact of development of Carver Barracks*

**NQRTR6** – *Speeding and crossing the road*

**NQRTR7**– *Parking and road safety in Quendon*

**NQRTR8** – *Joyce Frankland Academy expansion*

**Sports, Community Leisure Policies**

**NQRSCLI** – *Retaining and enhancing existing community facilities*

**NQRSCL2** – *Financial contributions from development*

**NQRSCL3** – *Provision of amenity space and for ball sports*



**NQRSCL4** – *Retention of sports fields*

**NQRSCL5** – *Improve the facilities at Newport Recreation Ground*

Would you like to be notified of Uttlesford District Council’s decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to adopt the Newport Quendon & Rickling Neighbourhood Plan?

**Yes**

**No**

**Thank you for completing this response form.**

Date: 28 October 2019  
Phone: [REDACTED]  
Email: [REDACTED]

Newport Parish Council and Quendon and Rickling Parish Council  
Newport Quendon & Rickling Neighbourhood Plan  
Newport Parish Council  
By email [planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk)

Dear Sir/Madam

**Re: Newport, Quendon & Rickling Neighbourhood Plan (Regulation 16) consultation**

Thank you for consulting Essex County Council (ECC) on this emerging draft Neighbourhood Plan (NP). ECC provides the following response, which reflects ECC's role as the Minerals and Waste Planning Authority, the Highways Authority, the Local Education Authority and Lead Local Flood Authority. ECC is also responsible at the local level for public health. Advisory information is also provided for the consideration of the Neighbourhood Plan Steering Group (NPSG).

**Requirements of Neighbourhood Plans and Links to emerging Uttlesford District Local Plan (2011-2033)**

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 non-strategic matters should be included in local plans that contain both strategic and non-strategic 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).

## Transport

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 Parish 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.

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.

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.

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.

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

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- 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*”.
- 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*”.
- Page 79 – “*Quendon & Rickling PC have previously consulted local residents and approached Essex Highway Authority*” should be amended to “*Quendon & Rickling PC have previously consulted local residents and approached the Highway Authority*”.
- 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*”.

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.

ECC notes that the following have now been amended to 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.

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.

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.

### **Public Rights of Way (PROW)**

Policy NQRGSE3 - Footpaths and access to the countryside – ECC note that the policy wording refers to ‘adverse impacts’. ECC 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.

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.

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.

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.

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.

### **Local Education Provision**

Policy NQREH2 - Primary School Places – 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.

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 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.

Policy NQRSL 5 - Improve the facilities at Newport Recreation Ground – 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 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.

### **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.

### **Minerals and Waste**

Glossary of Terms – ECC notes and welcomes that the glossary defines ‘development’ as excluding ‘the County matters of minerals and waste’.

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.

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 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.

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.”

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.

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.

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.

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”

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.

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.

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.

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 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.

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.

### **Concluding Comments**

ECC looks forward to engaging constructively and actively during the continued preparation of the Newport, Quendon and Rickling Neighbourhood Plan. This will ensure the continuation of a robust, long-term strategy for the area that provides a reliable basis on which ECC may fulfil its statutory responsibilities, plan future services and provide (or commission) the required social and physical infrastructure for which it is responsible.

If you wish to discuss any of the above matters in further detail please do not hesitate to contact me.

Yours sincerely,

Zhanine Smith  
Principal Spatial Planner  
Planning, Transport and Development  
Essex County Council  
County Hall  
CHELMSFORD  
CM1 1QH

cc. S Miles, Planning Policy, UDC

Planning Policy  
Uttlesford District Council  
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CB11 4ER

Lucy Bartley  
Consultant Town Planner

Tel: 01926 439116  
[n.grid@woodplc.com](mailto:n.grid@woodplc.com)

Sent by email to:  
[planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk)

28 October 2019

Dear Sir / Madam

**Newport Quendon & Rickling Neighbourhood Plan Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

**Assets in your area**

National Grid has identified the following high-pressure gas transmission pipeline and high voltage electricity transmission cable as falling within the Neighbourhood area boundary:

- **FM27 - Cambridge to Matching Green**

Nicholls House  
Homer Close  
Leamington Spa  
Warwickshire CV34 6TT  
United Kingdom  
Tel +44 (0) 1926 439 000  
woodplc.com

Wood Environment  
& Infrastructure Solutions UK Limited  
Registered office:  
Booths Park, Chelford Road, Knutsford,  
Cheshire WA16 8QZ  
Registered in England.  
No. 2190074





- **4YL Route – 400kv two circuit route from Pelham substation in East Hertfordshire to Bramford substation in Mid Suffolk**
- **4ZM Route - 400kV from Pelham substation in East Hertfordshire to Burwell Main substation in East Hertfordshire**

From the consultation information provided, the above gas transmission pipeline and electricity transmission cable does not interact with any of the proposed development sites.

### **Gas Distribution – Low / Medium Pressure**

Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact [plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

### **Electricity distribution**

Information regarding the distribution network can be found at: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

### **Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition, the following publications are available from the National Grid website or by contacting us at the address overleaf:

- A sense of place – design guidelines for development near high voltage overhead lines: A sense of place design guidelines for development near high voltage overhead lines: <https://www.nationalgridet.com/document/130626/download>
- Guidelines when working near NGG assets: <https://www.nationalgridgas.com/land-and-assets/working-near-our-assets>
- Guidelines when working near NGETT assets: <https://www.nationalgridet.com/network-and-assets/working-near-our-assets>

### **Appendices - National Grid Assets**

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown overleaf to your consultation database:

**Lucy Bartley**

Consultant Town Planner

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Gallows Hill  
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CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]

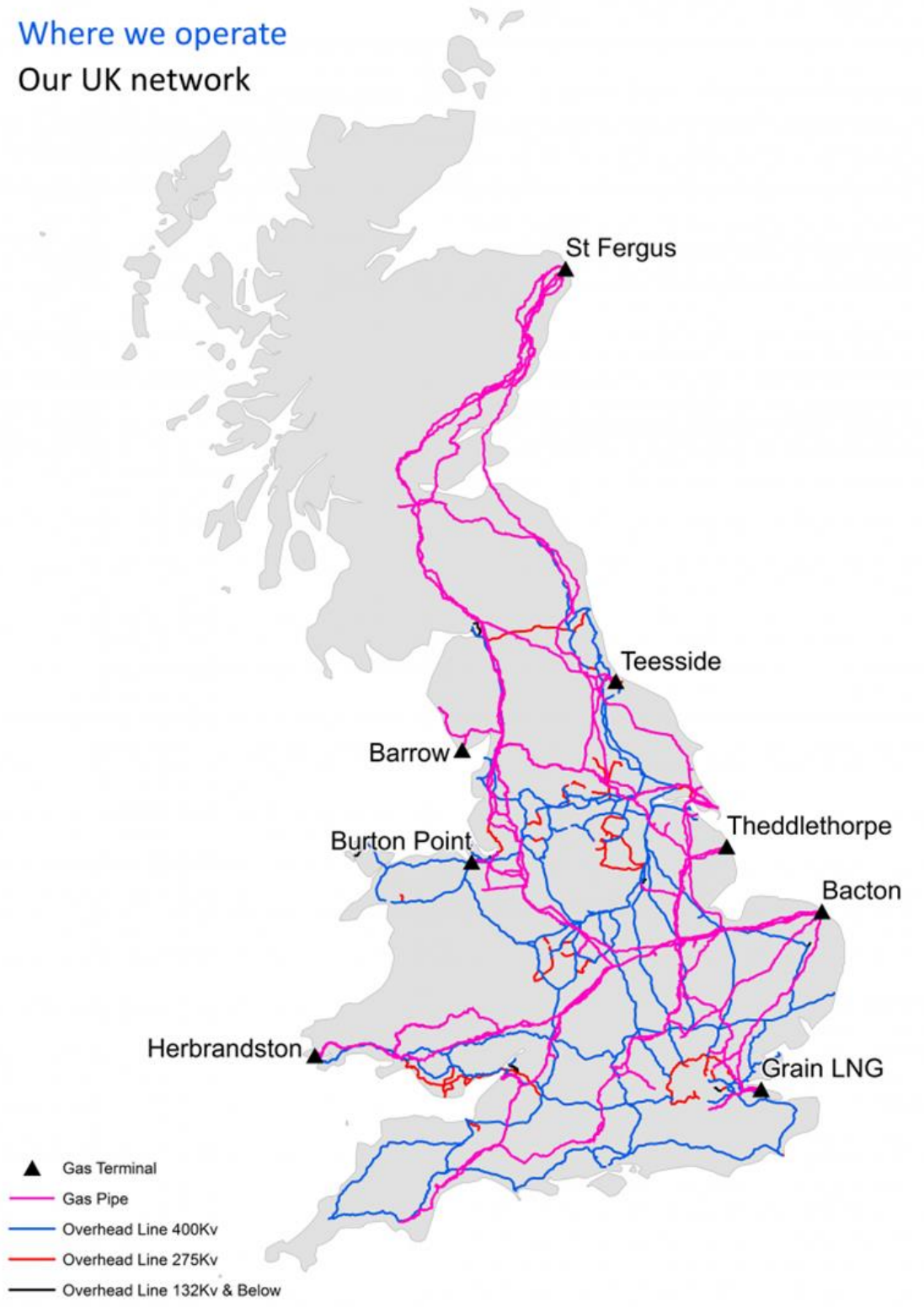
**Lucy Bartley**

**Consultant Town Planner**

cc. Spencer Jefferies, National Grid

**APPENDIX 1: NATIONAL GRID'S UK NETWORK**

Where we operate  
Our UK network





Historic England

Mr Neil Hargreaves

Direct Dial: [REDACTED]

Newport Quendon and Rickling Neighbourhood Plan

Our ref: PL00410902

Newport Parish Council

Waterloo House

High Street

Newport

CB11 4ER

25 October 2019

Dear Mr Hargreaves

**Ref: Newport, Quendon and Rickling Neighbourhood Plan Regulation 16 Consultation**

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of the Newport, Quendon and Rickling Neighbourhood Plan.

We welcome the production of this neighbourhood plan, but do not wish to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
HistoricEngland.org.uk



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*



Historic England

by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James  
Historic Places Advisor, East of England



cc:

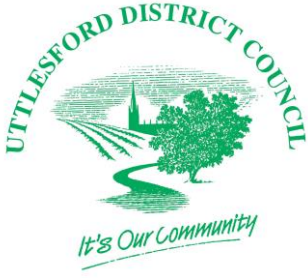


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## UTTLESFORD DISTRICT COUNCIL

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**Chief Executive: Dawn French**

22 October 2019

:

email: [REDACTED]

Dear Sir,

### **Re: Newport Quendon & Rickling Development Plan Regulation 16 Consultation**

Developing a Neighbourhood Plan is a complex and time consuming process. UDC acknowledges and appreciates the hard work that the Neighbourhood Plan Group have put into developing the Neighbourhood Plan, and looks forward to supporting the plan through examination to being 'made'.

The following comments are made on behalf of Uttlesford District Council.  
This response to the Neighbourhood Plan does address, in places, some individual policies and projects.

#### **General Points**

The following general observations are made:

*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.

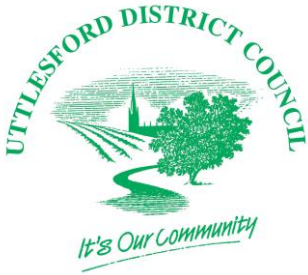
The Neighbourhood Plan should not repeat or adopt policies from the Local Plan or any such other document. The Neighbourhood Plan can use some of the Policy wording and add to the text to make the Policy specific to the Neighbourhood Area.

#### **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 ensuring a longer 'life' for the neighbourhood plan.

*Chapter 1: Page 7, First Sentence: environmental* should be included in the contribution to improvements. The three attributes of sustainability are economic, environmental and social.



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**Chief Executive: Dawn French**

Page 8, Paragraph 7, First Bullet Point, Last Sentence: The Uttlesford Local Plan 2005 is the adopted local Plan and 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.

### **Chapter 2**

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.

### **Five Year Land Supply**

Page 10, Paragraph 3: Last Sentence: Note the latest update Council's Five Year Land Supply is 2.68 years.

### **Chapter 5 Process, Vision, Aims & Objectives**

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 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.

### **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.

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.





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**Chief Executive: Dawn French**

### **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.

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.

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.

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).

### **Policies and Proposals – Air Quality**

Page 27 Paragraph 6: “Recordings from UDC of NO<sub>2</sub> 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://ngrplan.org/evidence-documents>, and the UDC website. Below is an extract of the raw NO<sub>2</sub> 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.

Newport location	September 2017	October 2017	November 2017	December 2017	Raw annual mean	Annualised and adjusted annual mean
Wicken Road	36.3	35.4	40	40.5	38.05	31.35



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**Chief Executive: Dawn French**

Page 28, Issue 3: “Raw NO<sub>2</sub> 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](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 bias-adjustment 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 NO<sub>2</sub> concentrations, used as a basis for forecasting, may now be under reported”.

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”.

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.

Policy NQRAQ1, Air Quality impact of development proposals – 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.

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.

### **Green Spaces and Environment**

Policy NQRGSE1, Discharge into watercourses - As per the our response to the Regulation 14 consultation, UDC maintains that the Environment 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.

Policy NQRGSE2, Locally supplied evidence of flood risk - 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.



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**Chief Executive: Dawn French**

### Policy NQRGSE3, Footpaths and access to the countryside

The first paragraph of the policy will depend on the scale of the development and whether there is a direct impact from the scheme.

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.

Third paragraph of the policy: Essex County Council deals with footpath diversions and not dealt with at District Council level.

### Education and Health

Policy NQRHE2 Primary Schools: Uttlesford District Council cannot control this matter as it is an Essex County Council function as the Education Authority.

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.

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.

### Housing Allocation Policies

Page 59, ELP: “**SP2** The Spatial Strategy 2011-2033 says – “For Newport, classified as a Key Village, no further houses are required additional to those already permitted.”

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.

This sentence on Page 59, ELP should be deleted and replaced with a correct statement.

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.

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?



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**Chief Executive: Dawn French**

### **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.

*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.

### **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.

### **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).

*Policy NQRSC2 - Financial contributions from development* - De 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.

**Yours Sincerely**

**Demetria Macdonald**

**Planning Policy Officer**

Planning Policy  
Uttlesford District Council  
London Road  
Saffron Walden  
Essex  
CB11 4ER

**Date:** 28 October 2019  
**Our ref:** 15920/01/SSL/SIN/17921466v1  
**Your ref:**

Dear Sir/Madam

## **Uttlesford District Council: Newport, Quendon & Rickling Neighbourhood Plan 2018-2033 Regulation 16 Consultation**

### **Representations on behalf of Taylor Wimpey**

On behalf of our client, Taylor Wimpey, please find below representations on the Newport, Quendon & Rickling Neighbourhood Plan (NQRNP) 2018-2033, published for comment until 29 October 2019.

Taylor Wimpey controls land to the east of Newport railway station, to the south of Debden Road. It is considered that this site is a sustainable location which could deliver much needed housing in the neighbourhood plan area. Representations were previously made on the NQRNP Regulation 14 consultation in June 2018.

We have included the following as part of our submission:

- Location plan (ref. PS15920-01-003); and
- Land East of Newport Landscape Visual Impact Assessment prepared by Barton Willmore.

### **Land East of Newport**

Development of the land to the east of Newport offers the opportunity to realise some of the objectives of the Plan, through delivering high-quality housing which is well-connected to the village centre and train station. This would be beneficial to the vitality of local businesses and services in Newport. Development could also assist, either through onsite provision or section 106 planning obligations, with some of the recreation and other infrastructure requirements identified in the draft plan (such as public open space and highway improvements in Newport).

The site lies to the south-east of the village of Newport and comprises two irregularly shaped parcels of land separated by Chalk Farm Lane. The two parcels comprise mixed pasture and scrub land and covers an area of approximately 13.65ha. The northern parcel comprises an area of open grassland bound by Debden Road to the north and Chalk Farm Lane to the west and south. The north-eastern part of the parcel includes a rectangular area enclosed by a post and rail fence.

The southern parcel is broadly triangular in shape, bound by Chalk Farm Lane to the north-east, an active chalk quarry to the south-east and the railway line to the west. The parcel is characterised by scrubland. Two residential properties are located to the north and north-west of this parcel, fronting onto Chalk Farm Lane.

A number of technical assessments have been prepared to assess the potential for residential development on the site and ensure that there would be no overriding constraints or significant impacts in relation to transport, flooding and drainage, noise and vibration and visual impacts on the landscape. The work undertaken in relation to this is summarised below.

## **Access**

The northern part of the site is accessed from Chalk Farm Lane, via Debden Road to the north and the pedestrian railway bridge to the west, the latter linking to Station Road and the village core. The southern parcel is accessible from the south-east, opposite the chalk quarry and to the north-east from Chalk Farm Lane. The Debden Road Bridge provides the key vehicular and pedestrian access from the site to Newport village. The Debden Road Bridge provides the key vehicular and pedestrian access from the site to Newport village. At present it is constrained due to its lack of pedestrian provision, one-way shuttle working for vehicles and limited visibility.

It is identified that in terms of pedestrian access, Network Rail are seeking to re-route pedestrians along Debden Road as a result of the future closure of a nearby level crossing. This work will be supported by the introduction of a three-way traffic signal at the junction of Debden Road/Chalk Farm Road. The principle of traffic signals in this location have, therefore, been accepted and we consider this could be further developed to accommodate/facilitate the development of the site.

It is therefore proposed that the entrance to Chalk Farm Road (from Debden Road) would be moved east along Debden Road. This would have additional benefits of removing the need for this junction to be included in the signal operation, provide 'more time' for traffic signal phasing to allow for other transport movements and incorporate pedestrian access. Junction modelling software confirms that existing traffic and the development of up to 300 dwellings on the site can be accommodated, alongside the safe movement of pedestrians across the bridge through implementing these works. It is therefore considered that safe and appropriate access could be provided for the site which would also provide benefits for existing users of Debden Road Bridge.

Chalk Farm Road could also be widened in order to facilitate two-way traffic.

## **Noise**

The West Anglia Mainline borders both parcels to the west and the chalk quarry borders the southern parcel to the south-east. The site is also in close proximity to the Newport Chalk Quarry and M11 motorway. An initial Noise Assessment has therefore been undertaken to establish what impact the railway would have on the amenity of future residential occupiers of the site.

Based on the preliminary assessment, it is considered any residential development delivered on the site would not hinder or jeopardise the current or future operations of the Quarry. Vibration levels were also found to be sufficiently low that additional mitigation above a recommended minor set-back, is not required.

On the potential impact from the railway it is concluded that, subject to the layout of the site and the internal configuration of the dwellings, the dwellings could meet the necessary noise criterion during the daytime and at night.

Overall, noise levels on the majority of both parcels, including when taking into account the Quarry, are sufficiently low such that mitigation should not be necessary.



## **Landscape Visual Impact**

The concerns raised in relation to landscape visual impact of the site are unfounded. In considering whether the site could be suitable for residential development, Taylor Wimpey commissioned Barton Willmore to prepare a Landscape Visual Impact Assessment. This concludes that although there are some areas which are visually sensitive, the majority of the site is not and therefore this should not prevent development coming forward in this location.

The potential developable area of the site has been set below the 75m contour line and included the visually sensitive area of the northern parcel as strategic open space. This strategy would allow new built form to be accommodated within the Cam Valley landform with a strong relationship to the existing settlement pattern of Newport. As such, it is considered that landscape visual impact of residential development at the site could be appropriately mitigated.

## **Flooding**

The Environment Agency Flood Map shows the site as being entirely within Flood Zone 1. This differs from UDC's Strategic Flood Risk Assessment which indicates that the lower land parcel is in flood zone 3a and may be at risk of flooding once the latest allowances for climate change have been applied.

Within the submitted initial Flood Risk and Drainage Review prepared by WSP, this disparity is noted, but it is concluded that the EA data is more up to date and therefore, based on the available information the risk of fluvial flooding is expected to be low. In relation to surface water flooding, there are areas of the southern parcel which are considered medium to high risk.

To mitigate the risk of flooding on the southern parcel from the above sources, it is proposed that the finished site levels could be engineered to provide positive drainage, prevent ponding and channel flows away from residential dwellings during exceedance events. The accumulation of standing water would therefore not occur and thus not pose a risk to the development.

In order to manage surface water run-off, sustainable urban drainage systems will be implemented within the proposed site alongside infiltration. Each parcel will have its own independent drainage strategy and an independent drainage network comprising of a traditional gravity piped network draining to an infiltration basin that will be supplemented throughout by permeable paving.

Further testing will be required in due course to test and refine the suggested mitigation strategy; however, the early indications suggest the potential for flood risk could be appropriately mitigated.

## **Summary**

The site presents an excellent opportunity to deliver residential development in a sustainable location and it is considered the site is suitable for residential development for around 200-250 dwellings which could assist in meeting Uttlesford's housing needs.

We note that the Chalk Pit allocation has now been removed as a housing allocation from the Neighbourhood Plan since the Regulation 14 consultation following a holding objection from Essex County Council (ECC). However, it is noted that this was just on the basis that further evidence was required and as such we consider that residential development could be brought forward on the site once the lifetime of the quarry is complete (particularly if the application for the site which involves its infilling is implemented, ref. ESS/42/18/UTT). The site in Taylor Wimpey's control could then support its delivery through providing linkages to the businesses on the High Street and the train station.

## Comments on the Draft Policies

### Policy NQRGSE3 – Footpaths and access to the countryside

Taylor Wimpey supports the maintenance and enhancement of existing footpaths and rights of way and would seek to retain these in any development proposals

It is not, however, considered necessary for this this policy to incorporate consideration for the degradation of rural views and views towards the villages and landmarks as part of this. This makes the policy overly restrictive 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.

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.

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, ~~will not be supported~~ **should demonstrate that this impact has been suitably mitigated.** This includes views identified as sensitive to change, as shown in the appendices published on <https://nqrplan.org/evidence-documents> and on maps 16 and 17 in this document.*

*Footpath diversions will need to be of at least equivalent quality to the path being replaced.”*

### Policy NQREH2 – Primary school places

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.

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.



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 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.

### **Policy NQRHA1 – Coherence of the villages**

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.

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. 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 setting without preventing or discouraging appropriate innovation or change.

### **Policy NQRHA3 – Connection with the countryside**

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.

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.

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 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.

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.*

*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.

#### **NQRHA4 – Building in the countryside**

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.

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.

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.

#### **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.

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 criteria (a)-(e) require. We consider that if these criteria were met, the density of development would be appropriate.

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

land which would be contrary to the Government's ambition to make optimal use of sites well served by public transport (NPPF paragraph 123).

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.

#### **Policy NQRHD4 – House sizes**

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.

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 Plan sets out the following monitoring targets for the delivery of housing:

- 1-bed flats – 4%
- 2-bed flats – 3%
- 2-bed houses – 12%
- 3-bed houses – 43%
- 4+bed houses – 38%

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.

#### **Conclusion**

Taylor Wimpey welcome the opportunity to comment on the Newport, Quendon & Rickling Neighbourhood Plan and are keen to continue to engage with the Steering Group, Parishes and wider community in relation to their interest in the land to the east of Newport.

The land in their control would help deliver some of the improvements to local facilities and infrastructure sought in the Plan and boost the local economy. If the Chalk Pit allocation were to be included as an allocation in the Plan again, it would also assist in reducing its isolation through providing linkages through to businesses on the High Street and the train station.

Should you wish to discuss the site or anything within these representations further please do not hesitate to contact me or my colleague Simon Slatford.

Yours sincerely

  
**Zoe Simmonds**  
Senior Planner

Copy                      Anna Davies   -   TW Strategic Land



Internal Use Only

Representation Number:

## **Newport Quendon & Rickling Neighbourhood Plan Publication Consultation**

### **Response Form**

**Consultation period ends: Tuesday 29 October 2019 at 5pm**

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Saffron Walden  
Essex  
CB11 4ER

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All responses will be made public with the respondents name and (if applicable) organisation. Anonymous responses cannot be accepted.

## UTTLESFORD DISTRICT COUNCIL – PLANNING POLICY

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**Section 1** if you are making comments (a representation) on the Neighbourhood Plan

**Section 2** to provide your details

### 1. USE OF PRIVATE DATA WHEN MAKING COMMENTS

**If you do not provide consent, we cannot process your comments and you may not be able to participate in the Neighbourhood Plan examination.**

**Yes** Please tick this box to provide your consent to allow Uttlesford District Council to process your data, in accordance with the General Data Protection Regulation and Data Protection Act, so your comments on the Neighbourhood Plan can be processed.

**\*Your name and comments will be made public, but any address, telephone and email address will remain confidential.**

### 2. YOUR DETAILS

Please confirm below your name and email **or** postal address. You are not obliged to provide your details; however we will be unable to process any comments you make.

**Contact**

**Name**

Rachel Bryan

**Email**

**Or Postal**

**Address**

We will keep a record of your consent for 7 years, after which it will be destroyed. For more information on how we collect, use and protect personal information generally, please visit <https://www.uttlesford.gov.uk/privacy-notice>

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The Council will:

- Use the information you provide for the purpose of performing of its statutory duties.
- Make any disclosures required by law and may also share this information, both across council departments and with other local authorities and government organisations.
- Check information you have provided, or information about you that someone else has provided, with other information it holds.

The Council will not give information about you to anyone else, or use information about you for other purposes, unless the law allows this.

## 1) Your details

Name	Mr D Hill c/o Sworders
Organisation (if applicable)	Sworders
Address	The Gatehouse Hadham Hall Little Hadham Ware Herts SG11 2EB
Email	[REDACTED]
Telephone	[REDACTED]

## 2) Your representations

Please specify which paragraph or policy your representations relates to and if you are suggesting any amendments. Please use a separate sheet if you need more space.

The Plan as Whole	Comments
Chapter of the Plan	Comments
<b>Chapter 1</b> What is a Neighbourhood Plan and why does it matter?	No comment.
<b>Chapter 2</b>	No comment.

Local and national planning policy and Essex Design Guide	
<b>Chapter 3</b> Newport, Quendon & Rickling; the villages	No comment.
<b>Chapter 4</b> Key Issues influencing the Neighbourhood Plan	No comment.
<b>Chapter 5</b> Process, Vision, Aims & Objectives	No comment.
<b>Chapter 6 – Policies and Recommendations</b>	
<b>Business &amp; Local Economy</b>  <u>Policies</u>  <b>NQRBL1</b> – <i>Support of new and existing business</i>  <b>NQRBL2</b> – <i>Change of use on upper floors</i>  <b>NQRBL3</b> – <i>Business parking</i>  <b>NQRBL4</b> – <i>High speed internet connection</i>	No comment.
<b>Air Quality</b>  <u>Policies</u>  <b>NQRAQ1</b> – <i>Air quality impact of development proposals</i>	No comment.



<p><b>NQRAQ2</b> – <i>Cumulative impact of developments on clean air and traffic congestion</i></p> <p><u>Recommendation</u></p> <p><b>NQRAQ3</b> – <i>Air quality monitoring and remediation</i></p>	
<p><b>Green Spaces and Environment</b></p> <p><u>Policies</u></p> <p><b>NQRGSE1</b> – <i>Discharges into watercourses</i></p> <p><b>NQRGSE2</b> – <i>Locally supplied evidence of flood risk</i></p> <p><b>NQRGSE3</b> – <i>Footpaths and access to the countryside</i></p> <p><u>Recommendations</u></p> <p><b>NQRGSE4</b> – <i>Developments bordering hedgerows</i></p> <p><b>NQRGSE5</b> – <i>Wicken Water Marsh Local Wildlife Site – maintenance and access</i></p>	<p><b>NQRGSE4:</b> 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><b>NQRGSE5:</b> 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 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,</p>

<p><b>NQRGSE6 – Sewerage systems</b></p>	<p>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:</p> <p><i>“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.”</i></p> <p>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.</p> <p>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><b>Education and Health</b></p> <p><u>Policies</u></p> <p><b>NQREH1 – General Practice</b></p> <p><b>NQREH2 – Primary school places</b></p>	<p>No comment.</p>
<p><b>Heritage</b></p> <p><u>Recommendation</u></p> <p><b>NQRHER1 – Consider Article 4 protections for Quendon &amp; Rickling</b></p>	<p>No comment.</p>
<p><b>Housing Allocation Policies</b></p> <p><u>Policies</u></p> <p><b>NQRHA1 – Coherence of villages</b></p>	<p><b>NQRHA1:</b> We object to this policy as it is overly restrictive of development outside of development limits. This restriction</p>

**NQRHA2 – Building on Brownfield Sites**

is extremely onerous, unjustified and fails to have regard to the national policy presumption in favour of sustainable development.

It also lacks clarity as the bullet points do not appear to 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”.

**NQRHA3 – Connection to the countryside**

**NQRHA3:**

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.

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.

As drafted, the policy would prevent all forms of development, including agricultural buildings and operations which would place a disproportionate burden 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...”

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.

**NQRHA4 – Building in the countryside**

**NQRHA4:**

We object to the inclusion of a list of evidence base documents which are stated as those which should inform

<p><b>NQRHA5 – No Policy</b></p> <p><b>NQRHA6 – Foxley House, Quendon, site allocation. (Ref ‘2 Que 15’)</b></p>	<p>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>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.</p> <p>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><b>Housing Planning and Design Policies</b></p> <p><u>Policies</u></p> <p><b>NQRHD1 – Parking Standards</b></p> <p><b>NQRHD2 – Housing Design</b></p> <p><b>NQRHD3 – Use of Specimen Trees</b></p>	<p>No comment.</p>

<p><b>NQRHD4</b> – <i>House sizes</i></p> <p><b>NQRHD5</b> – <i>Affordable homes and local connection</i></p> <p><b>NQRHD6</b> – <i>Affordable housing</i></p>	
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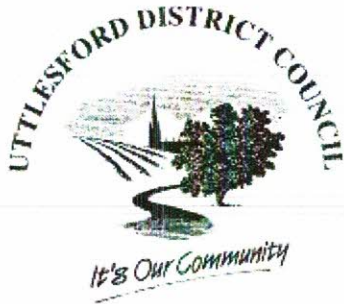
<p><b>Sports, Community Leisure Policies</b></p> <p><b>NQRSCLI</b> – <i>Retaining and enhancing existing community facilities</i></p> <p><b>NQRSCL2</b> – <i>Financial contributions from development</i></p> <p><b>NQRSCL3</b> – <i>Provision of amenity space and for ball sports</i></p> <p><b>NQRSCL4</b> – <i>Retention of sports fields</i></p> <p><b>NQRSCL5</b> – <i>Improve the facilities at Newport Recreation Ground</i></p>	<p>No comment.</p>

Would you like to be notified of Uttlesford District Council’s decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to adopt the Newport Quendon & Rickling Neighbourhood Plan?

Yes     Yes

No   

**Thank you for completing this response form.**



Internal Use Only

Representation Number:

## **Newport Quendon & Rickling Neighbourhood Plan Publication Consultation**

### **Response Form**

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**Section 2** to provide your details

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**\*Your name and comments will be made public, but any address, telephone and email address will remain confidential.**

**2. YOUR DETAILS**

Please confirm below your name and email **or** postal address. You are not obliged to provide your details; however we will be unable to process any comments you make.

**Contact**

**Name**

CHRIS ANDERSON

**Email**

[REDACTED]

**Or Postal**  
**Address**

[REDACTED]

We will keep a record of your consent for 7 years, after which it will be destroyed. For more information on how we collect, use and protect personal information generally, please visit <https://www.uttlesford.gov.uk/privacy-notice>



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- Check information you have provided, or information about you that someone else has provided, with other information it holds.

The Council will not give information about you to anyone else, or use information about you for other purposes, unless the law allows this.

**1) Your details**

Name	CHRIS ANDERSON
Organisation (if applicable)	RESIDENTIAL DEVELOPMENT LAND AGENT LTD
Address	BARKERS FARMHOUSE GRANGE ROAD, DUXFORDS CAMBRIDGE CB22 4QF
Email	[REDACTED]
Telephone	[REDACTED]

**2) Your representations**

Please specify which paragraph or policy your representations relates to and if you are suggesting any amendments. Please use a separate sheet if you need more space.

<b>The Plan as Whole</b>	<b>Comments</b>  See Separate Continuation Sheet
<b>Chapter of the Plan</b>	<b>Comments</b>
<b>Chapter 1</b> What is a Neighbourhood Plan and why does it matter?	

## NEWPORT, QUENDON & RICKLING NEIGHBOURHOOD PLAN

PUBLIC CONSULTATION ( 17/09/2019 - 29/10/2019 )

Response form – Continuation Sheet

### **2 0 The Plan as Whole**

The Plan is supported and informed by various documents including the Newport Transport Study ( Railton TPC Ltd , July 2019 ) - NTS.

A review of the NTS by SLR Consulting Limited ( and which is attached to this response ) reveals significant flaws within the NTS.

The NTS only serves to determine that if all development in Newport were to be implemented, the overall highway network would exceed capacity in the morning/peak hour. What it fails to do , and therefore why, for the purposes of adequately informing the Neighbourhood Plan it is not considered material or suitably informed for determining planning applications in isolation , is that it fails to identify what quantum of development could be accommodated and where ,such that a strategy for development in Newport can be supported .

By inference, the finding that if all developments were to proceed the system would be unable to accommodate the associated traffic generation fails to inform the development process as to what level of development could be accommodated in Newport, or indeed any settlement that results in additional traffic routing through Newport . As written the ultimate conclusion that could be drawn from the NTS would be that any development , even a single dwelling in Newport, or a development further afield, would be resisted for this reason.

As such, the supporting NTS is contrary to the aims of the Neighbourhood Plan which it fails adequately to inform and as such should not be considered a material document.

<p><b>Chapter 2</b> Local and national planning policy and Essex Design Guide</p>	
<p><b>Chapter 3</b> Newport, Quendon &amp; Rickling; the villages</p>	
<p><b>Chapter 4</b> Key Issues influencing the Neighbourhood Plan</p>	
<p><b>Chapter 5</b> Process, Vision, Aims &amp; Objectives</p>	



## Chapter 6 – Policies and Recommendations

### Business & Local Economy

#### Policies

**NQRBL1** – *Support of new and existing business*

**NQRBL2** – *Change of use on upper floors*

**NQRBL3** – *Business parking*

**NQRBL4** – *High speed internet connection*

### Air Quality

#### Policies

**NQRAQ1** – *Air quality impact of development proposals*

**NQRAQ2** – *Cumulative impact of developments on clean air and traffic congestion*

#### Recommendation

**NQRAQ3** – *Air quality monitoring and remediation*

### Green Spaces and Environment

#### Policies

**NQRGSE1** – *Discharges into watercourses*

<p><b>NQRGSE2</b> – <i>Locally supplied evidence of flood risk</i></p> <p><b>NQRGSE3</b> – <i>Footpaths and access to the countryside</i></p> <p><u>Recommendations</u></p> <p><b>NQRGSE4</b> – <i>Developments bordering hedgerows</i></p> <p><b>NQRGSE5</b> – <i>Wicken Water Marsh Local Wildlife Site – maintenance and access</i></p> <p><b>NQRGSE6</b> – <i>Sewerage systems</i></p>	
<p><b>Education and Health</b></p> <p><u>Policies</u></p> <p><b>NQREH1</b> – <i>General Practice</i></p> <p><b>NQREH2</b> – <i>Primary school places</i></p>	
<p><b>Heritage</b></p> <p><u>Recommendation</u></p> <p><b>NQRHER1</b> – <i>Consider Article 4 protections for Quendon &amp; Rickling</i></p>	
<p><b>Housing Allocation Policies</b></p> <p><u>Policies</u></p> <p><b>NQRHA1</b> – <i>Coherence of villages</i></p>	

<p><b>NQRHA2</b> – <i>Building on Brownfield Sites</i></p> <p><b>NQRHA3</b> – <i>Connection to the countryside</i></p> <p><b>NQRHA4</b> – <i>Building in the countryside</i></p> <p><b>NQRHA5</b> – <b>No Policy</b></p> <p><b>NQRHA6</b> – <i>Foxley House, Quendon, site allocation. (Ref '2 Que 15')</i></p>	
<p><b>Housing Planning and Design Policies</b></p> <p><u>Policies</u></p> <p><b>NQRHD1</b> – <i>Parking Standards</i></p> <p><b>NQRHD2</b> – <i>Housing Design</i></p> <p><b>NQRHD3</b> – <i>Use of Specimen Trees</i></p> <p><b>NQRHD4</b> – <i>House sizes</i></p> <p><b>NQRHD5</b> – <i>Affordable homes and local connection</i></p> <p><b>NQRHD6</b> – <i>Affordable housing</i></p>	
<p><b>Roads and Moving Around Policies</b></p> <p><b>NQRTR1</b> – <i>Extension of speed limits and footways</i></p>	

<p><b>NQRTR2</b> – <i>Mitigation of traffic impacts</i></p> <p><b>NQRTR3</b> – <i>Safe access to schools and village facilities</i></p> <p><u>Recommendations</u></p> <p><b>NQRTR4</b> – <i>Cycleway</i></p> <p><b>NQRTR5</b>– <i>Impact of development of Carver Barracks</i></p> <p><b>NQRTR6</b> – <i>Speeding and crossing the road</i></p> <p><b>NQRTR7</b>– <i>Parking and road safety in Quendon</i></p> <p><b>NQRTR8</b> – <i>Joyce Frankland Academy expansion</i></p>	
<p><b>Sports, Community Leisure Policies</b></p> <p><b>NQRSCLI</b> – <i>Retaining and enhancing existing community facilities</i></p> <p><b>NQRSCL2</b> – <i>Financial contributions from development</i></p>	



<p><b>NQRSCL3</b> – <i>Provision of amenity space and for ball sports</i></p>	
<p><b>NQRSCL4</b> – <i>Retention of sports fields</i></p>	
<p><b>NQRSCL5</b> – <i>Improve the facilities at Newport Recreation Ground</i></p>	

Would you like to be notified of Uttlesford District Council’s decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to adopt the Newport Quendon & Rickling Neighbourhood Plan?

**Yes**

**No**

**Thank you for completing this response form.**

## 1.0 Introduction

SLR Consulting Limited (SLR) has been instructed to provide a review and summary of the Newport Transport Study (NTS). The NTS was produced by Railton TPC Ltd. dated July 2019, as commissioned by the Newport Parish Council Neighbourhood Plan Steering Group.

## 2.0 NTS Context

The NTS states that:

*'The purpose of the report is to assess the potential adverse impacts of changes in traffic flows on the local highway network over the Neighbourhood Plan period. The need for a transport study arises as a result of significant housing development in the village over recent years and ongoing, that has led to concern about adverse impact in terms of congestion, safety and amenity. It is expected that the study will provide a rational basis for managing future development'.*

## 3.0 Document Review

The following provides a high-level review of the document in terms of its structure and methodology.

### 3.1.1 Structure

The NTS provides an introduction for context and then considers Transport Policy, existing conditions and identifies what are considered the key transport issues.

The report then reviews committed development, future traffic growth and assesses the performance of the highway network in future years with sensitivity tests. The NTS then discusses the identified issues concluding that in policy terms additional development would lead to a severe cumulative traffic impact.

### 3.1.2 Transport Policy

The NTS provides a review of relevant national and local transport policy.

The report also considers the role of Neighbourhood Plans and their reference in National Planning Policy Framework (NPPF) which is more of a general planning consideration than a highways and transport matter.

The policy review considers the NPPF and the Uttlesford Adopted (2005) and Emerging (2018) Local Plans, all of which are consistent with regards to the requirement for accessible development with sustainable transport options which do not have an unacceptable impact in terms of highway safety and operation.

Section 2.15 of the NTS refers to Paragraph 109 of the NTS which identifies the basis for judging the acceptability of development proposals in relation to the predicted level of transport impacts quoting:

*'109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.*

### **3.1.3 Existing Transport Conditions**

The NTS states at Section 1.2 that the study focuses on routes to and from the west of the village, in particular Bury Water Lane, Wicken Road and Frambury Lane.

The Existing Transport Conditions at Section 3 refers to a Location Plan at Figure 3.1 which highlights what it considers are the key highway links; Bury Water Lane, Wicken Road, Frambury Lane and Church Street. It also shows the location of the village shop, post office, bus stops and railway station.

This section considers accessibility in terms of pedestrian infrastructure and location of key facilities, highway safety with reference to data obtained from Crashmap, traffic flows from surveys undertaken in June 2019 and junction operation.

#### Junction Operation

Junction capacity analysis has been undertaken on the following junctions:

- Frambury Lane;
- Station Road;
- Wicken Road;
- Church Street; and
- Bury Water Lane.

The results showed that all of the junctions currently operate within their theoretical capacity.

However, the report does provide anecdotal comments on the Wicken Road/High Street junction occasionally building up queues of up to 10 vehicles caused by HGVs and on-street parking. It is said that this causes rat running along Church Street.

### **3.1.4 Current Key Transport Issues**

On the basis of the audit of existing conditions, the NTS has identified the following key transport issues:

1. High traffic flows on the B1383 in combination with on-street parking south of Wicken Road lead to queues and delays on the B1383 through the village;
2. Vehicles parked on footways presents risks to pedestrians and makes pedestrian movement along the B1383 more difficult (reducing pedestrian amenity);
3. Limited pedestrian crossing facilities on the B1383, coupled with high traffic flows on the B1383 leads to community severance, forcing many pedestrians to cross in the absence of designated facilities;
4. Absent or narrow footways lead to increased pedestrian risk and reduced pedestrian amenity on the eastern section of Bury Water Lane, on Church Street and at the junction of Wicken Road with the B1383;
5. The lack of footways along the eastern end of Bury Water Lane causes severance for those living in housing accessed via Bury Water Lane;
6. The Wicken Road/B1383 and the Bury Water Lane/B1383 junctions are currently operating close to capacity during the AM peak hour;
7. There is significant conflict between vulnerable highway users, school buses and other vehicles on Bury Water Lane during school start and finish times;

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8. Much of Newport lies within a Conservation Area. This increases the sensitivity of the area to changes in traffic flows and the environmental impacts of traffic;
9. Sporadic queues of traffic on Wicken Road lead to drivers seeking to rat-run along Church Street to avoid delays at the Wicken Road/B1383 junction; and
10. It is understood that levels of air pollution along the B1383 and, in particular, in the vicinity of the Wicken Road/B1383 junction are currently approaching or exceeding acceptable standards.

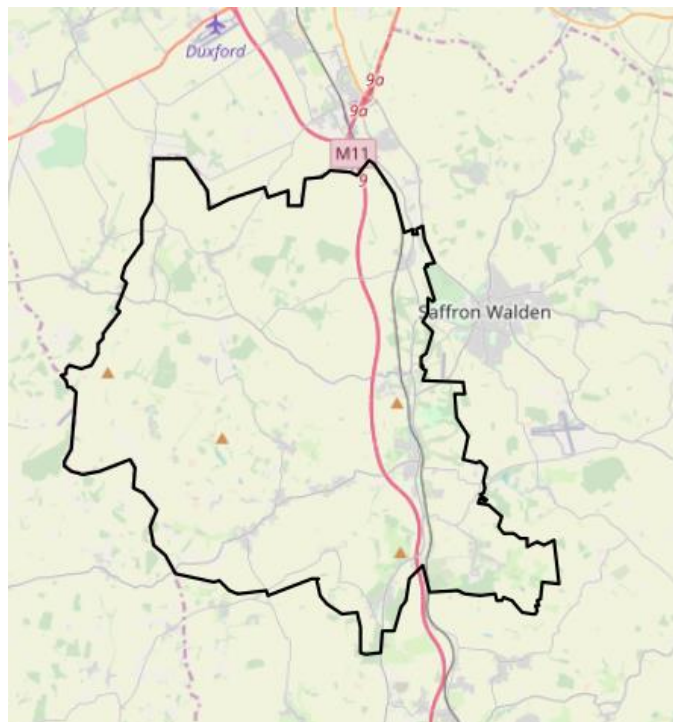
### 3.1.5 Committed Development and Traffic Growth

Committed development and Traffic growth have been applied to the background traffic flows to present horizon year scenarios of 2024, 2029 and 2034.

Committed development has been determined using the Uttlesford Planning Portal. Some of the dwellings within these committed developments are now occupied, this has been quantified using the electoral register. It is unclear how accurate this method is. Unoccupied committed development has been subtracted from the traffic growth calculations.

Traffic Growth was based on the Middle Super Output Area 003 which is shown within Figure 1.

**Figure 1**  
**Uttlesford MSOA 003**



The growth factors are based on an additional 409 dwellings within the above area by 2034, which represents an 11-12% increase in peak hour traffic by 2034.

### 3.1.6 Future Performance of the Highway Network

Junction operation has been assessed using the industry standard software Junctions 9, which assesses non-signalised junctions. The sensitive junctions have been identified as:

- Wicken Road/B1383; and
- Bury Water Lane/B1383.

These junctions have been modelled during the horizon year of 2024, 2029 and 2034. The PM peak has no concerns and operates within adequate reserve capacity during all scenarios.

However, the Wicken Road junction operates at the limits of what is considered to be acceptable during 2029 and 2034.

The Bury Water Lane junction operates beyond the limits of what is considered to be acceptable during 2024, 2029 and 2034.

Further to the above, the NTS has undertaken sensitivity tests based upon the following submitted planning applications which are at appeal:

- 17/2868 - Land South of Wicken Road – 150 dwellings;
- 18/1026 - Land North of Wicken Road – 75 dwellings; and
- 18/0739 – North of Bury Water Lane (Joyce Frankland Academy).

The sensitivity tests demonstrate that the potential traffic generated by the above developments exacerbate delay at the Wicken Road/B1383 and Bury Water Lane/B1383 junctions, particularly the Wicken Road/B1383 junction through which the majority of the additional traffic has been distributed.

## 4.0 Commentary

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.

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.

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.

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.

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# **Newport, Quendon & Rickling Neighbourhood Plan**

**Regulation 16 Consultation**

**Submission Version**



**October 2019**





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## **APPENDICES**

**Appendix A**    **Location Plan**

**Appendix B**    **Illustrative Masterplan**

# 1 INTRODUCTION

## 1.1 Context

- 1.1.1 These representations provide the response of Gladman Developments Limited (Gladman) to current consultation held by Uttlesford District Council (UDC) on the submission version of the Newport, Quendon & Rickling Neighbourhood Plan (NQRNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.
- 1.1.3 As Newport Parish Council and Uttlesford District Council are aware, Gladman are promoting a site within the Parish for residential development. This site is located at land north of Wicken Road, Newport. The site is capable of accommodating up to 74 dwellings (including 40% affordable) and could significantly contribute to meeting the housing needs in Uttlesford. It furthermore represents a logical and appropriate site for development in Newport, and the site is available, achievable and suitable for residential development. A location plan and illustrative Masterplan is available at Appendix A and Appendix B respectively.
- 1.1.4 Through these representations, Gladman provides an analysis of the NQRNP and the policy decisions promoted within the draft plan. Comments made by Gladman are provided in consideration of the NQRNP's vision, objectives and suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Planning chapter of the Planning Practice Guidance (PPG).
- 1.1.5 In accordance with the Neighbourhood Plan Basic Conditions, Neighbourhood Plan policies should align with the requirements of the National Planning Policy Framework (NPPF 2019) and the wider strategic policies for the area set out in the Council's adopted Development Plan. Neighbourhood Plans should provide a policy framework that complements and supports the requirements set out in these higher-order documents, setting out further, locally-specific requirements that will be applied to development proposals coming forward.
- 1.1.6 The NQRNP should only be progressed if it meets the Neighbourhood Plan Basic Conditions, supported by a robust and proportionate evidence base.

1.1.7 This submission focuses on the following:

- Legal Compliance;
- Regard to national policy and guidance;
- Neighbourhood Plan vision, objectives and policies; and
- Site submission

## **2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE**

### **2.1 Legal Requirements**

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

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority;
- f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
- g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

## 3 NATIONAL POLICY AND GUIDANCE

### 3.1 National Planning Policy Framework

3.1.1 On the 24<sup>th</sup> July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework (NPPF/the Framework). The first revision since 2012, it implemented 85 reforms announced through the Housing White Paper. This version of the NPPF was itself superseded on the 19<sup>th</sup> February 2019, with the latest version, largely only making alterations to the Government’s approach for the Appropriate Assessment as set out in Paragraph 177 of the NPPF.

3.1.2 Paragraph 214 of the 2019 NPPF sets out the transitional arrangements for the implementation of revised national planning policy. Paragraph 214 confirms that development plan documents submitted on or after the 24<sup>th</sup> January 2019 will be examined against the latest version of the NPPF. Given that the NQRNP was submitted for Examination after this date, the comments provided within this representation reflect the national policy requirements as set out in the NPPF2019.

3.1.3 The NPPF (2019) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirms the Government’s commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:

**“The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”**

3.1.4 Paragraph 14 further states that:

**“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:**

**a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;**

**b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement;**

- c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and**
- d. The local planning authority's housing delivery was at least 45% of that required over the previous three years."**

3.1.5 The NPPF (2019) also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed before the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan for and consider the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

3.1.6 In order to proceed to referendum, the Neighbourhood Plan will need to be tested through independent examination in order to demonstrate that they are compliant with the basic conditions and other legal requirements before they can come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.

## **3.2 Planning Practice Guidance**

3.2.1 Following the publication of the NPPF (2018), the Government published updates to its Planning Practice Guidance (PPG) on 13<sup>th</sup> September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.

3.2.2 Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and consider the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted

Development Plan<sup>1</sup>. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.

- 3.2.3 It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement as a minimum. Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward.

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<sup>1</sup> PPG Reference ID: 41-009-20160211



## 4 DEVELOPMENT PLAN

### 4.1 Relationship to Local Plans

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

4.1.2 The adopted Development Plan relevant to the preparation of NQRNP and the Development Plan which the NQRNP will be tested against is the Uttlesford Local Plan (ULP). This document was adopted in January 2005 and sets out the Council's vision, objectives, spatial strategy and overarching policies to guide development in the District over the period 2000 to 2011. However, it is important to note that the adopted Development Plan is time expired against the requirements of the NPPF 2019.

4.1.3 UDC has submitted its emerging Local Plan (eLP) for examination and is still ongoing. The eLP will cover the period 2011 to 2033. Policy SP2 sets out the Council's spatial strategy which seeks to distribute the majority of development towards the towns of Saffron Walden, Great Dunmow and the new Garden Communities at Easton Park and North Uttlesford.

4.1.4 Policy SP3 sets the housing requirement for Uttlesford during the plan period and identifies a provision for at least 14,000 dwellings to be delivered. Newport is identified as a Key village which provides a range of services to the surrounding rural area. Due to the existing facilities and services such areas will be a major focus for development in rural areas suitable for a scale of development that will reinforce their role as provider of services to a wide rural area. Quendon and Rickling are identified as a Type A village which act as a local service centre and are suitable for a scale of development that reinforces their role as a local service centre.

4.1.5 Given that the outcome of the Local Plan examination is still uncertain it is important that the Plan provides flexibility to ensure that the NQRNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

**'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'**

## **5 NEWPORT, QUENDON & RICKLING NEIGHBOURHOOD PLAN**

### **5.1 Context**

5.1.1 These representations are made in response to the current consultation on the submission version of the NQRNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This section of the representation highlights the key points that Gladman raise with regard to the content of the NQRNP as currently proposed.

### **5.2 Vision and Objectives**

5.2.1 In principle, Gladman support the Plan's vision which seeks to allow for long-term economic and social growth together with sustainable development. In addition, Gladman also support Objective 8 of the Plan which seeks to ensure new housing is delivered in response to proven housing shortage in a range of tenures, types and sizes to ensure local people of all ages are able to continue to live in the area.

5.2.2 However, it is unclear how the Parish Council will achieve these aspects of the Plan's vision and objectives given that it has not identified a housing target figure or identified additional housing sites to assist the local planning authority to meet its housing needs. This will be discussed in further detail in section 5.3 of these representations.

### **5.3 Neighbourhood Plan Policies**

5.3.1 This section of the representations provides Gladman's comments on the draft NQRNP's policies. As currently proposed, Gladman believe that a number of the NQRNP's policies require further modification, before they can be considered consistent with the Neighbourhood Plan Basic Conditions. Gladman's concerns relate to the following policies:

#### **NQRAQ1: Air quality impact of development proposals**

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.

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.

Gladman would question how this assessment would be practically undertaken and how it could account for vehicles which are driving through the settlement as 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.

- 5.3.4 The evidence supporting this policy appears to be largely based on the evidence provided for in relation to a recent planning appeal<sup>2</sup>. 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 NO<sub>2</sub> concentrates would not be significant<sup>3</sup>.
- 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.
- 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.

### **NQRAQ2: Cumulative impact of developments on clean air and traffic congestion**

- 5.3.7 Policy NQRAQ2 states that in order to address poor 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.
- 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.
- 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.

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<sup>2</sup> Ref: UTT/17/2868/OP

<sup>3</sup> PINS Reference: APP/C1570/W/18/3209655 Paragraph 77

### **NQRAQ3: Air quality monitoring and remediation**

- 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 m<sup>3</sup> 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.

### **NQRGSE2: Locally supplied evidence of flood risk**

- 5.3.11 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.

### **NQRGSE3: Footpaths and access to the countryside**

- 5.3.12 The above policy relates to links to existing footpaths and rights of way. The policy states 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 will not be supported.
- 5.3.13 Gladman are concerned with the second element of this policy which states that 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 will not be supported. 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.

## **NQREH2: Primary school places**

- 5.3.14 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.
- 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.
- 5.3.16 Gladman recommend that this policy is deleted.

## **NQRHA1: Coherence of the village**

- 5.3.17 Policy NQRHA1 relates to future development to address the linear layout of Newport. It states that in order to retain the coherence of the villages and reduce dependence on travel by car, development proposals will be supported if of a scale and setting relating well to the village within the Development Limits. It further states further development along the B1383 beyond the development limits will not be supported and any development beyond the development limits will not be supported other than a narrow set of circumstances i.e. infill development, rural exception site etc.
- 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 degree of flexibility. The following wording is put forward for consideration:

**“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:**

- **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.**

**Development adjacent to the existing settlement will be supported provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”**

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 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.”**

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.

### **NQRHA2: Building on Brownfield Sites**

5.3.21 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.

### **NQRHA3: Connection with the countryside**

5.3.22 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.

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.

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).”.**

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 appropriateness<sup>4</sup>. 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 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.

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.

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<sup>4</sup> PPG Reference ID: 67-009-20190722

- 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.
- 5.3.28 Gladman recommend that this policy is deleted in its entirety as it is in conflict with basic conditions (a) and (d).

#### **Policy NQRHA4: Building in the countryside**

- 5.3.29 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.
- 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.
- 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<sup>5</sup>
- 5.3.32 Gladman reiterate the fact that opinions on 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.
- 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).

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<sup>5</sup> PPG Reference ID: 8-036-20190721



## **NQRHA6: Foxley House, Quendon**

- 5.3.34 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.
- 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 PPG<sup>6</sup>. 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.

## **NQRHD1: Parking Standards**

- 5.3.36 Policy NQRHD1 requires parking arrangements to be in compliance with UDC eLP Policy D2, Essex Parking Standards 2009 and UDC Residential Parking Standards 2013.
- 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.
- 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.

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<sup>6</sup> PPG Reference ID: 41-009-20190509

## **NQRHD2: Housing Design**

- 5.3.39 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 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.
- 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”.**

- 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.

## **NQRHD4: House Sizes**

- 5.3.42 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 with evidenced local demand.
- 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.
- 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.

#### **NQRHD5: Social homes and local connection**

- 5.3.45 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.

## **6 SITE SUBMISSION**

### **6.1 Context**

6.1.1 Gladman are presently promoting the site at land north of Wicken Road, Newport for residential development. As explained earlier in these representations, the site is capable of accommodating up to 74 dwellings (including 40% affordable). It is submitted here that the site represents a logical and sustainable location for development, and this section highlights the key points that Gladman raise with regard to the suitability of the site to provide housing.

### **6.2 Locational sustainability of Newport**

6.2.1 Newport is identified as a Key Village in the eLP due to its role as a provider of services to a wide rural area. As set out in eLP Policy SP2, Key Villages (including Newport) will be the major focus for development in rural areas in order to reinforce their role as service providers. The locational sustainability and capacity of Newport to accommodate further housing development was confirmed by the Inspector at the recent land south of Wicken Road appeal<sup>7</sup>. Specifically, the Inspector comments in his appeal decision [§15] that:

“...On the basis of its location and facilities, both main parties agree that the village is a sustainable location for some housing development. I concur with this view.”

6.2.2 The principle that Newport is a sustainable location for housing development was also agreed by the main parties at the recent planning inquiry concerning the erection of up to 74 dwellings on the site<sup>8</sup>.

### **6.3 Suitability and sustainability of the site**

6.3.1 In respect of the site itself, the site comprises a parcel of undeveloped land fronting onto Wicken Road. It is currently in agricultural use; and there are no existing uses on the site which would prevent its development in the short-term and it is available for development now. The site represents a sustainable location for residential development and its development would make a positive contribution towards meeting the District’s growing housing needs.

6.3.2 The site lies adjacent to the built-up area of Newport. The urban form, topography and established landscape structure surrounding the site would negate any visual landscape impacts or perception of encroachment into the countryside arising from its development. It is well-connected to local facilities and services, employment opportunities and other key destinations. The site is also well-connected to existing infrastructure and is relatively contained.

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<sup>7</sup> Ref: APP/C1750/W/18/3209655

<sup>8</sup> Ref: APP/C1750/W/19/3223694

6.3.3 The suite of documentation submitted in support of the outline application<sup>9</sup> for development on the site and the appeal demonstrate that the site is not constrained by any technical or environmental constraints. Furthermore, these documents support and evidence the fact that the development of the site would deliver the economic, social and environmental dimensions of sustainable development as follows:

#### **Economic Role**

6.3.4 The site is situated within an accessible distance of a number of local employment opportunities, which can be accessed by cycling or walking. Furthermore, there are important employment clusters accessible from the site via sustainable transport modes – including the major district employment centre of Saffron Walden. Together, this makes Newport (and the site) a highly attractive place to live in respect of employment opportunities. Accordingly, the site is capable of providing convenient housing for the existing and future labour market in Newport (and Uttlesford). In a similar vein, the provision of housing on the site will generate additional annual household expenditure of which a proportion is likely to be spent locally in supporting services and facilities.

6.3.5 The development of the site will contribute to the local economy through the creation of construction jobs, and the household expenditure generated by the scheme will support additional employment opportunities in the District.

6.3.6 The provision of housing on the site will generate additional Council Tax payments to the Council. Furthermore, the Council will gain a direct contribution through the New Homes Bonus (provided by the Ministry of Housing, Communities & Local Government).

#### **Social Role**

6.3.7 The site will deliver much needed, high-quality family homes in a mixture of types and sizes to meet the housing demands of the local area. It is clear that housing development on the site could deliver much needed market and affordable housing and with this a mixed and balanced community capable of promoting social integration.

6.3.8 A policy-compliant provision of on-site affordable housing (40%) will be made, in an area where there is an existing unmet need.

6.3.9 As indicated on the illustrative Masterplan, the site is capable of providing a high-quality layout, which includes significant provision of open space including new ‘village green’ style public open space and a locally equipped area of play. The illustrative Masterplan demonstrates that the development will,

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<sup>9</sup> Ref: UTT/18/1026/OP. Outline application for up to 74 dwelling including access, open space, landscaping with all matters reserved except for means of access.

by virtue of its high-quality design and provision of on-site amenity space, promote healthy living and social integration.

#### **Environmental Role**

- 6.3.10 Any proposed development on the site would include retention of key existing ecological assets, and the delivery of new structural planting, while ecological enhancement measures would improve the potential of the site for wildlife. This would create the opportunity for net gains in biodiversity.
- 6.3.11 The Environment Agency flood maps confirm that the site is located entirely within Flood Zone 1, and as such is at low risk of flooding.
- 6.3.12 As referenced previously, the site lies adjacent the built-up area of Newport. Newport is identified as a Key Village, as part of the eLP. As such, a number of services and facilities are located either within walking/cycling distance or via public transport thus reducing the need to travel by private car.
- 6.3.13 The site is partly contained by existing built-form and the topography and established landscape structure surrounding the site would negate the perception of encroachment into the countryside and ensure the impact on the surrounding landscape and visual impacts is minimised.

## **6.4 Summary**

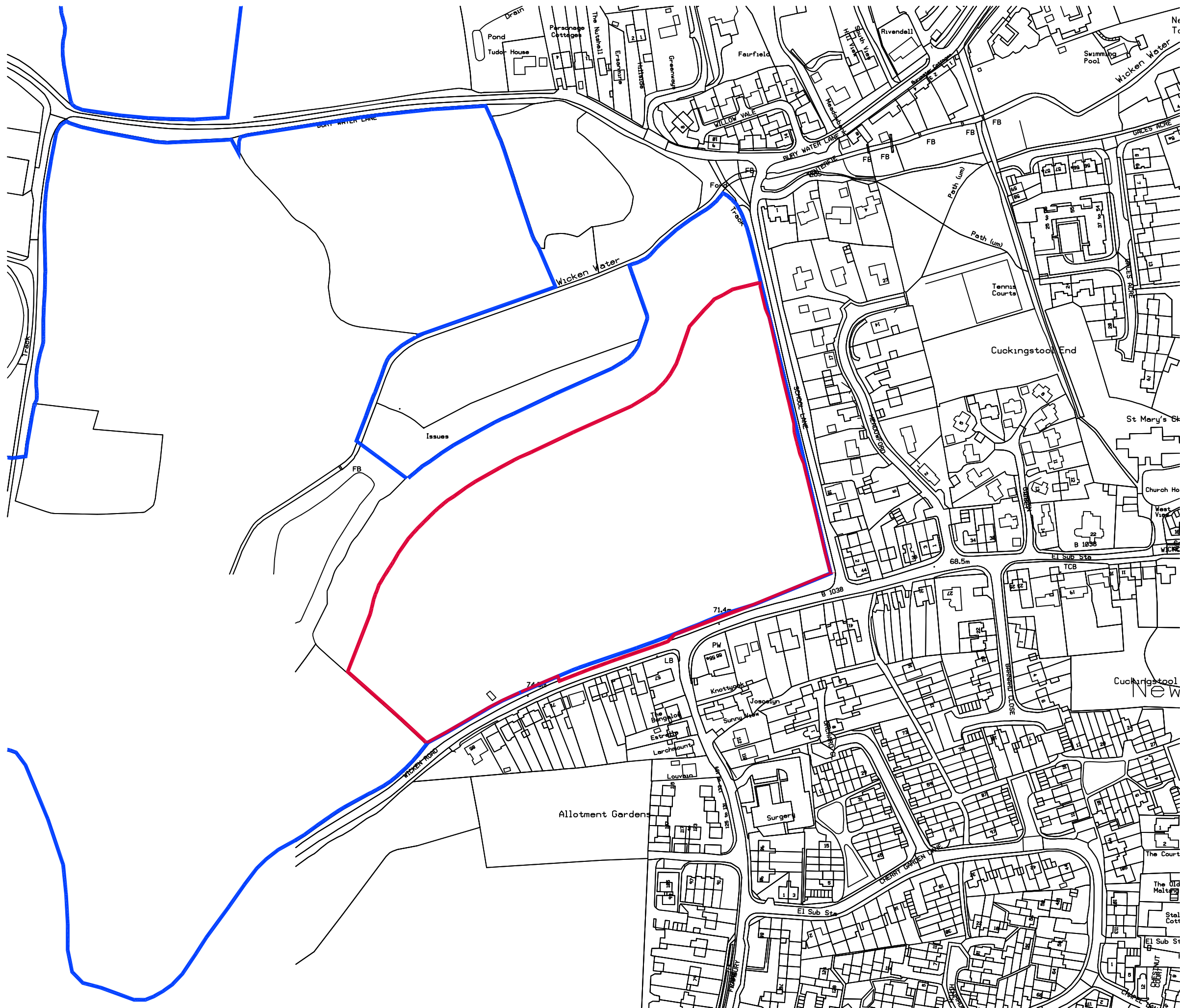
- 6.4.1 In consideration of the acknowledged need for new housing in Uttlesford and subsequent consideration of available opportunities for new development, it is considered that Newport and, specifically, the site, represent a logical and appropriate location for development.
- 6.4.2 The site is not constrained by any technical or environmental constraints, and is available, achievable and suitable for delivery of residential development.
- 6.4.3 Newport is a sustainable location for housing development, and the development of the site would contribute positively to meeting the Council's housing needs. The development of the site would also help to meet the Government's objective of significantly boosting the supply of housing.

## **7 CONCLUSIONS**

- 7.1.1 Gladman recognises the Government’s ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the NQRNP must be consistent with national planning policy and guidance. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum.
- 7.1.2 The Steering Group must ensure that the policies within the NQRNP allow for sufficient flexibility and are based on robust and justified evidence. As detailed through these submissions, we suggest that greater flexibility must now be built into the NQRNP’s proposals given the current uncertainty over the outcome of the eLP examination. Should the NQRNP fail to plan for this flexibility then there is a real risk that its proposals will need to be reviewed upon the adoption of the eLP, to remain an up-to-date part of the Development Plan for the Parish.
- 7.1.3 In a number of instances, the NQRNP’s policies are not in accordance with the requirements of national policy and guidance. These issues should be addressed through modification of the Plan to enable flexibility and to ensure the Plan’s policies are able to meet the basic conditions.
- 7.1.4 Should the Examiner decide it is necessary to hold a hearing session(s) to discuss the issues raised then Gladman formally request to participate at the examination in public.

## Appendix A





Notes:

REVISION	DATE	AMENDMENT
D	12/06/18	OWNERSHIP AMENDED
C	05/06/18	ADDITIONAL LAND OWNERSHIP SHOWN
B	12/03/18	UPDATED TO REFLECT HIGHWAYS INPUT
/	04/07/17	FIRST ISSUE

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SCHEME:  
**LAND SOUTH OF BURY WATER LANE  
 NEWPORT CB11 3UA**

TITLE:  
**SITE PLAN**

PAPER SIZE: A3L  
 SCALE: 1:2500  
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 CHECKED BY: RUB 29/8/17

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 REVISION D














## Appendix B

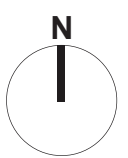
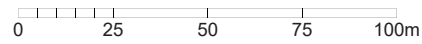




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-  Site Boundary (4.97ha)
  -  Land in same ownership (1.46ha)
- 
- Built Development**
-  Proposed Residential Area  
Up to 74 dwellings at 24 dph (3.14ha)
- 
- Access**
-  Proposed vehicular access
  -  Indicative Vehicular Access Road
  -  Existing Public Rights of Way
  -  Potential pedestrian connections
  -  Potential location for parking spaces
- 
- Green Infrastructure** (1.83ha)
-  Existing Vegetation (indicative)
  -  Indicative structural planting
  -  Potential location for attenuation basin
  -  Potential location for equipped play area
  -  Views towards St Mary's Church retained



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Gladman Developments Ltd  
Land at Wicken Road  
Newport

## ILLUSTRATIVE MASTERPLAN

1:1000 @ A1 1:2000 @ A3

19th July 2019 CEP / MGH

**8810-L-04 rev. A**

masterplanning  
 environmental assessment  
 landscape design  
 urban design  
 ecology  
 architecture  
 arboriculture

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Internal Use Only

Representation Number:

## **Newport Quendon & Rickling Neighbourhood Plan Publication Consultation**

### **Response Form**

**Consultation period ends: Tuesday 29 October 2019 at 5pm**

Uttlesford District Council is inviting representations on the submission version of the Newport Quendon & Rickling Neighbourhood Plan.

Representations must have been received by Uttlesford District Council no later than **5pm on Tuesday 29 October 2019**. Representations after this date will not be considered.

Representations can be submitted by email to:

[planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk) or by post to

Uttlesford District Council  
London Road  
Saffron Walden  
Essex  
CB11 4ER

Respondents do not have to use this form to respond. All responses must be made in writing, either electronically or otherwise.

All responses will be made public with the respondents name and (if applicable) organisation. Anonymous responses cannot be accepted.

## UTTLESFORD DISTRICT COUNCIL – PLANNING POLICY

In accordance with the **General Data Protection Regulation** please complete:

**Section 1** if you are making comments (a representation) on the Neighbourhood Plan

**Section 2** to provide your details

### 1. USE OF PRIVATE DATA WHEN MAKING COMMENTS

**If you do not provide consent, we cannot process your comments and you may not be able to participate in the Neighbourhood Plan examination.**

Please tick this box to provide your consent to allow Uttlesford District Council to process your data, in accordance with the General Data Protection Regulation and Data Protection Act, so your comments on the Neighbourhood Plan can be processed.

**\*Your name and comments will be made public, but any address, telephone and email address will remain confidential.**

### 2. YOUR DETAILS

Please confirm below your name and email **or** postal address. You are not obliged to provide your details; however we will be unable to process any comments you make.

**Contact  
Name  
Email**

Colin Challenger

**Or Postal  
Address**

We will keep a record of your consent for 7 years, after which it will be destroyed. For more information on how we collect, use and protect personal information generally, please visit <https://www.uttlesford.gov.uk/privacy-notice>

## **PRIVACY NOTICE**

The Council will use the information you submit, or have submitted, in all correspondence to the Council to enable the council's planning policy section to consider any information, representation or evidence submitted to assist with the Newport Quendon & Rickling Neighbourhood planning examination.

Further information about Data Protection rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at:

<https://www.uttlesford.gov.uk/privacy-notice> Printed copies of the Council's Privacy Notices can be provided on request.

The Council will:

- Use the information you provide for the purpose of performing of its statutory duties.
- Make any disclosures required by law and may also share this information, both across council departments and with other local authorities and government organisations.
- Check information you have provided, or information about you that someone else has provided, with other information it holds.

The Council will not give information about you to anyone else, or use information about you for other purposes, unless the law allows this.

## 1) Your details

Name	Belinda Ellis and Colin Challenger
Organisation (if applicable)	Sir Arthur Ellis Will Limited ["AEW"]
Address	37 Warren Street, London, W1T 6AD
Email	[REDACTED]
Telephone	[REDACTED]

## 2) Your representations

Please specify which paragraph or policy your representations relates to and if you are suggesting any amendments. Please use a separate sheet if you need more space.

The Plan as Whole	Comments
	<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.</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 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 <i>neutral</i> and <i>like</i> 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 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 <i>Recommendations</i> and</p>

	whether or not they are policies. That needs to be made clear.
<b>Chapter of the Plan</b>	<b>Comments</b>
<b>Chapter 1</b> What is a Neighbourhood Plan and why does it matter?	
<b>Chapter 2</b> Local and national planning policy and Essex Design Guide	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.
<b>Chapter 3</b> Newport, Quendon & Rickling; the villages	
<b>Chapter 4</b>	



<p>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><b>Chapter 5</b> Process, Vision, Aims &amp; 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. The proposal is to protect 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. 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>

## Chapter 6 – Policies and Recommendations

### Business & Local Economy

#### Policies

**NQRBL1** – *Support of new and existing business*

**NQRBL2** – *Change of use on upper floors*

**NQRBL3** – *Business parking*

**NQRBL4** – *High speed internet connection*

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.

**NQRBL1** - Support the approach that existing businesses and commercial premises should be protected to ensure the commercial vitality of Newport.

### Air Quality

#### Policies

**NQRAQ1** – *Air quality impact of development proposals*

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.

**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

<p><b>NQRAQ2</b> – <i>Cumulative impact of developments on clean air and traffic congestion</i></p> <p><u>Recommendation</u></p> <p><b>NQRAQ3</b> – <i>Air quality monitoring and remediation</i></p>	<p>submission is not justifiable. It is unclear why residential developments should provide such an assessment yet commercial developments are not required to.</p> <p><b>NQRAQ2</b> - 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><b>Green Spaces and Environment</b></p> <p><u>Policies</u></p> <p><b>NQRGSE1</b> – <i>Discharges into watercourses</i></p> <p><b>NQRGSE2</b> – <i>Locally supplied evidence of flood risk</i></p> <p><b>NQRGSE3</b> – <i>Footpaths and access to the countryside</i></p> <p><u>Recommendations</u></p> <p><b>NQRGSE4</b> – <i>Developments bordering hedgerows</i></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><b>NQRGSE2</b> - 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 Common.</p> <p><b>NQRGSE3</b> - No technical evidence is presented to demonstrate that the views identified are in fact sensitive to change. The policy is inappropriate.</p>

<p><b>NQRGSE5 – Wicken Water Marsh Local Wildlife Site – maintenance and access</b></p> <p><b>NQRGSE6 – Sewerage systems</b></p>	
<p><b>Education and Health</b></p> <p><u>Policies</u></p> <p><b>NQREH1 – General Practice</b></p> <p><b>NQREH2 – Primary school places</b></p>	<p><b>NQREH1-</b> 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 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><b>NQREH2-</b> 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><b>Heritage</b></p> <p><u>Recommendation</u></p> <p><b>NQRHER1 – Consider Article 4 protections for Quendon &amp; Rickling</b></p>	
<p><b>Housing Allocation Policies</b></p> <p><u>Policies</u></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</p>



<p><b>NQRHA3</b> – <i>Connection to the countryside</i></p> <p><b>NQRHA4</b> – <i>Building in the countryside</i></p> <p><b>NQRHA5</b> – <b>No Policy</b></p> <p><b>NQRHA6</b> – <i>Foxley House, Quendon, site allocation. (Ref '2 Que 15')</i></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><b>Housing Planning and Design Policies</b></p> <p><u>Policies</u></p> <p><b>NQRHD1</b> – <i>Parking Standards</i></p> <p><b>NQRHD2</b> – <i>Housing Design</i></p>	<p><b>NQRHD2</b> 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><b>NQRHD3</b> – <i>Use of Specimen Trees</i></p> <p><b>NQRHD4</b> – <i>House sizes</i></p> <p><b>NQRHD5</b> – <i>Affordable homes and local connection</i></p> <p><b>NQRHD6</b> – <i>Affordable housing</i></p>	<p><b>NQRHD4</b> - 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><b>Roads and Moving Around Policies</b></p> <p><b>NQRTR1</b> – <i>Extension of speed limits and footways</i></p> <p><b>NQRTR2</b> – <i>Mitigation of traffic impacts</i></p> <p><b>NQRTR3</b> – <i>Safe access to schools and village facilities</i></p> <p><u>Recommendations</u></p> <p><b>NQRTR4</b> – <i>Cycleway</i></p> <p><b>NQRTR5</b>– <i>Impact of development of Carver Barracks</i></p> <p><b>NQRTR6</b> – <i>Speeding and crossing the road</i></p>	

<p><b>NQRTR7</b> – <i>Parking and road safety in Quendon</i></p> <p><b>NQRTR8</b> – <i>Joyce Frankland Academy expansion</i></p>	<p><b>NQRTR8</b> - 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.</p> <p>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.</p>
<p><b>Sports, Community Leisure Policies</b></p> <p><b>NQRSCLI</b> – <i>Retaining and enhancing existing community facilities</i></p> <p><b>NQRSCL2</b> – <i>Financial contributions from development</i></p> <p><b>NQRSCL3</b> – <i>Provision of amenity space and for ball sports</i></p> <p><b>NQRSCL4</b> – <i>Retention of sports fields</i></p>	<p><b>NQRSCL2</b> - 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.</p>



<b>NQRSCL5</b> – <i>Improve the facilities at Newport Recreation Ground</i>	
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Would you like to be notified of Uttlesford District Council's decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to adopt the Newport Quendon & Rickling Neighbourhood Plan?

**Yes**     **X**

**No**   

**Thank you for completing this response form.**



Internal Use Only

Representation Number:

## **Newport Quendon & Rickling Neighbourhood Plan Publication Consultation**

### **Response Form**

**Consultation period ends: Tuesday 29 October 2019 at 5pm**

Uttlesford District Council is inviting representations on the submission version of the Newport Quendon & Rickling Neighbourhood Plan.

Representations must have been received by Uttlesford District Council no later than **5pm on Tuesday 29 October 2019**. Representations after this date will not be considered.

Representations can be submitted by email to:

[planningpolicy@uttlesford.gov.uk](mailto:planningpolicy@uttlesford.gov.uk) or by post to

Uttlesford District Council  
London Road  
Saffron Walden  
Essex  
CB11 4ER

Respondents do not have to use this form to respond. All responses must be made in writing, either electronically or otherwise.

All responses will be made public with the respondents name and (if applicable) organisation. Anonymous responses cannot be accepted.

## UTTLESFORD DISTRICT COUNCIL – PLANNING POLICY

In accordance with the **General Data Protection Regulation** please complete:

**Section 1** if you are making comments (a representation) on the Neighbourhood Plan

**Section 2** to provide your details

### 1. USE OF PRIVATE DATA WHEN MAKING COMMENTS

**If you do not provide consent, we cannot process your comments and you may not be able to participate in the Neighbourhood Plan examination.**

Please tick this box to provide your consent to allow Uttlesford District Council to process your data, in accordance with the General Data Protection Regulation and Data Protection Act, so your comments on the Neighbourhood Plan can be processed.

**\*Your name and comments will be made public, but any address, telephone and email address will remain confidential.**

### 2. YOUR DETAILS

Please confirm below your name and email **or** postal address. You are not obliged to provide your details; however we will be unable to process any comments you make.

**Contact  
Name**

Colin Campbell

**Email**

████████████████████

**Or Postal  
Address**

We will keep a record of your consent for 7 years, after which it will be destroyed. For more information on how we collect, use and protect personal information generally, please visit <https://www.uttlesford.gov.uk/privacy-notice>

## **PRIVACY NOTICE**

The Council will use the information you submit, or have submitted, in all correspondence to the Council to enable the council's planning policy section to consider any information, representation or evidence submitted to assist with the Newport Quendon & Rickling Neighbourhood planning examination.

Further information about Data Protection rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at:

<https://www.uttlesford.gov.uk/privacy-notice> Printed copies of the Council's Privacy Notices can be provided on request.

The Council will:

- Use the information you provide for the purpose of performing of its statutory duties.
- Make any disclosures required by law and may also share this information, both across council departments and with other local authorities and government organisations.
- Check information you have provided, or information about you that someone else has provided, with other information it holds.

The Council will not give information about you to anyone else, or use information about you for other purposes, unless the law allows this.

## 1) Your details

Name	Colin Campbell
Organisation (if applicable)	Hill residential Ltd and Joyce Frankland Academy Trust Newport
Address	The Power House, Gunpowder Mill, Powdermill Lane, Waltham Abbey EN9 1BN
Email	[REDACTED]
Telephone	[REDACTED]

## 2) Your representations

Please specify which paragraph or policy your representations relates to and if you are suggesting any amendments. Please use a separate sheet if you need more space.

The Plan as Whole	Comments
	<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.</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”</p>

	<p>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>
Chapter of the Plan	Comments
<p><b>Chapter 1</b> What is a Neighbourhood Plan and why does it matter?</p>	
<p><b>Chapter 2</b> 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><b>Chapter 3</b> Newport, Quendon &amp; Rickling; the villages</p>	

<p><b>Chapter 4</b> 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><b>Chapter 5</b> Process, Vision, Aims &amp; 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 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>
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## Chapter 6 – Policies and Recommendations

<p><b>Business &amp; Local Economy</b></p> <p><u>Policies</u></p> <p><b>NQRBL1</b> – <i>Support of new and existing business</i></p> <p><b>NQRBL2</b> – <i>Change of use on upper floors</i></p> <p><b>NQRBL3</b> – <i>Business parking</i></p> <p><b>NQRBL4</b> – <i>High speed internet connection</i></p>	<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><b>NQRBL1</b> - Support the approach that existing businesses and commercial premises should be protected to ensure the commercial vitality of Newport.</p>
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<p><b>Air Quality</b></p> <p><u>Policies</u></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>
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<p><b>NQRGSE5 – Wicken Water Marsh Local Wildlife Site – maintenance and access</b></p> <p><b>NQRGSE6 – Sewerage systems</b></p>	
<p><b>Education and Health</b></p> <p><u>Policies</u></p> <p><b>NQREH1 – General Practice</b></p> <p><b>NQREH2 – Primary school places</b></p>	<p><b>NQREH1</b> - 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><b>NQREH2</b> - 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><b>Heritage</b></p> <p><u>Recommendation</u></p> <p><b>NQRHER1 – Consider Article 4 protections for Quendon &amp; Rickling</b></p>	
<p><b>Housing Allocation Policies</b></p> <p><u>Policies</u></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 particular objectives have been highlighted and why others have not. In our view, as this</p>



<p><b>NQRHA4</b> – <i>Building in the countryside</i></p> <p><b>NQRHA5</b> – <b>No Policy</b></p> <p><b>NQRHA6</b> – <i>Foxley House, Quendon, site allocation. (Ref '2 Que 15')</i></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><b>Housing Planning and Design Policies</b></p> <p><u>Policies</u></p> <p><b>NQRHD1</b> – <i>Parking Standards</i></p> <p><b>NQRHD2</b> – <i>Housing Design</i></p> <p><b>NQRHD3</b> – <i>Use of Specimen Trees</i></p> <p><b>NQRHD4</b> – <i>House sizes</i></p> <p><b>NQRHD5</b> – <i>Affordable homes and local connection</i></p> <p><b>NQRHD6</b> – <i>Affordable housing</i></p>	<p><b>NQRHD2</b> - 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><b>NQRHD4</b> - 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>

**Roads and Moving Around Policies**

**NQRTR1** – *Extension of speed limits and footways*

**NQRTR2** – *Mitigation of traffic impacts*

**NQRTR3** – *Safe access to schools and village facilities*

Recommendations

**NQRTR4** – *Cycleway*

**NQRTR5**– *Impact of development of Carver Barracks*

**NQRTR6** – *Speeding and crossing the road*

**NQRTR7**– *Parking and road safety in Quendon*

**NQRTR8** – *Joyce Frankland Academy expansion*

**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.

Elements of the Railton transport study are flawed and we do not consider that the transport assessment supports the approach of Neighbourhood Plan.

The study claims that there are conflicts between bus, cars and pedestrian outside the school. However, there is a dedicated pedestrian crossing which prioritises pedestrians and those

	<p>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><b>Sports, Community Leisure Policies</b></p> <p><b>NQRSCLI</b> – <i>Retaining and enhancing existing community facilities</i></p> <p><b>NQRSCL2</b> – <i>Financial contributions from development</i></p> <p><b>NQRSCL3</b> – <i>Provision of amenity space and for ball sports</i></p> <p><b>NQRSCL4</b> – <i>Retention of sports fields</i></p>	<p><b>NQRSCL2</b> - 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>

**NQRSCL5 – Improve the facilities at Newport Recreation Ground**

Add a new policy allocation JFAN for the development of further sports facilities.

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.

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.

A further pitch at JFAN is strongly supported by SWHC.

Add policy reading

“The following provision at Joyce Frankland Academy will be supported:

- a further full size artificial turf pitch
- additional netball and tennis courts
- artificial cricket wicket
- ancillary sporting facilities to support the above, if required”

Would you like to be notified of Uttlesford District Council’s decision under Regulation 19 of the Neighbourhood Planning (General) (Amendments) Regulations 2015 to adopt the Newport Quendon & Rickling Neighbourhood Plan?

Yes  X

No

**Thank you for completing this response form.**