



# Report to Telford and Wrekin Council

The Planning  
Inspectorate  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol BS1 6PN  
☎ 0117 372 8128

by **Lead Inspector Susan Holland**  
MA, DipTP, MRTPI and **Assistant**  
**Inspector Elizabeth Hill** BSc (Hons),  
BPhil, MRTPI  
appointed by the Secretary of State for  
Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (SECTION  
20)

REPORT ON THE EXAMINATION INTO THE TELFORD AND  
WREKIN CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for Examination on 3 October 2006  
Examination hearings held between 15 May and 20 June 2007

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## 1. Introduction

- 1.1 The purpose of an independent examination of a development plan document (DPD) is, according to Section 20(5) of the Planning and Compulsory Purchase Act 2004, to determine :
- (a) whether it satisfies the requirements of sections 19 and 24(1), regulations under section 17(7) and any regulations under section 36 relating to the preparation of development plan documents;
  - (b) whether it is sound.
- 1.2 This report gives our assessment of the Core Strategy (CS) for Telford and Wrekin Borough in terms of the above matters, along with our recommendations and the reasons for them, as required by section 20(7) of the 2004 Act. References to Core Documents in the examination library are shown thus [A1].
- 1.3 Our role has been to consider the submitted CS against the tests of soundness set out in ¶4.24 of Planning Policy Statement 12: Local Development Frameworks (PPS12). The presumption is that the DPD is sound unless it is shown to be otherwise. The Planning Inspectorate's Guide [J5] indicates that the scope for making changes to a submitted CS is limited, particularly where such changes might have implications for the sustainability appraisal or the consultation procedures already undertaken.
- 1.4 On 26 October 2006 the Department for Communities and Local Government (DCLG) announced that the Council had been successful in their bid for Growth Point Status [B21]. The press release included a statement that this would mean accelerated housing growth resulting in another 13,000 new houses by 2016 and up to 25,000 by 2025. We were concerned as to whether this would be growth additional to that proposed in the CS and the existing and emerging Regional Spatial Strategies (RSS). Therefore, an exploratory meeting, attended by officers from the Council, West Midlands Regional Assembly (WMRA) and the Government Office for the West Midlands (GOWM), was held on 5 January 2007.
- 1.5 From the discussions held, it emerged that the additional number of houses to be built would be in the region of 2,850 to 2021 within the Telford urban area, which would be achieved through higher growth rates than were envisaged in the adopted RSS. The consensus was that the identification of the new Growth Point in itself was not a reason to delay the progress of the CS through its examination.
- 1.6 In response to representations made on the submitted CS the Council produced amendments to policies CS1 and CS13 in the Position Statements on Main Matter 2 : the Level of Housing Provision [L2] and Main Matter 7: Flooding and the Distribution of Development [L9]. A further set of amendments in relations to policies CS5, CS7 and CS11 were produced prior to the last hearing session on 20 June 2007 [L11], with a final version of the proposed changes to ¶¶9.13.1 to 9.13.4 concerning the review of green space contained in an e-mail, dated 25 June 2007. The Council's view is that these changes are minor and would not affect the soundness of the plan.

Our report is directed at the CS as submitted, but we also comment on these proposed changes and address whether they would assist in making it sound. In the attached Schedule to the Report, we recommend (with appropriate amendments) those minor changes which were proposed by the Council in its Position Statement.

- 1.7 An Early Indication Statement was issued in respect of waste and minerals issues in the plan, following the hearing session on these issues on 24 May 2007. The reasons for the unsoundness of the CS in respect of these topics is expanded upon below.
- 1.8 The report begins by assessing the CS against the first three procedural tests, and by considering whether it is in conformity with the community strategy (Test 5). We then deal with matters and issues considered during the hearing sessions of the examination in terms of the other soundness tests of conformity, coherence, consistency and effectiveness.
- 1.9 Our overall conclusion is that the Core Strategy could be made sound only through the deletion of Policies CS16 (Waste) and CS17 (Minerals) and through the recommended changes. These include the reduction in the timespan of the CS to 2016. Unless the timespan of the CS is drastically reduced as recommended, the flaws which we have identified will progressively erode its soundness. Arising from a lack of openness in, and significant omissions from, the evidence base, these flaws cast doubt upon the capacity of the CS to provide adequately, and with the necessary flexibility, for new housing development: but would have practical effects likely to manifest themselves, primarily, only post-2016.
- 1.10 Whilst reduction in the timespan of the Core Strategy would not conform to the national planning guidance of PPS12, we consider that the circumstances of Telford and Wrekin are such that this highly unusual course of action is justified. It is not intended in any way to be a model for core strategies elsewhere.
- 1.11 In section 4, we discuss the remaining issues raised by the examination and advise how any elements of unsoundness could be eliminated through minor changes which would not go to the heart of the Core Strategy.

## **2. Procedural and Conformity with the Community Strategy Tests**

### ***Test 1 – Consistency with the Local Development Scheme***

- 2.1. The amended Telford and Wrekin Local Development Scheme 2006 (LDS) sets out a programme of planning policy documents which the Council expects to be working on until 2010 [H9]. It envisages that the CS and the Waste DPDs would be the first to progress to adoption. The CS is the overarching policy document that sets out the vision, objectives and strategy for the LDF and would provide the context for other Local Development Documents (LDDs). The LDS indicates that the CS and Waste DPDs would be followed by other DPDs, including Development Control Policies, Land Allocations, Minerals Policies and Proposals and Action Area Plans for Central Telford and South Telford.
- 2.2. The CS defines a spatial vision, strategic development objectives and a spatial strategy for the Borough, together with core policies. The CS is in

line with the thrust of the LDS, so that the first soundness test has been met.

***Test 2 – Compliance with the Statement of Community Involvement and associated Regulations***

- 2.3. The Statement of Community Involvement (SCI) [H3] was adopted in May 2006. The CS Preferred Options Report [H4] was the subject of consultation for a period of 6 weeks. A pre-submission Consultation Statement, dated October 2006 [H12] was prepared with reference to Regulation 28 of the (Local Development) (England) Regulations 2004. It identified the parties approached and consultation processes used in the Preferred Options report.
- 2.4. The CS submission document [H13] was subject to full public consultation. The Council prepared a database listing all representations, submitting it to the Inspectors with a full set of the representations received under Regulation 29 of the 2004 Act. A summary of the representations made was published in January 2007 [K9], from which the Council identified the main matters which were raised in representations as required by Regulation 31(2c)(iii) [K11]. The Hearing sessions of the Examination were advertised and persons notified in accordance with Regulation 34.
- 2.5. Growth Points are intended to be “subject to robust testing and public consultation through .. regional and local planning processes” (Partnership for Growth, DCLG, 20 October 2006). The exploratory meeting on 5 January 2007 covered the issue of how public consultation on the Growth Point would be handled, since the announcement of the Council’s successful bid came after the start of the public consultation period on the submission document.
- 2.6. It was suggested by the Council that the increase in housing could be accommodated on land which had been the subject of a sustainability appraisal, information on which was already in the public domain. Further public consultation on the sites chosen to accommodate the extra growth would be subject to public consultation procedures for the Land Allocations DPD. A proposed change to cover the Growth Point was put forward by the Council in their position statement on the levels of new housing growth. Therefore we consider that adequate public consultation will take place on this issue.
- 2.7. Therefore we conclude that the CS is sound in terms of test 2.

***Test 3 – Sustainability Appraisal***

- 2.8. The Council has carried out sustainability appraisals of the Core Strategy throughout its preparation, as indicated in the CS Preferred Options Report – Sustainability Appraisal [H7] and the CS – Final Sustainability Appraisal [H14]. The approach taken is that contained in the Government’s document, Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (Nov 2005). Each of the development options and the likely environmental and social impact of the CS have been properly assessed.
- 2.9. Therefore we conclude that the CS is sound in terms of Test 3.

### ***Test 5 – Regard to the community strategy***

2.10. The CS refers to the Community Strategy in ¶¶4.11-4.13 and to its role in identifying key development issues and the long-term vision for the area, set out in sections 5 and 6 of the CS. These are amplified in sections 2, 3 and 4 of the Technical Support Document [H15]. Therefore we conclude that soundness test 5 has been met.

### ***3. Test 4 – Conformity; Test 6 - Coherence, Consistency and Effectiveness; Test 7 – Appropriateness and Foundation; Test 8 – Implementation and Monitoring; Test 9 - Flexibility***

#### ***Housing provision***

3.1. The Core Strategy housing provision is stated in Policy CS1 to be consistent with adopted RSS (June 2004). Policy CS1 quotes the terms of the adopted RSS housing requirement – that it *permits a maximum of 1330 new dwellings per annum up to 2011, and a maximum of 700 new dwellings per annum 2011-2021*. The CS leaves unstated - as does the Housing Trajectory contained within the Technical Supporting Document [H15] – any intention to make up the shortfall accumulated, to 2006, against that requirement. CS ¶3.11.2 partially acknowledges the shortfall, without making clear its full extent (around 3000 dwellings). In evidence to the Examination the Council expressed conflicting views, at times relying on the fact that the requirement is a ‘maximum’, and at others stating that it intends to make up the shortfall, though without indicating in its revised Housing Trajectory at [L2] that it intends to do so.

3.2. Following consultation on the Spatial Options of the emerging revision RSS, WMRA now proposes to change the base date of the emerging RSS from 2001 to 2006. This measure would in effect wipe out the cumulative shortfall in Telford & Wrekin. However, the RSS Examination has not yet taken place, and this newly proposed change to RSS may not persist to adoption. Nevertheless, strictly speaking, the CS figures for housing provision, as expressed, are in conformity with the adopted RSS and in this respect are sound.

3.3. The DCLG ‘New Growth Point’ initiative adds an apparent complication. The Core Strategy was submitted in advance of confirmation of the T&W bid for NGP funding. Initial NGP funding is for investigation and feasibility studies aimed at bringing forward sites that might not otherwise yet be capable of development. These sites have not been specified but are understood to be currently included within the Urban Capacity Study [A25] which underpins the Core Strategy. The numbers involved (2850 dwellings) are said to be ‘additional’ but in practice appear to represent accelerated growth to be taken from the emerging RSS provision. In the event that the base date of the emerging RSS is changed as now proposed, there would be an approximate coincidence between the numbers of dwellings removed from the RSS housing requirement, and the ‘additional’ numbers to be brought forward under the NGP initiative. In these circumstances, reference to the New Growth Point can be accommodated via minor changes to the Core

Strategy. Reference to the numbers representing the New Growth Point should be made in Policy CS1, and in the Housing Trajectory, which should be relocated from the Technical Supporting Document to the Core Strategy itself.

- 3.4. The Core Strategy refers only to the adopted RSS and mentions neither the emerging RSS, nor the need for flexibility. This is surprising, given (a) that preparation of the CS must have overlapped with that of the emerging RSS, even though formal public consultation on the latter did not begin until January 2007; (b) that the timespan of the CS was always likely to overlap with that of emerging RSS; and (c) that PPS12 ¶2.14 states that *the core strategy should aim to look ahead to any longer-term time horizon which is set out in the relevant regional spatial strategy*. The requirement of Test 9 that the CS should be *reasonably flexible to enable it to deal with changing circumstances* would, together with the provision of PPS12 ¶2.14, strongly indicate a need for consideration to be given to emerging RSS. Leaving aside for the moment the question of the time horizon, the question of flexibility should first be considered.
- 3.5. The RSS Spatial Options vary widely in their potential consequences for housing growth in Telford & Wrekin for 2001-2026: from 24,000 (Option 1) through 30,000 (Option 2) to 36,000 (Option 3), with corresponding annual build rates (gross) of 960-1,200-1,440. Option 1 equates to the current adopted RSS levels with which the CS must be (and is) in conformity. However, the Option 2 and 3 figures exceed the levels assumed in the Core Strategy: Option 3, by far.
- 3.6. Clearly it would be difficult for the Core Strategy to demonstrate flexibility to Option 3 levels (even to 2021) whilst remaining in conformity with adopted RSS. At the time of writing, both GOWM and WMRA consider that the CS would demonstrate such flexibility if it accommodated housing development to Option 2 levels. (WMRA, according to its letter dated 12 July 2007 to Telford & Wrekin Council, and taking account of the 2004 Household Projections, now assumes a housing figure for Telford & Wrekin which equates to Option 2 levels). Whilst Core Strategies commonly have to cope with emerging RSS, the huge gap between past performance and the highest level of growth proposed in the emerging West Midlands RSS at Option 3 suggests that currently it would be quite unrealistic for Telford & Wrekin to put forward a core strategy which provided, even on the basis of 'flexibility', for the highest growth levels proposed in emerging RSS.
- 3.7. Nevertheless, it remains the case that the Revision RSS housing requirement is not yet firm even as a Preferred Option, and has not yet been set in adopted form. The Core Strategy must be seen to provide, not for a specific housing requirement but for flexibility, so that it is capable of dealing at a strategic level with changing circumstances. In the current climate in which Government consistently seeks both growth and acceleration of housing development, especially in urban areas, it is highly probable that in the context of Telford, flexibility is to involve varying degrees of up, rather than a range of up and down. At the very least, in order to cope with the potential for changing circumstances, the CS should demonstrate flexibility sufficient to encompass past shortfalls, NGP growth, and RSS Option 2 levels, plus some contingency.

- 3.8. The submission Core Strategy does not itself contain a housing trajectory: instead, a trajectory is included in the Technical Supporting Document [H15]. That housing trajectory is very limited in the information which it imparts, and is very difficult to interpret. As a suggested change put forward in its Position Statement, the Council has redesigned the trajectory in the form of a bar graph, with much-improved communication of the data (which have previously been made public through the appropriate process). Accordingly, it is recommended that the revised housing trajectory should be used, and that it should be incorporated into the CS as an Appendix.
- 3.9. The revised Housing Trajectory shows in the form of a bar graph for the period 2001-2006 the numbers of *recorded net dwellings*. By including, above the bar, a line showing the adopted RSS housing requirement, the Trajectory indicates the gap, or shortfall, between the two. For the period 2006-2011 the graph both substitutes *outstanding planning permissions*, and adds to the bar the category *strategic sites*. From 2009 the bar includes the additional category of *projected allocations*; and from 2011, the further additional category of *New Growth Point*. From 2011, when the adopted RSS requirement figure falls from 1330 to 700, these categories combine in each bar to exceed the adopted RSS requirement by approximately the amount of the earlier shortfalls (the evidence to the Hearings is that this is coincidental). From 2016, the *NGP* category disappears, to be replaced 2016-2021 by a correspondingly much larger category of *projected allocations*, the overall housing projection figures continuing at the same level as before. If (and only if) previous shortfalls are indeed to be written off, these overall projections would appear to correspond approximately to emerging RSS Option 2 levels.
- 3.10. However, having considered the core evidence in the light of discussions at Hearing sessions, we have come to question the Council's stated confidence that sufficient housing sites will be available to supply housing up to emerging RSS Option 2 levels; and that the Core Strategy contains sufficient provision for flexibility. There are several reasons for our doubts.
- 3.11. Firstly, the Core Strategy does not specify, for Telford, the numbers of dwellings to be provided at any spatial level below that of the town as a whole. This could be taken to stem from a reluctance to set numerical targets, or from an interpretation of '*broad locations*' to mean complete avoidance of detail within the urban area. But it suggests not so much flexibility, as vagueness.
- 3.12. Secondly, the lower-level DPD Preferred Options documents themselves appear to fail to follow Core Strategy policy which is to focus housing development within town and district centres. Instead, sites are allocated at varying – albeit accessible – distances from those centres. This is not merely a matter relating to the soundness of the lower-level DPDs and to be pursued only at that level, if it indicates (as it appears to do) that the potential is limited for securing the numbers necessary to meet RSS Option 2 levels, or to provide otherwise for flexibility, via currently identified sites.
- 3.13. Thirdly, no reference is made in the Core Strategy to the part played by demolitions, even in South Telford where the CS text at ¶3.11.12 refers to *neighbourhood renewal initiatives*, and ¶3.11.14 to *£173.5 million for housing acquisition, demolition and replacement*. The Housing Trajectory

does not include a category for demolitions. No reference is made to the possibility that the number of demolitions in the proposed Action Areas might exceed the (very low) levels assumed by adopted RSS – nor to the numbers and densities by which those demolitions are expected to be replaced. The extent of demolition (of high-density deck-access flats) and neighbourhood renewal in Woodside, South Telford is not made clear. The evidence base does not include the Preferred Options document for the South Telford Action Area DPD, and so the numbers of dwellings envisaged for the South Telford AA are not available. It is not possible to tell whether, and if so to what extent, replacement dwellings will have to be located elsewhere.

3.14. Fourthly, the Housing Trajectory is overwhelmingly dominated, post-2016, by ‘future allocations’ as yet unspecified, and which, for the following reasons, we now question:

(i) the Council’s apparent reliance upon ‘optimistic’ assumptions and weightings in estimating the likely housing yield from sites identified in the Urban Capacity Study [A25]. The assumptions include a ‘strong’ housing Market with continued price rises of 10% per annum (whereas the current market is ‘weak’ with rises of less than 5%); and also include densities of 45 dwellings per hectare, which reflect only the early high-density New Town estates, of the kind now proposed for replacement. Under different assumptions, capacity (according to the UCS) would be much less. Moreover, the proportion of ‘difficult’ sites in the UCS is not apparent;

(ii) the Council’s reliance (as acknowledged at the Hearing on Housing) upon the relaxation of the Telford urban boundary. The Core Strategy does not provide, either explicitly or implicitly, for such a relaxation. This is one of the ‘difficult decisions’ which the CS avoids (see Report under Settlement Strategy, below);

(iii) the Council’s reliance (on the basis of the Land Allocations DPD Preferred Options Report [H5]) upon sites which are designated as Green Network: to the extent of up to 600 dwellings on 3 separate sites. (These are HSG06 [77dwellings]; HSG07 [116 dwellings] and MU02 [600 dwellings, many of which (though not all) would be on GN land]. The Green Network has been fiercely protected by recent Local Plan policies and occupies 38% of the land area of Telford (CS ¶3.9.22). The Core Strategy does not provide for any relaxation of the Green Network. (This is another ‘difficult decision’ which the CS avoids).

3.15. As drafted, the Core Strategy:

(a) fails to acknowledge that the Green Network has been, to date, an element of strategic importance in the planning of the town of Telford, and has been strongly protected by statutory Local Plan policies, and on appeal;

(b) fails to consider the role of the Green Network in the proposed spatial development strategy;

(c) fails to provide for a review of the Green Network, or for future distinction between the constituent parts of the GN in terms of e.g. landscape setting; separation between built-up areas; barriers to accessibility; formal and informal recreation space;

(d) fails to acknowledge that the Green Network may need to undergo significant changes, including a reduction in scale and difference in function, if the numbers of dwellings which would represent an appropriate level of flexibility in the Core Strategy are to be brought forward;

(e) yet, at the same time, does not abolish the Green Network.

- 3.16. Any decision or open intention to build on any part of the existing Green Network would be 'sensitive'. However, in relation to the Green Network, the intentions of the Core Strategy are not open. Nor did the CS Preferred Options document [H4] make clear the implications of the Preferred Option (or of the other Options) for the Green Network. The CS Preferred Option (that is, Option 4) was developed as an amalgam of the 3 other Options (1-3) put forward. Its stated 'disadvantages' include *potential loss of large areas of open space*. In the reasons given for preferring Option 4, no mention is made in the document of the likely need to build on greenfield sites; no mention is made of the Green Network; and the disadvantages of Option 4 (and those of its contributory Option 2) are not reconciled, balanced or explained away; nor is any mention made of the likely scale of land take from open space. Those reasons which are given simply emphasise accessibility. In the submission Core Strategy there is no mention of the possible need to build on large (or any other) areas of open space, nor any mention of building on Green Network land.
- 3.17. Policy CS11 and its supporting section 9.12 express an intention to protect areas of open space from 'unnecessary' development - and so implicitly provide for 'necessary' development on land designated as Green Network. Without an openly-conducted review of the Green Network at the strategic level (and the evidence base contains no such review, consultation or sustainability appraisal on the GN) it would be unsound to relegate such a material change in policy to a subsequent DPD – and especially, as appears to be intended in CS ¶9.13.4, to relegate it to a '*Green Spaces SPD*'.
- 3.18. The Council's proposed change to the CS text on open space would draft into the forthcoming review of open space (to be conducted in the context of PPG17) a reference to *an update of the existing Wrekin Local Plan "Green Network" designation*. This would be entirely inadequate as a substitute for a dedicated GN review. In particular, it would not incorporate considerations of landscape character and setting, or of accessibility: both of which are fundamental at a strategic level, especially if there is a question of setting Green Network designation aside. If it is necessary to set aside the designation in order to make housing provision to emerging RSS Option 2 levels (or otherwise to provide the flexibility necessary to soundness), then the Core Strategy is not sound.
- 3.19. In comparison with the period to 2021, and especially 2016-2021, the period up to 2016 is much more certain with regard to housing land supply. There is at least a 5-year supply of land. The 'strategic sites' represent land with longstanding 'S7.1' consents dating from New Town days and currently owned by English Partnerships. The evidence (and particularly evidence to the Hearings on Housing) indicates a clear will on the part of English Partnerships to pursue housing development on this land in the short to medium term, and the 'strategic sites' justifiably form a major element of the development shown in the (proposed change) Housing Trajectory to

2013. After this date, their projected annual yield falls sharply. Outstanding planning permissions also form a major element of the Housing Trajectory, to 2011. Neither of these sources is particularly significant in the period 2013-2016.

- 3.20. However, the New Growth Point element of the Housing Trajectory extends precisely from 2011 to 2016. It represents the new housing to be brought forward by the DCLG New Growth Point initiative, for which the Council has won initial funding and which will be further supported by Government. The evidence is that NGP funding will assist in bringing forward sites which would otherwise prove ‘difficult’ to develop. In the period to 2016, therefore, NGP funding will assist in ensuring that those more ‘difficult’ sites from among the sites identified in the Urban Capacity Study are brought forward whether the Council’s assumptions with regard to the UCS prove optimistic or not. In this respect, 2016 is a significant date. Success of the NGP initiative is important to the achievement of potential flexibility in the housing supply.
- 3.21. It is after 2016 that the Housing Trajectory shows an overwhelming reliance upon ‘projected allocations’. These are likely to be highly dependent upon (a) the degree to which the Council’s ‘optimism’ with regard to the Urban Capacity Study is founded/unfounded; (b) the withdrawal of sites from the Green Network; and (c) adjustments to the urban boundary. As such, the projected allocations post-2016 contain the most uncertainty, and both embody and express the principal elements of unsoundness in the Core Strategy as it stands.
- 3.22. Reduction in the timespan of the Core Strategy, to 2016, would thus eliminate the insoluble barriers to soundness: that is, those which could not be addressed save by fundamental changes the substance of which would not have been covered by previous public consultation and sustainability appraisal. Without such a reduction, the Core Strategy is unsound.
- 3.23. To follow PPS12 ¶12.14 would suggest that the time-horizon for the Core Strategy should be 2026, in accordance with the emerging RSS. However, given that the Core Strategy and the Housing Trajectory are both vague in their provisions for housing 2016-2021, and supported with insufficient clarity by the existing evidence base, and that the adopted RSS which is the foundation for the CS has itself a time horizon only to 2021, it would be unrealistic, as well as unsound, for the Core Strategy to span the period to 2026.
- 3.24. Reduction in the CS timespan, to 2016, would not conform to PPS12. However, the circumstances of Telford and Wrekin are unusual and distinctive. Firstly, its adopted Local Plan ran only to 2006. Secondly, English Partnerships has agreed to seek Town and Country Planning Act approval for all future development in Telford rather than the existing S7.1 New Town Act approvals. A firm continuing planning policy framework is needed to ensure that the ‘strategic sites’ owned by English Partnerships are brought forward without further delay.
- 3.25. Thirdly, it is important to ensure that the DCLG New Growth Point initiative can be implemented, to ‘kick start’ a period of renewed growth after past shortfalls. Initial NGP funding has been only for exploratory work. Further funding is not necessarily guaranteed, especially in the absence of a firm

planning framework. With no such framework in place – that is, without a Core Strategy to guide subsequent DPDs including the all-important Land Allocations DPD – it is likely that the impetus towards growth, envisaged by DCLG and the Telford & Wrekin Partnership, would become fragile and at worst, would be lost, leaving a state of uneasy stagnation, a continued shortfall in performance, and protracted uncertainty.

- 3.26. In such conditions, good planning in the next 8 years in Telford and Wrekin could be dangerously compromised. Not only housing and all related provision, but other factors, including the Green Network itself, could be adversely affected by an absence of planning policies. Accordingly we conclude that a reduction in the timespan of the Core Strategy to 2016 is necessary in order to make it sound.

Recommendation: The following changes are necessary to make the CS sound

1. The end date of the Core Strategy shall be 2016 and not 2021. All relevant references shall be amended accordingly.
2. The Housing Trajectory shall be as updated by the Council's Position Statement on Main Matter 1: Quantification, and shall form part of the Core Strategy, as Appendix B. The existing Appendix B (National Planning Policy) shall be re-ordered as Appendix C.
3. In Policy CS1 (Homes), the following paragraph shall be inserted as the 3rd paragraph of the policy: *A maximum of 2850 dwellings will be brought forward under the New Growth Points Initiative, from the total housing requirement set by RSS.*
4. In Section 9.3 (Homes) a new paragraph shall be inserted after ¶9.3.3, as follows: *In October 2006 Telford was identified under a DCLG initiative as one of 29 New Growth Points that could accommodate additional housing development (that is, at least 20% above RPG figures as at October 2003). Under the initiative, the Council will undertake feasibility work to identify land within the Telford urban area to be brought forward for this development. Sites thus identified will be brought forward via the forthcoming Land Allocations DPD. The dwellings to be brought forward in this way will be included in the total number of dwellings eventually determined as the housing requirement by the emerging Review RSS.*

### **Affordable Housing**

- 3.27. The Core Strategy contains no dedicated policy on affordable housing, on the basis that *to make specific strategic-level reference to affordable housing ... may render the core strategy and policy out of date and in need of review, in a relatively short time* [source: Council Position Statement 4a]. This view is elucidated in the CS text at ¶9.3.6, which states that *the affordability of new homes will be identified by the most recent and up-to-date local Housing Needs Study (HNS) or Housing Market Assessment (HMA). The price level at which a home becomes 'affordable', either to purchase and/or rent, will be informed by the HNS/HMA and will be defined within the Development Control Policies DPD and Supplementary Planning Document.*

- 3.28. That affordability may change with time, and may vary with location, is understood. In relation to affordable housing policy for Telford, there might be no problem with this approach: though the absence of numerical targets could limit progress towards its increased availability, and it would be highly preferable if the Core Strategy contained at least a strategic overview of affordable housing.
- 3.29. However, it is a feature of the Core Strategy, in relation to Newport and to the Rural Areas, that the very basis of the housing numbers proposed by the CS is the identified need for a specific proportion of affordable housing: that is, the need for affordable housing as set out in the Housing Needs Study [A23] is used to calculate the numbers of new dwellings to be built, on the basis of a specific proportion of affordable housing to be required of new developments. The Council’s Position Statement 3c (Spatial Distribution of Housing) explains at ¶1.15 that *the overall housing requirement for the two areas has been calculated through the application of an affordable-to-market new build housing proportion. For Newport this proportion is 35% i.e. 22 affordable homes [the identified annual need] represent 35% of all new homes built in Newport each year. For the rural area the proportion is 40% i.e. 6 affordable homes [the identified annual need] represent 40% of all new homes built in the rural area.* That it is the need for affordable housing which is the basis for the overall housing numbers in Newport and the rural areas, however, remains unstated and unclear in the CS itself.
- 3.30. Unless the affordable housing proportions of 35% and 40% for Newport and the rural areas are explicitly built into the Core Strategy, there will be a heightened risk that these proportions will not be achieved. This is not a matter of detail appropriate to a lower-order DPD, but a matter of strategy. Failure to achieve these proportions would have impacts at strategic level, undermining not only the intended improvement in the availability of affordable housing, but the basis of the overall housing numbers in Newport and the rural area. Such a change would introduce no new material, and would strengthen the application of the strategic policy. The recommended reduction in the timespan of the CS to 2016 would enable the basis of the housing strategy in Newport and the rural areas to be reviewed in line with its success in the early years, and to be strengthened, or otherwise amended, if necessary. But the change is necessary from the outset.
- 3.31. Both CS ¶9.3.6 and Policies CS6 (Newport) and CS7 (Rural Area) should be amended to include the target levels of affordable housing for those areas.

Recommendation: The following changes are necessary to make the CS sound.

1. The following text shall be added to the end of ¶9.3.6: *Since the overall housing totals for Newport and for the rural area have been determined on the basis of the requirement for affordable housing as identified by a previous Housing Needs Study, the relevant proportions of affordable housing (35% for Newport and 40% for the rural area) will be required of new housing developments under Core Strategy policies CS6 and CS7.*

2. Policy CS6 Newport shall include, as the 3<sup>rd</sup> sentence of the policy, the following: *New housing development will be expected to deliver affordable housing to the level of 35% of all such development.*

3. Policy CS7 Rural Area shall include, as the 3<sup>rd</sup> sentence of the policy, the following: *New housing development will be expected to deliver affordable housing to the level of 40% of all such development.*

### **Settlement strategy**

- 3.32. The settlement strategy of the CS is to focus development primarily upon the urban area of Telford; to a far lesser extent upon the market town of Newport; and, to a still lesser degree, upon 3 named villages in the rural area, which are intended to act as 'service centres' in the terms of PPS7 (Sustainable Development in Rural Areas). That in itself is sound. However, this settlement strategy is expressed at the broadest of spatial levels. With reference to Telford itself, the Core Strategy policies lack sufficient spatial content to make clear the intended emphasis, distribution and direction of focus on and within the urban area. Telford is not a single, homogeneous entity but encompasses a variety of locations, all different in character, and in which the focus on development will vary in its nature and emphasis.
- 3.33. Separate policies are included for Telford (CS3), Central Telford (CS4), and for District and Local Centres in Telford (CS5). Even though each of these states an intention to accommodate growth in the location to which it relates, these policies do not add up, collectively, to a sound and satisfactory coverage of the *broad locations for delivering ... housing and other strategic development needs* which PPS12 advocates at ¶2.10. Neither Policy CS5 nor CS4 makes it clear that development (and particularly housing development) is intended to be located not only in the centres concerned but also in surrounding locations which are immediately or closely accessible.
- 3.34. The evidence base suggests that any intention to locate development in the centres themselves has not been followed through, at least in the earlier part of the plan period to 2016. The Urban Capacity Study [A25] shows the unconstrained capacity of development within town and district centres as being only 692 units (with Wellington and Newport indicated as having the most potential because of their size and the type of buildings within them). In the case of Telford town centre, the re-use of existing surface car parks would yield an unconstrained capacity of 1852, but this would depend on the provision of alternative, possibly multi-storey, car parking and the encouragement of the use of public transport to the town centre. Transforming Telford indicates that about 262 dwellings would be included in the Southwater development. In addition, a further 400 dwellings would be provided at Old Park and 100 in Priorslee, through the Telford Central Area AAP. Both of these sites lie a little way outside Telford town centre.
- 3.35. Nevertheless, this is well short of the majority of development being within the town and district centres (as defined on the proposals map) which is the wording of the spatial development strategy. The sites put forward in the Preferred Options for the Land Allocations DPD are mainly within 800m of a District centre and therefore would be accessible by sustainable means of transport in accordance with PPG13.

- 3.36. The basic approach of the CS on accessibility – that is, to achieve development in such a way that the accessibility of facilities and services within the existing urban area would be improved - is too diffuse. Clarification is required in the text to the effect that accessibility to District Centres (rather than location in the centres themselves) is to be a key criterion for the siting of new housing development. More explicit treatment of accessibility, as a fundamental element of policy, is necessary in order to make the Core Strategy sound. This can be achieved appropriately through minor changes, since the necessary statements are already present at various places in the text.
- 3.37. The spatial development strategy promotes development within town and district centres. However, in the period up to 2012, most of the housing development will be on large new housing sites at Lightmoor, Lawley and East Ketley, which will have their own local centres for day-to-day needs developed as part of their infrastructure. These sites would be developed in a sustainable manner, and in accordance with the principle of accessibility. However, their development would not in itself support the regeneration of existing district centres, which is one of the main policy thrusts of the CS. A change, to include the strategic sites in Policy CS1, is necessary in order to make the Core Strategy sound.
- 3.38. These defects can be remedied through minor changes to reposition material from the supporting text (on Central Telford, South Telford, and the Strategic Sites of Lightmoor, East Ketley and Lawley) into the policies. Such changes will suffice for the period to 2016. Beyond 2016, however, it is doubtful that the settlement strategy, as expressed in the submission CS, would be sound without fundamental changes which would go beyond what has been subject to public consultation and sustainability appraisal.
- 3.39. If there were, in practice, likely to be some difficulty with proposals for housing development in the most central areas (and the absence of subsequent proposals for central development suggests that there may be), it would be necessary to review and reposition the policies much earlier than the submission CS timespan would suggest. The recommended reduction in the CS timespan to 2016 would enable early review and the demonstration of better clarity in the evidence base.
- 3.40. The strategy takes into account, and appears to be heavily influenced by, the fact that the population of Telford has never reached the total of 225,000 for which the New Town of Telford was originally planned (CS ¶3.5.1, 3.5.2). The implication of this statement is that the urban area of Telford is capable of absorbing considerable (though unspecified) growth without the need for expansion: though this is not openly stated. The CS does not explicitly acknowledge that, today, the population envisaged for the original New Town would be divided into significantly more households and so would generate a larger housing requirement.
- 3.41. On the evidence of the Examination Hearings, the Council takes the view that the Core Strategy would support some limited expansion of the developed area at the urban edges, without the need for a supporting policy statement which openly advocates the expansion of the development boundary. We do not accept that view. It is not expressed openly anywhere in the CS, and does not form part of CS policy. There is no evidence that

such a spatial option was ever put to public consultation or that sustainability appraisal has been carried out on such a basis. The Core Strategy appropriately includes only a key diagram on which it is not possible to distinguish detail at the level of the individual site. However, it is unsound to rely upon the scale of the key diagram to blur an intention to expand the urban edge of Telford as set in previous Local Plans.

- 3.42. Neither the CS evidence base, nor the Housing Trajectory as amended, clearly demonstrates that the settlement strategy would be sufficiently flexible to accommodate an increase in the order of, or even approaching, the medium-growth RSS Option 2. Moreover, since the growth arising from NGP status is in a distinct category deriving from increases proposed by emerging RSS (rather than from shortfalls against adopted RSS), the CS settlement strategy could not necessarily be assumed to be sufficiently flexible to support the NGP. Nor has the strategy been clearly demonstrated to be adequate to support, in combination with NGP-related growth, that element of growth which would remedy the substantial shortfall accumulated in past years against the adopted RSS housing requirement, should emerging RSS, following its examination, eventually require it.
- 3.43. The evidence base relevant to the settlement strategy does not include any consideration of a possible need for urban extensions. In the absence of such consideration it cannot necessarily be assumed that the Core Strategy is unsound merely because it does not include proposals for urban extensions. The focus of future growth upon the existing urban area conforms to adopted RSS strategy to the extent that it would not trigger out-migration from the MUA, and to that extent it is sound. However, the CS evidence base does not demonstrate unequivocally that growth in the order of, or even approaching, emerging RSS Option 2 levels could be accommodated in the existing urban area without recourse to urban extensions. The Council expresses confidence that the CS could do so: but that has not been demonstrated.
- 3.44. On the evidence, a spatial strategy for Telford and Wrekin which is intended to provide for the period to 2021 is likely to be unsound if it has not at least taken into consideration the possibility of a need for urban extensions. The recommended reduction in the timespan of the Core Strategy to 2016 would avoid that unsoundness. Early review of the CS should include evidence that would demonstrate whether or not urban extension(s) might be required to accommodate growth post-2016, and, if so, the broad spatial direction of such extension(s).

Recommendation: The following changes are necessary to make the CS sound.

1. In ¶8.4 the words *and housing* shall be deleted from the phrase *the focus for economic and housing development* in the 2<sup>nd</sup> sentence of the paragraph.
2. In ¶8.4 the following sentence shall be added as the 3<sup>rd</sup> sentence of the paragraph: *Housing development will be focused on these centres and on locations which are highly accessible to these centres.*

3. In Policy CS4 (Central Telford), the 2<sup>nd</sup> sentence shall be deleted and replaced by the following: *The role of the Central Telford Area will be consolidated and enhanced as the hub of the service centres hierarchy by:...*
4. In Policy CS4 (Central Telford) an additional bullet shall be added as the 2<sup>nd</sup> bullet, as follows: *Locating new housing development both within the centre and in locations highly accessible to the centre;*
5. In Policy CS5 (District and Local Centres in Telford) the word 'respectively' shall be deleted and replaced by the word *respective*.
6. In Policy CS5 (District and Local Centres in Telford) the following shall be added as the 2<sup>nd</sup> sentence: *New housing development will be located both within these centres and in locations highly accessible to these centres.*
7. In Policy CS1 (Homes), the sentence 'Telford will be the location for the overwhelming majority of new homes' shall be deleted and replaced by the following sentence: *Telford, including the Strategic Sites of Lightmoor, Lawley and East Ketley, will be the location for the overwhelming majority of new homes.*
8. In Section 8 (Spatial Development Strategy) a new paragraph shall be inserted after ¶8.4, as follows: *In the period up to 2012, most of the housing development will be on large new housing sites at Lightmoor, Lawley and East Ketley. These are known as the Strategic Sites, and represent existing commitments. The Strategic Sites will have their own local centres for day-to-day needs developed as part of their infrastructure, and will be developed in a sustainable manner and according to the key criterion of accessibility.*

### **- Newport**

- 3.45. Policy CS1 (Homes) specifies approximately 60 new dwellings per annum to meet Newport's *local housing requirements* but does not make it clear that this number is intended to provide in part for household generation within the wider rural area. Policy CS6 (Newport) states that the local development needs of Newport include those of its rural hinterland. Neither policy makes it clear that the number of new dwellings proposed is derived from the number required (at a proportion of 35% affordable dwellings in all new developments) to yield affordable housing to the level calculated by the Housing Needs Survey [A23 & A24], and to provide, in Newport, for an element of affordable housing need predicted to be generated within the rural area rather than in Newport itself.
- 3.46. Nevertheless, in itself the proposed shift in the balance of housing development, away from the wider rural area and towards Newport, appropriately reflects national and RSS policy to focus upon market towns and 'service centre' villages the new housing which is required to meet needs in rural areas. In that respect the CS approach is sound. (It is, nevertheless, unsatisfactory to omit from the CS a policy on affordable housing which would specify a proportion of 35%, since that proportion has clearly been used in order to calculate the number of dwellings to be

assigned to Newport. This matter is dealt with above, under the heading Affordable Housing).

- 3.47. Of the 4 options for Newport as set out in the CS Preferred Options Report [H4], Option 1, concentrating development on previously developed land within the current built up area was judged by that report to *maximise regeneration opportunities [through] use of brownfield and under-used sites* and to achieve *increased vitality and viability in the centre*. The CS Sustainability Appraisal [H7] judged Option 1 to be the *most preferable*. However, Option 1 would yield only *approximately 25 dwellings per annum* and would not achieve the necessary levels of affordable housing, since urban sites would commonly fall below the threshold size for affordable provision. Moreover, if focused on the town centre, pressure for housing could displace other uses and thus diminish rather than support the role of Newport as a market town. Policies CS1 and CS6 together represent Preferred Option 3 for Newport. Though this option would ultimately entail extensive use of greenfield sites, it would nevertheless be the most likely to achieve the required level of affordable housing.
- 3.48. In the absence of a Strategic Housing Market Assessment it is not yet possible to test the perception that there is a particular need in Newport for smaller units of accommodation, both to match the local range of household types, and to provide affordable market (as distinct from social) housing. Though a strategic emphasis on particular types of housing stock could be desirable, such a change would be fundamental, is insufficiently supported in the evidence base, and has not been put to consultation: and so it would be inappropriate to make such a change at this stage. The recommended reduction in the timespan of the Core Strategy to 2016 would allow an early review to include relevant policy on the basis of the forthcoming Strategic Housing Market Assessment together with the results of monitoring of housing development in the early part of the plan period.
- 3.49. The Land Allocations Preferred Options Report [H5] suggests that 2 major greenfield sites would be allocated to be developed before 2016: the first, for 270 dwellings, in the period to 2011; and the second, for 330 dwellings, for 2011-2016. This represents a high proportion of greenfield development. Newport is not as well-provided with brownfield opportunities as Telford, and a higher proportion of greenfield development may be unavoidable if the proposed dwelling numbers are to be achieved in Newport. To that extent, the strategy is not unsound.
- 3.50. However, the concentration of that development into only 2 such large sites and, crucially, the development of both these sites in the earlier part of the plan period, as evidenced by [H5], raises the possibility that in the event not all the dwellings could be marketed to, and occupied by, people coming from Newport, the rural area, or Telford, and that such concentrated development may, through wider advertising necessary to achieve sales, trigger significant in-migration from the Metropolitan Urban Areas. Individual site allocations are not themselves a matter for the Core Strategy. However, the Land Allocations Preferred Options document gives expression to the strategy and is an indicator of its potential consequences. It is manifestly not part of the Core Strategy to stimulate in-migration from the MUA to Newport or the rural area: but to focus growth (including all growth arising

from NGP status) upon Telford. At the same time, however, the means to prevent in-migration from the MUA are limited. If it were inevitably to occur through the implementation of CS policies, the CS would not be sound.

- 3.51. Whilst the Retail Study [A33] states at ¶15.25 that its *capacity figures are dependent on which population growth scenario for the Telford area transpires*, the Study does not explicitly base its capacity predictions upon specific population growth assumptions, and does not make it clear whether or to what extent the population growth envisaged in the Preferred Option for Newport is considered to be necessary in order to improve the retail attractiveness of the town, particularly in the early part of the plan period. The Freeth Cartwright Newport Study [A44] assumes at ¶15.21 that *the additional expenditure arising from population growth associated with the preferred development option will allow existing deficiencies within the centre to be redressed* but offers no explanation of the mechanism through which this effect is expected to result. The evidence of these 2 studies is not sufficient to exclude such an effect, but in itself is insufficient to establish a strong causal link between the two.
- 3.52. Out-commuting is also a potential consequence of early substantial greenfield housing development: especially in the absence both of co-ordination with employment and, in particular, of expansion in employment opportunities in Newport and its immediately surrounding area. The Newport Town Strategy document [A43] by the Newport Regeneration Partnership, states at section 1.2 that *in 2003, rates of out-commuting from Newport were relatively high, that just 21% of residents actually worked in Newport, while 52.8% worked elsewhere within Telford and Wrekin [and] 26.2% of Newport’s employed population commuted outside the Borough.* [A43] suggests at p3) that *a high proportion of [out-commuters] spend a proportion of the income that they earn outside the town of Newport (in the place of their employment).* The Newport Study 2006 by Freeth Cartwright [A44] does not address the matter of out-commuting and, in particular, its effect upon the retail spend in Newport. If the strategy were to result in increased out-commuting, it would not be sound.
- 3.53. Whilst the Core Strategy evidence base includes some consideration of open space from the point of view of sport and recreation [A38, G11], the CS was prepared and submitted in advance of a full open space assessment against the criteria set by PPG17. The Preferred Options Report [H4]) lists as advantages of both Option 2 and Option 3 (the Preferred Option) for Newport that either would *provide new playing field provision in the south of the town in association with neighbouring schools.* [A43] notes at p4 that according to the most recent review (in 1994) of open space in Newport, *there was 19.685 hectares of open space compared to the NPFA target of 26.73 hectares for the town (the national target is 2.43 hectares of open space per 1,000 population).* Though open space standards are now to be set locally, the Borough review of open space is not yet available and so it is not clear (a) whether a shortfall in open space can still be identified for Newport, nor (b) whether the proposed new playing field would remedy a shortfall, given that the additional population associated with the Preferred (and other) Option would itself add to the open space requirement. In this respect it could reasonably be concluded that the Core Strategy for Newport is unsound.

- 3.54. The Interim Report on the assessment of open space, sport and recreation facilities and provision [G11] was produced after only the first 2 stages of the assessment process set by PPG17, and does not include the setting of local space standards. Furthermore, the deferral of a Borough-wide landscape character assessment to lower-order DPD stage has deprived the Core Strategy evidence base of a landscape character assessment which would consider the landscape setting of Newport. For these reasons it is more likely that the CS will be sound if its timespan is reduced to 2016 as recommended, and a commitment to a second large greenfield housing site is avoided in the period 2011-2016.
- 3.55. However, nothing in the Core Strategy dictates that the greenfield development necessary to achieve the proposed housing figures should be concentrated into the early plan period. The recommended reduction in the timespan of the Core Strategy would enable further consideration to be given to the timing and possible phasing of greenfield development in Newport and (depending upon the results of the Strategic Housing Market Assessment, the performance of the first greenfield site in the delivery of affordable housing, and the monitoring of the effect of such development upon in-migration from the MUA), to the amount of greenfield development judged to be necessary. Without the recommended reduction in its timespan, the Core Strategy would not be sound.
- 3.56. Whilst [H4] makes clear at ¶7.15 that *the council will also be supporting an increase in the amount of available employment opportunities within the town and that this will take the form of an extension to the existing allocation between Audley Avenue and the A518 and the introduction of a mix of uses on some development sites*, this intention has not found its way into Core Strategy policy, either in CS2 (Jobs) or CS6 (Newport). Without such a parallel emphasis on employment at strategic level, the regeneration of Newport would appear to be largely dependent upon the retail sector in the form of secondary development following an increase in population: a strategy which, on the evidence of past experience, would be unlikely on its own to be effective.
- 3.57. Failure to improve the balance between housing and employment would exacerbate existing levels of out-commuting both from Newport and from its rural hinterland, acting in opposition to the stated strategic intention to support Newport's role as a market town. Explicit reference should therefore be made in the CS to the strategic intention to improve the employment base of Newport through the allocation of additional land and by other means. Accordingly, a Change should be made to Policy CS6 (Newport), in line with the statement in the Preferred Options Report [H4] at ¶7.15, but avoiding reference to a specific site.
- 3.58. The Council's suggested changes supporting employment-related development within the campus of the Harper Adams University College, and supporting also the reinstatement of the Shrewsbury and Newport Canals, are dealt with below under the Rural Area. In conjunction with the recommended reduction in the CS timespan, and the Change signalling an increase in employment land in Newport itself, these Changes would render the Core Strategy sound.

Recommendation: The following change is required to make the CS sound.

1. The following sentence shall be added to Policy CS6 (Newport), after the 1<sup>st</sup> sentence, as follows: *The amount of available employment land within the town will be increased, in order to provide new local employment opportunities.*

### **- Rural Areas of the Borough**

- 3.59. Policy CS1 indicates that 250 dwellings are proposed for the rural area as a whole, and Policy CS7 states that these will be focused upon 3 named villages (High Ercall, Tibberton and Waters Upton). The proposed number of dwellings is derived from the need in rural areas for affordable housing, as identified by the Housing Needs Survey [A23, A24]. The focus of new housing development upon a small number of villages would enable development to take place on larger sites which would trigger a requirement for affordable housing to be provided. Whilst this approach entails the building of general market housing in order to achieve affordable housing, it would not result in an increase (as against the past Plan period) in the proportion of dwellings going to the rural area as a whole. Sustainability would be improved in the following ways. The past dispersal of new housing among small scattered villages would cease. Services and facilities including primary schools and satellite health care could reach a larger proportion of the rural population from a single base. Public transport to the nearest towns would be more likely to be viable. Overall, it would be possible for the number and length of rural journeys undertaken by the private car to be reduced. A wider mix of housing could be provided in the named villages.
- 3.60. High Ercall, Tibberton and Waters Upton have direct road connections to the B5062, which provides a single continuous link between Newport and Shrewsbury, and also a link via the A442/A5223 to Telford and to the M54. Though there may be a need for some improvement to the short lengths of rural lanes forming the connections to the B5062, the overall road link is good. Drivers from Tibberton would be unlikely to prefer (as some residents suggested) to use the lanes through Kynnersley and Preston on the Weald Moors to reach Telford, as these are narrow and twisting, appear to flood easily, and are slow to navigate and prone to blockage by farm vehicles.
- 3.61. The rural areas are not readily accessible to the Metropolitan Urban Areas to the extent that allowing the proposed amount of housing would necessarily or directly attract in-migration from the MUAs. The numbers of dwellings involved are not large. In these circumstances the Core Strategy approach to rural areas conforms to the regional policy of RSS 11 [A1], and to the national planning policy of PPS7 [E5], and is sound.
- 3.62. The choice of High Ercall, Tibberton and Waters Upton as ‘service centres’ is based upon their existing level of services combined with their location, which is reasonably accessible to the outer rural area and to the employment centres of Telford and Newport (and Shrewsbury) without being so close to any urban area that the village might act in effect as a suburb rather than as a rural service centre. The closure of the Post Office at Tibberton would

reduce the available service base, as would the closure of the shop (said to be threatened). However, the size of the existing village is such that (in common with the 2 other named villages) it is the most likely of the rural settlements to be able to sustain such facilities in the future. If distributed with care in these 3 already sizeable villages, the new development would not have a harmful impact upon the existing village character. On balance, the designation of High Ercall, Tibberton and Waters Upton is sound.

- 3.63. The Proposed Options Land Allocations document [H5] indicates that in the 10-year period 2006-2016, 130 dwellings (52% of the total) would be provided, on 5 sites in 3 villages. That would leave 48% of the total to the 5-year period 2016-2021, which amounts on an annual basis to a larger proportion. However, given the recommended reduction in the time-span of the Core Strategy to 2016, the survival of the relatively larger post-2016 element of rural housing provision into a revision of the Land Allocations DPD could usefully be made dependent upon the results of monitoring in the earlier years of the CS. Monitoring would show, as a minimum, whether the approach had succeeded in achieving affordable housing and whether or not this had specifically served the rural area as intended. It might also be possible to record other relevant effects (such as the degree to which the village shop or post office was supported by new development), especially if the sites concerned were to come forward without delay.
- 3.64. Given that Policy CS7 is highly restrictive of new housing development in rural areas, it offers little prospect for ‘enabling development’ to help fund regeneration works to the Shrewsbury and Newport Canals. The locations concerned (Longdon on Tern, Long Lane, Wappenshall and Preston on the Weald Moors) represent settlements which do not currently have the level of services and facilities necessary to support new housing development and which are in any case too close to Telford to serve the outer rural area as potential service centres. ‘Enabling development’ in these locations would undoubtedly conflict with the settlement strategy incorporated into the CS. No change could be made at this stage to allow a relaxation in respect of canal-related development, since neither consultation nor sustainability appraisal has been carried out on any such proposals, which in any case have yet to take shape in a manner which could be presented formally. The recommended reduction in the timespan of the Core Strategy to 2016 could allow consideration of such proposals when the Strategy is reviewed. For the present, it would not be appropriate to go beyond the Change recommended below, expressing support for the regeneration project in a manner which would, according to the evidence, assist in obtaining future funding for regeneration projects.
- 3.65. Policy CS7 restricts all forms of development, not merely housing, to *that necessary to meet the needs of the rural area* and focuses such development upon the 3 named villages. The submission document makes no employment allocations in the rural area. Nor does it include policy statements explicitly encouraging towards rural businesses. To do so would not be necessary if this would merely repeat national planning policy, and the policy statements of PPS7 [E5] themselves offer qualified support for rural employment development. However, in respect of rural employment the submission Core Strategy lacks local distinctiveness, through its

omission of positive policy relevant to the Borough, and in this respect is unsound.

- 3.66. The Council’s suggested Changes to the text supporting Policy CS7 would specifically admit new employment development within the Harper Adams University College campus, which from its core educational functions has diversified into research and development activity in the fields of food technology, agriculture and sustainable energy, with on-site facilities which are used by businesses including a veterinary practice.
- 3.67. The Council’s suggested Changes would also explicitly encourage employment development associated with the reinstatement of the Shrewsbury and Newport Canals, both in Newport and in rural communities. These Changes would add to the local distinctiveness of the CS and would provide appropriate policy guidance at the strategic level: and so they would make the Core Strategy sound.
- 3.68. The Core Strategy was submitted before the announcement that the British Sugar site at Allscott would close. This site is located in the rural area outside any large settlement or village designated for rural growth. Its future use represents a problem at the strategic level, compounded by its position on a railway line where the evidence suggests that a station halt could be engineered; and complicated by the presence, on site, of a SSSI which has been dependent for its ecology on warm water emissions from the sugar factory. As it stands, the Core Strategy contains no policy statement which could relax the restrictive policy of CS7 if that were necessary to allow alternative development. In respect of development falling outside Policy CS7 and outside the tolerances of the Use Classes Order and the General Permitted Development Order, the future of the site would be decided through the application of national planning policy. Whilst this is not entirely satisfactory from a development plan point of view, no change could currently be made to the Core Strategy to encourage alternative uses (particularly housing) which would conflict with Core Strategy policy as it stands. Neither consultation nor sustainability appraisal of alternative uses has been carried out. The reduction in the timespan of the Core Strategy to 2016 would allow work to begin on a strategic policy approach to this important site.
- 3.69. Subject to the Changes, we consider that the Core Strategy is sound in its approach to the rural areas.

Recommendation: The following changes are necessary to make the CS sound

1. The following paragraph (¶19.9.4) shall be added after ¶19.9.3: *The Harper Adams University College campus is a major employer in the rural area, and a major contributor to the rural economy. Appropriate development, including employment-related development, within the campus will be encouraged.*
2. The following paragraph (¶19.9.5) shall be added after new ¶19.9.4 above: *The disused Shrewsbury and Newport Canals run through the rural area from Newport in the east to Rodington in the west. The Council recognises the potential contribution that the reinstated canal could make as a tourist/leisure attraction within the Borough, and supports the principle of its reinstatement, which is likely*

*to result in the regeneration of associated local employment in Telford, Newport, and a number of rural communities across the Borough.*

## **Waste**

- 3.70. The CS identifies the current situation for waste management in its spatial profile of the Borough and draws on the Municipal Waste Management Strategy [A47], dated June 2005, as required by ¶16 of PPS10. This document sets out how the Borough will manage its waste over the period 2005-2021 and identifies the need for facilities for energy from waste (EfW) and mechanical biological treatment (MBT) in the Borough. However, these identified needs are not carried through into the spatial development issues and long-term vision for the borough, as required by ¶2.10 of PPS12.
- 3.71. Material which might have set the context for Policy CS16 is contained within Sections 5 and 6 of the Waste Development Plan Document. This material includes tables from the draft Regional Waste Planning Strategy and a regional study of Waste Facilities, both of which inform the RSS. Since the guidance in ¶16 of PPS10 says that waste core strategy policies need to be in accordance with the policies of the RSS, these requirements need to be set out in the core strategy, or as appendices, as part of the context for its waste policies.
- 3.72. Policy CS16 largely reiterates the national planning objectives for waste planning set out in ¶3 of PPS10, rather than presenting a proactive, locally-focussed, clearly-defined strategy for waste planning in the Borough, including targets and milestones to be met over the plan period. The issue of the absence of targets and milestones is addressed under the section on quantification, implementation and monitoring, below.
- 3.73. ¶16 of PPS10 says that the core strategy on waste should look forward for a period of at least 10 years and to any long-term time horizon set out in the RSS. The Council accept that, at maximum importation rates, residual landfill capacity for municipal, commercial and industrial waste would be exhausted by about 2017. Whilst these rates have not been achieved historically, even with the importation of waste from outside the Borough, we do not consider that it has been demonstrated that there is sufficient flexibility to deal with residual landfill requirements to 2021, which is the time horizon set in the adopted RSS.
- 3.74. ¶2.10 of PPS12 says that broad locations should be indicated for the delivery of strategic development, including essential public services. Whilst most of the waste management and treatment sites areas would be within the areas defined for development in the spatial development strategy, the main landfill site to be used for the disposal of municipal, commercial and industrial waste during the plan period is outside this area. A separate statement may be needed in the plan about the relationship of the site to the spatial development strategy. In addition the core strategy could be more specific in emphasising the role of existing industrial areas and industrial sites coming forward through the Site Allocations DPD as locations for EfW and MBT.

- 3.75. In our view the waste section of the CS needs to be substantially rewritten, incorporating contextual material from the Waste DPD, and setting targets and milestones within the waste policy(ies). The policy needs to say what will be delivered in terms of waste management for a minimum of a 10 year period and beyond and indicate broad locations for development.
- 3.76. Therefore we conclude that if the section on waste, including Policy CS16, were to remain in the CS it would be unsound and we recommend that it should be deleted. Policies P64-68 of the Shropshire and Telford and Wrekin Joint Structure Plan 1996-2011 have been saved, leaving some strategic waste policies for the area in place. However, this is only a temporary measure and the Council should explore mechanisms for the early replacement of the waste policy section.

Recommendation: The following change is necessary to make the CS sound.

1. Policy C16 and the section on waste shall be deleted.

### ***Minerals***

- 3.77. The areas of current mineral working for crushed rock and brick clay are outlined in the spatial profile of the Borough as are workable sand and gravel working areas. However, there are other minerals in the area which have been worked in the past and for which there have been recent proposals, for example, opencast coal, which is only mentioned in the reasoned justification in the context of the need for reclamation schemes. Minerals are not defined as a spatial development issue and not included specifically in the long-term vision for the Borough.
- 3.78. In terms of other contextual material, no supporting evidence was put forward in support of the minerals policy and its reasoned justification and we do not consider that it has a robust evidence base. We were told at the hearing session covering this policy that the Minerals DPD is at an early stage and so it was not submitted as part of the Council's evidence. We also heard that there are other difficulties in setting the apportionment for aggregates for the Borough. Generally, the regional context for minerals development is not adequately addressed in the CS.
- 3.79. Policy CS17 largely reiterates national objectives for minerals planning set out in ¶19 of Minerals Policy Statement 1: Planning and Minerals (MPS1), rather than presenting a locally-focussed, clearly-defined policy for the delivery of minerals planning in the Borough. From the information presented, it is not possible to see how the Borough will contribute appropriately to regional and local demand for minerals, as set out in ¶12.11 of PPS12.
- 3.80. Current areas of mineral working are mentioned in the plan. However, the broad locations of areas which might be worked during the plan period and areas which might need to be safeguarded for future working are not indicated either in the text or any strategic diagram. Minerals can only be worked where they occur and it is important that future working is not sterilised by development. As submitted, the CS fails to provide clear guidance to minerals operators and the public about the broad locations

where mineral extraction might take place or that should be safeguarded from development. Consideration needed to have been given to showing minerals safeguarding areas on the strategic diagram.

- 3.81. In our view the minerals section of the CS needs to be substantially rewritten. It should incorporate contextual material about minerals occurring in the borough with more detail given on those currently being worked and those which might come forward for working over the plan period. There is difficulty in assessing reserves and working periods and uncertainty in apportioning the amount of aggregates required over the plan period. However, more guidance is required in the CS to ensure an adequate supply of minerals though the plan period, together with a broad indication of existing and potential working areas.
- 3.82. Therefore we conclude that if the section on minerals, including Policy CS17, were to remain in the CS it would be unsound: and we recommend that it should be deleted. Policies P64-68 of the Shropshire and Telford and Wrekin Joint Structure Plan 1996-2011 and 26 of the policies in the Shropshire and Telford and Wrekin Joint Minerals Local Plan have been saved, which will provide some minerals planning policy for the area. However, this is only a temporary measure and the Council should explore mechanisms for the early replacement of the minerals policy section.

Recommendation: The following change is necessary to make the CS sound.

1. Policy C17 and the section on minerals shall be deleted.

### ***Quantification, Implementation and Monitoring***

- 3.83. National planning policy, in terms of spatial planning is set out in ¶¶30-32 of Planning Policy Statement 1: Delivering Sustainable Development (PPS1) and ¶¶1.8-1.11 of PPS12. ¶ 32(i) of PPS1 says that plan policies should be set out clearly with indicators against which progress can be measured. The Government’s Planning LDF Framework Monitoring – A Good Practice Guide (2005) supports the “objectives-policies-targets-indicators” approach to monitoring.
- 3.84. Targets shown in the Implementation and Monitoring section of the Core Strategy are almost all directional rather than numeric. Many of the indicators as set out in the Good Practice Guide lend themselves to numeric recording, which in itself suggests that numeric targets should be set. The SMART system (Specific, Measurable, Achievable, Realistic, Time-bound) also suggests in itself that at least some numeric targets should be set. The guidance does not insist upon numeric targets. In theory, a target expressed as ↑ or ↓ or =/> would appear to be ‘smart’ – and might in some situations be ‘smarter’ than a highly numeric target. Nevertheless, used across the whole expanse of the Core Strategy, regardless of the type of provision to be made, the merely directional target represents a very low bar to be scaled. Only in the short term, and on balance, could the widespread use of directional targets be regarded as sound.

- 3.85. With the exception of Policy CS1, none of the other policies themselves include milestones and targets and the housing trajectory has been left for inclusion in the Technical Supporting Document [H15]. Therefore there is no firm baseline set out in the policies against which to monitor progress, especially as the indicators in the implementation and monitoring section of the CS are set out in the form of comparative measures, for example, equal to, increase or decrease.
- 3.86. The Core Strategy acknowledges the problems of housing delivery over recent years but no discussion as to how such problems would be resolved is included in the document. Work is continuing as part of the Growth Point initiative to identify problems in delivery and in their position statements on housing and at the hearing sessions, the Council was optimistic that the problems of having much of its development land concentrated in a single ownership (English Partnerships) had been overcome. Nevertheless it is unclear what response will be made to departures from targets over the plan period and what action might be taken to speed up implementation. Only through the hearing sessions did it become apparent that a phased approach could be taken to housing development in the rural areas and Newport, which would ensure that local needs were being met and that greenfield land in Newport would only be released if necessary.
- 3.87. Local development frameworks should promote a proactive, positive approach to managing development (PPS12, 1.3). In this case, we conclude that the Core Strategy is insufficiently proactive, leaving too much to subsequent DPDs, and giving an inadequate account as to how the Council will promote and manage development.
- 3.88. In these circumstances, the Core Strategy can be regarded as sound only in the short term. Beyond the minor changes set out below, it is not possible to go. We are not in a position to devise, or to derive from the CS text and evidence base, targets or milestones or measures for proactive management. To do so would exceed our powers and contravene the principle that anything other than minor changes should have been previously subject to public consultation and, where appropriate, sustainability appraisal.
- 3.89. The lack of targets, milestones and measures for proactive management would render the Core Strategy unsound in the longer term. The recommended reduction in the CS timespan, to 2016, will enable review of the approach to the setting of targets, milestones, and the management of progress, in the light of experience with the directional targets in the early years. We conclude that the Core Strategy is sound in terms of Test 8 only if the timespan is reduced to 2016.

#### **4. Other Issues**

- 4.1. This section of the report deals with other issues which were covered in the examination.

##### ***Employment***

- 4.2. The CS figures for proposed employment land provision are not contained within Policy CS2 (Jobs), and appear nowhere else in the form of a target to be met. However, RSS itself does not set a requirement for employment

land, from which a target could be directly derived. The CS text on employment at Section 9.4 reflects the evidence base and contains sufficient information on the types of employment for which there is an identified need within the Borough, and on which the Core Strategy intends to focus. The evidence is that the existing available supply of employment land is sufficient to meet the highest forecast population on the basis of 36,000 dwellings (equivalent to emerging RSS Option 3). Whilst more than half the employment land in the Borough is in a single ownership (English Partnerships, through land designations under S7.1 of the New Towns Act) this has not hindered achievement of employment growth to date

- 4.3. The Core Strategy does not clearly specify the spatial directions of employment growth beyond the broadest of levels: that of Telford for all scales of employment development; and Newport, and the District Centres in Telford, for small and medium scale employment development. Nor does the CS contain criteria for the location of large sites, leaving these to be specified at lower-order DPD level. However, the specification in CS ¶9.4.3 of employment categories for which the Borough has a need (research and technology/science parks; incubator/small and medium-sized enterprise; specialist freight terminals; office and business parks, among others) itself, together with the emphasis of Policy CS2 on *accessible locations* provides, on balance, a sufficient guide at the strategic level in the situation where an adequate and identifiable supply of employment land already exists.
- 4.4. Given the recommendation that the CS timespan be shortened to 2016, it could be said that the figures for employment land given at CS ¶9.4.2 – that is, 153-236 hectares of land – should be reduced accordingly. However, it appears that the Land Allocations DPD Preferred Options document allocates 200 hectares of land to 2016: a figure which falls within the middle of the range specified at ¶9.4.2. No change is therefore necessary in this respect.
- 4.5. Accordingly, subject to the recommended changes in respect of employment provision in Newport and in the rural area, we conclude that in relation to employment the Core Strategy meets the tests of soundness.

### ***Town, District and Local Centres***

- 4.6. The CS does not define the hierarchy of centres in the Borough, as required by ¶2.15 of Planning Policy Statement 6: Planning and Town Centres (PPS6), but leaves its definition to the Development Control Policies DPD. Whilst this is unsatisfactory, there is no obvious place within which to include the hierarchy in the CS, as currently drafted, without significant changes to the document. However, any subsequent review of the CS should have full regard to national planning policy guidance on this matter.
- 4.7. The text to Policy CS5 in the Technical Support Document [H15] sets out an overview of District centres in the Borough, with Telford identified as the main town centre. Wellington, Dawley, Madeley, Oakengates, Hadley and Donnington conform to the typology of district centres set out in Annex A of PPS6. Newport is treated as a separate market town outside Telford urban area. Local centres are left to be defined in the Development Control Policies DPD, although ¶9.7.7 of the reasoned justification to Policy CS5 indicates 3 new development areas where local centres will need to be provided, probably by developers.

- 4.8. The Council has a clear commitment to the development and improvement of Telford town centre indicated in the long-term vision in the CS and the community strategy, with significant investment envisaged over the plan period which would have benefits in creating a vibrant town centre with a well-developed evening economy. Although the amounts of housing and additional floorspace proposed for various uses within the town centre are already known, these have not been included within Policy CS4 of the CS. Since this is a strategic development, in our view it is unsatisfactory to have left this to the Central Telford Action Area Plan (AAP). The AAP should be dealing mainly with site-specific and implementation matters, in accordance with ¶2.19 of PPS12.
- 4.9. The spatial development strategy and Policies CS4 and CS5 direct housing and economic development to the town, district and local centres, with regeneration of the latter two types of centres being one of the priorities for the Borough. The decline in the quality of the district centres was commented upon by several respondents, including Wellington Civic Society, and was clear from site visits. Increasing the population and economic activity within and close to the district centres would represent a sustainable strategy for their regeneration, although as noted in Section 3 above, many sites are in locations accessible to centres, rather than located within them.
- 4.10. The Sports Council has criticised the strategy of focussing development, including sport and recreation, on centres as there has been no assessment of need for recreation facilities, as required by Planning Policy Guidance Note 17: Planning for Open Space, Sport and Recreation (PPG17) and its companion guide [D8, D9], which should have informed the CS. Instead a proposed study will form part of the evidence base for the Green Space Strategy SPD. However, the principle of locating recreational and leisure facilities in the district and local centres or other highly accessible places would be the most sustainable option. Whilst the PPG17 assessment is not yet complete, we do not consider that the acceptance of such a principle would prejudice the outcome of the assessment.
- 4.11. In response to our concerns about the reflection of local distinctiveness in policies for the centres, the Council produced a minor change to incorporate the text at ¶9.7.5 into Policy CS5. A similar change covering Newport could also incorporate ¶9.8.7 into Policy CS8. Together these changes would ensure that local distinctiveness would be taken into account in development proposals in accordance with ¶36 of PPS1.

Recommendation: The following changes are necessary to make the CS sound.

1. The text at ¶9.8.7 of the CS shall be incorporated into Policy CS8;
2. The text at ¶9.7.5 of the CS shall be incorporated into Policy CS5.

### ***Flood risk***

- 4.12. Planning Policy Statement 25: Planning and Flood Risk (PPS25) was issued after the submission of the CS. ¶12 of PPS25 requires Strategic Flood Risk Assessments (SRFAs) to be carried out to inform the preparation of its LDDs and a sequential approach to be taken to the allocation of land. A similar approach was advocated, though not required, in PPG25, the predecessor guidance document.
- 4.13. At the time of the hearing, the Council had only just started its SFRA, but, in drawing up the CS, it has had regard to the Environment Agency’s floodplain maps and other flooding information. However, no Boroughwide assessment of flood risk in terms of a sequential test appears to have been undertaken prior to submission of the Core Strategy or to have informed its strategy or policies. The Council has suggested a minor change with additional wording after ¶9.15.2, which states that the SFRA would be used to inform the Land Allocations DPD. Whilst this represents a pragmatic approach to the current situation, it would not fulfil the strategic purpose of the SFRA which, in accordance with PPS25, should be to inform strategic decisions and policies in the CS, rather than be left to a subsequent DPD. Therefore we consider that this change should not be incorporated into the CS, since it would make the document unsound. However, it highlights the need for the early review of the CS, which should be undertaken in the light of the findings of the SFRA.
- 4.14. The Council’s position statement on flooding issues places emphasis on flooding from the River Severn in the Ironbridge Gorge, where little additional development will take place. Insufficient account is taken of smaller watercourses in the Borough and inadequate drainage systems which can add significantly to flooding problems. Although the Council’s response indicates that a surface water management plan will be produced, support for such initiatives in Policy CS13 is qualified. Such support needs to be expressed in a more proactive manner and linked to green space policy, since green space close to development can be used effectively to assist with water management. Nevertheless, these issues in themselves do not make the document unsound. However, in any subsequent review of the CS, further explanation needs to be given on how development will avoid increasing the risk of flooding.
- 4.15. Therefore we recommend that no change should be made in respect of Policy CS13.

### **Minor Changes**

- 4.16. The Council’s Position Statement on Minor Changes sets out a number of very minor changes to the Core Strategy, largely updating dates and correcting typographical errors. These are attached as a Schedule to the Report.

Recommendation: The following changes are necessary to make the CS sound.
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1. Minor changes as set out in the attached Schedule shall be made to the Core Strategy.

## **5. Overall conclusions**

- 5.1. We conclude that, whilst Conformity Test 4 has been met, Coherence, Consistency and Effectiveness Test 6 has been met only in relation to the years 2006-2016, and not in relation to the full CS timespan to 2021. In respect of Test 7, the strategies and policies of the CS are not the most appropriate to deal in all the circumstances in the post-2016 period; all alternatives that would be relevant beyond 2016 have not been considered; nor does the evidence base support the strategies and policies if they were to apply beyond that date. Accordingly, we conclude that the CS meets Test 7 only up to 2016. Given its lack of targets, milestones and measures for proactive management, the CS would meet Test 8 only in the period subject to least uncertainty with regard to housing provision – that is, to 2016. The Core Strategy is not sufficiently flexible to deal with changing circumstances in the period 2016-21: and so it meets Test 9 only to 2016.
- 5.2. We accept that a considerable amount of good planning work has been undertaken in producing the material on which the Core Strategy is founded. Our recommendations take into account our view that this should not be wasted. Nevertheless, there are significant ‘blind spots’ in the evidence base: in particular, in the breadth and depth of evidence needed to support the ‘difficult decisions’, and in the necessary openness to public consultation on those ‘difficult decisions’. A stronger foundation is necessary to produce a new CS for the Borough for the period 2016-2026, which would address the issues that we have highlighted in this report. The CS should be subject to an early review, to be begun as soon as possible in order to ensure the delivery of housing post-2016.

## **6. Formal determination and recommendation**

- 6.1. Having completed an examination of the Core Strategy as submitted to the Secretary of State, our formal determination under Section 20(5) (b) is that the development plan document is sound only to 2016 and not to 2021. Consequently, we recommend that the document shall be adopted under the provisions of section 23 of the Planning and Compulsory Purchase Act 2004 to 2016 only, in accordance with Section 22 of the Act.

*Susan Holland*  
*Elizabeth Hill*

INSPECTORS

**Schedule: Minor Changes**

**Section 1 - About this document**

Paragraph 1.1:

Delete sentences, 'This document will be the first Development Plan Documents for the Borough to be prepared under the new planning system introduced by the Planning and Compulsory Purchase Act 2004' and; 'It has been submitted to the Secretary of State 3rd October 2006 and published for a six week period of public consultation.'

Paragraph 1.2:

Delete sentence, 'The Core Strategy DPD is now at Submission stage.'

Paragraph 1.4:

Delete sentence, 'Nearly 700 representations were made and considered, and, where appropriate, these have been incorporated into this Core Strategy Submission DPD'.

Insert, 'The Core Strategy Submission DPD was submitted to the Secretary of State on 3<sup>rd</sup> October 2006, and subsequently examined by independent Inspectors, who presided over public hearing sessions in May and June 2007.'

Paragraph 1.5:

Delete paragraph

Paragraph 1.6:

Delete paragraph

Paragraph 1.7:

Delete paragraph

Diagram 2: Amend to reflect LDS

Paragraph 1.10: Formatting of 5<sup>th</sup> line.

Paragraph 1.11: Telephone numbers need updated.

## **Section 2 - Purpose of the Core Strategy**

Paragraph 2.3:

Delete, 'anticipated'.

## **Section 3- A Spatial Profile of the Borough**

Paragraph 3.8.5:

Replace, 'draft Telford & Wrekin Economic Strategy (June 2004)' with, 'Economic Development Strategy'

2nd sentence, delete 'draft'

Paragraph 3.8.8:

4<sup>th</sup> line replace 'within the last year' with in 2005

Paragraph 3.9.8:

Delete, 'and British Sugar, located at Allscott'.

Paragraph 3.9.11:

Replace 'Jctn6' with 'Junction 6'.

Paragraph 3.10.9:

Insert, 'The Council has commissioned a Strategic Flood Risk Assessment as well as a Urban Drainage Assessment'.

Paragraph 3.10.15:

Replace, 'then' with 'than'

Paragraph 3.10.19:

Delete '(currently nearing completion)'

Paragraph 3.10.21:

2<sup>nd</sup> line replace, 'These include' with In 2006 there were

Paragraph 3.10.32:

Replace '14.2%' with '30%'

Paragraph 3.10.33:

Replace, 'inertia' with 'inert'

Paragraph 3.10.38:

In the first sentence, insert full stop after 'industry' and replace 'The need' with *There is a need*.

In the new second sentence, replace 'will require' with 'When a proven need arises, there will be a requirement for'.

Paragraph 3.11.9:

Delete, '..most recent study of housing needs in the Borough, including a survey of households, (..'

Paragraph 3.11.16:

Replace 1st sentence with, 'In the 2001 Crime & Disorder Audit, 22% of residents were concerned about becoming a victim of crime in their neighbourhoods.

## **Section 4- Policy Context**

Paragraph 4.1:

Delete, 'In developing the Core Strategy, the Council does not start with a clean sheet.'

2<sup>nd</sup> sentence replace, '..our new plan will be..', with '..the Core Strategy is..'  
Insert at end, 'The core policies will not duplicate national planning policy guidance notes or statements, nor those of RSS. These documents policies should be read alongside the Core Strategy.'

Paragraph 4.10:

1<sup>st</sup> sentence, replace 'In RSS' with 'In RSS (June 2004)'

Paragraph 4.12:

5<sup>th</sup> line replace, 'key Ambitions' with 'Shared Community Priorities':

- Priority : Transforming Telford & Wrekin;
- Priority 2: Children & Young People;
- Priority 3: A Sustainable and Quality Environment;
- Priority 4: Safe, Strong and Cohesive Community;
- Priority 5: Healthier Communities and Vulnerable People; and
- Priority 6: Local Economy & Skills'.

Insert a final sentence, 'The LDF seeks to facilitate the delivery of the spatial aspects of the Community Strategy.'

## **Section 5- Spatial Development Issues**

Paragraph 5.1:

1<sup>st</sup> line, insert '2002' after 'Telford & Wrekin Community Strategy'

## **Section 6- Long-Term Development Vision**

Paragraph 6.2:

First bullet point Insert, '(T&W)' after 'Telford & Wrekin'

## **Section 7- Spatial Development Objectives**

Paragraph 7.2:

After bullet point 6: Insert:

- Arleston & College;
- Hadley;
- Donnington & Donnington Wood;
- Malinslee & Langley;
- Brookside; and
- Woodside & Sutton Hill'

## **Section 8 – Spatial Development Strategy**

Paragraph 8.1:

3<sup>rd</sup> sentence (6<sup>th</sup> line), Insert 'broad' in front of 'locations'.

Summary of Telford & Wrekin's Spatial Development Strategy, delete, 'shown on page 77'

## **Section 9- Strategic Development Policies**

Paragraph 9.3.7:

1<sup>st</sup> sentence insert, 'As required by PPS3,' at beginning of sentence

Paragraph 9.4.3:

Replace 'to increase' with 'for greater diversification in'

Paragraph 9.5.3:

2<sup>nd</sup> line insert 'Black Country and Telford' in front of 'Housing Market Renewal Area'

Paragraph 9.6.3:

3<sup>rd</sup> line insert 'relatively' in front of 'few'

7<sup>th</sup> line replace 'block' with 'constraint'

Paragraph 9.7.4:

6<sup>th</sup> line replace 'policy' with 'Policies DPD'

Paragraph 9.10.6:

Replace, 'timetabled for adoption in 2010 (Local Development Scheme, 10 April 2006)' with '(See LDS for scheduled adoption)'

Paragraph 9.12.3:

3<sup>rd</sup> line delete 'existing'

CS14:

1<sup>st</sup> and 6<sup>th</sup> lines replace 'Boroughs' with 'Borough's'

Paragraph 10.1.1:

Replace 'council's' with 'Council's'

## **Glossary of Terms**

Development Plan Documents:

10<sup>th</sup> line replace 'and' with 'which incorporates'

## **Appendix B**

Replace 'PPG3' with 'PPS3 Housing November 2006'

Delete 'PPG21' Tourism Nov 92 (national guidance now withdrawn)  
Replace 'PPG25 Development and Flood Risk Jul 01' with 'Planning Policy Statement 25: Development and Flood Risk Dec 2006'