

## Telford & Wrekin Local Plan – Inspector’s Matters, Issues & Questions (MIQs)

Date: 28 October 2016

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This paper provides the Council’s response to the Inspector’s MIQs –

### **Matter 4 – Economy & Community**

#### **4.1 Is the Council’s assessment of the additional employment land required during the Local Plan period (76 hectares, as stated in policy EC1) sufficiently justified in line with the Framework, most particularly paragraph 22, and national Planning Practice Guidance (PPG)?**

- 4.1.1 One of the legacies of the New Town is that the Telford Development Corporation (TDC), tasked with promoting economic diversification following the closure of the East Shropshire coalfield, made substantial provision for employment<sup>1</sup>. All of the employment allocations within the urban area of Telford<sup>2</sup> benefit from s7(1) consent under the New Towns Act 1983<sup>3</sup> and are effectively commitments. The majority of the remaining undeveloped sites are in Homes and Community Agency (HCA) ownership. This historic approach to land assembly and long term delivery is consistent with the thrust of the present day NPPF<sup>4</sup> and helps deliver the Marches LEP’s Strategic Economic Plan<sup>5 6</sup>.
- 4.1.2 In considering potential land allocations in the Local Plan, the Employment Land Review<sup>7</sup> showed a potential supply of 378 hectares within the B Use Classes, the vast majority of which fall within Telford. By contrast, the review shows Newport only has a potential supply of 3 hectares<sup>8</sup>. Recognising the paucity of employment land in Newport, the Council commissioned Peter Brett Associates (PBA) to consider the needs of this market town<sup>9</sup> and have made one allocation<sup>10</sup> consistent with the consultant’s advice.

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<sup>1</sup> Equivalent to the current B Use Classes

<sup>2</sup> As set out in the Wrekin Local Plan

<sup>3</sup> These do not time expire

<sup>4</sup> Paragraphs 7, 17 (bullet point 3), 19 to 21

<sup>5</sup> Summarised in Document B1a (paragraphs 2.0.5 to 2.0.7) and also available to view online at <http://www.marcheslep.org.uk/what-we-do/economic-plans/>

<sup>6</sup> A6. The Council understands that the LEP will be writing to the inspector in its role as a duty to cooperate body.

<sup>7</sup> C1b

<sup>8</sup> C1b, paragraph 2.8

<sup>9</sup> B1a (section 4.2); C1a

<sup>10</sup> E27 - land south of the A518, Newport

- 4.1.3 The Council has set a minimum target of 76 ha for employment land delivery consistent with a housing requirement of 15,555 homes<sup>11</sup>. This equates to 3.8 ha per year up to 2031. The Council is confident this can be delivered over the lifetime of the Local Plan and offers the following evidence to support this.
- 4.1.4 The Council signed a stewardship agreement with the HCA in 2012 to lead on the marketing of sites in HCA ownership. The HCA and DCLG agreed a Land Deal with the Council in March 2016 that will recycle £44.5m from land sales for site preparation and infrastructure to support growth. The Council not only leads on marketing all HCA sites in the borough but is also responsible for securing planning permission, carrying out infrastructure works to release sites, and their disposal
- 4.1.5 Since 2012, this multi-agency approach supported by the Council's inward investment strategy and economic strategy – Enterprise Telford - has achieved the following:
- The establishment of a programme that is marketing these sites within the UK and beyond;
  - The Council, LEP<sup>12</sup> and Highways England have committed to invest £37.7m in the highway network that will enable fifteen sites<sup>13</sup> to come forward;
  - Planning permissions have been issued on Sites E3 and E19<sup>14</sup>. The Council has funded upgrades to the electricity network to enable these sites to come forward; and
  - Sites within seven of the allocations have been sold for employment <sup>15</sup>
- 4.1.6 Consequently, the Council considers that the sites it has identified in the Plan, when taken together, have reasonable prospects of delivering the necessary development against the policy target set out in EC1.

**4.2 Is the scale and distribution of the Plan's intended employment allocations (some 148 hectares, as set out in Appendix B) sufficiently justified in line with the Framework and PPG? Specifically, can it be shown that (1) the intended uplift from the identified need is both deliverable and sustainable and (2) that the Plan's approach makes the best use of land?**

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<sup>11</sup> C2a-i

<sup>12</sup> Marches Local Enterprise Partnership – they have separately shown support for the Council's approach in Appendix 3 to this statement.

<sup>13</sup> Sites E1 to E14 and E19 as well as sites H1, H2 and H8

<sup>14</sup> Based on gross site area figures for site E3 (21.78ha) and E19 (22.21ha) with planning permission.

<sup>15</sup> As of October 2016, a range of employment sites have either been sold or terms for disposal have been agreed including Sites E3, E11, E12, E16, E19, E21 and E22

4.2.1 Allocations have been made in Telford and Newport. The two major previously developed sites in the rural area at Allscott and Crudgington have permission for a mix of employment and housing. There is therefore no need to make allocations in the rural area.

4.2.2 Turning to Telford, while the Council has allocated 148 ha of employment land, it would be more appropriate to have referred to all of the sites in the Telford<sup>16</sup> urban area (138 ha)<sup>17</sup> as commitments rather than allocations in that they benefit from New Towns Act consent. They were identified on the Wrekin Local Plan Proposals Map as such when it was adopted in 2000<sup>18</sup>. It is important further to clarify that these combined areas are a gross figure. It is not anticipated that all 138 ha would ever be developed. This can be demonstrated, for example, with reference to Site E19 at T54. Figure 1 shows the land that will be developed and an area of woodland that will be protected consistent with Policy NE1.

**Figure 1 Identification of developable area on Site E19 (T54)**



<sup>16</sup> With the exception of E13

<sup>17</sup> This is a gross area and excludes roads and sensitive environmental areas that will be excluded from development. For example, E19 has an extensive swathe of tree cover around which new development will be sited.

<sup>18</sup> [http://www.telford.gov.uk/downloads/file/1266/wrekin\\_local\\_plan\\_telford\\_inset\\_proposals\\_plan](http://www.telford.gov.uk/downloads/file/1266/wrekin_local_plan_telford_inset_proposals_plan)

- 4.2.3 The Telford & Wrekin Local Plan merely carries over this designation from the Wrekin Local Plan. All of the sites enjoy good access to the strategic road network (M54, A442, A518 and A464). It is therefore appropriate that they be considered for B Use Class activity. The retention of these sites is vitally important to help protect the long term economic position of the borough.
- 4.2.4 The Council has identified a range of sites<sup>19</sup> to provide flexibility for potential investors. This is appropriate given the sectors Telford operates in including the automotive/advanced manufacturing and general manufacturing. These do not sit well with housing and other sensitive uses. For example, Canadian investor Magna Cosma will establish a new aluminium plant at T54 (allocation E19)<sup>20</sup>. They have acquired 9.42ha with an option to acquire a further 5.7ha over the next 20 years. Identifying sites with New Towns Act consent as allocations gives certainty to inward investors about compatibility of adjacent uses and potential for continued expansion as well as providing for the expansion of existing local industry.
- 4.2.4 The Council is mindful of the four tests of soundness in its plan-making function<sup>21</sup> but considers it uniquely expedient to give the sites a similar status to that in the Wrekin Local Plan, for three reasons. First, it shows potential inward investors the amount of land available in Telford; secondly, it tells investors on other parts of the industrial estates on which these allocations are identified the preferred uses for these sites; and, thirdly, it makes clear that the preferred use for these sites is for B Use Class activity. Thus, it removes from the HCA or a future landowner the possibility of promoting land for retail or housing (for which the Local Plan has better sites) or another use that could potentially sterilise surrounding land in the B Use Classes or would be at odds with an Article 4 direction restricting a change of use from B Use Class activity<sup>22</sup>.

### **4.3 Is the range of uses provided for in strategic employment areas sufficiently justified?**

- 4.3.1 The range of uses reflect local conditions. The Council's policy is to promote B Use Class activity and appropriate ancillary uses to support employment growth. The preference for B1(a) uses in Hadley Park and Central Telford<sup>23</sup> reflects their proximity to other sensitive uses. Other sites with direct access to the strategic road network locations have been identified for B2 and B8 Use Classes.

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<sup>19</sup> From 0.5 ha at Halesfield 2 (Allocation E24) to 21.78 ha at Hortonwood West (Allocation E3)

<sup>20</sup> Outline permission TWC/2015/0666

<sup>21</sup> NPPF paragraph 182

<sup>22</sup> [http://www.telford.gov.uk/downloads/file/4638/article\\_4\\_direction\\_notice](http://www.telford.gov.uk/downloads/file/4638/article_4_direction_notice) This covers sites E1 to E14 and sites E17 to E26.

<sup>23</sup> Allocations E11, E12, E17 and E18

**4.4 Are the Local Plan’s policies for the development of shopping and town centre uses, including (1) the growth assumptions set out in section 4.2, (2) the hierarchy of centres contained in policy EC4, (3) the limitations on non-retail uses set out in policy EC6 and (4) the retail impact assessment thresholds set out on policy EC8, based on robust and up-to-date evidence and consistent with national policy and guidance?**

**(1) Retail policy growth assumptions**

- 4.4.1 The Local Plan’s housing requirement assumes an increase in the borough’s population from 166,831 to 198,000 between 2011 and 2031 (an increase of 31,169 people).
- 4.4.2 The Retail & Leisure Capacity Study and Health Check<sup>24</sup> modelled three growth strategies over the period 2013 to 2031. If allowance is made, on a pro rata basis, for population growth in the first two years of the Local Plan period, the Council is effectively now planning for an increase of around 28,052 persons in the 18 year period between 2013 and 2031.
- 4.4.3 This is similar to the 29,600 increase in population accounted for by Growth Scenario 1 (‘Housing Completion Led’) of the study. The difference between the two figures (1,548) is less than 1% of the borough’s estimated population at 2031.
- 4.4.4 Any minor variation from this target will not materially impact on the findings of this study. Moreover, the Council has approved a further 2,551 sqm of retail floorspace at Madeley<sup>25</sup>. The Council could therefore cope with the consequences of an increase in the release of employment land.

**(2) The hierarchy of centres**

- 4.4.5 Councils must define a network and hierarchy of centres resilient to anticipated future economic changes<sup>26</sup>. The hierarchy in Policy EC4 is up to date and reflects local circumstances.
- 4.4.6 Policy EC4 requires proposals to contribute to the diversity and vitality of these centres having regard to their role in the hierarchy. Such an approach is consistent with the requirements of the retail and main town centre use policies of the NPPF and the Secretary of State’s recent guidance on the wording of such policies in determining a call-in application for retail-led development in Exeter<sup>27</sup>.

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<sup>24</sup> C1f-i and C1f-ii

<sup>25</sup> Planning permission TWC/2016/0387

<sup>26</sup> NPPF, paragraph 23

<sup>27</sup> PINS reference APP/Y11110/W/15/3005333

4.4.7 The Secretary of State confirmed in that decision that development plan policies can be more expansive than simply setting out a sequential and impact test. Paragraph 14 of the letter considers these tests and states that:

‘...while the NPPF may only set two tests, it expects LPs to fill the gaps, as it were, by meeting the criteria in NPPF 23, including *a network and hierarchy of centres...*’ (The Secretary of State’s emphasis)

### **(3) Mix of uses**

4.4.8 The Council will promote a mix of shops and other supporting uses in its market towns and district centres recognising that these high streets should continue to be at the heart of the areas they serve<sup>28</sup>. They are also the parts of the borough with the best public transport accessibility. Reflecting changes in shopping patterns in recent times, the retail study and permitted development rights for changes of uses within parades<sup>29</sup>, the Local Plan has generally reduced the primary shopping areas of its market town and district centres relative to the Wrekin Local Plan as a means of promoting their continued vitality while consolidating a core of retail uses.

4.4.9 It is appropriate to control the amount of non-retail use for three reasons. First, it maintains the primacy of a retail core and allows people without a car to shop for convenience goods and other essentials<sup>30</sup>. Secondly, it implicitly acknowledges that an overconcentration of hot food take aways (Use Class A5) can harm a centre’s vitality by reason of noise, fumes and litter and can create dead frontages during daytime shopping hours because of shutters and other paraphernalia associated with late night uses. Finally, controls placed on the concentration of A5 uses will help contribute to initiatives to tackle obesity. The NPPF<sup>31</sup> and national policy for health puts great emphasis on the planning system promoting healthy communities<sup>32 33</sup>. There is a growing evidence base that links the proportion of take aways with obesity<sup>34</sup>. The Council’s acknowledgement of this link reflects local public health data and

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<sup>28</sup> An approach that is broadly consistent with the Portas Review. “The Portas Review – An independent review into the future of our high streets”, Mary Portas, December 2011 -

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6292/2081646.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6292/2081646.pdf)

<sup>29</sup> Refer Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 [http://www.legislation.gov.uk/ukxi/2015/596/pdfs/ukxi\\_20150596\\_en.pdf](http://www.legislation.gov.uk/ukxi/2015/596/pdfs/ukxi_20150596_en.pdf)

<sup>30</sup> 2011 Census data for the borough show that 20.6% of all households did not have a car (source: KS416EW). It is reasonable to assume that this proportion would rise as a result of an ageing population.

<sup>31</sup> Section 8, paragraph 69

<sup>32</sup> “Healthy Lives, Healthy People: Our strategy for public health in England.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/216096/dh\\_127424.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf)

<sup>33</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/296248/Obesity\\_and\\_environment\\_March2014.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296248/Obesity_and_environment_March2014.pdf)

<sup>34</sup> G12

strategies for Telford and is broadly consistent with approaches taken by other councils<sup>35</sup>.

#### **(4) Retail impact thresholds**

- 4.4.10 The impact assessment thresholds in Policy EC8 are informed by the retail study, which included health check analyses of each centre. The health checks provide an assessment of main town centre floorspace based on data from surveys completed for each of the centres<sup>36</sup>. Given that any variations to the extent of floorspace within the identified centres are likely to be limited since the surveys were undertaken, the Council considers the health check analysis and associated floorspace data sufficiently robust and up-to-date to inform establishing benchmark thresholds for the purposes of impact assessments.
- 4.4.11 The NPPF also advocates the use of locally set floorspace thresholds for the assessment of retail, leisure and office development outside of town centres and which are not in accordance with an up-to-date Local Plan<sup>37</sup>. The use of tiered floorspace thresholds, aligned to the borough's retail hierarchy, allows policy requirements for impact assessments to be suitably reflective and proportionate to the role and function of particular centres and their vulnerability to change, consistent with the PPG<sup>38</sup>.
- 4.4.13 The thresholds in Policy EC8 are proportionate to the situation on the ground. For proposals on the edge or outside of the town and market centres an impact assessment threshold of 500sqm represents a greater than average unit. Only 12.9% of units within Telford town centre, 6.5% of units within Wellington district centre and 5.5% of units within Newport town centre are of this size or greater (refer Appendix 1 to this paper). The 300sqm threshold identified as being relevant in proximity to district centres provides a similarly proportionate benchmark when compared against the average unit size.
- 4.4.14 Given the role and function of local centres, it is logical that impact thresholds should be smaller than for the borough's town and district centres, with 200sqm considered to be an appropriate threshold.
- 4.4.15 The Council's approach is both justified while at the same time not unnecessarily restrictive to development proposals where there is no acute

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<sup>35</sup> Usefully summarised in "Building the foundations: Tackling obesity through planning and development", February 2016 – a joint report by the Local Government Association, Public Health England and the Town and Country Planning Association [http://www.local.gov.uk/documents/10180/7632544/L16-6+building+the+foundations+--+tackling+obesity\\_v05.pdf/a5cc1a11-57b2-46e3-bb30-2b2a01635d1a](http://www.local.gov.uk/documents/10180/7632544/L16-6+building+the+foundations+--+tackling+obesity_v05.pdf/a5cc1a11-57b2-46e3-bb30-2b2a01635d1a)

<sup>36</sup> Surveys were undertaken in March and April 2013 using the most recent Experian Goad floorspace data available at the time of report.

<sup>37</sup> Paragraph 26

<sup>38</sup> Paragraph: 016 Reference ID: 2b-016-20140306

impact risk. The thresholds are also appropriately positioned such that proposals from leading supermarket operators for their smallest format stores in locations close to local and district centres will have to demonstrate that no significant adverse impacts will arise from the grant of planning permission. This is particularly important given the significant turnovers that such stores are capable of generating.

#### **4.5 Is the Local Plan's application of the 'sequential approach' to the location of town centre uses consistent with the Framework?**

4.5.1 Yes. The application of the 'sequential approach' to town centre uses is consistent with the NPPF and fully justified by evidence in the retail study<sup>39</sup> and the technical paper<sup>40</sup>. It is important to ensure the vitality of the Telford town centre and the network of market town and district centres is maintained and improved. The NPPF recognises that town centres are generally the most sustainable locations for people to shop, relax and work, and sets out where additional sequential and impact consideration will need to be considered for proposals outside these areas.

4.5.2 Policy EC8 adds locally distinctive criteria where the Council will require applicants to provide impact assessments to accompany their applications. This approach adds local distinctiveness by taking account of the settlement strategy, size and role of the centre recognising that the size and role of a centre is a key factor in determining the likely impacts of town centre proposals in edge and out of centre locations. Therefore, the policy includes a tiered approach to determining the need for Impact Assessments. Proposals for main town centre uses under these thresholds in edge or out of centre locations are unlikely to lead to significant adverse impacts on town centres and therefore impact assessment will not be required in these instances.

4.5.3 In arriving at the thresholds of 500 sqm, 300 sqm and 200sqm where impact assessments will be sought, the Council and WYG considered the role of these levels of relevant centre where they will be applied and the likely scale of development that may lead to significant adverse impacts. It is therefore considered these thresholds are locally justified. Using this evidence as a key material consideration, the Council have already applied these thresholds in discussions with applicants for retail development successfully, rather than using the default NPPF threshold. Policy EC8 now formalises this approach.

#### **4.6 Does the Local Plan provide adequately for, and appropriately ensure the protection of, community facilities?**

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<sup>39</sup> C1e and C1fi – iii

<sup>40</sup> B1b

4.6.1 Policy COM1 provides for the protection, enhancement of existing community facilities as well as, where demand arises, the delivery of new facilities where demand arises. The policy is clear that the loss of existing facilities will be resisted and the provision of new facilities should reasonably meet the needs of the population, that is, they should be accessible. The supporting text lists the types of facilities covered by the policy and paragraph 7.0.2<sup>41</sup> refers to facilities covered in other areas of the Local Plan.J4 M

#### **4.7 Should the Local Plan make explicit reference to the Newport and Shrewsbury Canals project?**

4.7.1 No. The attached paper<sup>42</sup> shows comprehensively why such a reference would be unjustified, ineffective and therefore inconsistent with the NPPF<sup>43</sup>. Additional evidence from three technical experts confirms why this proposal should not appear in the Local Plan as a defined project (refer Appendix 2).

#### **4.8 Are the Local Plan's policies for telecommunications and broadband adequately justified and consistent with national policy?**

4.8.1 The telecommunication policies are justified and consistent with the NPPF<sup>44</sup>.

- Policy C7 supports better access to mobile communications in general and superfast broadband in particular for existing and new developments.
- Criterion (iv) was drafted following consultation with infrastructure providers. It is justified on the grounds that developers should plan for broadband infrastructure at the earliest opportunity in cooperation with a broadband provider consistent with Government policy<sup>45</sup>.
- The Council is addressing gaps in broadband provision that have not been filled on a commercial basis<sup>46</sup>. Policy C7 ensures developers plan for broadband at the planning application stage, future proofing against further gaps in coverage which would require additional public sector intervention.
- Policy C7 also helps identify potential viability issues associated with delivery of broadband infrastructure (where commercial delivery is not forthcoming) enabling discussion with the Council at the earliest opportunity rather than on completion of a development.
- Policy C8 is locally distinctive. It ensures that developers provide evidence related to the siting and location of telecoms infrastructure. The supporting text to the policy identifies areas where new development could potentially

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<sup>41</sup> Biodiversity and open space in the Natural Environment chapter, provision of bus services set out in policy C1 and rural infrastructure in policy EC7.

<sup>42</sup> G9

<sup>43</sup> Paragraph 182 sets out the four tests of soundness.

<sup>44</sup> Paragraphs 42 to 43.J4

<sup>45</sup> Department for Culture Media & Sport, New build homes: superfast broadband connectivity options (2016).

<sup>46</sup> Refer Superfast Telford programme with BT Openreach <http://www.superfast-telford.co.uk/>

create an unacceptable impact and should therefore be considered as part of any application for planning permission or prior approval.

**APPENDIX 1      Assessment of unit and floor space summaries of the centres in the retail hierarchy**

**Table 1. Town Centre and Market Towns – Unit and Floorspace Summary**

<b>Town Centre / Market Town</b>	<b>Total No. of Outlets</b>	<b>Total Amount of Floorspace (Sq.m)</b>	<b>Average Outlet Floorspace (Sq.m)</b>	<b>No. Units Above Threshold</b>	<b>% of Units above 500 Sq.m Threshold</b>
Telford	179	75,400	421	23	12.9%
Newport	164	30,570	186	9	5.5%
Wellington	213	43,420	204	14	6.5%
<b>Total</b>	<b>556</b>	<b>149,390</b>	<b>269</b>	<b>46</b>	

**Table 2. District Centres – Unit and Floorspace Summary**

<b>District Centres</b>	<b>Total No. of Outlets</b>	<b>Total Amount of Floorspace (Sq.m)</b>	<b>Average Outlet Floorspace (Sq.m)</b>	<b>No. Units Above Threshold</b>	<b>% of Units above 300 Sq.m Threshold</b>
Dawley	59	7,365	125	3	3.4%
Donnington	17	3,273	195	2	11.8%
Hadley	18	3,207	178	4	22.2%
Ironbridge	38	3,190	84	0	0.0%
Madeley	59	10,165	172	1	1.7%
Oakengates	110	16,450	150	12	10.9%
<b>Total</b>	<b>301</b>	<b>43,650</b>	<b>145</b>	<b>22</b>	

Source: WYG Site Visits March/April 2013 and Table 5.1 and Table 5.2 of Retail & Leisure Capacity Study and Health Check

**EXAMINATION OF THE TELFORD AND WREKIN LOCAL PLAN 2011-2031**

**Matter 4 – Economy & Community**

**Question 4.7:          Should the Local Plan make explicit reference to the Newport and Shrewsbury Canals project?**

My name is Eric Ashcroft. I graduated from Leeds University in July 1965 with a II (i) Honours degree in Civil Engineering. In July 1969 whilst working as a Resident Engineer for the States of Jersey Sewerage Board I was elected a member of the Institution of Civil Engineers and also a member of the Institution of Municipal Engineers.

In January 1970 I was appointed Senior Engineer (main drainage) at Telford Development Corporation and in 1974 I was promoted to Principal Engineer responsible for design, contracts and construction supervision.

In 1977 I was appointed Principal Engineer (Planning) at Severn Trent Water Authority and became Severn Trent District Manager for East Shropshire in 1985. In 1989 I was promoted to District Manager for West Shropshire and Montgomeryshire with responsibility for Lake Vyrnwy and Llyn Clywedog.

From January 1997 I was appointed CEO of the Trinidad and Tobago Water and Sewerage Authority until retirement in May 1999.

To describe some of the problems Telford Development Corporation's drainage engineers faced in early 1970s I refer to the attached Map 2A, which was included in the 'Proposed Telford New Town Sewerage Order' in 1969. The map illustrates the complexity of the drainage system serving the farmland north of Telford and highlights the problematic Hurley Brook which connected into the Commission Drain.

By 1973 flooding problems on the Weald Moors resulted in a meeting at Priorslee Hall at which the Landowners fully supported Telford Development Corporation's proposals for a new Northern Interceptor which would divert storm water from the Weald Moors to the River Tern and provide for the future, much higher, peak storm flows which would be generated by the New Town development.

The Northern Interceptor, which took the form of an open channel, was constructed in 1975 by Telford Development Corporation as agents of the Severn Trent Water Authority. From the River Tern to point H, Eyton Lower Lock, it consisted of a new open channel across farmland. From Eyton Lower Lock to Wappenshall Junction works were carried out on the

disused canal to convert it into an open channel. Similar work was carried out on the canal between Wappenshall Junction and Britton Lock (point F).

The Hurley Brook was enlarged and improved through the Leegomery area (F to E) and connected to the Northern Interceptor F. Thus the source of much flooding on the Weald Moors was removed and provision was made for the development of North West Telford. The asset, known as the Northern Interceptor, was regarded as a sewer and became the property of Severn Trent Water Authority, now Severn Trent plc.

From the above it is clear that there is a conflict between the proposal for the restoration of the Shropshire Union Canal between Wappenshall and Eyton Lower Lock and the operation of the Northern Interceptor which now occupies the site.

The Canal requires a channel which is full of water in all conditions and which can fill locks, controlled by lock gates, prior to boats being lowered or raised. But the creation of the Northern Interceptor has required the removal of the lock gates at Eyton Lock and the provision of a concrete weir to ensure there is always a hydraulic gradient to sustain the very high rates of flow which arrive in storm conditions from the developing New Town.

In dry weather conditions the Interceptor has very little residual flow and whereas a canal operates as instructed by man, the Northern Interceptor reacts to the weather with all its varieties of timing and intensity.

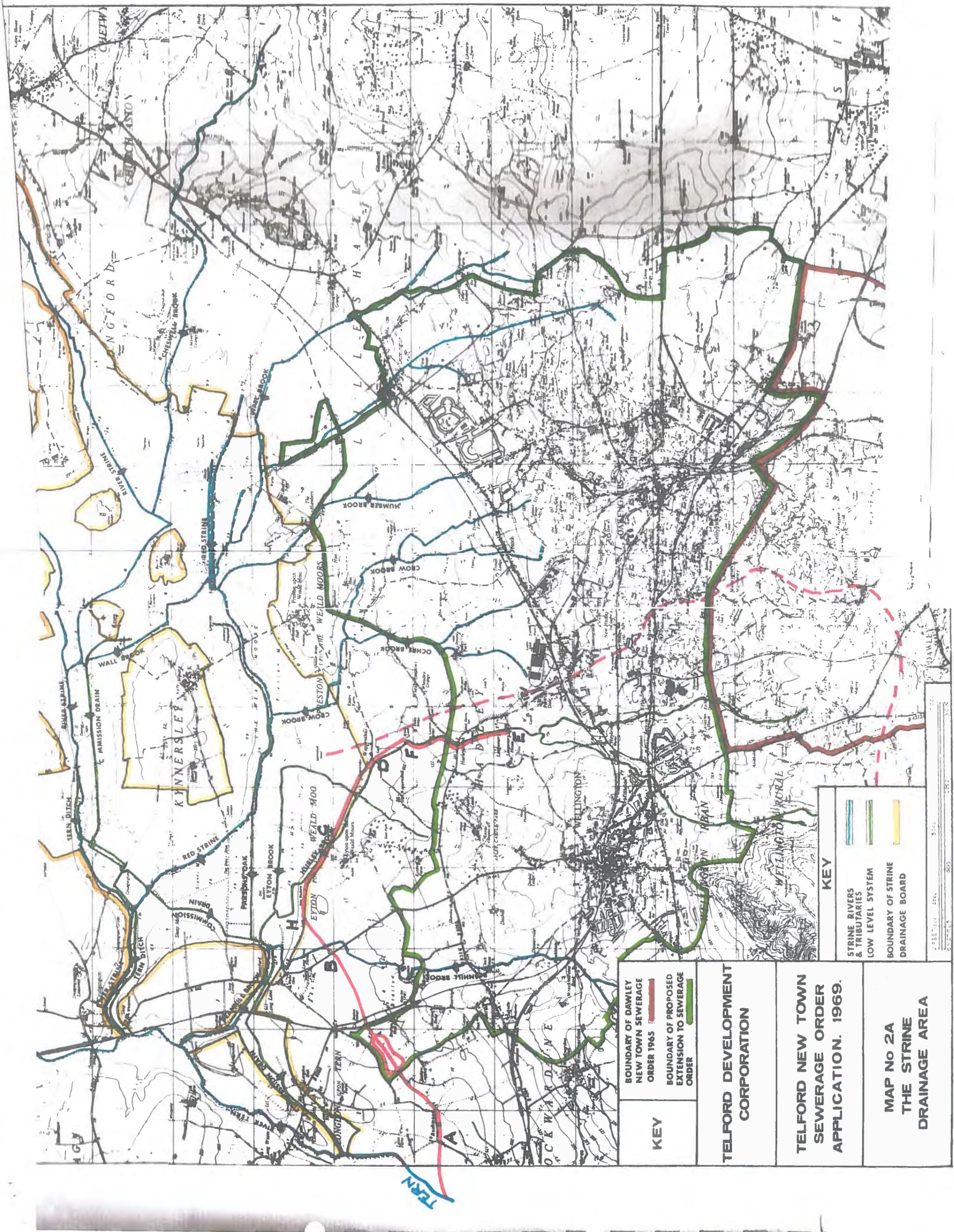
The difference between the Canal and the Northern Interceptor is further illustrated by their respective flow carrying capacities. Whereas the capacity of the canal is, to all intents and purpose, zero, the carrying capacity of the Northern Interceptor is approximately 12 cubic metres/second.

I suggest the only practical solution to the obvious conflict in requirements of the two functions is to construct a new storm water channel between Wappenshall and a point adjacent to Eyton Lower Lock, parallel to the existing Northern Interceptor on its south side.

This channel would be connected to the existing new open channel upstream of Wappenshall Junction and similarly immediately downstream of Eyton Lower Lock. With the existing flows diverted to the new channel the existing open channel would then be available to convert back to its original role as part of the Shropshire Union Canal.

The cost of these works, including land purchases (assuming land owners agreed about 8ha would be required), excavation, disposal of soil, construction of access roads, fences, creation of puddle clay lining, restoration of lock gates and removal of concrete weir from Eyton Lock etc, etc, would be very substantial for a modest length of approximately 2.25km.

8th October 2016



**KEY**

BOUNDARY OF DAWLEY  
NEW TOWN SEWERAGE  
ORDER 1965

BOUNDARY OF PROPOSED  
EXTENSION TO SEWERAGE  
ORDER

**TELFDORD DEVELOPMENT  
CORPORATION**

**TELFDORD NEW TOWN  
SEWERAGE ORDER  
APPLICATION. 1969.**

**MAP NO 2A  
THE STRINE  
DRAINAGE AREA**

**KEY**

STRINE RIVERS  
& TRIBUTARIES

LOW LEVEL SYSTEM

BOUNDARY OF STRINE  
DRAINAGE BOARD

SCALE  
1:50,000

1 INCH = 1.25 MILES

1:12,500

1 INCH = 0.31 MILES

**APPENDIX 2b  
Matter 4**

**Emails from Severn Trent Water regarding Question 4.7 of**

**From:** [Ashford, Gavin](mailto:Ashford_Gavin)  
**To:** [Munyuki, Lawrence](mailto:Munyuki_Lawrence)  
**Subject:** FW: Newport & Shrewsbury Canal  
**Date:** 28 October 2016 09:18:22

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**From:** Growth Development [<mailto:growth.development@severntrent.co.uk>]  
**Sent:** 26 October 2016 16:37  
**To:** Ashford, Gavin <[gavin.ashford1@telford.gov.uk](mailto:gavin.ashford1@telford.gov.uk)>  
**Cc:** O'Kane, Marcus <[Marcus.O'Kane@severntrent.co.uk](mailto:Marcus.O'Kane@severntrent.co.uk)>; Coffey, Amanda <[Amanda.Coffey@severntrent.co.uk](mailto:Amanda.Coffey@severntrent.co.uk)>; Hurcombe, Paul <[Paul.Hurcombe@severntrent.co.uk](mailto:Paul.Hurcombe@severntrent.co.uk)>; Banham, Andy <[Andy.Banham@severntrent.co.uk](mailto:Andy.Banham@severntrent.co.uk)>; Wootton, Robert <[Robert.Wootton@severntrent.co.uk](mailto:Robert.Wootton@severntrent.co.uk)>; Clarke, Doug <[Doug.Clarke@severntrent.co.uk](mailto:Doug.Clarke@severntrent.co.uk)>  
**Subject:** RE: Newport & Shrewsbury Canal

Hi Gavin,

In response to your email below, please see me comments highlighted in red.

Kind regards

*Dawn*

Dawn Williams  
Growth & Water Efficiency Analyst  
☎ **07554114125 mobile**  
✉ [dawn.williams@severntrent.co.uk](mailto:dawn.williams@severntrent.co.uk)

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**From:** Ashford, Gavin [<mailto:gavin.ashford1@telford.gov.uk>]  
**Sent:** 25 October 2016 11:01  
**To:** Growth Development <[growth.development@severntrent.co.uk](mailto:growth.development@severntrent.co.uk)>  
**Cc:** Hurcombe, Paul <[Paul.Hurcombe@severntrent.co.uk](mailto:Paul.Hurcombe@severntrent.co.uk)>; Banham, Andy <[Andy.Banham@severntrent.co.uk](mailto:Andy.Banham@severntrent.co.uk)>; O'Kane, Marcus <[Marcus.O'Kane@severntrent.co.uk](mailto:Marcus.O'Kane@severntrent.co.uk)>; Wootton, Robert <[Robert.Wootton@severntrent.co.uk](mailto:Robert.Wootton@severntrent.co.uk)>; Clarke, Doug <[Doug.Clarke@severntrent.co.uk](mailto:Doug.Clarke@severntrent.co.uk)>; Coffey, Amanda <[Amanda.Coffey@severntrent.co.uk](mailto:Amanda.Coffey@severntrent.co.uk)>  
**Subject:** RE: Newport & Shrewsbury Canal

Dawn,

On the matter of the Newport & Shrewsbury Canal can you please clarify STW's position regarding the comments below:

- 1) Can you confirm that STW would **not** support the abstraction of ground water to supply the canal, as, this would lead to unacceptable levels of water stress impacting on STW's ability to provide potable water supplies for future development in Telford. Alternative sources of supply would have to be secured including, as mentioned below, supplies from Barnhurst works via the Shropshire Union Canal or through retention schemes such as wet lands (which I would imagine would require significant amount of land take to hold enough

water to top up the canal in dry weather?).

STW would **NOT** support the abstraction of groundwater to support the canal.

- 2) Can you confirm that significant additional drainage infrastructure would be required to replace the current STW Northern Interceptor Channel, if as the Canal Trust plan sections of route are brought back into use as the canal, as the canal could not perform the role of the current drainage channel. I would assume that STW would expect the Canal Trust to meet the full cost of any works?

If the Canal Trust wanted to divert the current STW Northern Interceptor Channel then they would have to fund the full cost of the work.

- 3) In STW's view the canal project is not linked to the delivery of development in the Local Plan and that the costs and complexities of the project in relation to STW's existing infrastructure, commitments and the likely call on water supplies would negatively impact on STW's ability to provide for the levels of growth set out in the Local Plan.

This project is not seen as priority to the business. However if we were approached by third parties to go into partnership with funding we would need to consider the benefits to the company.

In summary we would like STW to say they don't support the project as it is not a priority for the organisation, not linked to statutory undertakings and would impact negatively on your operations.

Severn Trent Water agrees that this project should not be included in the Local Plan.

If you could get back to me by the end of Thursday that would be really helpful.

Thanks

Gavin

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**From:** Growth Development [<mailto:growth.development@severntrent.co.uk>]

**Sent:** 20 October 2016 16:19

**To:** Ashford, Gavin <[gavin.ashford1@telford.gov.uk](mailto:gavin.ashford1@telford.gov.uk)>

**Cc:** Hurcombe, Paul <[Paul.Hurcombe@severntrent.co.uk](mailto:Paul.Hurcombe@severntrent.co.uk)>; Banham, Andy <[Andy.Banham@severntrent.co.uk](mailto:Andy.Banham@severntrent.co.uk)>; O'Kane, Marcus <[Marcus.O'Kane@severntrent.co.uk](mailto:Marcus.O'Kane@severntrent.co.uk)>; Wootton, Robert <[Robert.Wootton@severntrent.co.uk](mailto:Robert.Wootton@severntrent.co.uk)>; Clarke, Doug <[Doug.Clarke@severntrent.co.uk](mailto:Doug.Clarke@severntrent.co.uk)>; Coffey, Amanda <[Amanda.Coffey@severntrent.co.uk](mailto:Amanda.Coffey@severntrent.co.uk)>

**Subject:** RE: Newport & Shrewsbury Canal

Hi Gavin,

Further to your recent enquiry concerning the issues around the above development, I can now provide you with the following information.

**[Newport and Shrewsbury Canal Update](#)**

Water supply is going to be a major issue for the canal as there isn't any available from the Strine or the Meece catchments during low flow periods. One solution could be constructed wetlands/ponds which could store water during winter and release back to augment river flows. The scope of these could be to include additional water to supply the canal. The canal could also be supplied by water from the Shropshire Union Canal (assuming the development takes it there) and the main supply of water to the Shropshire Union is from Barnhurst.

Rebuilding the canal would be a major project, without the added concerns of water availability. All the streams in that area are on the sandstone aquifer, which combined with historic groundwater abstraction over many decades means that base flow is severely affected. Therefore in summer there would not be any water available to transfer to the canal.

Severn Trent Water are currently investigating flows in the Strine catchment around Newport under the RSA (Restoring Sustainable Abstraction) Programme. This forms part of the NEP (National Environment Programme) and EA initiative driven by WFD (Water Framework Directive). We are looking at solutions to how we can restore flows to the stream when required and it is possible that we could look at solutions in partnership to address other issues in the catchment.

Water issues are also under discussion as part of the CaBA (Catchment based Approach) process, which is a national programme looking at how partnerships can work to the benefit of catchments. The Shropshire Middle Severn CaBA group includes Newport and Shrewsbury along with many other interested parties. This also includes a representative from Telford and Wrekin Council. This project would be of interest to the CaBA group, so we will raise it at the next meeting (which is in about 3 weeks).

With regard to the Local Plan Severn Trent Water agrees that the restoration of the Canal is a private matter and it should focus on the framework of Telford and Wrekin's ability to meet the future housing needs.

However if you feel that this objective can be delivered without the need to reinstate the Newport and Shrewsbury Canal then you should not refer to this aspect in the Local plan.

Should you need any further assistance please do not hesitate to contact me on the details below.

Kind regards

*Dawn*

Dawn Williams  
Growth & Water Efficiency Analyst  
☎ **07554114125 mobile**  
✉ dawn.williams@severntrent.co.uk

**APPENDIX 2c      Email from The Strine Internal Drainage Board regarding  
Question 4.7 of Matter 4**

**From:** [Ashford, Gavin](mailto:Ashford_Gavin)  
**To:** [Munyuki, Lawrence](mailto:Munyuki_Lawrence)  
**Subject:** FW: Newport & Shrewsbury Canal  
**Date:** 27 October 2016 15:17:19

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**From:** Kate Mayne [mailto:wykeymoss@btinternet.com]  
**Sent:** 03 October 2016 10:03  
**To:** Ashford, Gavin <gavin.ashford1@telford.gov.uk>  
**Cc:** udales@live.co.uk; 'John Belcher' <john@belcherfarms.co.uk>  
**Subject:** RE: Newport & Shrewsbury Canal

Hi Gavin,

I have spoken to the board and have formulated the following response based on our discussions: -

The Strine Internal Drainage Board is concerned about the implications of a project to rebuild the Shrewsbury & Newport Canals near Telford. Redevelopment would inevitably include part of the canal now functioning as the Telford Northern Interceptor Channel, which carries surface water drainage and sewer over flows from a significant area of Telford. The channel has a vital function in containing often fast flowing and high volume storm water runoff away from the Strine drainage district and on into the River Severn. These types of flows would be incompatible with navigation of the channel by canal boats, therefore it's reinstatement as a canal will almost certainly require the construction of a replacement drainage structure to serve this purpose.

Future development in Telford will stretch the capacity of the current drainage system around Kynnersley & Eyton, even with the installment of SUDS & attenuation features. We cannot therefore see how the redevelopment of the canal network here could bring anything but considerable addition cost and added pressure the existing drainage infrastructure. As the Strine IDB acts as the Lead Local Flood Authority for land in its area the IDB would strongly object to the diversion of any of these flows into rural watercourses in the boards operation area.

The Strine IDB does not therefore feel that it is appropriate for the canal's redevelopment to form part of Telford & Wrekin's local plan unless significant assurances can be made as to what will replace its drainage function; and how it is proposed to cost in items such as the compulsory purchase of land to install an alternative drainage structure.

If you need anything further regarding this, please let me know.

Thanks very much,  
Kate

Kate Mayne  
Clerk to the Strine Internal Drainage Board  
Moss Cottage  
Wykey  
Ruyton XI Towns  
Shrewsbury  
SY4 1JA  
[wykeymoss@btinternet.com](mailto:wykeymoss@btinternet.com)

**APPENDIX 3      Letter from The Marches Local Enterprise Partnership  
regarding Matters 2, 4 & 8**



The Marches Local Enterprise Partnership  
c/o Cameron House  
Knights Court  
Archers Way  
Battlefield Enterprise Park  
Shrewsbury  
SY1 3GA  
(01743) 462026

Ms Tina Kelly  
Programme Officer  
c/o Development Management  
Telford & Wrekin Council  
PO Box 457  
Wellington Civic Offices  
Telford TF2 2FH

**By E-mail**

24 October 2016

Dear Ms Kelly,  
**Telford & Wrekin Local Plan - Inspector's Matters, Issues & Questions (MIQs)**

I am writing to confirm the LEP's support for the Telford & Wrekin Local Plan. The Plan includes ambitious but realistic employment and housing targets for the Borough, which serve to meet government priorities and which support the delivery of the Marches LEP's Strategic Economic Plan. The LEP also offers the following additional comments on four of the questions posed by the Inspector:

**Matter 2 - Duty to Co-operate & Relationship to Other Plan Areas**

**2.1 Q: Has the Council satisfied the Duty to Co-operate set out in section 33A of the Planning and Compulsory Purchase Act 2004?**

We would confirm that the Council has discharged its duty to cooperate with the LEP. The Council has engaged constructively with the Marches LEP as the Local Plan has been developed. We support the housing requirement of 15,555 new homes and the ambitious but realistic plan to deliver at least 76 ha of additional employment land by 2031.

We also endorse the decision in the Local Plan to identify additional employment land over and above the 76 ha in order to provide a range of appropriately sized sites across the borough.

The Telford Local Plan will help to deliver:

1. the vision for the Marches area, set out in the LEP's Strategic Economic Plan, of *"a strong, diverse and enterprising business base, operating in an exceptional and connected environment, where the transfer of technology and skills foster innovation, investment and economic growth"*

2. A key strategic objective of the Strategic Economic Plan – *“To provide a compelling business investment offer with a progressive planning framework and infrastructure fit for tomorrow’s business needs.”*
3. Stretch targets set out in our Strategic Economic Plan, to deliver 38,000 new jobs and 70,000 new homes by 2031.

Since 2014, we have supported the Council and other Telford & Wrekin based businesses by providing:

- £19.53m of Local Growth Funds and LEP Capacity Funding to key infrastructure projects which are opening up commercial and residential sites for investment and supporting the development of the Telford Land Deal to the same ends, which has a reinvestment value into the area of up to £44.5m over the next 10 years;
- To date, £720,000 of business loan funding to create 240 private sector jobs within the Borough; and
- £45,000 of grant funds to the local authority to assist in the provision of business support through the Marches Growth Hub – Telford & Wrekin.

We will continue to direct and prioritise our investment where the Strategic Economic Plan and our local authority Local Plan aims align.

#### **Matter 4 – Economy & Community**

**4.1 Is the Council’s assessment of the additional employment land required during the Local Plan period (76 hectares, as stated in policy EC1) sufficiently justified in line with the National Planning Policy Framework, most particularly paragraph 22, and national Planning Practice Guidance (PPG)?**

Telford has more land available for employment than the 76 hectares noted through the legacy of its New Town status. These sites were original New Town allocations, have consent and are ready to be delivered. Most undeveloped employment land is in Homes & Communities Agency ownership and is now subject of a new ‘deal’ or arrangement with HCA (see below). The LEP therefore considers the figure of 76 hectares of additional land for B Use Class activity and ancillary uses to be appropriate and realistic in terms of the Plan period.

There is a renewed interest to deliver land for employment in Telford as a result of the Telford Land Deal which will enable the Council, working in partnership with the LEP, not only to promote and sell employment land proactively, but also to address site specific issues such as access and ecological constraints to make the sites ready for development. The LEP will help the Council and other partners deliver this land through its proactive board membership on the Telford Land Deal and the support to promote opportunities for future Growth Deal and other funding package applications.

The LEP also supports the provision of the employment allocation in Newport - Site Allocation E27 (land south of A518, Newport). The delivery of this site will contribute

to LEP priorities for the Agri-Food/Agri-Tech sector, as part of the LEP's prioritised Newport Innovation Package project and Growth Deal 3 submission. Owing to its proximity to other proposed development north of the A518, this site will be able to share strategic infrastructure with land to the north. It would therefore seem to be the most appropriate site to promote and is likely to be delivered too.

**4.2 Is the scale and distribution of the Plan's intended employment allocations (some 148 hectares, as set out in Appendix B) sufficiently justified in line with the Framework and PPG? Specifically, can it be shown that (1) the intended uplift from the identified need is both deliverable and sustainable and (2) that the Plan's approach makes the best use of land?**

The LEP supports the Council approach in identifying additional sites for development over and above the 76 ha. Many of these benefit from consent under the New Towns Act 1981 and could be developed now. The sites range from 0.5 ha at Halesfield 2 to 22.35 ha at Shawbrich. We support the identification of a range of sites and, in particular, one major allocation at Shawbirch. Showing the "allocations" on a plan will help potential inward investors understand the varied land offer, provides clarity on the Council's approach in ensuring the complementarity of business and residential growth and sends a clear signal as to why the employment sites should be protected for B Use Class activity and ancillary activity as opposed to retail or housing.

#### **Matter 8 - Site Allocations**

**8.1 Are the allocated sites appropriate and deliverable, having regard to the provision of the necessary infrastructure and facilities, and taking account of environmental constraints?**

The LEP considers the provision of the employment and housing sites in the Local Plan to be acceptable and appropriate. To date our funding and support is helping deliver the following sites:

Hortonwood (E1 to E10)  
Hadley Park (E11 and E12)  
T54 (E19)  
Shawbirch (E28)  
Halesfield (E20 to E22)  
Donnington/ Muxton (H1)  
The Hem (H10)

Yours sincerely,



Gill Hamer

**Director, The Marches Local Enterprise Partnership**  
C.c. V Maher; K Mulholland, Telford & Wrekin Council

