

Gladman Developments Ltd

**Matter 3 Hearing Statement
Telford and Wrekin (2011 – 2031)**

Development Strategy



October 2016

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1 MATTER 3 – DEVELOPMENT STRATEGY

1.1 Question 3.1 – Does the Local Plan plan positively for the development required in the area, in line with the presumption in favour of sustainable development set out in the Framework?

1.1.1 Gladman do not consider that the Local Plan plans positively enough to meet the development required in the area. It is considered that the housing requirement does not reflect the full OAN for Telford and Wrekin (See Hearing Statement to Matter 1) in that it provides for 778 dwellings per annum as opposed to Barton Willmore's assessment of OAN which is between 826 and 891 dwellings per annum.

1.1.2 Additional sites are therefore required to be allocated through the Development Plan process to both meet the actual OAN for the borough across the Plan period and to introduce flexibility into the Plan to address any future shortfall in housing land supply as a result of non-delivery on allocated sites or to meet unmet housing needs from the West Midlands conurbation (See Hearing Statement to Matter 2).

1.1.3 Gladman consider that their sites, as outlined in the hearing statement for Matter 8, are suitable, available and achievable and capable of assisting the Council with delivering their full, objectively assessed, market and affordable housing needs. Gladman also consider that the Council cannot demonstrate a five year housing land supply, as set out in the hearing statement for Matter 1. These sites are capable of making a significant contribution towards the Council's five year housing land supply.

1.1.4 Gladman's sites are as follows:

- Land at Muxton Lane, Muxton
- Land off Haygate Road, Wellington
- Land off Humber Lane, Telford
- Land off Shrewsbury Road, Edgmond

1.1.5 Gladman object to the Council's own policy for the Presumption in Favour of Sustainable Development. It is considered to be too restrictive and contrary to the guidance in the Framework to boost significantly the supply of housing. The presumption in favour of sustainable development is designed to ensure that developments that are sustainable can be approved without delay. Policy SP4 is so heavily caveated by the 13 detailed criteria that it will be ineffective in delivering the Government's aim of boosting significantly the supply of housing.

1.2 Question 3.2 - Is the Local Plan's settlement hierarchy and proposed distribution of development, particularly between the urban and rural areas, sufficiently justified? With reference to paragraph 28 of the Framework, is adequate provision made for development in rural settlements?

- 1.2.1 Whilst it is recognised that Telford is the largest urban settlement in the borough where a majority of new development will be directed, it is considered that at present, the Local Plan places too greater emphasis on Telford at the expense of the wider hinterland and other settlements in the borough.
- 1.2.2 Policy SP1 sets out that 13,400 dwellings will be delivered in Telford across the Plan period which equates to 86.5 % of all new development. This leaves 1,200 new homes to be delivered in Newport (7.7%) and only 900 new homes (5.8%) across all of the other settlements within the borough.
- 1.2.3 In addition, the majority of the development that is planned to come forward in the rural area is concentrated on two large scale previously developed sites as Crudginton and Allscott with the remaining 5 settlements in the rural area only taking 80 new dwellings in total across the plan period. This concentration of development in the rural area on just two sites will only further exacerbate the affordability problems in the remainder of the rural settlements.
- 1.2.4 Para 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential therefore, that the needs of the sustainable rural settlements across the borough are assessed and a meaningful level of growth apportioned to them to ensure their ongoing vitality and viability. This will help to preserve and enhance rural services and facilities and allow local rural communities to meet their own needs for housing whilst providing much needed affordable housing in the parts of the borough that suffer with the greatest affordable housing need.
- 1.2.5 This is especially important within Telford and Wrekin as the Council correctly assert in para 2.1.33 of the Local Plan that housing affordability remains a challenge and that across the borough the cost of a typical house is seven times mean income whereas in the rural area this rises to nine times mean income in parts, including Newport.
- 1.2.6 The need to address affordability is one of the main objectives of the Government with The Prime Minister recently expressing the importance of this matter in simple and stark terms¹:

¹ Prime Minister's, Speech to Conservative Party Conference 2016 (<http://press.conservatives.com/post/151378268295/primeminister-the-good-that-government-can-do>)

'High housing costs – and the growing gap between those on the property ladder and those who are not – lie at the heart of falling social mobility, falling savings and low productivity'

- 1.2.7 In order to address this divergence, a greater level of growth should be directed towards the rural area than has been the case in the past. The Council state that 6% of the borough's population currently live in the rural area and only 5.8% of new growth will be directed towards these areas. Reflecting past levels of growth will not redress the affordability gap between the urban and rural areas of the borough, it may only serve to increase it.
- 1.2.8 In distributing the growth, the Council should also be mindful that to maximize housing supply the widest possible range of sites, by size and market location, are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. A wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.
- 1.2.9 One of the main aims of the Government is to encourage small and medium sized housebuilders to step up delivery and fill the gap in housing provision to help solve the housing crisis. These types of housebuilders thrive on small sites in desirable areas where people want to live and where the infrastructure and other costs do not jeopardise the delivery of the site. In order to achieve this aim, the Local Plan should be allocating a wide range of sites in a variety of locations both within and on the edge of urban and rural settlements across their area to ensure that as many housebuilders as possible have access to suitable sites in order to boost delivery. The Telford and Wrekin Plan, as set out, simply does not achieve this because of its over-reliance on large scale urban extensions.

1.3 Question 3.3 – Are the prioritisation of previously developed sites within Telford and Newport, the focus on development of publically owned land and the approach to best and most versatile agricultural land sufficiently justified and in line with national policy in the Framework?

- 1.3.1 Gladman consider that references in Policies SP1, SP2 and SP4 to the prioritisation of previously developed sites for new housing development in Telford, Newport and in the general policy on the presumption in favour of sustainable development are unsound. These parts of the Policies are contrary to the advice contained in paragraphs 17 and 111 of the Framework that only seek to encourage the use of brownfield land not prioritise it.
- 1.3.2 In addition, the parts of these policies that deal with Best and Most Versatile Agricultural Land are also unsound as they are contrary to paragraph 112 of the Framework. This states that LPAs should consider the economic benefits of BMV and where **significant** development of agricultural land is necessary then LPAs should seek to use areas of poorer quality land in preference to that of a higher

quality. There is therefore no outright restriction on the use of BMV and it is simply a factor that is weighed in the planning balance when considering any proposal.

- 1.3.3 The policy wording in Policies SP1, SP2 and SP4 should therefore be revisited to properly reflect the advice set out in the Framework.