

**Submission on Behalf of Redrow Homes Midlands.**

**Telford and Wrekin Local Plan Examination**

**Matter 3      Development Strategy**

**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 paragraphs 28, 54 and 55 of the Framework, is adequate provision made for development in rural settlements?**

1      The Local Plans proposed growth distribution fails to allocate sufficient development in Newport. The Plan currently proposes that approximately 1,200 new homes will be delivered over the Plan period. This level of growth for this market town is insufficient to support the economic growth and prosperity of the Town. The importance of supporting the economic base of Newport has been reflected in the approval of Planning Permissions in Newport that currently represents a level of commitments of some 1,676. dwellings These relate to completions, under construction, sites with planning permissions and resolutions to grant permission at the following sites:-

Audley Avenue

East and West of Station Road

East of Station Road

The Officers reports on these sites have indicated that the sites are in sustainable locations and the developments proposed would help to support the housing needs and economic development of the town, thereby supporting the local economy for Newport and the surrounding areas. As expressed in our submissions on Matter 1 the need for affordable housing is acute in Newport and the delivery of affordable homes has been considered as part of the overall sustainability benefits of these sites by the Planning Authority

2

It is clear that the anticipated level of development in Newport envisaged within Policy SP2 of 1,200 homes is already committed development or development that the Council relies upon being delivered as part of the five year housing land supply. On that basis the Policy needs to be modified to include a realistic level of development, to reflect the existing commitments and delivery sites that are relied upon in the Councils housing delivery strategy.

3

The level of development included within the Policy should be at least 1,700 new homes over the Plan period, this would allow for the development of other sustainable development sites including the site we are promoting at Kestrel Close which can deliver around 140 dwellings.

4

It is clear from the recent history of Newport that whilst the level of completions from the town did not meet the Core Strategy targets from 2006 to 2011, in recent years the completions have increased reflecting the more recent planning permissions that have been granted and the delivery of homes in that location. The current level of sites that have been completed, under construction and with planning permission are some 811 dwellings at March 2016. A further 735 sites are regarded as commitments by the Council

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The SHMA [ Page 77 of Cbi Table 7.2] has sets out that there is an annual need for 101 new affordable dwellings per annum in Newport which is 15% of the overall requirement of 665 dwellings in the Borough. The level of development proposed in SP2 will not deliver the affordable homes needed and an increase in the provision to the levels suggested will assist in progress toward meeting some of this need. It is not clear from the Plan how the needs in Newport this will be met under the proposed strategy. The past delivery of

affordable homes in Newport has amounted to 55 dwellings between 2006 to 2015.

The rationale for the level of development in Newport is set out in Table 9 of the Spatial Strategy and paragraph 3.2.2.5 and it is based on Newport comprising 8 % of the households in the Borough and consequently being apportioned 8% of the housing requirement. This analysis fails to recognise the potential of Newport as a sustainable location, the affordable housing needs arising in Newport and the potential of additional housing sites to meet those needs. In short it is an inadequate response to the position, a position which the Council have in fact already surpassed in the level of developments permitted which itself acknowledges these particular factors.

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The Strategy proposed in the plan has failed to take account of sustainable development opportunities in Newport specifically at the Kestrel Close site and as such does not comply with para 28 of the Framework by taking a positive approach to new sustainable development.

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There would clearly be no harm to the overall strategy of the plan to increase the level of new housing in Newport and this would have clear sustainability benefits as outlined above. It would also bring the Plan into line with the reality of the committed development and allocations in Newport that are relied upon to deliver the land supply over the next five years.

**3.3 Are (1) the prioritisation of previously developed sites within Telford and Newport (policies SP1, SP2 and SP4), (2) the focus on the development of publically-owned land and (3) the approach to best and most versatile agricultural land (policies SP1-SP3) sufficiently justified and in line with national policy in the Framework?**

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With regard to the Policy SP2 it would appear that housing over and above the proposed housing site H13 and committed sites ; further development will be required to be on previously developed land. Taking into account the level of commitments set out in answer to 3.2 this will mean that 1,546 committed dwellings are available principally on green field sites and anything after this will have to be PDL In our view this is a flawed approach. The needs of Newport have been explained above. An approach that restricts further development to PDL sites is unlikely to deliver the amount of affordable housing and other benefits that are clearly required in Newport to support the economic role as a Market town. There are always viability issues with PDL sites which mean that the full suite of appropriate planning benefits are seldom achieved.

9

We do not agree with the approach taken in Policies SP1-3 with regard to BMV Land. The Framework sets out at para 112 that account should be taken of the economic and other benefits of BMV land. It goes onto say that where significant development of agricultural land is necessary ,poorer land should be preferred. Significant amounts of agricultural land are considered to relate to parcels of land over 20 hectares, this being the threshold for referral of planning application to Natural England under the GDPO requirements . In our opinion therefore it is not the correct approach to preclude the development of non significant amount of agricultural land including areas of BMV where the sustainability befits of the development as a whole are clear. The issue of BMV is only one of part of the environmental considerations as part of sustainable development and should not be treated as outweighing overall sustainability benefits. BMV land not figure in the Framework in the footnote on page 4 which sets out areas which are regarded as restricted.

10

The Plan must plan for sustainable development as a whole taking into account all three dimensions of sustainable development as set out in para 7 of the Framework. It is unsound for the plan to be skewed by one dimension of the environmental considerations in the context of the Frameworks aim to boost the housing supply.

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We have commented upon the issue of publicly owned land in our submissions to Matter 1. We regard the overemphasis on publicly owned land to be a flaw in the strategy which could result in failure to bring land forward when it is needed and potentially give a particular land owner too much control over land release, land pricing and delivery.

JVH 27<sup>th</sup> October 2016.