



ROMAN **SUMMER**

EIP REPRESENTATIONS

TELFORD AND WREKIN LOCAL PLAN

**CONCERNING LAND OFF NEW TRENCH LANE, MUXTON,
TELFORD – MATTER 3.1**

ON BEHALF OF TESNI PROPERTIES LTD

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Matter 3.1 – Development Strategy

Does the Local Plan plan positively for the development and infrastructure required in the area, in line with the presumption in favour of sustainable development set out in the Framework?

- 1.1 No. In conjunction with the sister comments on Matter 1 presented by DPP (on behalf of Tesni), the Plan does not plan positively in that it does not provide sufficient land for housing.
- 1.2 Of specific concern to Tesni is the omission of their land as part of the H1 Strategic Extension. Our representations seek the allocation of our client's land for mixed use (housing, Class B1 and a Local Centre to form a 'gateway' development) as part of the H1 Extension, or - failing that - it should be made available for development as an insurance policy in the LP if / when certain triggers are met during the Plan period – namely in the event that the Council's projected delivery of housing is not achieved. This will have the effect of future proofing the LP in the event of need and / or if other sites do not come forward.
- 1.3 The land in question is located off New Trench Lane on the northern edge of Muxton. It is all land identified on enclosed drawing reference TPM drawing reference 101B, which we request be considered alongside the following appended documents :
- TPM plan reference 101B (Location Plan)
 - Landscape & Visual Impact Assessment (TPM Landscape)
 - Global Masterplan ref: 102 [this shows indicatively how the omission land could be developed alongside allocation H1]
 - Masterplan for omission land in isolation [ref: 105C] [to be the subject of an imminent planning application]
 - Masterplan Strategy document (TPM)
 - Landscape and Visual Impact Assessment (TPM)
- 1.4 The land is sustainably located, and was put forward as part of a proposed site for housing in the Council's May 2014 *Proposed Housing and Employment Sites* document, at which point it was considered by the Council to be sustainable. Indeed, our client was involved in advanced discussions with the Council at that stage with a view to promoting

the omission land (together with the Council owned land to the west - now forming allocation H1) for a residential led development.

- 1.5 The Council's Technical Paper: Housing Site Selection July 2015 is part of the evidence base to explain the process by which the LPA allocated proposed housing and employment sites. The paper explains that :

'Although there are other sites that score just as well as some of the selected sites, not all sites could be allocated as the housing capacity for the borough is limited and there is not a need to allocate additional land to meet the borough's housing requirement as set out in the Local Plan'.

- 1.6 This statement clearly applies to our client's land, given that it possesses just as strong sustainability credentials as the adjacent land which has been allocated under H1 as a Sustainable Urban Extension. Indeed, Appendix C of the Technical Paper explains how our client's land was included as part of a wider parcel of land which was assessed, where it was ultimately recommended that the site *could* deliver a substantial amount of housing and regeneration to the area, with few development constraints.
- 1.7 In that assessment, the Council acknowledged that our client's land has good sustainability credentials, as part of a wider parcel of land for potential development.
- 1.8 We question whether the extent of the H1 allocation is large enough to create a *truly* sustainable and high quality urban extension. Policy HO2 makes it clear that, in addition to 750 new homes, the site needs to accommodate a much wider range of uses, to include open space, employment, local services / facilities and supporting infrastructure.
- 1.9 The site (as currently allocated) is 41.886 ha. Live planning applications propose a total of up to 650 houses, together with a primary school, doctor / dentist, play area and open space. Notably – and somewhat inexplicably bearing in mind the requirement of the draft Local Plan policy - neither of the H1 applications includes employment. The draft policy allocating the Sustainable Urban Extensions requires employment as part of the necessary 'sustainable' mix. We therefore question whether the site is anywhere near the scale it needs to be to create a genuinely sustainable, high quality Urban Extension to include all of the non-residential uses that will make it succeed. For this reason, our client's land ought to be reintroduced as part of the Strategic Urban Extension under Policy HO2.

Our Proposal

- 1.10 To further illustrate our point, our client has appointed TPM Landscape (landscape architects) to undertake its own assessment of the HI allocation and current applications and to consider how, if the allocation was to be extended to include our client's land, a better quality – and more sustainable – ‘extension’ might be delivered. At around the same time as the EiP commences we will be submitting an outline planning application promoting the following development on the omission site :

A comprehensive phased mixed-use development for residential use (maximum 665 units); for commercial/employment use of Class B1a offices, B1b research and development and B1c light industrial (maximum 9,290 sq.m); for a Neighbourhood Centre including retail, food and drink and leisure uses (Use Classes A1, A2, A3, A4, A5, D1 and D2) (maximum 2,510 sq.m, of which no greater than 1,000 sq.m in retail use including a convenience store up to 400 sq.m); for public open space, equipped play spaces, ecological habitats, greenways and balancing ponds; new vehicular accesses off New Trench Road (A518) (including new roundabout junction) and Wellington Road; new public transport, cycle and pedestrian access off Richards Road; together with associated car parking, landscaping, infrastructure and ancillary facilities.

- 1.12 TPM's assessment work has identified a number of opportunities and potential benefits / advantages of the development of our client's omission land in combination with the draft HI allocation that would better align with landscape and green infrastructure objectives, and would in turn create a better and more sustainable urban extension. These advantages / opportunities include :

- The north east of Telford is noted by the Council as being short of orchards, outdoor sports facilities, parks, public gardens and recreation grounds. Links to the countryside and between open spaces are also noted (by the Council) to be lacking.
- There are therefore excellent opportunities to expand the Green Infrastructure network, but, if the correct amount of housing is to be delivered, together with employment and other supporting infrastructure (such as a primary school) as it needs to be, it is very evident that Allocation HI in itself is simply not large enough. More land is required to deliver all of these benefits in a truly sustainable fashion, as evidenced by the TPM Masterplan submitted with these objections.
- The whole HI allocation site's developable area is indicated as 27.5 Ha, which *could* equate to 962 dwellings if a density of 35 houses per hectare is utilised. This is the

density stated within the D&AS for the existing applications for the HI site, although those two applications combined are promoting just 650 houses.

- By introducing a further 18.99 Ha via our client's land (together with that of other interested parties), this could deliver a theoretical further 665 homes.
- It is accepted that this level of housing (ie 962 + 665 = 1,627) considerably exceeds the current 750 house allocation, but that is the maximum extent of housing across all sites, and will almost certainly be reduced depending on the extent of employment, open space, green corridors and suchlike.
- In addition, around 100,000 sq feet of Class B1 commercial development and a Neighbourhood Centre are proposed to the east of the omission land, creating sustainable employment opportunities as part of what will be a truly sustainable and well balanced development (and, crucially, reflecting and respecting the demands of the draft policy). Locating employment in this part of the 'extension' will also help to create a true 'gateway' on the approach into Telford, taking forward that particular ambition on 'Map 1' of the adopted Local Plan.
- The TPM Masterplan brings together all of these layers of design through the introduction of a landscaped park that links the masterplan elements together as well as connecting into the existing settlement. Substantial new woodland blocks are proposed through the central spine of the 'park' and to the east, connecting together small, existing woodland plantations, and also offering a substantive landscape buffer and visual screen to the boundary with the Lilleshall Strategic Landscape Area.
- Multiple options for travel through the park and development are offered via the TPM Masterplan, with 'green' cycle and footpath routes joining existing public rights of way, offering connection to the open countryside as well as loop routes within the site itself.

1.13 As it stands, therefore, we consider the draft plan to be unsound and not positively prepared.

1.14 In particular, we consider Allocation HI to be too small to deliver a truly mixed and high

quality sustainable urban extension, which – as the draft policy suggests – must include employment space as well as housing and other uses.

- 1.15 It is important that undue emphasis is not placed on the current planning applications for HI, but it is difficult to separate those from the draft allocation and the emerging Local Plan. The Council is clearly behind those applications, even if only named as applicant on one. Fundamentally, it cannot have escaped the Council's attention that its own planning application is inconsistent with its own draft policy, in that no employment is proposed.
- 1.16 Ultimately, on the Council's own evidence (ie their own planning applications for HI), the draft allocation is simply not big enough to accommodate all that is necessary to create an outstanding and genuinely sustainable urban extension. More land is required to achieve that, and the logical candidate land is that controlled by our client and the subject of these objections.
- 1.17 If the allocation is widened to include our client's land, a better quality and *more* sustainable 'extension' can be delivered.
- 1.18 As noted above, our client's omission land is readily capable of delivering some 655 homes over and above the current HI allocation. The ultimate extent of housing (and other) development will clearly depend on the built density (which might, for example, feather out towards the rural edge), the amount of open space and parkland, the delivery of non-residential uses (including employment), and the need to ensure those can be viably delivered and will be sustainable into the future. At this stage, therefore, we are suggesting a broad range of housing provision on the omission land (ie our client's land that is currently excluded from the current allocation HI) in the region of 400 to 655 mixed homes.

Summary of Objection

- 1.19 For the reasons explained above, we object to the omission of our client's land as part of Allocation HI.
- 1.20 We request that it be included as part of that allocation in order to secure a better quality

and more sustainable extension, capable of delivering the full mix of uses (unlike the current draft HI allocation, which is simply too small).

- 1.21 We request that our client's land be allocated now – at stage 1 – as an allocation as part of HI.
- 1.22 Failing that, and in the interests of 'future proofing' the emerging Local Plan (for example, in the event that certain sites fail to come forward at sufficient pace to address the needs of the Borough), our client's land should be identified as a 'staged' allocation, the development of which to be triggered by a particular circumstance. For example, where the Council's 5 year housing supply slips, or in the event of other land allocations not coming forward with a period of 3 years.
- 1.23 So, on the basis of all of the above commentary, we consider the draft Plan to be unsound, not fully justified, not effective, and not positively prepared. As such, it is contrary to the provisions of the NPPF in the following respects :

§151 :

"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development."

- 1.24 For reasons explained, allocation HI is not sustainable in that – on the Council's own evidence – it is not of sufficient scale to accommodate the range of uses that the Council's own policy is promoting. It is not large enough to deliver employment or the extent of greenways and parkland / linkages / recreation zones that we consider are fundamental to an exemplar sustainable extension. It promotes a new primary school, but without considerably more housing than can be accommodated on HI as it stands today, there will be nowhere near enough pupils generated to attend the school, and in those terms it is not a viable proposition.

§154 :

"Local Plans should be aspirational but realistic."

- 1.25 Again, for reasons explained, the current HI allocation is simply not sufficient it itself. It

is not realistic.

§156 :

“Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- *the homes and jobs needed in the area;*
- *the provision of retail, leisure and other commercial development;*
- *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- *the provision of health, security, community and cultural infrastructure and other local facilities; and*
- *climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.”*

1.26 For reasons explained, allocation HI is not of sufficient size to adequately accommodate the above in line with the Council’s own draft policy.

§157 :

“Crucially, Local Plans should, inter alia :

- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*
- *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.*

1.27 Again, we consider that allocation HI is not sufficient (without expansion to include our client’s land) to properly deliver the above.