

## Telford and Wrekin Local Plan

### Examination in Public

15th – 24<sup>th</sup> November 2016

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#### Representations on behalf of Mr S P Holding and Mr A Hodson (Comment ID's PUB248, PUB250, and PUB 251 (Holding) and PUB 260 (Hodson))

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#### Comments in relation to Inspector's Matters, Issues and Questions Paper

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#### Matter 3 – Examination Session 22 November 2016

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1.0 This representation is a combined submission on behalf of Mr S P Holding and Mr A Hodson, as many of the issues that they wish to comment on are common to both.

2.0 Briefly, and as background to the reason for these representations,

2.1.1. Mr Holding owns land at Upper Coalmoor, which is situated close to Horsehay, and which lies around 200m west of the Telford development boundary - it is therefore regarded as lying in 'countryside' and subject to rural policies contained in the Local Plan. Mr Hodson purchased the land at Upper Coalmoor in 1999. He was introduced to the site by the Council, who wished to see the operation he had established at Water Upton, cease. He relocated his business to Upper Coalmoor and over the next 12 years built up a business from one that employed just five people to one that employed nearly 200, with the benefit of a number of planning permission granted during the 2000's.

2.1.2 Mr Hodson owns an area of land at Granville Road, Donnington, which was part of the Granville Colliery, which is no longer operative. All the buildings associated with the colliery were demolished, apart from the building now owned by Mr Hodson. That building was retained when the colliery activity finished specifically to accommodate Mr Hodson's father's business. The Council, at the time (early 1990's), wished to relocate the business away from the site from which it had operated from for many years, which was in a fairly central position in Telford. The site was specifically chosen because the Council, at the time, regarded it as being within the urban area of Telford, and it was, indeed, indicated on the Development Plan at the time as being situated within the development boundary for Telford. The Council did not want the business located in a rural area. Since then the development boundary has been realigned and the site is now shown lying outside the development boundary. Thus it is now regarded as being 'countryside' and as being subject to rural area policies contained in the Local Plan.

2.2. Both of the sites are now in commercial use, but neither is associated with a rural settlement, and the majority of staff in both cases live in Telford rather than the rural area. They are located in the rural area only because the Council determined to draw the development boundary for Telford in the location shown on the Local Plan, not because the operations have close associations with agriculture or forestry. Mr Hodson's land immediately abuts the Telford development boundary (Telford, of course, having a population of 167,000 people), while Mr Holding's land is within 200m of those 167,000 people. Telford is, of course, a sustainable settlement and the two sites relate directly to the town. Neither site is located anywhere near one of the four 'development villages' identified in the Local Plan.

2.3 Para. 4.1.3.1 of the Local Plan says that,

"In order to generate extra employment in the rural area and promote the expansion of existing businesses, the Council will provide flexibility to develop diversification opportunities as set out in Policy EC3."

That, however, is not the experience of either operator, and possibilities for expanding the businesses are discouraged by the Council on the basis that the sites lie in the rural area and not in close proximity to a rural community. Further, they are not agriculture or forestry operations or of the nature of being education and research, leisure, culture or tourism activities.

3.0 So, against those backgrounds (and the representors have no reason to believe that other similar operations do not meet the same resistance – Veolia, which occupies a site immediately adjacent to Mr Holding's site, and the nearby retail garden centre, for instance) the following comments are made in response to the Matters raised by the Inspector.

### **3.1 Matter 3**

3.1.1 Matters 3.1 and 3.2

3.1.2.1 The Plan does not plan positively for employment development in the rural area of the Borough. The Local Plan appears to perpetuate, in Policy EC3, the idea that all employment in the rural area should be related to agriculture or forestry or be of some specialist form, that other forms of employment development are inappropriate in the rural area, and that anyone employed in the rural area also lives in the rural area. The decline in employment in agriculture and forestry in the Borough has been dramatic, and the agricultural and forestry workforce is now a very small percentage of the total economically active population.

3.1.2.2 Policy EC3 is not in line with the Framework, which indicates at para. 28 that local plans should (amongst other things) support the sustainable growth and expansion of all types of businesses and enterprise in rural areas. The sites concerned lie in the rural area because they are outside the development boundary for Telford but that does not mean they are unsustainable developments, as they help to sustain a workforce within Telford, as well as people in the rural area. There are no allocations for employment development in the rural area, and no policy that ensures that existing operations which do not happen to be agriculture or forestry

etc. operations, will be encouraged to grow and provide more employment in sustainable locations, despite what para.4.1.3.1 of the Local Plan says.

- 3.1.2.3 Policy SP4 is confusing, as it appears to be an attempt to add further criteria to the concept of sustainability to those found in the Framework. Some of the criteria suggested are very similar to matters identified in the Framework, while others appear to be in conflict with the Framework. For instance, and in relation to the situations at Upper Coalmoor and Donnington, Policy SP4 indicates priority is to be given to maintaining the character and appearance of the countryside, but that does appear to be supported by the Framework, and might work against the expressed intention in the Framework to support sustainable growth of all types of business and enterprise in rural areas, and promote the development and diversification of agricultural and land based rural businesses.

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27 October 2016