

Telford and Wrekin Local Plan

Examination in Public

15th – 24th November 2016

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))

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

Matter 7 – Examination Session 23 November 2016

- 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.

4.1 Matter 7

4.1.1 Policy ER7 whilst setting out a series of considerations that the Council will look to in dealing with planning applications for waste management development, does not take a positive stance, and give solid guidance on how, where and at what level waste should be disposed. The aim appears to be to guide waste management sites to the strategic employment areas but, although some waste management operators are accommodated on the town's industrial sites, they are known to be difficult to locate, and do not often produce good neighbour development for other industrial and business developments.

4.1.2 The policy does not identify or give any encouragement to the further development of existing sites. Both sites owned by Mr Holding and Mr Hodson are now engaged in various versions of waste management, as is the Veolia site immediately adjacent to the Upper Coalmoor site, and it would appear logical to concentrate further development on existing facilities. They are, however, in the rural area, where it appears the Council do not wish such uses to be, even though experience has shown them to be highly suitable. Whilst trying to guide waste management facilities to urban location, the Council nevertheless does not appear willing to recognise existing sites as urban development.

- 4.1.3 It does not appear that Policy ER7 sits comfortable with the National Policy for waste and does not take a positive approach to the identification of opportunities to located waste management facilities, relying instead on a reactive approach to the submission of planning applications.

27 October 2016