

**Matter 3.2**

**Is the Local Plan’s settlement Hierarchy and proposed distribution of development, particularly between urban and rural areas, sufficiently justified?**

With reference to paragraph 28 of the Framework, is adequate provision made for development in rural settlements?

**NPPF  
paragraph 28.**

Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

1. support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;
2. promote the development and diversification of agricultural and other land-based rural businesses;
3. support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and
4. promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. cultural buildings, public houses and places of worship.

**Paragraph 54**

In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.

**Paragraph 55**

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:

- the essential need for a rural worker to live permanently at or near their place of work in the countryside; or
- where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or
- where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or
- the exceptional quality or innovative nature of the design of the dwelling. Such a design should:
  1. be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;
  2. reflect the highest standards in architecture;
  3. significantly enhance its immediate setting; and
  4. be sensitive to the defining characteristics of the local area.

### **Practice Guidance on Rural Housing**

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.

Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan and the plan proposal meets the basic conditions.

### **Telford and Wrekin Plan – Submission Version**

Policy SP3 makes a good start. It states:

The Council will support development in the rural area where it addresses the needs of rural communities. Development is directed to the reuse of previously developed

land and to settlements with good infrastructure. The best and most versatile agricultural land will be protected by using areas of poorer quality and in preference to higher quality land for new development.

(Note the Council appears to be happy to use Grade 2 land for some of their major housing sites around outskirts of the existing built up area.)

The Council will support the delivery of approximately 900 net new homes in the rural area up to 2031.

Paragraph 3.2.3.4 states: 'and support, in a sustainable way, the people and communities which live and work in the area.'

Paragraph 3.2.3.5 states : 'The Council will support a limited amount of new housing to meet the needs and aspirations of the rural community, including provision for affordable homes and for specialist needs and the elderly.'

It goes on to say it will support jobs and economic development and also 'The Council will support the retention .....of rural shops, services and community facilities.' ( Though does not specify how this will be achieved).

Policy EC 7 seeks to support shops and services in rural areas by preventing their redevelopment except in exceptional circumstances.

Policy HO 5 seeks to set percentages of affordable housing for sites of 11 or more dwellings. ' 35% to be applied to Newport and in any other location, including the rural area'. (Experience suggests that this percentage is not achievable on most brownfield sites.)

#### POLICY HO 10

'The Council will direct most of new rural housing to sites with unimplemented planning permission. The Council will also support a limited amount of infill housing in the following settlements: Edgmond, High Ercall, Lilleshall, Tibberton and Waters Upton that can demonstrate that they will help meet the rural housing requirement. Within these identified rural settlements, conversion of non-residential buildings to residential use will also be supported. These settlements are indicated on the Policies Map.'

'Elsewhere in the rural area residential development will be strictly controlled.' (This latter point is contrary to the requirements in the Planning Practice Guidance on Rural housing which suggests that blanket restrictions on villages should be avoided unless they can be substantiated).

The larger of these unimplemented planning permissions referred to in policy HO 10 are set out in Appendix 1 of the Telford and Wrekin Housing Land Supply – deliverable sites April 2016-2021. In the rural area these now include the two large brownfield sites at Crudgington (111 dwellings) and Allscott (470 dwellings) – some 706 dwellings that have planning permission and are supposedly deliverable by 2021. There are, in addition, a number of smaller sites in the rural area with

permission. 80 dwellings proposed over the remaining 10 years of the plan period seems very modest.

I am not competent to argue whether the 900 dwellings proposed in the rural area is reasonable or not. My arguments relate to the distribution of the proposed 900 dwellings within the rural area, the concentration of the majority of the dwellings on two unsustainable brownfield sites and the failure to address more fully the need for affordable housing in the rural area identified in the SHMA 2016.

The five villages referred to on policy HO 10 have been assessed in the Rural Areas – Technical Paper as having the most services and facilities out of 68 settlements identified within the rural area. In paragraph 3.14 it suggests that new housing in the rural areas should, in the first place be focussed towards settlements with services and which will promote patronage of existing public transport service. It recognises that Council's are restricted on when they can ask for affordable housing. This will direct local policy to concentrating new development within a few settlements (presumably the five settlements in policy HO 10) or to major brownfield sites such as Crudgington and Allscott – whether or not they are in sustainable locations.

Paragraph 4.2 states that the demographic profile shows an ageing population and shortage of affordable housing. It concludes that there is a case for focusing new housing in areas (villages?) with the best infrastructure.

Of the 900 dwellings proposed in the rural area over the plan period 581 are on these two brownfield sites. Neither of these sites is adjacent to one of the five villages identified in the Rural Settlements – Technical paper with the greatest concentration of services and facilities.

The question is how sustainable are the two sites at Crudgington and Allscott?

The Crudgington site is approximately 1 mile from Waters Upton. Crudgington itself is a very small settlement that shares a school with the next village at Waters Upton. The approved site is away from both these villages and it is necessary to cross a busy A road to get to any facilities. Whilst there is a footpath along the A442 there is no footpath along the B road from the site to A442. Whilst it is 6<sup>th</sup> in the list of settlements in terms of services and facilities, it scores less than half the points of the top three villages.

Allscott is also a small village (16<sup>th</sup> in the list of settlements) with few facilities and no footpaths linking the site to the village or Admaston. It is remote from public transport. Suggestions that the new residents will work from home is unlikely.

Both sites are remote from jobs, no scope for linkages to other areas. Allscott will provide a school – adjacent to the railway line – but 470 dwellings will not support a primary school as around 1000 dwellings are needed. Pupils will therefore be transported (by car) from Admaston and the surrounding area. It is unlikely to support a shop. These two isolated sites are not of sufficient size to support a wide range of services and facilities as might be expected with a new settlement.

Neither of these two sites will contribute to the needs of the remainder of the rural area.

Looking at Appendix 1 of Telford and Wrekin Housing Land Supply – deliverable sites (April 2016 – 2021) in the rural area some 125 dwellings have been approved as listed below.

68 dwellings are proposed in Tibberton including 25 affordable dwellings. Tibberton is 4<sup>th</sup> in the table.

11 dwellings in Long Lane (mobile homes). This settlement is not even mentioned in the table though Longden-on-Tern (the nearest village) is 8<sup>th</sup> in the table.

Ellerdine has 12 dwellings including 4 affordable. This settlement is 12<sup>th</sup> in the table.

Preston on the Weald Moors has 20 dwellings with no affordable. This settlement is 10<sup>th</sup> in the table.

Rodington has 14 dwellings including 5 affordable. This settlement is 7<sup>th</sup> in the table

There are no larger sites put forward for the three villages identified with the most services and facilities in the table ie Edgmond, Lilleshall and High Ercall. This is in part a result of previous policies restricting development in the rural area in both the Core Strategy and Wrekin Local Plan together with the free for all approach to granting planning permission before the five year housing supply was identified.

Over the remaining plan period (15 years) there only 80 additional dwellings proposed to enhance and maintain the viability of these local communities (as required by NPPF paragraph 55). It should be noted that 'Rural housing is essential to ensure viable use of these local facilities' according to the Planning Practice Guidance. 80 dwellings (less the 9 dwellings recently approved in Roden) will do little to help retain local services and community facilities such as schools, local shops, public houses, churches etc in the rural area.

Why has the Council chosen not to support the retention of existing services and facilities and maintain and enhance the viability of the four rural settlements, in addition to Tibberton, they have identified in policy HO 10 by allocating housing within them? Instead it prefers to develop two isolated and unsustainable sites.

These two sites at Crudgington and Allscott should be seen as windfall sites – their only advantage being that they are on brownfield land. Further development should be permitted in the rural area, on larger sites to allow for affordable housing to be provided, particularly in the five settlements with the best services and infrastructure (over and above the 80 currently proposed during the plan period). This may require greenfield development but this is not forbidden by the NPPF and, indeed, the Council seems happy to develop on greenfield land on the edges of Telford and Newport.

## **AFFORDABLE HOUSING IN THE RURAL AREA**

In the Rural Settlements -Technical Paper and paragraph 5.3.2.2 in the Local Plan, The Council acknowledges that there will continue to be a demand for affordable housing in the rural area, given the affordability issues facing local households, particularly those living in the rural area due in part to the high cost of housing in the rural area. This is exacerbated by the ageing demographic profile of the rural area.

It is difficult to find the number of affordable dwellings actually provided in the rural area.

The SHMA 2016 assessed the need in the rural area for the period 2015 – 20 as 440 dwellings that is 88 per year. It does not provide figures for the number of affordable dwellings provided in the rural area in recent years and neither do the Annual Monitoring Reports or the Peter Brett Report

The two sites at Crudgington and Allscott will only provide 10% affordable housing (not 35%) some 57 affordable dwellings. As these sites are remote from existing settlements there is no certainty that these dwellings will be occupied residents from the rural area needing affordable dwellings. In any event these sites are likely to be developed over a period of years.

Looking at the the Council's Housing Land Supply – deliverable sites 2016 – 2021 in the rural area 125 dwellings have approved These will provide 34 affordable dwellings giving a total of 91 affordable dwelling when there is an assessed need of 440 dwellings. It is unlikely that the other small sites with planning permission will generate affordable dwellings. Again the remaining 80 dwellings to be allocated over the plan period are intended to be on small sites and are unlikely to produce any further affordable dwellings.

Whilst there is the exceptions policy HO 11 it is considered this is unlikely to produce many affordable houses if past development is anything to go by, even with the addition of self –build.

If affordable housing is to be provided in the rural area to meet the need put forward by the SMHA 2016 then more sites of 11 or more dwellings need to be allocated. If it is intended that 35% affordable is to be achieved it would appear that green field sites need to be considered as the two brownfield sites at Crudgington and Allscott will only provide 10% affordable dwellings. It is suggested that the Council look at the villages they have identified as having the most infrastructure, services and facilities in the Rural Settlements – Technical Report and put forward sites for future development to help increase the numbers of affordable dwellings in the rural area to meet the recognised need.

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