

Our Ref: 40/15  
Your Ref: Representor Ref. 86

11 February 2017

**Ms T Kelly  
Programme Officer  
c/o Development Management  
Telford & Wrekin Council  
Wellington Civic Offices  
Telford  
TF2 2FH**

Dear Ms Kelly

**TELFORD AND WREKIN LOCAL PLAN EXAMINATION  
POLICY EC3 AND URBAN AREA BOUNDARY  
SUBMISSION ON BEHALF OF MR A HODSON – LAND AT GRANVILLE ROAD,  
DONNINGTON**

I would be grateful if you would pass on to the Inspector Mr Hodson's appreciation for allowing this written submission in place of the presentation at the oral session on Day 6 of the Examination.

Mr Hodson's concern is that the Council does not appear to have carried out any comprehensive review of the Telford urban area boundary, and yet has revised that boundary to the east (Site H2), north east (Site H1) and north (Site E3 and land immediately to the west), in order to accommodate two large scale housing, and one large employment, developments in order to allow development on high quality agricultural land (Grade 2 in the case of Sites H1 and E3 and adjacent land) and at least 3a in the case Site H2) without, apparently, investigating the possibility of smaller scale developments immediately around the Telford built up area boundary on previously developed land or land of lower agricultural quality. As Policy SP4 indicates a "priority being given to focussing development on the built up areas of Telford and Newport through the use of previously developed land" (the policy does not say "within the built up area boundary" of those settlements) the policy adopted by the Council in relation to extensions of the built up area boundary cannot be considered sound.

Mr Hodson's land sits immediately adjacent to the urban area boundary, as shown on the attached plan. It is situated in the 'rural area' of the Borough thanks only to the positioning of the urban area boundary. It has no affinity with the rural area, and hasn't had any such connection for many years – a long time before it came into Mr Hodson's ownership, being the administrative and operating centre of a fully working coalmine.

Neither was it previously regarded by the Council as being part of the rural area. Mr Hodson's father moved his business from a central location in Telford to the site it now

occupies at the request, and with the assistance, of Telford and Wrekin Council and the Development Corporation that existed at the time. They would only agree to him moving to a site that was within the urban area, as they did not consider his operation to be suitable for a rural location. This requirement was well documented in correspondence at the time.

The site had always been located within the Telford New Town Boundary and when the Telford Local Plan 1991 – 2001 was drawn up, it was again included within the urban area boundary.

However, when the Wrekin Local Plan was produced the site was excluded from the urban area and placed in the rural area of the borough. No explanation was offered at the time for this change and none has been forthcoming since.

This leaves Mr Hodson with an area of land lying outside the urban area boundary but with an existing urban-type use (unlike the housing and employment areas in sites H1, H2 and the extended E3 area referred to above, which are in agricultural use) but he cannot do anything with it.

The Council have already indicated they will not agree to the site being redeveloped for an alternative use, and the operation of Policy EC3 would mean that it could not be redeveloped for other employment uses, or even to expand the existing employment uses, because the site does not relate to agriculture or forestry and is not in a use similar to those listed in Policy EC3i as being appropriate forms of rural diversification; further, it will be impossible to make out a business case that it will help sustain a rural community, as required by EC3iii, as there is no rural community close to Mr Hodson's site, although Telford, a genuinely sustainable settlement, lies just a few millimetres from his land, but is not considered by the Council to be an appropriate settlement for the purposes of Policy EC3.

It seems clear to Mr Hodson that the Council has given no consideration to the possible extension of the town's boundary to include previously developed sites or sites of lower grade agricultural classification, that have the potential for urban development. Instead, they have concentrated solely on identifying large format developments which will cater for national or international companies. Mr Hodson does not criticise the Council for wishing to attract such developers and employers but a plan that focuses on these forms of developer but which gives so little consideration to small scale or local (often of long standing) enterprises cannot be regarded as being sound.

Thank you for your consideration.

Yours sincerely

**CLIVE ROBERTS**

