

Our Ref: 11/16

Your Ref: Representor Ref: 131

6 February 2017

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Dear Ms Kelly

**TELFORD AND WREKIN LOCAL PLAN - EXAMINATION SESSION 4**  
**EMPLOYMENT IN RURAL AREAS – POLICY EC3**  
**LAND AT UPPER COALMOOR, HORSEHAY – Mr S P HOLDING**

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

At the Examination Session on 1 February when the issue of employment in rural areas was discussed, Mr Maher, for the Council, indicated that the Council would consider Policy EC3 further to see if any amendments were appropriate. This further submission is an attempt to highlight the problems that Mr Holding believes Policy EC3 will cause and the type of employment that it should be attempting to encourage.

Whilst the representations I made at the hearing and in my earlier written submissions were made on behalf of two parties, Mr S P Holding and Mr A Hodson, the issues raised are of general application to the rural area.

The primary concern is that employment in agriculture and other forms of employment in the rural area is reducing, and the nature of the population living in the rural area is changing. Together, these influences are resulting in local people having few employment opportunities in the rural area, and that means that they cannot afford to live in the rural area.

In order to provide for these local people, diverse forms of employment need to be encouraged, but it is not likely to be in the agricultural or forestry sectors. If the diversification of the rural economy is to become reality it will require Councils to accept uses that are not related to agriculture or forestry in the rural area. For instance tractor drivers may be looking to undertake haulage work, blacksmiths may become car repairers, general labourers may become (landscape) gardeners. Policy EC3 ought to facilitate such enterprise.

As it stands, Policy EC3 limits support for new employment development to,

- i) re-use of previously developed land,
- ii) the conversion of redundant buildings, or
- iii) the extension of an existing site,

and those forms of development must,

- i) be related to agriculture or forestry, or assist in the diversification of the rural economy, and
- ii) be accompanied by a business case which demonstrates that the employment will support the local economy and help sustain rural communities.

As I have indicated earlier employment opportunities in the agricultural and forestry sectors are reducing, and the examples given in Policy EC3 for rural diversification might appeal to persons of middle-high social status and particularly assist the Harper Adams University, but they are of no benefit to persons displaced from manual jobs in agriculture and related activities. Diversification should not be limited in such fashion. If the object of the limitation is to safeguard the appearance of the countryside, then the policy should make that clear rather than suggest uses that are unlikely to produce any significant number of jobs especially for local people.

The Telford rural area has a very limited number of villages, and they are relatively small. It is unlikely that any sizeable employment operation would be welcomed in a village, and as soon as a site which is remote from a village comes available, it becomes difficult to prove that it will support any particular rural community.

Mr Holding has already been faced with this situation. At the insistence of the Council he moved his business from Waters Upton (ironically one of the three villages where development was supposed to have been concentrated in the Wrekin Local Plan) to a site at Upper Coalmoor, around 200m from the built up area of Telford. The nearest village, Little Wenlock, now a retirement and commuter village, is situated around two miles away.

Mr Holding built up a business, not dependent upon local agriculture or forestry, from a staff of around 9 people when he moved to Upper Coalmoor, to around 200 people in 2010. The Council had no interest in the operation when it was at its height, but recently, due to the recession and various other issues, the operation has reduced so that around 90 persons are now employed on the site; the Council, however, has now taken action aimed at reducing the operation and the employment opportunities significantly.

The chances of expanding the business (it is again beginning to take on more staff) are restricted by Policy EC3 as the policy does not support the sort of jobs that actually can take place in the rural area.

It is appreciated that the Council wishes employment uses to operate from their industrial estates in Telford itself, but those estates are not suitable for all types of operation and budgets and, especially when dealing with waste products (as Mr Holding does) they are entirely

unsuitable. The fact that they are not associated with a rural settlement, but are very closely associated with Telford – a sustainable settlement – should not count against the efforts of the operators to create jobs.

The National Planning Policy Framework says that planning policies should support economic growth in rural areas in order to create jobs and prosperity (para. 28). Policy EC3 does not do this but, instead, places a series of restrictions on the type, size and nature of employment that may be permitted in the rural area, and thus it is in conflict with the NPPF. No evidence is included in the Technical Papers that would suggest that a certain number of jobs is required in the rural area to cater for the economically active people who live there, where the jobs should be located, what type of jobs are necessary or how many jobs are likely to be created by the action of Policy EC3. Without such an evidence base it cannot be concluded that Policy EC3 will do anything other than stifle employment opportunities in the rural area. On that basis the Local Plan cannot be regarded as being sound.

Yours sincerely

**CLIVE ROBERTS**