



22 September 17

Dear Telford and Wrekin Council,

Telford & Wrekin Local Plan: Comments on the Main Modifications

I am writing to make some comments on the proposed main modifications to the Local Plan. I think the current status of planning policies for the authority are a matter of very considerable concern. My main comments are about the rural area, see below.

1. Revised OAN

On this issue, I would just like to comment briefly. While it is entirely appropriate for the Inspector to question and probe the figures, I think it is both surprising and worrying that:

- revised figures were accepted by TWC without any real analysis as far as I can see;
- forecasting employment numbers and housing is undoubtedly complex and uncertain;
- But, I certainly feel that a proper analysis of the Inspector's comments would have helped in having confidence in the robustness of the plan and proposed numbers

2. Spatial Distribution of Additional Housing

- The spatial distribution of housing numbers allocations across the authority seems very superficial;
- The apportionment of housing numbers on a pro rata basis seems very odd given that Telford is a purpose built New Town designed for a much larger population than it currently has.
- One would expect that new housing development would be concentrated in the urban area of Telford with its associated infrastructure and development capacity, and also for sustainability reasons, rather than distributed across the whole area on a pro rata basis.
- The intention to also allocate the additional 1725 houses proposed in the modifications on a **pro rata basis seems even stranger**, and it is highly surprising that no apparent detailed consideration of the location of these additional houses has been undertaken.
- **The implications for the Rural Area, are disproportionately significant, see below, and I think this urgently needs re-consideration. In fact, the impact of this**

approach on the rural area appears in practice to be contrary to the stated approach of the Plan.

3. Implications for the Rural Area

- The original draft plan had a relatively restrictive approach to housing in the Rural Area reflecting its infrastructure, the nature of its small-scale settlements and a bias against greenfield development;
- 900 houses were proposed of which the large majority were to be based on two major brownfield sites which are something of an anomaly. My understanding is that apart from these 2 special sites providing some 600 houses, general infill would provide some 220 houses over the plan period, **and 80 additional houses were proposed for the five key settlements identified in the rural area (Tibberton, Waters Upton, Edgmond, High Ercall and Lilleshall) over the plan period.**
- I don't have a view over whether this is an appropriate number of houses for the rural area. I take a position that infill and organic change is acceptable that doesn't fundamentally change communities, and the figure of 80 for the key settlements is open to discussion as far as I am concerned.
- The proposed pro rata allocation of houses to the Rural Area in the Modifications **means, however, an additional allocation of 100 houses** with a high probability that these additional houses would be located in the five identified settlements.
- While the additional allocation of houses is 11% across the District as a whole, the fact that the large majority of the new houses proposed for the Rural Area are on the 2 brownfield sites, this means that the effective increase in proposed housing numbers for the 5 key settlements in the rural area is likely to go **from 80 to 180 – an increase of 125%**. I'm sure this is not intentional and seems to fly in the face of the broad narrative for development outlined in the Plan. Presumably this reflects the speed at which the modifications to the Plan have been produced;
- Even if the infill houses in the rural area are included along with the 80 from the five settlements, then the modifications imply an **increase of 100 houses on some 300 houses (excluding the brown field sites) in the rural area = 33% growth;**
- This is surely not intended;
- **I suggest very strongly that the Council look again at these figures and only allocate an extra 11% to the planned housing figures excluding the two brownfield sites. This would be an additional number of houses between some 10-33 for the Rural area in the Modified Plan;**
- Having on the 20th September sat in on the public inquiry for the 85 houses for Edgmond that has gone to appeal, it feels to me that the rural area is very, very vulnerable to developers looking for quick profits. This is clearly not TWC's intention in the Local Plan, but I think there needs to be great care about developers being able to fundamentally get around the intention of the plan;
- The two large brownfield sites in the Rural Area also strike me as potentially a very serious future hostage to fortune. Their viability was questioned at the public

inquiry on the 2th September by the appellant. **If they proved not to be viable, the 600 houses proposed on these two brownfield sites should not be re-allocated to the rural area.** This would be a tragedy for the rural area and end up with consequences wholly unintended in the Plan as it would it would open up a development frenzy in the countryside

- **I think, therefore, the Plan needs to make very clear and be explicit that if these two brownfield sites do not proceed, that the 600 houses will not be sought in the Rural Area, but allocated across the District as a whole. The fact that these two major brownfield development sites are in the rural area does not mean that this level of development is appropriate for the rural area if they do not proceed.**

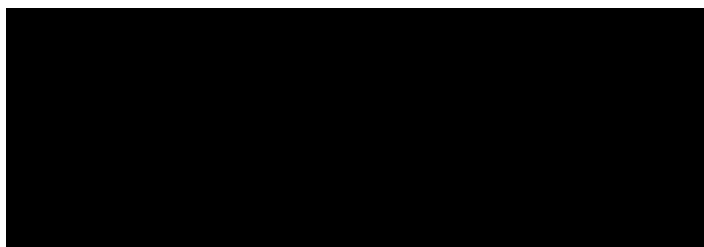
In summary, therefore, I suggest the **following modifications and clarifications** need to be made to the Plan to be consistent with its Policy objectives:

- 1. Additional housing allocated to the rural area in the Modified Plan should be between some 10-30, and not 100 as currently proposed;**
- 2. It should be made very clear in the Modified Plan that, if the two brownfield sites do not proceed, the 600 houses will not be sought in the Rural Area, but allocated across the District as a whole.**

I hope the above comments are helpful and will be seriously considered. If they are not, I think there is a very serious danger that the Council's planning approach to the Rural Area will be fundamentally undermined with huge sustainability issues created.

Finally, I recognise these points are quite complex and I will be happy to clarify or expand upon any of the issues raised should this be helpful.

Yours



Andy Hancox