

Our Ref: 40/15

21 September 2017

Business & Planning First Point Wellington
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Dear Ms Kelly

**TELFORD AND WREKIN LOCAL PLAN
INSPECTOR'S PROPOSED MAIN MODIFICATIONS**

I refer to the Schedule of Proposed Main Modifications to the Local Plan that the Inspector issued for public comment from 31 July 2017. This letter is written on behalf of Mr A Hodson,

Mr Hodson has considered the proposed modifications as far as they relate to those issues that affect his interests and in the context of the Inspector's conclusion that the Plan, as it stands, is not 'sound' and legally compliant and the modifications proposed are necessary in order for it to be so.

Mr Hodson appreciates that it is the Inspector's remit to ensure the Plan is 'sound' and legally compliant rather than, necessarily, to 'improve' it. He appreciates also that he may comment, now, only upon the modifications the Inspector has suggested. The comments below reflect this appreciation.

The Inspector will recall that the Mr Hodson's concerns were based on the fact that the land that he owns at Lodge Lane, Donnington, that is located immediately adjacent to the Telford Urban Area boundary, and which had been included within the urban area boundary, is now excluded from that designation. This is despite the fact that it is in an urban use, services the urban area, and that since the inception of the Telford New Town Plan in the 1960's until the publication of the Wrekin Local Plan in 2000 it had always been indicated as being within the urban area, and is a brownfield site. Its exclusion now affects its development potential for any purpose, including employment or housing. Mr Hodson, then, did not believe that was consistent with para. 17 or para. 158 of the NPPF.

Main Modification MM5, Page 27 indicates at Table 3 objective 8 that the Council will support the delivery of approximately 17,280 new dwellings in the Borough by 2031. Mr Hodson welcomes this change.

Main Modification MM8 on Page 34 indicates that land for the provision of 14,950 houses has been identified. That, too, is welcomed.

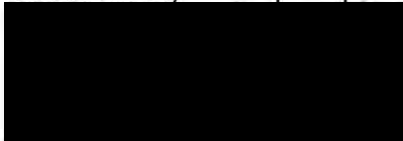
M55 - Mr A Hodson

However, **Main Modification MM39, Page 67** in respect of **Policy HO2** indicates that the shortfall in housing sites to meet the assessed housing need will be brought forward through the preparation of a Housing Allocations Local Plan. This is, apparently, intended to be a completely separate document to the current Local Plan, and might or might not materialise. Advice from the Council indicates that they currently have no plans or timetable in place for the preparation of this additional document. This being the case, the proposed modification to Policy HO2 cannot be regarded as making the Plan sound as it does not make firm provisions for the additional necessary housing to be provided. The Plan then, as it stands, cannot provide sufficient land to meet its housing targets.

Mr Hodson is disappointed that the Inspector has not proposed further modifications to the rural employment policies, which simply perpetuate the idea that all employment in the rural area is based on agriculture or forestry or is small scale and related to existing settlements. This is not the case, and hasn't been the case for several hundred years, particularly in the Telford area.

Proposed Modification MM22, Page 47, in respect of **Policy EC3** strengthens the perception that rural businesses can (or should) fit into converted barns, whereas they often need larger buildings to fulfil their potential. It also gives the impression that rural businesses need to be contained within buildings, whereas a major attraction to the rural area is the opportunity for uses that do not require buildings – this facility is often lacking in urban areas and particularly in Telford where the Strategic Employment Areas are geared towards attracting large operators into large buildings which out-prices anyone simply needing open land. This does not create the conditions for creating a prosperous rural economy, or for diversifying the rural economy. Use, and redevelopment of any existing employment land in the rural area should be encouraged, not just existing barns.

Yours sincerely

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes or dates.

Clive Roberts