

Our ref: 11/16

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Business & Planning First Point Wellington
Wellington Civic
Offices Larkin Way
Tan Bank
Wellington
TF1 1LX



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 submitted on behalf of Mr S P [REDACTED]

Mr Holding 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 Holding 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 Mr Holding's original concerns were based on his assessment,

1. That the policies that had been proposed in the Local Plan in relation to employment development in rural areas would not support a "prosperous rural economy" as the NPPF advocates, and were therefore not sound. Mr Holding believed the policies to be too restrictive and that they failed to grasp the current and historic factors relating to development in the countryside.
2. That development in a Minerals Safeguarding Area should not be prevented if it would not result in the sterilisation or loss of the mineral reserve.

Bearing this in mind the Mr Holding wishes to make the following comments on the Proposed Main Modifications:

Main Modification MM21 Page 47. Mr Holding welcomes the proposed alterations to **Policy EC3** which deletes the examples of what might constitute diversification of the rural economy which, other than tourism, have little to do with the rural area or with providing employment for people living in the rural area.

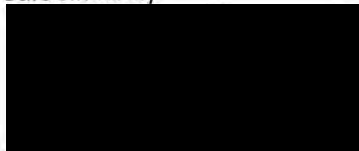
However, Mr Holding is disappointed that the Inspector has not proposed to extend this flexibility in the concept of provide employment in rural areas to the rural area policies which, as the policies stand, simply perpetuate the idea that all employment in the rural area is based on agriculture or forestry, or is small scale, and that the way to diversify the rural economy is to introduce more small scale urban uses that will have minimal impact on the appearance of the rural area. Continuation of this idea will also have minimal impact on the employment opportunities for people living in the rural area. The idea of the countryside is not actuality, 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. By strengthening this perception the modification does not create the conditions for a prosperous rural economy.

Main Modification MM23 on page 47. Mr Holding has no comment to make on the inclusion of the suggested wording to **para. 4.1.3.2** that relates to Harper Adams University, but cannot understand why the paragraph is limited to that operation only. There are other major employees in the rural area - though perhaps not limited to what are essentially urban business activities – often with over 100 employees, and they too should expect support for development that would create yet more employment.

Main Modification MM75 page 140. Mr Holding supports the proposed change to **Policy ER2** which indicates that Mineral Resources will be protected from unnecessary sterilisation by other development unless there are specific reasons why the benefit of the development outweighs the resource that exists. Mr Holding also supports the proposed alteration that would allow Major development proposals within the urban areas abutting on Minerals Safeguarding Areas subject to conditions, but wonders why the exceptions i) ii) and iii) which appear quite logical, should not be extended to development within Safeguarding Areas and to the Rural Area. NPPF Para 143 (bullet point 3) says the Planning Authorities should define minerals Safeguarding Areas and adopt appropriate policies in order that known resources of land and national importance are not needlessly sterilised by non-mineral development. The LPA should then, be in a position to positively identify those resources which are of local or national importance and those which are not, and so should be able to frame policies that would allow non-mineral development that would not sterilise the resource.

Yours sincerely



Clive Roberts