

Environment and Planning Policy Team
Telford and Wrekin Council
PO Box 457
Telford
TF1 1LX

VIA EMAIL & POST: LocalPlan@telford.gov.uk

22552/A3/IG/jc

22 September 2017

Dear Sir/Madam,

REPRESENTATIONS TO SCHEDULE OF PROPOSED MAIN MODIFICATIONS TO THE TELFORD AND WREKIN LOCAL PLAN ON BEHALF OF METACRE LTD – REPRESENTOR ID 31

We write on behalf of our Clients, Metacre Ltd, in response to the Council's letter dated 31st July 2017 inviting responses to the Inspector's Proposed Main Modifications to the Publication Version Telford and Wrekin Local Plan 2011-2031 (the "Local Plan").

Our Clients have previously submitted representations to the Local Plan at all stages of its drafting and during the Examination of the Local Plan to date. Whilst we note that some of our Client's concerns have been addressed by the Inspector, we do not consider that the comments made by our Clients through this process have been addressed in full.

It is not the intention of these representations to repeat the comments made in previous representations made to the Local Plan Process. However, it may be necessary to draw on those representations in demonstrating the points made to the Main Modifications proposed by the Inspector.

Context

The Inspector wrote to the Council on the 30th March 2017 (Document F10) to outline some concerns with the Local Plan. Specifically, those concerns centred around the methodology used to calculate the OAN for the Plan Period and Site Selection Methodology for the allocation of sites.

Accordingly, the Inspector proposed that the Council re-visit its OAN Methodology (in light of a previous Inspector's Decision Notice at Kestrel Close) and delete the proposed allocations within the emerging Local Plan which have not already obtained planning permission (or have consent by virtue of the New Towns Act 1981).

Subsequently, the Council has revised its OAN figure in line with the OAN proposed by the Inspector at the Kestrel Close Appeal and agreed with the approach taken by the Inspector to the deletion of its proposed allocations which do not already have consent.

We welcome the response of the Inspector at Examination Document F10 which addresses our main concerns with the Local Plan as drafted; in particular, it addresses our difficulties with the Site Selection Methodology. Indeed, the revised OAN figure for the borough now more closely reflects our Client's position regarding the correct OAN for the borough.



Metacre Site

Throughout the progression of the Local Plan through the plan-making process our Client proposed the allocation of its Site to help meet the housing needs of the borough [Site Reference 658 – the 'Metacre Site', Land north of Redhill, Watling Street]. The reasons for the Client's proposal to allocate the Site are well documented and will not be repeated here. Indeed, our Client accepts the Inspector's recommendation that the Local Plan does not seek to allocate any further development save for those Sites which already have planning permission or consent under the New Towns Act 1981; as above.

Nevertheless, since the closing of the Examination Hearings, the Council has determined an outline planning application at the Metacre Site for up to 450 dwellings, retail development consisting of up to 600 sq.m and a Public House of up to 800 sq.m with all matters reserved save for access [LPA Reference TWC/2015/0728]. A Location Plan and Illustrative Layout Plan of the proposed development is enclosed with these representations.

The Council determined the above application at its Planning Committee Meeting 30th August 2017 and resolved to approve the planning application subject to the signing of a S.106 Agreement which is currently being progressed in line with the Heads of Terms considered by the Planning Committee.

As set out within paragraph 19 of the Inspector's Letter 30th March 2017 (F10) the Inspector proposes the deletion of those housing site allocations that have yet to gain planning permission and assess the implications for the housing land supply. Nevertheless, the Inspector notes that a significant proportion of the intended yield from the Plan's site allocations relates to sites where planning permission has already been granted. For the avoidance of doubt, the Inspector saw little reason to delete those allocations that relate to extant planning permissions or section 7(1) consents.

It is our contention that, save for the proposed allocations which relate to section 7(1) consents, the remaining proposed allocations within the Local Plan have been granted planning consent outside the Local Plan process in lieu of the Plan being adopted. Our Client now finds itself in a similar position with regard to the Council's resolution to grant planning consent at the Metacre Site.

It is our view that, given the larger nature of the Metacre Site and the number of dwellings it will deliver, that the Site should be incorporated into the Plan's identified housing land supply and allocated for housing development within the Plan; the Inspector will need to consider the effect of the Site's inclusion within that housing land supply as above. We will address this point below with reference to the Inspector's proposed modifications to the housing land supply information presented within the Local Plan.

Regardless of the Site's allocation for development or otherwise, we consider that the Site should be incorporated within the Settlement Boundary of Telford. The Site comprises a sustainable development in which to help meet the Council's housing requirement across the Plan Period and its inclusion within that supply is significant in meeting that requirement. We consider that the Council, in progressing the Local Plan, and a subsequent Allocations DPD, should have certainty on the delivery of housing from the Metacre Site which is best achieved through the allocation of the land, or its incorporation within the Settlement Boundary.

Indeed, to put the above into context, we summarise that the proposed changes to the housing requirement (to reflect a higher Objectively Assessed Need (OAN) for housing) comprises an increase of some 1,725 homes to the OAN which are predominantly required at Telford. The overall effect of the proposed changes to the emerging Local Plan including the deletion of some site allocations, is

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a shortfall of some 2,450 dwellings to be found over the Plan Period. The proposed development of some 450 homes will deliver approximately a 5th of the shortfall across the Plan Period.

As the Council progresses the Local Plan and looks to progress its Site Allocations Development Plan Document (DPD) (which the Council has not yet begun to draft) it must have certainty that the DPD will be relevant for the duration of the Plan Period which will be improved through the allocation of strategically significant Sites within the Local Plan which have already been granted planning permission; as proposed with other large sites within the Plan.

Proposed Main Modifications

Where relevant, we have addressed the Inspector's Proposed Main Modifications to the Local Plan below, using the Inspector's referencing system for those proposed modifications.

MM6 – Object – The Local Plan does not make provision for approximately 17,280 new homes. The Local Plan in its current draft makes provision for some 14,830 new homes but has a requirement for 17,280 new homes. This part of the Local Plan should be amended to make clear that, with a Part 2 (Site Allocations DPD) Local Plan, the Local Plan will make provision for approximately 17,280 new homes.

MM8 – Object – As with MM6, the Local Plan does not yet make provision for 14,950 homes in Telford but will once sufficient land is committed through planning permissions or allocated through a Site Allocations DPD.

MM12 – Support – We support the revision to the policy criteria with regards to Best and most Versatile Agricultural Land.

MM15 – Object – We support the removal of the overly restrictive policy criteria previously proposed as part of Policy SP4. We are also supportive of the text of the proposed revised Policy SP4 insofar as it is reflective of the provisions of paragraph 14 of the NPPF which provides the presumption in favour of sustainable development with regards to decision taking.

However, we consider that modified policy SP4 does not do enough to promote sustainable development in terms of the other arm of the 'presumption' which relates to plan making. Paragraph 14 of the NPPF requires that local planning authorities should positively seek opportunities to meet the development needs of their area.

With regard to Telford's Local Plan, the Council is in a situation where the Local Plan, at this stage, does not meet its development needs and a secondary element of the Plan is considered to be necessary. However, at this stage, the absence of a second part to the Local Plan would not necessarily mean that the Local Plan is out of date or that the Local Plan has no relevant policies; such that the presumption in favour of sustainable development contained in Policy SP4 would not be triggered. Accordingly, the Council could find itself in a position where the Local Plan was unsupportive of sustainable development despite needing additional sustainable development Sites to meet the needs of the borough.

We consider that Policy SP4 should be amended to include the extracts from the first part of paragraph 14 of the NPPF which relates to plan making and specify that sustainable development will be supported where it helps to meet the development needs of the area.

As set out within our representations to the Hearing Sessions for the Local Plan Examination, we consider that a policy such as SP4 needs to be positively worded to enable genuinely sustainable

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development to come forward and boost the supply of housing. It should not be a necessity that Local Plan policies are required to fall out of date or be absent before the Local Plan is afforded the flexibility to support sustainable development which has not been envisaged by the plan; perhaps some 15 years previous.

Seeking positive opportunities to meet the 'development needs' of the borough is particularly important in considering the significant need for affordable housing which the Local Plan proposals cannot meet. It is essential in that the Local Plan provides sufficient flexibility that windfall sites can come forward, particularly where they will help the borough meet its affordable housing needs.

MM40 – Comment – We would be grateful to understand when the Council is proposing to release its monitoring data for 2016-2017 which should, if possible, be included within the Council's supply information.

MM41 – Comment – As set out above, we consider that the Council's supply information should be updated to include the Metacre Site which the Council has resolved to grant planning permission for subject to the signing of a S.106.

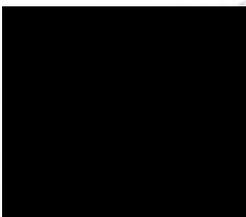
MM48 – Object – We support the explanatory text set out by the Inspector regarding the supply position during the latter parts of the plan period. However, we consider that it is necessary for the Local Plan (Part 1) to set out the requirements for and trigger for the publication of a Site Allocations DPD. As drafted, MM48 could result in the Council simply monitoring the Local Plan delivery for the first 17 years of the plan period before any action is taken to resolve the last part of the housing requirement. We suggest that the Council is encouraged to provide a Site Allocations DPD within the next 5 years or encouraged to review the Local Plan at that stage.

Further to the above, our proposed amendments to MM15 would allow the Council the flexibility to enable sustainable development to come forward in the interim period between the adoption of Part 1 and Part 2 of the Local Plan.

MM55 – Comment – The requirement of the Local Plan should be 'approximately' 17,280.

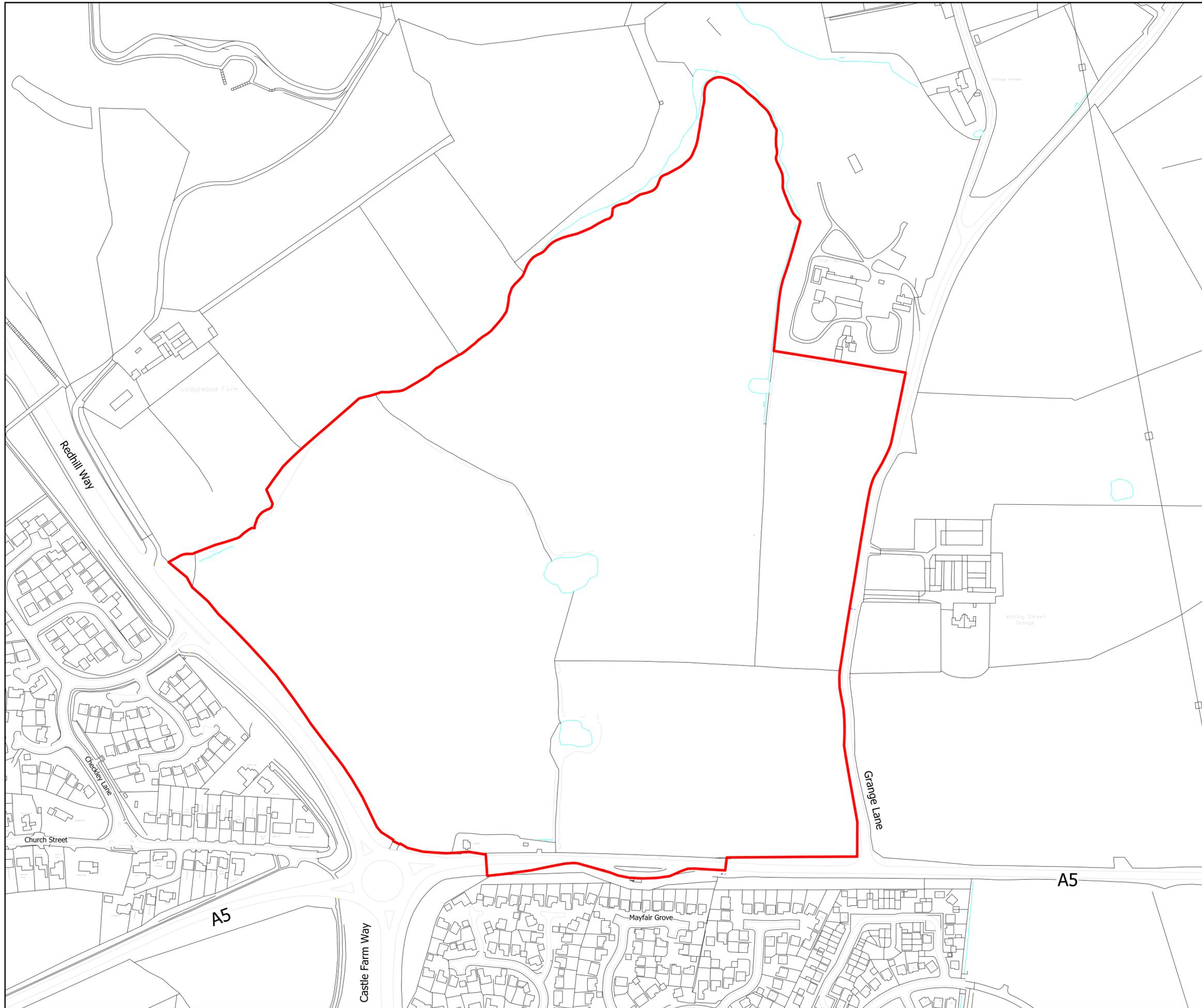
We trust you will take these comments into consideration, and we would welcome the opportunity to engage further with the Council on these matters. Please advise us of any further consultations.

Yours sincerely,

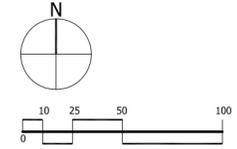


IAN GILBERT
Senior Planner

Encls. Site Location Plan
Illustrative Layout Plan



Site boundary
Site Area: c. 31.25ha



Project
**Grange Farm
Telford**
Drawing Title
Site Boundary

Date 09.07.15	Scale 1:2500 (A2)	Drawn by BB	Check by IG
Project No 22552	Drawing No 01	Revision -	

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The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-



Project
 Grange Farm
 Telford
 Drawing Title
 Illustrative Masterplan

Date 05.04.2016	Scale NTS	Drawn by SW BB	Check by SW
Project No 22552	Drawing No Ind01	Revision	

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