



6 Stafford Place SHIFNAL Shropshire TF11 9BH

Tel: 07976 080813

Email: andy@advance-planning.co.uk

EXAMINATION OF THE TELFORD & WREKIN LOCAL PLAN 2011-2031

MATTER 3 – DEVELOPMENT STRATEGY

Question 3.2

Is the Local Plan's settlement hierarchy and proposed distribution of development, particularly between the urban and rural areas, sufficiently justified? With reference to paragraphs 28, 54 and 55 of the Framework, is adequate provision made for development in rural settlements.

It is perhaps worth having an understanding of the underlying political context for the approach that has been adopted by the Council. The Labour Group which currently rules by the slimmest of majorities (one seat), has little interest in the rural areas - its heartland is Telford. The Conservative Group does not seek to encourage development in the villages where proposals tend to be unwelcome by the local communities. In this context, it is hardly surprising that the Council has chosen to restrict new housing development in the rural area and seeks to confine the majority of the provision (600 or so dwellings) on two extremely large 'windfall' sites, in relatively 'out-of-the-way' locations at Allscott and Crudgington, where significant investment is needed to bring forward development in relatively unsustainable locations, that are proving to be unattractive and of little interest to the house-building industry.

A more balanced and appropriate strategy for the rural areas would have been to acknowledge the potential to regenerate brownfield sites at Allscott and Crudgington, but to treat these potential opportunities as the windfalls that they will be, if and when they are ever developed.

In the meantime, the rural area allocation should be increased by at least 200 dwellings to enable a more balanced and sustainable distribution of development within the largest and most sustainable settlements identified in the Plan, where allocations of around 20 dwellings should be identified on suitable sites. It may also be appropriate to identify a second tier of 'suitable settlements' (the additional villages identified at Policy H9 Wrekin Local Plan) where limited housing development may be permitted to help to sustain local communities.

We say this because we believe that development of the scale envisaged can help to breathe new life into villages, without detriment to the scale and character of a settlement. It can assist in sustaining services and facilities and equally importantly, development of sufficient scale can help to deliver affordable housing which the Council acknowledges is needed, but which will not otherwise be provided through a policy of allowing only infill (one or two dwellings).

Indeed, the Council must explain how its rural area development strategy will deliver affordable and market homes in sustainable rural locations to meet the needs of local communities. I suggest that the proposed policy, which is little more than a continuation of the existing policy that has failed the rural area so badly. As such it will merely serve to exacerbate the existing problems and not assist in the delivery of affordable housing where it is required, in villages such as Edgmond for example.

Question 3.3

Are the following sufficiently justified and in line with national policy in the Framework:

- 1) the prioritisation of previously developed sites within Telford and Newport**
- 2) the focus on the development of publically owned land and**
- 3) the approach to best and most versatile agricultural land sufficiently justified and in in line with the NPPF?**

- 1) The NPPF seeks to encourage the re-use of previously developed land (paragraph 14), but it does not advocate the prioritisation of brownfield sites ahead of greenfield ones.
- 2) If the Council is to improve on its past trajectory of housing delivery, it needs to identify a range of sites of different types, sizes and ownerships, in order to ensure sufficient choice is available for a wide range house-builders (small medium and large plc's) in locations where need and demand is strong. It is inequitable and ultimately unhealthy for the Council to seek to control the housing land market for reasons of monetary gain, in what would effectively be a re-establishment of the former new town approach where the HCA dominated the land supply and ultimately failed to assist the timely delivery of sufficient new homes. There is a good choice of available omission sites that aid the operation of the market.
- 3) The quality of best and most versatile land is a factor to be taken into account when identifying the most suitable sites for development and when considering planning applications for development. It should, however, be given that much of the land surrounding Telford is either Class 2 or Class 3, the importance of this matter has to be tempered and considered in the wide planning balance.

It is ironic of course that the Council proposes to allocate the two urban extensions (H1 and H2) on Grade 2 land, yet is taking a completely contradictory stance in seeking to challenge through the High Court, another proposal at Wellington, that was recently allowed on appeal on grounds that it affects bmv land.

Question 3.4

Has the Local Plan been subject to adequate sustainability appraisal?

We are concerned that the Sustainability Appraisal (SA) has not adequately assessed the impact of Mineral Safeguarding specifically having regard to the Council's proposal for a large sustainable urban extension at Muxton. In particular, the Council has proposed a specific policy (ER2) requiring detailed analysis and justification of non-mineral development in mineral safeguarded areas and yet has chosen to exclude identification of minerals within a newly defined urban boundary enclosing a large proposed strategic urban extension which currently lies in the rural area and which contains glaciofluvial deposits. The SA makes passing reference to mineral deposits and does not adequately address the sustainability arguments that would permit sterilizing what appear to be safeguarded minerals within a proposed large strategic urban extension to be located in a current rural and easily accessible area.

The Integrated Appraisal Report confirms in Table 1.2 (The Local Plan Aims and Objectives) the laudable aim and objective at Aim 7: (Reduce the environmental impact) Objective 29 *"Safeguard the borough's limited mineral resources for future generations"*;

This aim is reconfirmed in Table 2.1 (IA Framework) at Objective 7 *"to protect mineral resources from sterilization"*. and this is confirmed in Table 2.6 (the key to IA ranking of options) as *"The Objective will primarily relate the **sterilisation of mineral resources**"*.

While the sterilization of mineral resources is a significant objective enshrined in proposed policy, the IA confirms at Table 3.3: Key Sustainability Issues and Opportunities that in relation to Mineral resources for all areas and Authority wide that there *"are no challenges"* and yet confirms at 3.102 that the overall key challenges are identified as *"provide timely capacity for the management of resources at material assets".....and "value those assets found within Telford and Wrekin....."*

It can be seen therefore that the IA recognizes the specific objectives and aims of the Plan in relation to Mineral Policy is the safeguarding of mineral resources for future generations but regrettably sees no challenges in relation to mineral safeguarding.

It is also regrettable that in IA Table 4.3: Summary of SA Findings for Housing Growth Options (2013) that in relation to Sustainability Objective 7 (amongst others objectives, the protection of mineral resources) that the protection of mineral resources is not discussed.

The IA then confirms at Table 4.9: Summary of Approach to Alternatives Assessment and Selection for Spatial Distribution Options at Option 35 “*In line with the National Planning Policy Framework the council intends to adopt policies to ensure Minerals safeguarding Areas*” noting this is in line with the NPPF and has been selected and covered under policy ER2.

It is clear therefore, that the Council is advocating a very clear and strong policy objective and aim of protection of mineral resources within the Plan while the IA sees no challenges in relation to Key Sustainability Issues and Opportunities.

It is unfortunate that following the strong and defined policy objectives referred to above, that, at IA Table 4.4: Summary of IA findings for Growth Options (2015), the IA merely provides an ill defined, colour coded appraisal of SA Objective 7 which relates to both aggregates and the protection of mineral resources. This also confirms the written findings referred to earlier at Table 4.3 where the IA findings for Growth Options (2013) did not specifically discuss implications for mineral resources. It is clear therefore, that there is no clear evidence of the consideration of the sustainability credentials of any of the housing growth options having regard to the issue of the protection of mineral resources at this stage. Of particular concern is the lack of numerical ranking within the appraisals leaving the observer to subjectively reflect on numerous confusing individually colour coded “analyses” which cannot be ranked numerically to assist in judging overall sustainability appraisals of options.

The IA seems to recognize this shortcoming at para 5.7 where it states “*The compatibility analysis suggested that there is the potential to strengthen the Local Plan with the inclusion of an additional objective under Aim 7 that seeks to minimize the impact of new development on natural resources and encourage their efficient use*”.

The IA then goes on to review the policies and Site Allocations with particular reference to the SEA Directive, NPPF and relevant SA Objectives.

Of particular interest is SOIL at p167/183 and in particular SEA Topics; Soil; NPPF paras 109-125 and SA Objective 7.....”*to protect mineral resources from sterilization*”.

Under this heading there is reference to the appraisal of Local Plan Policies where at 5.133 it confirms *“Development has the potential to negatively affect soils by hindering future access to or use of mineral deposits. Draft Local Plan Policy ER2 ensures that any applications for non-mineral development within a Mineral Safeguarded Area that could sterilize that resource are not to be granted unless a number of criteria are to be met”*.

The IA then provides an Appraisal of Site Allocations and at 5.137 concludes *“The appraisal has also identified that development at the following preferred site options has the potential to hinder future access to and use of mineral resources”. Land at Muxton (SHLAA ID’s: 144,482,504 and 508).*

While it is accepted that the IA has flagged up the potential for sterilization of mineral resources at the above SHLAA options, (which represent the Sustainable Urban Extension proposed at Muxton) there is no quantifiable and evidential analysis of the potential of such a large development to sterilize scarce mineral resources of unknown quantity at what is a rural location unfettered by existing development which could determine the sustainability of the proposals. It is evident from the bald wording of the appraisal of the site allocations above that scant regard has been given to the full and proper appraisal of site sustainability.

Perhaps equally importantly and somewhat surprisingly, the IA in appraising the sustainability of the plan is silent on what is potentially the most important flaw in the plan relating to the sustainability of minerals policy and site allocations. This is the effect of removing the identification of minerals from within the urban boundary on the Minerals Safeguarding Areas Map (MSAM). This plan proposal, therefore, clearly precludes the evaluation of minerals in accordance with proposed policy within the urban boundary at a location which proposes a large strategic urban extension and which is currently located in the rural area, relatively remote from housing and with good road access that could aid the winning and distribution of minerals which the MSAM clearly demonstrates at the urban boundary.

Accordingly, we submit that the Local Plan **is unsound** since the SA and SEA have not adequately addressed the issues of mineral safeguarding and sustainability in relation to housing proposals (in particular the large urban extensions proposed in rural areas outside of the present urban boundary of Telford) and we propose that the only resolution to this issue is for the examination to be suspended and the Local Plan and SA to be revisited in order that the proposed allocations have been subjected to thorough and rigorous sustainability appraisal. These concerns are set out further in answers to Questions 7.1 and 7.2 (separate correspondence).