



*Acres Land & Planning Ltd*  
*'Acres of space'*

Hallam Land Management Ltd & Seabridge Developments

Respondent No.

Matter 3 Development Strategy

**TELFORD & WREKIN LOCAL PLAN 2011-2031: CORE STRATEGY EXAMINATION  
 MATTERS, ISSUES AND QUESTIONS.**

**MATTER 3 – DEVELOPMENT STRATEGY**

**3.1 Does the Local Plan plan positively for the development and infrastructure required in the area, in line with the presumption in favour of sustainable development set out in the Framework? [Inspector's note: The Council is also asked to consider whether the criteria-based approach set out in policy SP4 represents either duplication or potential confusion with other policies, both in the Local Plan and the Framework.]**

In our view, there is no discernible development strategy or planning logic behind the choice of strategic sites which have come forward in the Plan. There is no tangible link between the employment and housing allocations and the principal determinants of choice appear to be brownfield sites and publicly owned land.

Policy SP4 – to which we have objected – appears to exist despite the land allocations – rather than consistent with the allocations. Not only is the policy long-winded and complicated but it doesn't seem to conform to the spirit of the Presumption in Favour Of Sustainable Development as is appears in paragraph 14 of the NPPF.

The nature of the policy has been couched in such a way which suggests that the criteria are designed to deliberately restrict and restrain new development rather than promoting development. In our view, there should not be an overall limit on development, bearing in mind that housing targets are supposed to be minima and that Telford & Wrekin is a former New Town which benefits from a wealth of publicly funded infrastructure.

Criterion B1 for example aims to limit development to the 'planned' scale of development when (since this is based on a recessionary trend) this may well prove to be inadequate and has been sharply reduced by the Submission Plan (compared with previous plans for the Borough). In the past, Telford has been the focus for regional housing and employment growth and an exemplar for new initiatives against a background of history and heritage.

We are not convinced that the Council now has a positive vision for Telford. Nor is there any internal consistency between the different elements of the Local Plan.

Furthermore, there should not be a need for the Council to repeat all the other policies within Policy SP4, just in case some development is able to slip through! In our view, this policy is not positively framed and hence we feel it is 'fundamentally unsound'.

**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?**

No. The Local Plan appears to distribute the scale of development between Telford (86%), Newport (8%) and the Rural Areas (6%), purely on the basis of the current number of households in those areas, rather than necessarily on the basis of actual needs. Below the strategic level, the policy approach appears to be driven fundamentally by the availability of public land and more specifically the desire to develop out the Council owned (and HCA controlled) sites within the town boundaries.

The problem of affordability has been exacerbated by focusing all the rural allocation within two relatively remote brownfield sites (at Allscot and Crudgington) within the rural areas which have not as yet been developed – and show no signs of being so - neither of which lie in sustainable rural locations but were chosen simply because they were brownfield sites.

**3.3 Are (1) the prioritisation of previously developed sites within Telford and Newport (policies SP1, SP2 and SP4), (2) the focus on the development of publically-owned land and (3) the approach to best and most versatile agricultural land (policies SP1-SP3) sufficiently justified and in line with national policy in the Framework?**

No they are not. There is no 'presumption in favour of brownfield land' within the NPPF or within Government policy. The Government has repeatedly emphasised within policy documents and Ministerial Statements that they wish to see brownfield land developed for housing, but there is no logic to focusing housing on unsuitable brownfield sites if that means that employment is located on greenfield sites. Previous attempts to prioritise brownfield land by introducing a 'brownfield first' policy ensured that all housing proceeded at the pace of the slowest resulting in a general slow-down of all development – which in the event caused the exacerbation of the housing shortage.

The focus of 2/3 of the housing allocations on to publicly owned land is a concern for the delivery of the Local Plan insofar as the range and choice of sites and their ability to come forward is likely to be constrained. Ownership is not a planning matter and therefore this should not drive the location of allocations.

The wording of Policies SP 1, SP 2 and SP 3 all preclude the use of the 'best and most versatile agricultural land' for future development – which is normally identified as land falling within ALC 1, 2, and 3A. Yet much of the Telford and Wrekin area (which is not brownfield land) is either Grade 2 or 3 land – and paradoxically the Muxton site owned by the Council and allocated for development is Grade 2 land.

In practice the Government policy for use of agricultural land within paragraph 112 of the NPPF simply states that *'LPA's should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, LPA's should seek to use areas of poorer quality land*

*in preference to that of a higher quality*'. This policy does not distinguish between the needs of employment and that of housing.

### **3.4 Has the Local Plan been subject to adequate sustainability appraisal?**

The Local Plan has been subject to Sustainability Appraisal however it is debatable whether this can be viewed as adequate. In our earlier responses to previous versions of the Local Plan in my role within Turley on behalf of Hallam Land Management, I undertook a detailed assessment of the Council's Sustainability Appraisal in relation to the choice of strategic sites. I am attaching a copy of this evidence for the EIP Inspector.

### **3.5 Does the Local Plan provide satisfactorily for the delivery of development, with particular reference to transportation and other infrastructure, consistent with the intended introduction of a CIL Charging Schedule?**

History has shown that Telford and Wrekin has struggled to meet its housing targets since the 1980's, albeit by reducing the housing target by almost 50% it has now given the illusion that it has over-provided in recent years! The Council needs to produce a clear Delivery Strategy to ensure that housing employment and infrastructure can be delivered in an efficient and timely way.

### **3.6 Is adequate provision made for monitoring the Local Plan's effectiveness?**

There is a rudimentary monitoring policy within Appendix A of the Local Plan and a reference to Monitoring the delivery of housing within Policy HO 3 - The Housing Trajectory policy, but in practice the Council's approach to monitoring has been to change the policy if it is not working. Within this Local Plan the Borough's housing requirement has been sharply reduced with the aim of 'taking control' of the scale and location of housing following the Council's experience in losing successive appeals as their housing land supply fell below the 5 year target during the 2013-4 period – the solution was to reduce the housing target to influence the 5 year housing supply equation.

This is not the most appropriate way of delivering peoples' housing needs. Therefore it should be the extent to which housing needs are met which should be monitored, rather than just the eventual housing requirement target from the Local Plan.

More important, if indeed the Telford & Wrekin Local Plan is found 'sound' then as the Council's strategy moves ahead, the delivery of employment land release and the production of jobs needs to be measured against housing delivery to ensure that the existing homes/jobs imbalance which has resulted in significant net inward commuting, does not get any worse.

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