

Telford and Wrekin Local Plan

Examination in Public

15th – 24th November 2016

Representations on behalf of Mr S P Holding and Mr A Hodson (Comment ID's PUB248, PUB250, and PUB 251 (Holding) and PUB 260 (Hodson))

Comments in relation to Inspector's Matters, Issues and Questions Paper

Matter 4 – Examination Session 22 November 2016

- 1.0 This representation is a combined submission on behalf of Mr S P Holding and Mr A Hodson, as many of the issues that they wish to comment on are common to both.
- 2.0 Briefly, and as background to the reason for these representations,
 - 2.1.1. Mr Holding owns land at Upper Coalmoor, which is situated close to Horsehay, and which lies around 200m west of the Telford development boundary - it is therefore regarded as lying in 'countryside' and subject to rural policies contained in the Local Plan. Mr Hodson purchased the land at Upper Coalmoor in 1999. He was introduced to the site by the Council, who wished to see the operation he had established at Water Upton, cease. He relocated his business to Upper Coalmoor and over the next 12 years built up a business from one that employed just five people to one that employed nearly 200, with the benefit of a number of planning permission granted during the 2000's.
 - 2.1.2 Mr Hodson owns an area of land at Granville Road, Donnington, which was part of the Granville Colliery, which is no longer operative. All the buildings associated with the colliery were demolished, apart from the building now owned by Mr Hodson. That building was retained when the colliery activity finished specifically to accommodate Mr Hodson's father's business. The Council, at the time (early 1990's), wished to relocate the business away from the site from which it had operated from for many years, which was in a fairly central position in Telford. The site was specifically chosen because the Council, at the time, regarded it as being within the urban area of Telford, and it was, indeed, indicated on the Development Plan at the time as being situated within the development boundary for Telford. The Council did not want the business located in a rural area. Since then the development boundary has been realigned and the site is now shown lying outside the development boundary. Thus it is now regarded as being 'countryside' and as being subject to rural area policies contained in the Local Plan.

2.2. Both of the sites are now in commercial use, but neither is associated with a rural settlement, and the majority of staff in both cases live in Telford rather than the rural area. They are located in the rural area only because the Council determined to draw the development boundary for Telford in the location shown on the Local Plan, not because the operations have close associations with agriculture or forestry. Mr Hodson's land immediately abuts the Telford development boundary (Telford, of course, having a population of 167,000 people), while Mr Holding's land is within 200m of those 167,000 people. Telford is, of course, a sustainable settlement and the two sites relate directly to the town. Neither site is located anywhere near one of the four 'development villages' identified in the Local Plan.

2.3 Para. 4.1.3.1 of the Local Plan says that,

"In order to generate extra employment in the rural area and promote the expansion of existing businesses, the Council will provide flexibility to develop diversification opportunities as set out in Policy EC3."

That, however, is not the experience of either operator, and possibilities for expanding the businesses are discouraged by the Council on the basis that the sites lie in the rural area and not in close proximity to a rural community. Further, they are not agriculture or forestry operations or of the nature of being education and research, leisure, culture or tourism activities.

3.0 So, against those backgrounds (and the representors have no reason to believe that other similar operations do not meet the same resistance – Veolia, which occupies a site immediately adjacent to Mr Holding's site, and the nearby retail garden centre, for instance) the following comments are made in response to the Matters raised by the Inspector.

4.1 Matter 4

4.1.1 Matter 4.1

4.1.2 Policy EC1 deals only with the Strategic Employment Sites and Policy EC2 says that the Council wishes to see new employment sites in the urban area sited as close as possible to the Strategic Employment Sites. There is no provision in these policies for employment in the rural area. The rural area of the Borough has, over the past five years, seen the closure of two major employers in the rural area, one at Allscott and the other at Crudgington. There does not appear to be any strategy to attempt to replace the employment lost in the rural area. It is accepted that the rural area has been provided with additional jobs by the development of Harper Adams University, but the jobs that has created are not likely to be attractive to persons displaced for the sites at Allscott and Crudgington. This is bound to increase the need to travel – especially as both these isolated sites are, it is understood, to be redeveloped for housing, and so, whilst the provision within the urban area may be adequate, the lack of strategy in respect of the rural area means that the assessment of requirement is inadequate.

4.2.1 Matter 4.3

4.2.2 Policy EC1 provides for Class B Uses and similar industrial uses and ancillary uses to be permitted on the Strategic Employment Sites. In saying that the Council expects these sites to deliver these particular uses, there is an implication that other uses may not be welcomed. This limitation is quite restrictive, as Class B Uses includes most industrial uses in any event, and ancillary uses are probably intended to mean uses that would provide a service for the industrial operators, and are probably not intended to develop in their own right. There are many operations taking place on employment sites that are not Class B uses, and these should be catered for. A significant amount of the activity taking place on the sites that are operated by Mr Hodson and Mr Holding would probably not be regarded as Class B uses, and would thus be discouraged from the strategic areas. 'Other' sites in the urban areas are more likely to be closer to residential properties, and may not be appropriate for some of the activities taking place at Upper Coalmoor and Donnington. If suitable sites are not available within the urban area, provision ought to be made in the rural area, if not by allocation then by a flexible policy approach.

4.2.3 The plan should be revised to bring it in line with the Framework's expressed intention to deliver economic prosperity.

4.2.4 In the case of the land at Donnington the development boundary could easily be diverted around the site, so that it could return to being regarded as a site within the urban area of the Borough – as it was when Mr Hodsons use was first established, thus it would not be subject to the restrictions imposed by Policy EC3.

4.2.5 In the case of Mr Holding's site at Upper Coalmoor, again the development boundary could be extended to include the site in the manner that it was extended to accommodate a small housing estate just 100m from the Upper Coalmoor site in the last Plan review, or by revising Policy EC3 to make it clear that expansion and/or redevelopment of existing employment sites, even if they are not based on agriculture, forestry or some particular university or administrative operation, in the rural area will be supported.

27 October 2016