



Acres Land & Planning Ltd

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Hallam Land Management Ltd and Seabridge Developments

Respondent No.

Matter 4 Economy and Community

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

MATTER 4 – ECONOMY & COMMUNITY

4.1 Is the Council's assessment of the additional employment land required during the Local Plan period (76 hectares, as stated in policy EC1) sufficiently justified in line with the Framework, most particularly paragraph 22, and national Planning Practice Guidance (PPG)?

The Council has adopted an unashamedly pro-active approach towards encouraging employment and investment, indeed the Consultation version of the Local Plan, published in 2015 (para 4.9), proposed 110 hectares of employment rather than the 76ha proposed in the Publication and Submission Versions of the Plan. Whilst we support the Council's positive stance towards economic growth and welcome the portfolio approach to land availability as a means of boosting the economy of Telford region's and bolstering the wider economy, we feel that the employment objectives should be matched by a similar and complimentary approach to housing delivery. Clearly at the moment they are not.

Paragraph 4.1.1.3 of both the Publication and the Submission Versions of the Plan indicates that the actual amount of employment land identified in Telford is **149ha**, a figure also included in the earlier Consultation Version. This is double the amount of land allegedly provided (76ha) within Policy EC1 and paragraph 4.1.1.2. Yet despite this actual supply figure remaining unchanged since the earlier Consultation version, Map 2 was amended between the Consultation version and the Publication version, to show a reduced coverage of employment land. It appears from this that the employment figures quoted in the documents are not necessarily linked to the accompanying plans.

Paragraph 22 of the NPPF warns against over-allocating employment land and above all protecting areas of employment where there is no reasonable prospect of the site being developed for that purposes and which might otherwise be used for other uses. This reflects the tendency of some authorities to over-allocate employment land and under-allocate housing. Telford & Wrekin Borough is one of the classic examples of this practice.

The Government's Planning Policy Practice Guidance offers a similarly methodological approach to defining economic and housing needs where the two are actually covered in the same section – indicating clearly that the two are regarded as complimentary and therefore should be co-ordinated and consistent.

4.2 Is the scale and distribution of the Plan's intended employment allocations (some 148 hectares, as set out in Appendix B) sufficiently justified in line with the Framework and PPG? Specifically, can it be shown that (1) the intended uplift from the identified need is both deliverable and sustainable and (2) that the Plan's approach makes the best use of land?

As implied in response to the last question, we are generally supportive of a growth led strategy, but this must be followed through to the housing policies if the Local Plan is to be consistent, robust and 'sound'. The Council has clearly over-cooked the employment land allocations, but if the range of sites manages to attract inward investment, then this may not be a weakness in the Plan. In the context of a New Town where land supply is more generous and the nature of employment needs more land (rather than in an urban area where employment may be more easily accommodated in back-land, above shops or in offices, there may be a justification for a broader supply of land – incorporating a shortfall allowance.

Policies EC2 and EC3 also provide scope for additional employment land, over and above the figures in EC1 and the identified employment sites in paragraph 4.1.1.3. Of course, not all employment requires actual land release. Increasingly people choose to work from home or have 'mobile' jobs. But these people need housing too.

In terms of employment land provision, much of the allocated land is focused on the northern and eastern sides of Telford, whilst the current housing allocations (at Dawley, Lawley and Lightmoor) are on the southern and western sides of the town. Similarly the rural housing sites at Allscot and Crudgington are unrelated to any employment opportunities.

The Wappenshall site, on the other hand is on the northern edge of Telford adjacent to the Hortonwood and Hadley employment areas as well as being close to Donnington and Shawburch employment areas – which are all on the northern edge of the town. Wappenshall is also integrated with HCA land lying on the northern side of Queensway and close to Queen Elizabeth Hospital.

4.7 Should the Local Plan make explicit reference to the Newport and Shrewsbury Canals project?

Yes. The disused Shrewsbury and Newport Canal is an integral part of the Council's heritage and tourism infrastructure. It is a matter of some puzzlement that there is an absence of any positive policy to support and promote the restoration of the Shrewsbury and Newport Canal – nor even a reference to the disused Shrewsbury & Newport Canal.

The only reference to canals at all is within paragraph 4.3.2.8 of the 'Economy' section which states that *'Telford has historically been home to various canal routes. Many of these have now undergone a process of blending into the landscape. It is recognised that the reinstatement of the canals could deliver additional visitors to the area. There are many barriers to the restoration of the Borough's old canals, however schemes which relate to their restoration will be considered on their individual merits'*.

The (mis-named) Newport Canal is then mentioned in Appendix E as falling within an SSSI. This perfunctory reference to potentially one of the Borough's most important and heritage assets displays

- a worrying lack of expertise within Telford & Wrekin and a disinterest of the importance of the assets within the Council's control,
- a breath-taking complacency that it is acceptable to ignore the significance and potential of the canal network, despite its huge significance to the growth of Telford. There appears to be an acceptance that the canals can be allowed to simply 'blend into the landscape' – as if they were best forgotten,
- an unfortunate lack of vision of the massive economic and tourist benefits which canals could encourage for the benefit of their residents and visitors, and
- a complete disregard for local bodies and volunteers who have striven over many years to improve and restore the canal for the benefit of the residents of Telford.

Paradoxically Telford proudly promotes itself as the birthplace of industry and the Ironbridge Gorge is internationally known as a World Heritage site. Yet the Council is inexplicably silent on the future of the Shrewsbury & Newport Canal which is an integral part of that heritage – despite the impressive restoration work being undertaken by the S & N Canal Trust on a voluntary basis – a body which has been in existence for nearly 20 years.

The benefits and significance of the Shrewsbury & Newport Canal were brought to the attention of Telford & Wrekin during the previous consultation phase, both by local residents, by the Shrewsbury and Newport Canal Trust and by myself (acting on behalf of Hallam Land Management) and the landowner of the Wappenshall site who is a Trustee of the Canal Trust (both in written representations and in several different public consultation meetings). Yet, paragraph 3.27 of the Council's technical paper suggests that; *'As part of the Regulation 18 consultation only a limited number of comments were received'*. No mention is made of the plea to protect and promote the Shrewsbury and Newport Canal.

The Council's technical paper on the Historic Environment explains in paragraph 1.6 that *'the NPPF is very clear that the historic environment is a key part of sustainable development' and that 'LPA's should strive to conserve and enhance the historic environment and ensure that local plans set out positive policies for conservation of these assets'*. Paragraph 1.7 also states that *'the NPPF recognises that heritage assets are irreplaceable and should be conserved in a manner that is appropriate for their significance. Through the conservation of these historic assets benefits to the local community in terms of enjoyment, cultural identity and economic regeneration can be delivered'*.

Paragraph 1.8 goes further in saying that *'local plans should encourage a strategy in which heritage assets are brought back to life and into a use which is consistent with their conservation that contributes to wider sustainability aims. The core principle that should underpin the plan and decision making is that heritage assets are conserved in a way appropriate to their significance to society so that they can be enjoyed for the quality of life they bring to future generations.'*

These passages are especially significant since the Council has steadfastly neglected to include one of the most precious historical and heritage assets in the Borough – the disused Shrewsbury and Newport Canal which runs through the Borough and provides possibly the single greatest opportunity to satisfy most (if not all) the objectives outlined in paragraphs 1.7 and 1.8 outlined above. There is scope through a combination of voluntary effort, charity and lottery funding, public money and private investment to create an important tourist, heritage and wildlife asset comparable to the Ironbridge Gorge World Heritage site.

The disused canal includes a historic wharf at Wappenshall Junction, (which paradoxically belongs to Telford & Wrekin Council) where the Shrewsbury & Newport Canal meets the older 'tub-boat canals, built during the birthplace of the Industrial Revolution. The canal also includes the Longden on Tern Aqueduct, which is the very first iron aqueduct still preserved in situ and represents a landmark in industrial technology. The 'tub boat' canal leading to Trench through Leegomery from Wappenshall Junction, includes existing examples of guillotine locks which are extremely rare and despite being relatively well preserved, are not promoted or protected in the Plan.

The Wappenshall site, adjacent to Wappenshall Junction provides the opportunity to help bring many of these heritage assets back to life and link development with the industrial heritage assets which form part of the canal network. Above all, the disused canal creates an opportunity, as the policy in the NPPF suggests, to conserve the canal as a living entity and bring new life to the area and to introduce heritage as an integral part of the rural and where appropriate the urban fabric. This will enable people to enjoy the facility for the quality of life it brings to the people of Telford as well as to future generations.

So unlike the previous Wrekin Local Plan, the Shrewsbury & Newport Canal with its unique heritage features is not mentioned as a 'heritage asset' in the Plan nor is the line of the disused canal either identified or preserved on the Local Plan Proposals Map. This needs to be addressed in the Main Modifications to the Plan.

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