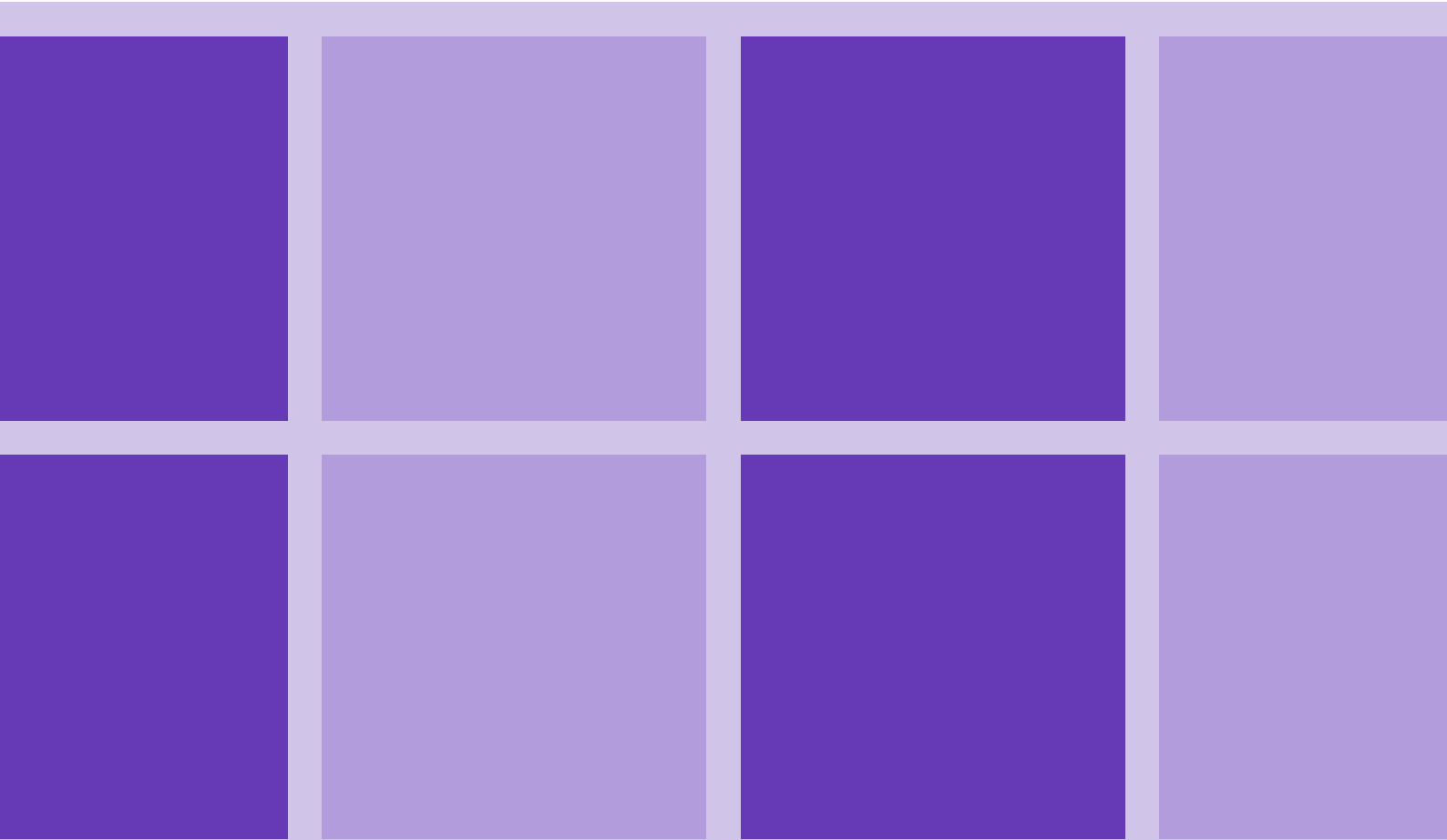


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Executive summary

- 1** This paper explains how the Council will plan for new housing growth in the rural area of the borough in the Local Plan. It provides a detailed justification for Policies SP3, HO10 and HO11 of the Local Plan and takes account of national changes in planning policy and local factors i.e. planning permissions since July 2015.
- 2** The Council is planning for around 900 new homes up to 2031. This number reflects the current split between the existing urban and rural populations.
- 3** Around 240 of these new houses will come from sites with planning permission. Around 580 of them will come from two brownfield sites at Allscott and Crudgington. The balance - 80 homes - will be expected to be provided within the settlements of High Ercall, Waters Upton/Crudgington, Tibberton, Edgmond and Lilleshall. These settlements have been identified because they have the highest levels of community infrastructure.
- 4** The Council does not anticipate supporting housing anywhere else in the rural area other than in special circumstances. These include the following situations: (a) where it would meet the essential need for a rural worker to live near their place of work; (b) where it would represent the optimal viable use of a heritage building; (c) where it would re-use redundant buildings; or (d) where it represents exceptional design.



1 Introduction

1.1 This technical paper forms part of the evidence base to inform the Local Plan and justify the strategy for housing in the rural area of the borough.

1.2 The principal output of the paper is the identification of those areas where the Council considers the borough's future rural population growth should be concentrated and to clarify the Council's intended approach to any new applications for housing it receives in the open countryside, set out in Policy SP3, HO10 and HO11 of the Regulation 18 (Consultation) and Regulation 19 (Publication) version of the Local Plan.

1.3 It also takes account of comments received during the Regulation 18 consultation which took place between August and September 2015 and the Regulation 19 exhibition which took place between January and March 2016 as well as other updates such as the Housing and Planning Act 2016.

2 Review of the rural area of the borough

2.1 The following review draws principally on other evidence that supports the evolving Local Plan including the Council's Strategic Housing Market Area demographic research. Other background documents that form part of the evidence base for the Local Plan referred to in this paper have been quoted where relevant. The paper does not intend to repeat what is contained in other documents but, rather, seeks to quote relevant parts where it will support this review.

Geography and geology of the rural area

2.2 The borough has a diverse countryside ranging from the Shropshire Hills Area of Outstanding Natural Beauty (AONB) to the flat Strine Levels north of Telford.

2.3 Broadly, the rural area of the borough can be categorised into three distinct areas.

2.4 The north western part of the rural area forms part of the wider Shropshire, Cheshire and Staffordshire Plain. As a landscape that owes much of its character to glacial origins and contains some of the most fertile parts of the borough due to its water retaining clay soils. It is generally characterised as a flat landscape with strong field patterns and sparse woodland. It contains a diversity of sites of habitat value and rich archaeological heritage.

2.5 The rural area south east of Newport and Telford are identified within the Mid Severn Sandstone Plateau that extends eastwards towards the Black Country. This is an extensive sandstone plateau although it is punctuated by Lilleshall Mount, a prominent volcanic ridge. These rural areas have been in active agricultural use for centuries. This can be seen today in the rich cluster of listed heritage in surrounding villages such as Wrockwardine, High Ercall, Longford, Tibberton and Edgmond and the spread of ancient monuments.

2.6 The south western part of the rural area of the borough forms part of the wider Shropshire Hills Area of Outstanding Natural Beauty which extends from The Wrekin westwards towards the Welsh border. It has an upland and more rugged character compared with the rest of the rural area and is nationally recognised for its rich and complex geology. It has extensive areas of woodland and is well used for recreation. The Wrekin Hill itself is a very prominent and regionally recognised landmark.

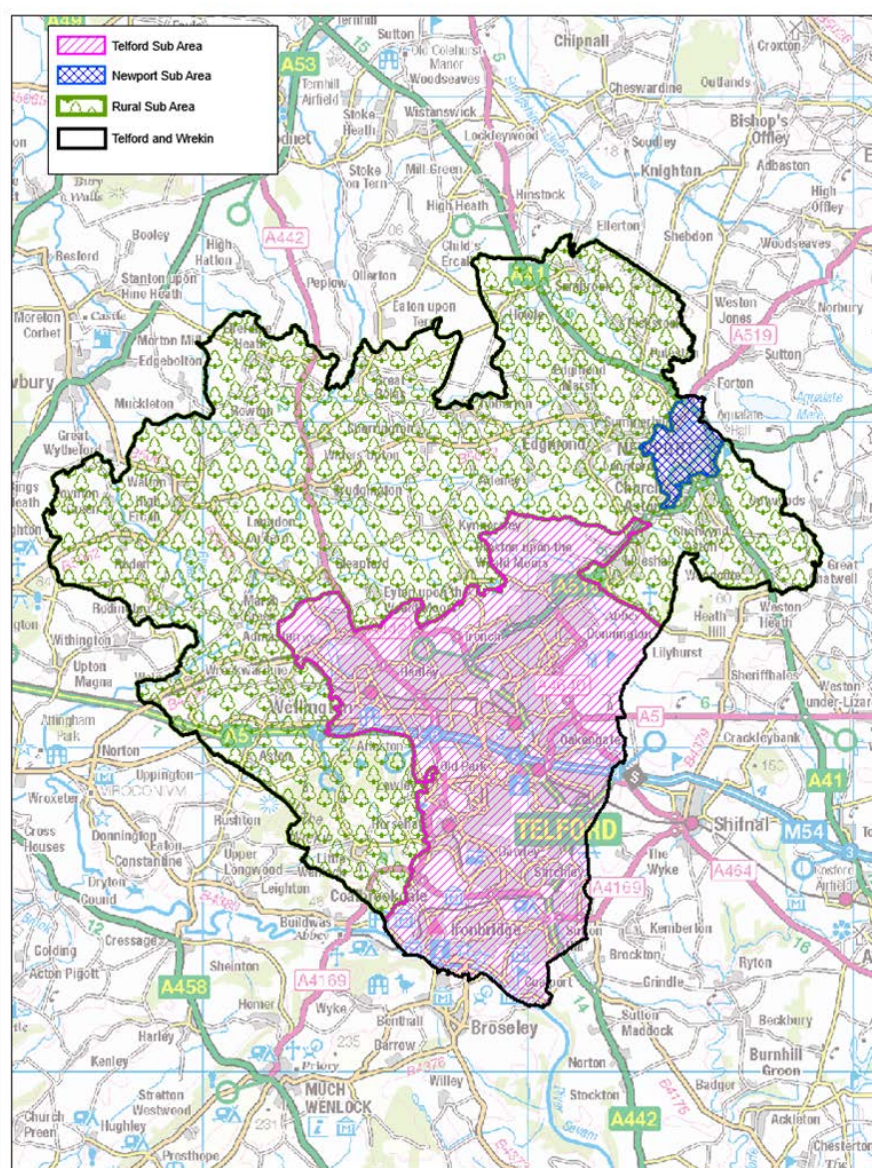
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2.7 Much of the rural area of the borough has minerals deposits though there are no more active coal mines. There is now only one active quarry in the rural area at Leaton.

Description of settlements in the rural area

2.8 While the majority of the borough is rural if measured by area, the borough population is dominated by the urban areas of Telford and Newport which as of 2011 comprise 93.7% of the borough's population. Away from these two urban settlements, the rural area can be said to comprise the non urban parts of four of the former local government electoral wards that existed prior to local government boundary reorganisation : Church Aston and Lilleshall; Ercall Magna; Edgmond; and Wrockwardine. The recorded population of the rural area in the Census 2011 was 10,497 residents (6.3% of the borough) with 3,887 households (5.8% of all households).

Figure 1 Rural area defined



2.9 A review of the Ordnance Survey covering the rural areas of the borough reveals 68 recorded settlements. These vary in size from small isolated groups of houses (for example, at Isombridge) to a number of larger service villages with schools, village shops and churches. Three of these villages have more than 300 homes - Lilleshall and Edgmond. However, the settlement pattern of the rural area can be described as scattered with no one village dominating. As a result, there is no one distinct rural centre and most of the physical and community infrastructure is dispersed too.

2.10 The settlement structure of the rural area is projected to alter over the next few years following the issue of planning permission on two large previously developed sites: the former British Sugar site at Allscott; and the former Dairy Crest site at Crudgington. The Allscott site received outline planning permission in May 2016 for a scheme of up to 470 homes, a new primary school, employment floorspace and a new local shopping centre. An expanded village of Allscott with more than 500 homes will be the largest rural settlement in the borough. The redevelopment of the former Dairy Crest depot at Crudgington, just south of Waters Upton will provide 110 new homes and some employment floorspace (permission granted in November 2015). It is possible to draw from this that there will be two separate villages in easy walking distance of each other that, combined, will provide a range of services that will be used by Waters Upton and Crudgington residents alike.

Population profile of the rural area

2.11 The 2011 Census data suggests that the population profile of the rural area is markedly different to the rest of the borough in the following respects:

- The rural area has an older population relative to the rest of Telford & Wrekin. The mean age of residents recorded in the Census was 43.5 years compared to 37. However, this figure conceals the fact that Edgmond is unique in housing a young student population centred around Harper Adams University.
- Mean household size is comparable to the rest of the borough.
- The rural area has a noticeably smaller proportion of non white people (2.7%), compared with 8.3% for Telford & Wrekin and 17.2% for the West Midlands.
- The rural area has a lower rate of unemployment than the rest of the borough but also a lower proportion of people in employment too. This both reflects the generally older population which is no longer economically active but also the student population at Harper Adams University in Edgmond. The proportion of students including full time students aged 16 to 74 in the rural area is more than twice the borough average.
- A higher proportion of rural area residents are in better paid work with more having been educated to NVQ Level 3 (equivalent to A Levels), NVQ Level 4 (equivalent to a degree) or above.
- Car ownership rates are higher in the rural area with almost one fifth of the rural area having three or more cars. This may reflect the rural area's relative poor transport infrastructure but can also be interpreted as a proxy indicator to demonstrate further the higher levels of household income in the rural area.

2.12 The Appendix to this report contains a set of statistical tables drawn on the 2011 Census to confirm these findings in detail and to compare and contrast the rural area of the borough with Telford & Wrekin, the West Midlands and England.

2.13 Other indicators reinforce the view that the rural area is generally wealthier than the rest of the borough. For example, Paycheck data for the borough as of May 2013 indicates that the mean gross household income for the rural area (£39,687) is more than 15% higher than the rest of the borough (£34,504). The proportion of residents claiming Job Seekers' Allowance as of March 2013 was 1.3%, less than a third of the borough wide rate. House prices locally were recorded at the same time between 36% and 46% higher than the rest of the borough (Table 1).

Table 1 Mean house price (March 2013) - comparison of rural area and the whole of the borough

House type	Rural area	Telford & Wrekin
Detached	£287,800	£202,500
Semi detached	£166,300	£121,600
Flat and terrace house	£161,500	£109,800

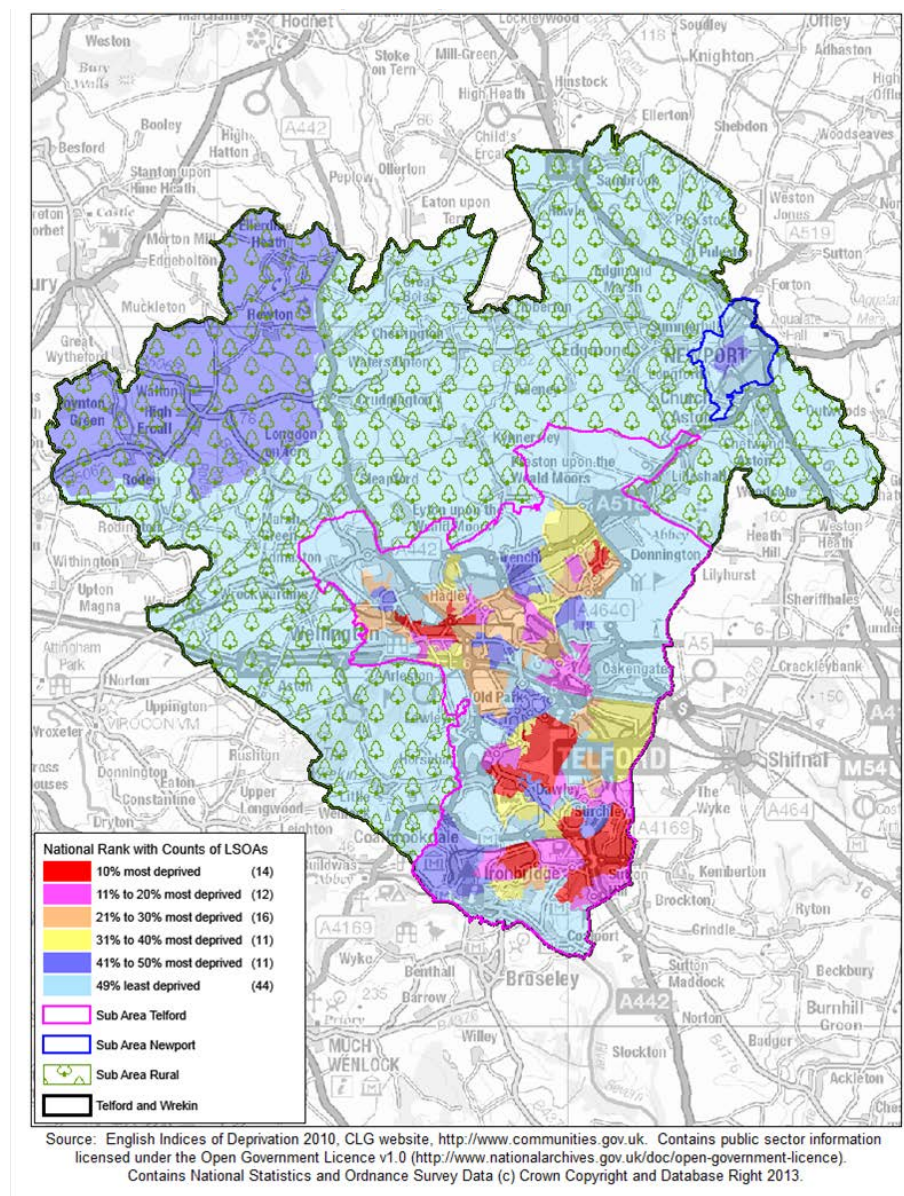
2.14 Despite the higher house prices in the rural area and greater challenges of affordability, there are noticeably fewer housing options for families in lower incomes as confirmed by the Census.

Table 2 Split of housing by tenure (Census 2011)

Tenure	Rural area (%)	Telford & Wrekin (%)
Owned	78.4	63.7
Shared ownership (part owned and part rented)	0.6	0.4
Social rented	7.3	19.7
Private rented	11.9	15.0
Living rent free	1.8	1.2
All households	100.0	100.0

2.15 However, it would not be fair to deduce that the rural area has a homogeneous population profile. There are pockets of deprivation around High Ercall which has a high proportion of social housing. The Index of Multiple Deprivation 2010 reveals that this part of the Ercall Magna parish is within the top 40% to 50% of deprived areas in England, although this area does not register the same levels of deprivation as parts of the Telford urban area (Figure 2).

Figure 2 National Rank Index of Multiple Deprivation by Lower Super Output Area, Telford & Wrekin



Economic base and other local infrastructure issues

2.16 The Council's last review of the rural economy was conducted in 2013. Drawing on this data, Table 3 (below) shows a split of businesses in the rural area that demonstrates the importance of agriculture by the number of businesses.

Table 3 Breakdown of businesses in the rural area by sector (2011 to 2012)

Sector	Number of businesses
Agriculture, forestry & fishing	155
Wholesale & retail trade, repair of motor vehicles	105
Professional, scientific & technical services	85

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Sector	Number of businesses
Construction	85
Tourism and recreation	50
Public Administration, Education and Health	55
Administrative & support service activities	45
Manufacturing	50
Other	130
Total	755

2.17 The 2011 to 2012 data for the rural area shows that 10 businesses (or 1.7%) had between 50 and 249 employees. The rest were small and medium size enterprises, meaning they had between one and 49 employees. The economic profile of the borough's rural area will have changed recently as a result of the decision by Dairy Crest to close their operations at Crudgington.

2.18 Farming nonetheless continues to be the predominant land use function of the rural area taking up over half the borough's rural area. As of 2013, an estimated 18,879 hectares of land is in agricultural use, a fall of 1.4% since 2010. Food production continues to be the main agricultural use (including wheat, potatoes, dairy and livestock) but there has also been a growth in non food crops too. The number of holdings continues to fall from around 340 in 2007 to 283 in 2013 (Table 4).

Table 4 Farm holdings in Telford & Wrekin (by size) 2010 and 2013

Size of holding in hectares (ha)	Year 2010	Year 2013	Difference %
Less than 5 ha	137	138	+1
5 <20 ha	44	40	-9
20 <50 ha	29	29	0
50 <100 ha	26	21	-19
> 100 ha	56	55	-2

2.19 Over the same period, agricultural employment in the borough fell by over 10% from 655 to 583 people.

2.20 Linked to this sector, Harper Adams University makes a significant contribution to the rural businesses and other agricultural related businesses in urban areas of the borough. It is ranked as one of the top ten ranked universities in the UK in the fields of agriculture, forestry and related subjects. The university has recently invested in new facilities including an Agricultural Engineering Innovation Centre, Veterinary Services Centre and Entomology laboratories and Dairy Crest has built a new food innovation centre for its product development staff which opened

late 2015. Nearby Newport has a cluster of businesses serving the agricultural sector. Research conducted as part of the Local Plan suggests that between eight and nine hectares of land be allocated for employment uses that will in part support the rural economy. The Local Plan has identified 10 hectares of land to enable the borough to provide flexibility of choice.

2.21 Rural based micro and small businesses are at a marginal disadvantage with regard to fuel and distribution costs. With the exception of Harper Adams, the absence of a local higher education base and the lack of institutional capacity limits potential growth of a higher skilled workforce. The LEP identifies other challenges affecting the set up and operation of rural businesses, including restricted access to the road and rail network, difficulties in attracting skilled workers and patchy broadband access.

2.22 On the matter of broadband, the Council is working on a £5.6m project in partnership with Broadband Delivery UK (BDUK) and British Telecom to enable more than 9,300 residents and businesses that cannot currently access faster fibre broadband to be able to do so through an open access network of Internet Service Providers. The programme aims to ensure that 98% of homes and businesses in the borough will be able to access superfast broadband by the end of 2017.

2.23 The 2011 Census records that around 7% of residents aged between 16 and 74 worked from home. This is double the rate of the rest of England and nearly three times as much as the average across the borough but consistent generally with other rural areas across England. Research by the Office for National Statistics confirms that home workers in rural locations tend to be engaged in skilled activity.

Governance – role of parish Councils

2.24 Telford & Wrekin is unusual across England in that all of the borough is governed by active parish councils. Many of the parishes are ancient and reflect the long heritage attached with much of the rural area.

2.25 There are 14 parishes that cover the rural area, some of which have been vociferous in opposing planning applications for new housing especially since the introduction of the NPPF.

Implications

2.26 Arising out of this review, the following issues are relevant to the planning of housing in the rural area in the Local Plan.

- The settlements in the rural areas are scattered. There is no major settlement in this hierarchy though this may change in time if and when the British Sugar site at Allscott is built out.
- There are a range of businesses in the rural area but no single major employer.
- The rural area of the borough is important for its agricultural and landscape and nature conservation importance. Much of the landscape is visually sensitive due to its flatness. Extensive agriculture and additional house building pressure could potentially result in wildlife habitat loss.
- Farming plays an important role in the economy despite the closure of employers such as British Sugar at Allscott and, more recently, Dairy Crest at Crudgington. It can be supported by the investment programme being completed at Harper Adams University and additional

employment land provision in Newport. However, farming is not a major employer and residents in the rural area rely on urban areas for work including Telford, Newport and beyond.

- Given the dispersed nature of settlements in the rural area, local residents (and especially children) and businesses have poor links to public services and road infrastructure. This can both reduce ease of access to work and school and prevent local businesses from expanding. Investment in high speed broadband will help address this.
- The non-agricultural economic base is limited locally but there is scope to expand this. It is appropriate that any substantial growth in economic activity in the rural area be directed to Newport or Telford or restricted to small scale development.
- The rural areas of the borough are popular especially with older people but relatively high property prices will make it more difficult for younger people and key workers supporting the local economy and infrastructure, such as schools, to remain in the area.

3 Review of national policies relevant to the rural area

3.1 There are three main planning policy documents at the national level that inform how local authorities should plan for their rural areas in compliance with their obligations under the Town and Country Planning (Local Planning) (England) Regulations 2012. Two of these - the National Planning Policy Framework (the NPPF); and the Planning Practice Guidance (the PPG) – were prepared by the government.

3.2 The third relevant document is the multi-agency group publication “The Rural Challenge” (dated 2010 and updated in December 2014), chaired by Lord Taylor. This suggests how local authorities should go about the process of achieving sustainable rural communities and gives further advice on relevant planning policies that can support them.

3.3 Consideration also needs to be given to the recent changes to “permitted development” rights set out in the Town and Country Planning (General Permitted Development Order) 2015 because they contain reforms that promote more flexible use of land in the rural area including allowing some small agricultural buildings to be converted to dwellings.

National Planning Policy Framework (the NPPF)

3.4 The NPPF provides the framework which local authorities must use when planning for future population growth in both urban and rural areas. The key principles of the NPPF pertinent to this technical paper are:

- Patterns of growth should be actively managed to make fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable (paragraph 17);
- In drawing up Local Plans, local planning authorities should recognise town centres as the heart of their communities and pursue policies to support their vitality. They should also define a network and hierarchy of centres that is resilient to anticipated future economic changes (paragraph 23);
- In rural areas, the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship, should be promoted through local and neighbourhood plans (paragraph 28);
- In preparing Local Plans, local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport, in order to reduce greenhouse gas emissions and reduce congestion (paragraphs 30 and 34);
- Local planning authorities should boost significantly the supply of housing through the plan making process (paragraph 47). In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs (paragraph 54);
- Sustainable development should be promoted in rural areas by locating new housing where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby (paragraph 55);
- New housing should be discouraged in the open countryside unless there are special circumstances: for example, where it would meet the essential need for a rural worker to

live near their place of work; where it would represent the optimal viable use of a heritage asset; where it would re-use redundant buildings; or where it represents exceptional design (paragraph 55).

Planning Practice Guidance (the PPG)

3.5 The Government's Planning Practice Guidance adds further context to the NPPF and brings together extensive technical guidance to support the Council's plan making functions. On rural housing, its guidance is as follows:

- Local planning authorities should recognise the particular issues facing rural housing in terms of housing supply and affordability.
- Rural housing should be seen as essential to ensuring viable use of local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship.
- Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.
- On affordable housing, its advice across rural and urban areas is that affordable housing should only be sought where justified.
- Different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The Planning Policy Guidance adds further context to the NPPF and brings together a range of technical guidance to support the plan making function of the council.

The Rural Challenge

3.6 A coalition of groups from the private, public and voluntary sectors chaired by Lord Taylor wrote "The Rural Challenge" in August 2010, which seeks to promote sustainable rural settlements. Much of its guidance was aimed at shaping the eventual form of the Localism Act 2011 and the NPPF and it is not government policy. However, it has been considered below as it provides good advice and a useful set of recommendations on how to achieve sustainable rural settlements. The following advice was considered particularly relevant to the council in preparing this paper:

- The plan making process should help empower local people in the plan making and rural communities should take advantage of the opportunity to instigate and complete community led planning activity to decide local priorities.
- Local Plans must be based on a thorough understanding of local rural economies and society and have a comprehensive assessment of the social, economic and environmental criteria for determining sustainable development.
- Local authorities should adopt clear policies to promote, protect and maintain a good supply of appropriate sites and premises for all kinds of businesses in rural areas and should work with partners to promote broadband to provide opportunities to access public services electronically.

- Public service providers should consider options for shared and multi-purpose service outlets, before making cuts to services.
- Local transport planning should take greater account of access issues for dispersed rural communities.

Localism

3.7 A consistent theme in national planning policy since 2010 has been the promotion of localism. As it relates to planning in the rural area, the thrust of government policy has been to give local communities the power to shape their own neighbourhoods.

3.8 There are three planning instruments that Parish Councils or other designated Neighbourhood Forums may use to shape their local areas.

3.9 First, they can make neighbourhood development plans (mini plans to help a parish shape where new housing and other uses go); secondly, they are empowered to establish neighbourhood development orders, an instrument that effectively grants planning permission for specified developments in a neighbourhood area. Once established there would be no need for anyone to apply to the Council for planning permission if it is for the type of development covered by the order. Finally, they can apply for community right to build orders. These are similar to neighbourhood development orders but allow certain community organisations to bring forward small-scale development on a site without the need for planning permission. This gives communities the freedom to develop, for instance, small scale housing and other facilities they want.

Town and Country Planning (General Permitted Development) (England) Order 2015

3.10 This piece of secondary legislation (the GPDO) enacted in April 2015 has consolidated a number of recent changes to “permitted development” rights which allows development to proceed as of right without the need for planning permission subject to submission of a “prior approval” request.

3.11 The legislation introduces more flexibility around changes of use within the Town and Country Planning (Use Classes) Order 1987 that could potentially affect the planning of the rural area. The changes of most relevance to this paper are:

- Permitted changes of for pubs (Use Class A4) to other uses within the A Use classes such as shops;
- Allowing more flexible use of agricultural buildings to be converted to uses within Use Class A1 (shops), Class A2 (financial and professional services), Class A3 (restaurants and cafes), Class B1 (business), Class B8 (storage or distribution), Class C1 (hotels) or Class D2 (assembly and leisure); and
- Allowing the conversion of some redundant former agricultural buildings to housing.

Other legislation affecting rural areas

3.12 The loss of country pubs has been a well-publicised concern in rural areas in recent years. The Localism Act 2011 and subsequent secondary legislation (The Assets of Community Value (England) Regulations 2012) also allows community interest groups to designate such

sites as assets of community value which would give them the right to acquire the site if the owner wishes to sell it. The Swan Inn public house at Waters Upton was placed on the Council's list of Assets of Community Value in November 2015.

3.13 The Housing and Planning Act 2016 has introduced into law the requirement to deliver starter homes as part of the affordable housing package. The Council awaits Government advice on how this new legislative requirement will be turned into national planning guidance.

Implications arising from review of national policy

3.14 Arising out of this brief overview of national policy, recent legislation and the advice of the Rural Coalition, the following implications arise:

- Planning for the rural area is not a one way task led by the Council. It should be done in partnership with local communities.
- While national policy directs councils to boost significantly the supply of housing significantly, it is clear that this should be done on a sustainable basis. This means that new housing allocations in the Local Plan within the rural areas should in the first place be focused towards settlements with services or where new housing would help support or maintain local services and to take advantage and promote patronage of existing public transport options.
- National policy does not encourage the development of local policies which restrict new housing in the rural area unless supported by robust evidence. At the same time, it does not support the promotion of housing in the open countryside apart from in special circumstances.
- National policy makes clear that councils are restricted on when they can ask for affordable housing. For the rural area where need is greatest, this will direct local policy to concentrating new development within a few settlements or to major brownfield sites (such as Crudgington and Allscott) with the potential to deliver sufficient houses so as to provide much needed affordable housing.
- The development of planning policy for the rural area will need to embrace an element of flexibility, taking account of the recent changes in the needs in the GPDO that could result in the loss of community type facilities such as the country pubs as well as the type of housing to meet rural needs.

4 Review of local planning policy context

Identifying local housing need and the future demographic profile

4.1 The Council has an obligation to plan for the borough's future housing needs. The research commissioned to establish an Objectively Assessed Need for the borough has informed the policies that will inform the Local Plan up until 2031. It also assumes a housing requirement of 15,555 homes. This forms the basis of Policy HO1 of the Local Plan. The Local Plan has always anticipated that most of this new development will continue to be provided within the urban areas of Telford and Newport. Some rural accommodation will still be needed to provide choice for residents.

4.2 The demographic profile of the rural area referred to above show both an ageing profile and a shortage of affordable housing relative to house prices. It is reasonable to assume that this will continue during the plan period. On this basis Policy HO5 of the Local Plan has sought to direct developers to provide 35% affordable housing on schemes of 11 houses or more.

4.3 It is also reasonable to assume that there will be more pressure for housing options to allow older people to live at home or stay in villages they currently live in. This will include adaptations to existing buildings or the provision of bungalows or other types of assisted living.

Delivering services to rural communities

4.4 The Telford Local Strategic Partnership is a consortium of public bodies committed towards the common goal as set out in the Council's Community Strategy of making Telford & Wrekin 'the Place of Enterprise, Innovation and Partnership'. It commits partners to deliver this vision through four themes across the urban and rural parts of the borough set out below:

- *Live – we want to ensure that the Borough continues to be a place people choose to live and feel they belong whatever their background. We will continue our efforts to raise educational attainment, improve health and address health inequalities, improve housing for all and work to ensure that all of our communities are safe and feel safe.*
- *Work – we will continue to support the creation of jobs by attracting inward investment and supporting existing businesses, and by developing a skilled, work-ready workforce which meets the needs of local employers.*
- *Visit – we want to continue to attract more visitors to the Borough. Our offer is second to none – a rich heritage in the Ironbridge Gorge, our beautiful environment including the Wrekin, and The International Centre – a major national conference location.*
- *Play – we want to encourage positive and active lifestyles and community participation by celebrating our heritage, nurturing our green spaces and developing our leisure and culture offer.*

4.5 The Council as the local highway authority has received £17.4m from the Local Enterprise Partnership to amend a series of junctions located along the strategic highway network in Telford and on site infrastructure that will open up additional housing and employment sites at Muxton, Shawburch and Hortonwood where the Local Plan anticipates substantial growth.

4.6 For the foreseeable future investment in the rural road network will only be triggered by developers' funding under section 106 of the Town and Country Planning Act 1990 at Allscott, Tibberton and Crudgington where a series of recently or soon to be approved planning applications are likely to proceed.

Public and community facilities in the rural area

4.7 There are limited public facilities in the rural area. There are six local authority or voluntary aided/controlled primary schools at High Ercall, Edgmond, Tibberton, Lilleshall, Crudgington and Preston upon the Weald Moors. They all have good or outstanding OFSTED reports and attract a catchment from outside the villages they are located in. The Council provides a free bus pass or other transport assistance for pupils attending their designated or nearest school which is more than three miles from their home address, or two miles if under the age of eight, measured using the shortest walking route, accompanied as necessary by an adult.

4.8 There are no secondary schools and no independent schools. The Building Schools for the Future programme has been and will be investing in the reconstruction of schools in the urban parts of the borough.

4.9 Apart from a part time surgery in High Ercall, there are no primary care facilities in the rural area. The Council contributes towards the Wrekin bus service run by Arriva Buses to help isolated residents access essential services. The roll out of broadband will allow more residents to access services online.

4.10 A mobile library has historically served 21 rural settlements on a fortnightly basis complemented by a home delivery service for housebound residents.

4.11 The Council manages 10 public parks in the rural areas and sports pitches including football (Edgmond), cricket pitches (Edgmond and Tibberton) and a ball court at Edgmond. Other sports facilities for local residents in the rural area run by private and community groups include the High Ercall tennis club and the Lilleshall cricket club. Lilleshall Hall Golf Club and the National Sports Centre are located just over the borough boundary.

4.12 There were four post offices as of April 2015 covering the rural area.

4.13 There are 19 active places of worship and 11 village and community halls.

Parish Council initiatives

4.14 The Waters Upton Parish Council Neighbourhood Plan was "made" in June 2016. Ercall Magna and Lilleshall Parish Councils are progressing their own neighbourhood development plan.

4.15 Other parishes have periodically prepared parish plans that cover governance and other local management matters. These are not land use management documents.

4.16 A rural forum of parishes meets every three months to review issues of common interest.

Implications

4.17 Arising out of this brief review of local initiatives, the following conclusions can be drawn:

- The foregoing assessment of community infrastructure across the rural area is scattered and limited. This reinforces the case for focusing new housing in areas with the best infrastructure.
- The Council and those parish councils working on neighbourhood development plans will need to take account of government policy as it relates to the obligation to boost significantly the supply of housing. It sets thresholds at schemes of over 10 homes. As it relates to the rural area, this means that if the borough is to meet some of its affordable housing need, housing should be focused as far as possible around settlements with the best infrastructure or on major sites that can deliver substantial amounts of affordable housing.
- The Council will also need to take account of an ageing population in planning for new housing.

5 Methodology

5.1 This section of the technical paper explains how the Council has used the foregoing information and a detailed review of its settlements to justify its rural housing policies.

Housing requirement in the rural area

5.2 From the outset the Council has sought to allocate a mix of housing in the urban and rural areas. Consideration needs to be given to the appropriate mix between the two areas.

5.3 As a starting point, the Council has planned for a rural/ urban split that reflects the current split. Based on the 2011 Census mix of households, that would mean the Council should be planning for around 5.8% of its total housing requirement within the rural area, that is, around 900 new homes. This seems an appropriate balance as it would continue to provide opportunities for new households and the children of existing residents. This is the basis for the housing figure in Policy SP3. To provide substantially more housing in the rural area would conflict with the government policy which seeks to promote sustainable development by encouraging effective use of brownfield land and locating as much housing as possible closest to existing infrastructure and would be inconsistent with other requirements such as the promotion of Planning in Principle sites established following the enactment of the Housing and Planning Act 2016. For a predominantly urban authority like Telford & Wrekin, these will be overwhelmingly in urban Telford.

Location of rural housing requirement around the rural area

5.4 The provision of around 900 new homes in the rural area will come primarily from two sources. These are:

- Houses with planning permission (both built and not started) since the start of the Local Plan. Sites which were approved for or built since the start of the Local Plan period, that is from 2011. As of April 2015, the Council estimates that it had approved around 270 homes ⁽¹⁾. A number of these permissions have lapsed and it is reasonable to assume that some of these permissions will not be implemented. For the purpose of this planning exercise, it has been assumed that 241 of these homes will be built out.
- Two large brownfield sites in the rural area which have been granted planning permission at Crudgington and Allscott. In total, these two sites will be expected to deliver around 580 homes. ⁽²⁾. The case for including Allscott was specifically identified as one worth pursuing by the inspectors who examined the Council's Core Strategy.

5.5 The balance of new homes required would therefore be about 80 homes.

5.6 Table 5 below shows how this level of provision has been identified.

1 Based on a preliminary work on the council's annual monitoring return. Final figure to be confirmed.

2 They are both outline permissions so the final amount of homes cannot be confirmed.

Table 5 Housing land provision in the rural area 2011 to 2031

		Gross	Net
A	Net completions (2011 to 2015)	68	68
B	Under construction	33	33
C	Not started	193	
	Less an allowance for non-completion and lapsed permissions	(53)	140
D	Total existing supply		241
E	Allscott	470	470
F	Crudgington	110	110
G	Balance to be found in rural settlements		80
H	Balance		620
I	TOTAL FUTURE SUPPLY (D + H)		901

5.7 Over and above this, the Council will expect some further housing that will be supported only in the special circumstances as set out in the NPPF (for example, where it would meet the essential need for a rural worker to live near their place of work; where it would represent the optimal viable use of a heritage asset; where it would re-use redundant buildings; or where it represents exceptional design).

5.8 The Council has had to review which settlements should accommodate the balance of new housing.

5.9 A three stage methodology was adopted for this technical paper. This involved:

- Identifying all rural settlements in the borough;
- Screening out a first tranche of rural settlements that were not considered suitable for accommodating population growth by reason of their lack of infrastructure or the absence of special circumstances that would justify housing development; and
- Identifying a shorter list of settlements and considering their suitability to accommodate the balance indicated in the Local Plan having regard to a qualitative review of their capacity to accommodate growth.

Stage 1: Identifying all rural settlements in the borough

5.10 The rural settlement audit attempts to assess each of the named rural settlements in the borough having regard to its access to infrastructure or whether it contains significant quantities of previously developed land that would represent an opportunity to promote a sustainable settlement.

Technical Paper - Rural Settlements

5.11 An initial 68 rural settlements were identified based on the Ordnance Survey map. These are set out below:

Table 6 Rural settlements in the borough

Adeney	Ellerdine/ Ellerdine Heath	Poynton
Allscott	Eyton upon the Weald Moors	Poynton Green
Aston	Haygate	Preston upon the Weald Moors
Bolas Heath	Hennington	Puleston
Brockton	High Ercall	Roden
Brocton Leasows	Howle	Rodington/ Rodington Heath
Calvington	Huntington	Rowton
Charlton	Isombridge	Rushmoor
Cherrington	Kynnersley	Sambrook
Cheswell	Leaton	Sleapford
Chetwynd Aston	Lilleshall	Stanford Bridge
Chetwynd Park	Little Wenlock	Steeraway
Church Aston	Longdon on Tern	Stockton
Cluddley	Longford	Sugdon
Coalmoor	Lynn	Tibberton
Cold Hatton Heath	Marsh Green	University
Cold Hatton Heath Lanes	Meeson/ Meeson Heath	Walcot
Conquer Moor Heath	Moortown	Walton
Cotwall	New Works	Wappenshall
Crudgington/ Crudgington Moor	Osbaston	Waters Upton
Edgmond	Overley	Wrockwardine
Edgmond Marsh		

5.12 It was decided to merge some settlements for the purpose of the technical paper where two built up areas are so close to one another as to form one distinct place. In this case, Ellerdine/ Ellerdine Heath and Crudgington/ Crudgington Moor were combined as they are plainly within walking distance of each other. However, Cold Hatton Heath and Cold Hatton Heath Lanes were not.

5.13 Church Aston is identified as a village on Wikipedia but is not physically separated from Newport. Most of the settlement is within the urban area of the current Wrekin Local Plan and so has not been assessed as a separate settlement.

5.14 A ranking of infrastructure was prepared based broadly on the Wychavon rural study⁽³⁾ which sought to identify settlements for growth on the basis of infrastructure. However, the Wychavon methodology was adjusted to Telford & Wrekin to take account of other relevant local factors (for example, the absence of rail services in the rural area, the Superfast Telford project which will be rolled out shortly and the presence of previously developed land in or close to a settlement that could accommodate significant amounts of housing consistent with the NPPF).

Primary services

5.15 The first test was to review whether the settlement had access to any of the following primary services as of March 2015. A score of three points was given for each of the following services up to a maximum score of 18.

- Post office⁽⁴⁾
- Food shop / general store
- Community centre/ village hall
- GP surgery⁽⁵⁾
- Primary school
- Local employment opportunity (defined as an industrial estate, business park, rural business centre or commercial leisure/ tourist facility).

5.16 In a rural settlement, a post office can allow residents to do banking and withdraw money so it is given special local importance in the assessment.

Secondary services

5.17 Each settlement was then reviewed to assess its access to secondary services that complement these core services. A score of 1 point was given to each of the following services.

- Petrol station/ garage
- Bank
- Public house
- Public leisure centre
- Public sports pitch

3 This formed part of the recently adopted South Worcestershire Development Plan

4 Including part time post offices such as Lilleshall

5 Including part time surgeries, for example, at High Ercall

- Children's play area
- Library (including mobile service)
- Place of worship ⁽⁶⁾
- Pharmacy
- Hospital
- Whether the settlement had superfast broadband or is identified on the Superfast Telford roll out plan as of April 2015
- Secondary school
- Between two and nine shops
- Ten or more shops

Accessibility

5.18 Each settlement was then scored against the following criteria:

- Access to a bus service (a score of three points was given if the village is served by a commercial bus service and a score of one point if the bus is served by the less frequent Wrekin Connect only)
- Access to Telford town centre (a score of three points was given if within five kilometres)
- Access to major employment areas offering a minimum 500 jobs (a score of three points was given if within five kilometres).

Availability of extensive areas of previously developed land

5.19 Finally, each settlement was reviewed to consider whether there was an extensive area of previously developed site in excess of three hectares. The logic for three hectares was that it would potentially provide a yield of 100 homes and would be more likely to generate some additional community infrastructure or help maintain and support other villages' services consistent with paragraph 55 of the NPPF. A score of three points was given to each settlement with such a site or a site within walking distance of an existing settlement.

Research sources

5.20 The following sources of information were used to carry out the research.

- Telford & Wrekin business rates
- Telford & Wrekin Leisure Services records (open space, libraries)
- Telford & Wrekin list of polling stations
- Telford Superfast broadband programme
- NHS Direct
- The Post Office
- Yell.co.uk
- Telford and Wrekin Clinical Commissioning Group (www.telfordccg.nhs.uk)
- Google.co.uk including the Google Earth mapping facility to spot premises
- Parish Council websites where available
- Travelinemidlands.co.uk – for bus services

6 Settlements with two or more places of worship of different denominations in active use (for example, Tibberton and Edgmond) scored two points

- The council's Wrekin Connect service (http://www.telford.gov.uk/info/20174/public_transport/133/wrekin_connect)
- www.achurchnearyou.com/ - this identifies Church of England places of worship in the borough and other Ordnance Survey based reviews identified other places of worship which were then reviewed again either by means of a site visit or a further check on the internet to assess if the place was in active use.

Stage 2: Infrastructure screening exercise

5.21 This desk top review revealed the following scores by rank (Table 7).

Table 7 Ranking of settlements by infrastructure

Settlement	Score
Edgmond	24
High Ercall	22
Lilleshall	22
Tibberton	19
Waters Upton	15
Crudgington/ Crudgington Moor	11
Rodington/ Rodington Heath	11
Wrockwardine	11
Little Wenlock	10
Preston upon the Weald Moors	9
Sambrook	9
Brockton	8
Great Bolas	8
Longdon on Tern	8
Sleapford	7
Allscott	6
New Works	6
Roden	6
Stockton	6
Chetwynd Park	5

Technical Paper - Rural Settlements

Settlement	Score
Cold Hatton Heath	5
Cold Hatton/ Heath Lanes	5
Kynnersley	5
Rowton	5
Cherrington	4
Coalmoor	4
Cotwall	4
Ellerdine/ Ellerdine Heath	4
Hennington	4
Howle	4
Meeson/ Meeson Heath	4
Moortown	4
Poynton	4
Sugdon	4
Walcot	4
Puleston	3
Chetwynd Aston	2
Huntington	2
Leaton	2
Standford Bridge	2
Walton	2
Wappenshall	2
Aston	1
Bolas Heath	1
Calvington	1
Charlton	1
Cluddley	1

Settlement	Score
Conquer Moor Heath	1
Eyton upon the Weald Moors	1
Haygate	1
Isombridge	1
Longford	1
Marsh Green	1
Steeraway	1
Adeney	0
Brockton Leasows	0
Cheswell	0
Lynn	0
Osbaston	0
Overley	0
Poynton Green	0

5.22 The first observation to make is that very few settlements have extensive amounts of primary infrastructure. For example, the only settlement with more than one shop is High Ercall. Again, High Ercall is the only settlement with a GP practice too though this only opens twice a week. Two of the settlements with shops (Waters Upton and Tibberton) rely on a service provided by volunteers. In some centres (for example, Edgmond) the post office combines with a general store.

5.23 No rural settlement has a secondary school and children of secondary school age are obliged therefore to take public transport or be driven by parents to school. None of the settlements have fixed library services either. This in itself presents a case for seeking to promote more of the borough's housing requirements to the urban areas of the borough, with better infrastructure and seeking to restrict where new housing should go to those areas with the best of the limited infrastructure.

5.24 This review of the settlements identified that 42 of them had very little infrastructure (reflected in a score of five or lower) and no extensive areas of previously developed land that would justify siting new housing to support services in other villages having regard to the advice in the NPPF or the PPG.

5.25 Nine settlements scored between six and nine points. Some of these (for example, Preston upon the Weald Moors and Brockton) have primary schools but none of them collectively have a wide range of infrastructure or good access to public transport such that residents are likely to remain car dependent for most services. In the context of the current older population

profile of the rural area relative to the rest of the borough and the assumption that the rural areas will age sooner than the rest of the borough, it would not be appropriate for the Local Plan to encourage extensive amounts of new housing in these settlements either.

5.26 Allscott stands out as a settlement with a relatively low score albeit it has an extensive area of previously developed land that has been granted planning permission for a mix of uses including 470 new homes. When built out, this settlement would have an extensive amount of new infrastructure including a primary school, local shopping centre and extensive areas of open space available for public use. However, it is not appropriate to give Allscott a higher score at this stage.

5.27 At the other end of the scale, three settlements (Edgmond, Lilleshall and High Ercall) scored more than 20 points and ten settlements scored ten points or above and all have primary schools, places of worship and other signs of active community life. Tibberton scored 19 points. It has a school, bus service and other evidence of community infrastructure including a pub and two places of worship but no post office.

5.28 Crudgington/ Crudgington Moor scored relatively highly (11 points) because the primary school of the same name was identified as being in that settlement albeit it is roughly equidistant between Crudgington and Waters Upton (15 points) and is used by residents from both villages. Crudgington also has the now closed Dairy Crest operations which represents an extensive area of previously developed land. However, it does not have any shops. Some Crudgington residents are likely to use the shop in nearby Waters Upton. At the same time it enjoys both north – south bus services into Wellington and east – west bus services connecting the village with Newport and Shrewsbury. The point to note here is that when considering Crudgington, it is necessary to take account of its proximity to Waters Upton and vice versa. Therefore, for the purpose of assessing the potential of Waters Upton, it has been combined with Crudgington in the next stage of analysis.

5.29 Lilleshall performed well in the first stage screening too and enjoys some of the best links to public transport and to major employment areas (for example, at Donnington) and other facilities such as the National Sporting Centre just outside the borough boundary. It is a relatively large rural settlement - around 450 homes - but does not have a shop although there is a range of services in Muxton (some 2.5 km away). The nearest public house, the Red House Inn, is located just outside the settlement boundary west of the A518 too. However, it does have a number of other community assets including extensive sporting provision, a school, a village hall and place of worship. It would appear appropriate to give this settlement further consideration to its housing potential.

5.30 On the basis of this brief overview, the following shortlisted eight settlement areas were identified for further qualitative consideration:

- Edgmond
- High Ercall
- Lilleshall
- Tibberton
- Waters Upton/ Crudgington
- Rodington/ Rodington Heath
- Wrockwardine
- Little Wenlock

Stage 3: Qualitative assessment of shortlisted settlements

5.31 Each of the eight shortlisted settlements was assessed again in more detail with regard to their suitability to accommodate some additional housing. At this third stage, consideration was given to the settlement's highway capacity on the advice of highways and drainage capacity on the advice of Severn Trent Water.

Edgmond

5.32 Edgmond is the largest of the settlements in the rural area which, in combination with student complex at Harpers Adams, has around 560 residential properties. It has the most comprehensive range of infrastructure too including employment opportunities at the nearby university. It should therefore be considered for new housing both to meet future household growth and the needs of an expanding academic institution.

5.33 The village has an historic core with a cluster of listed buildings and related spaces within a Conservation Area. It has expanded and evolved over time, particularly northwards with areas of later Victorian and 20th century development, the former tending to be more associated with the highways running through and therefore the settlement tends to be more linear in nature.

5.34 There are opportunities for very limited infill development within the village and also within the grounds of Harpers Adams University for some non family accommodation. It will also be important to protect Edgmond from coalescing with Newport.

5.35 Severn Trent Water do not currently have a hydraulic model for this village. Any developer wishing to promote new housing would need to show how this can be satisfactorily drained.

High Ercall

5.36 High Ercall scored the second highest with regards to primary infrastructure. The provision of a GP service makes it a suitable settlement to consider for a modest amount of growth especially to meet the needs of older people. There is already an established 55 unit sheltered care facility run by the Wrekin Housing Trust.

5.37 The village is compact and there are clear and abrupt boundaries with the surrounding countryside. Much of the village is covered by a Conservation Area. There are limited opportunities for housing growth and this should be restricted to infill only. The Council's SHLAA identified one site, land off Park Lane, as potentially suitable for housing subject to it addressing site challenges such as the presence of a tree preservation order (TPO) and its location within a conservation area.

5.38 Any new development would have to take account of its potential increase in flooding in the network. However, Severn Trent Water advises that the risk is minimal and the settlement could accommodate some additional housing.

Lilleshall

5.39 Lilleshall is a long linear settlement with an estimated 453 homes. It has an historic core around the church, the Lilleshall Hill, and has been extensively extended to the north and south largely following the line of Limekiln Lane and Church Road. There are several narrow roads which lead off this central 'spine' containing small clusters (often linear in nature) of development.

5.40 The largely linear form means that the settlement has extensive boundaries with the surrounding countryside and this form and relationship is a distinctive feature of the village. Generally, existing spaces within the village should be preserved. The Council's Strategic Landscape Study gives further justification for this approach.

5.41 Large agricultural fields separate the settlement - from the urban area of Telford to the south and Newport to the north. It is important to protect - this separation to preserve the distinction and identity of Lilleshall.

5.42 New housing should only be met by small scale infill development. Development on the edge of the village that extends it southwards towards urban Telford should be resisted.

Tibberton

5.43 Tibberton is smaller in scale than the previous named settlements with an estimated 220 homes. It does not have a post office but has a shop which also serves as a community run facility and operates on a part time basis.

5.44 The historic linear pattern of the village has evolved in the post war period into a quadrilinear form covering four roads around a central field and a school. This new form will become more pronounced if the outline planning application TWC/2014/0230 (land off Plantation Road) is implemented. The Council has successfully resisted major applications subsequently following the release of its five year land supply statement in March 2015 (for example TWC/2014/0236 at 12 Tibberton) but has lost a planning appeal on land that is part previously developed at Mill Lane (TWC/2014/1080).

5.45 Preserving the integrity of the character and scale of the village and being responsive to the constraints of the small highways which through and beyond the settlement provide a justification for discouraging substantial numbers of additional new homes.

5.46 A critical challenge is the poor road links between the village and the B5062 to the south. The settlement already has a large number of unimplemented planning permissions of around 40 homes as of April 2015 and extra provision will be difficult to plan for.

5.47 Any additional new housing would be expected to be limited to modest infill only. Development of this scale could be accommodated into the existing drainage systems.

Waters Upton/ Crudgington

5.48 The two settlements have been considered as one for the purposes of this paper because of their proximity and shared use of certain facilities.

5.49 Waters Upton is a well-defined linear settlement with an historic core around the church and a spur road. It has a number of working farms within or close to the village including a farm shop.

5.50 Crudgington is more clustered in its form than Waters Upton, occupying a corner of land between the A442 and the B5062. It contains a dispersed collection of dwellings of various ages including a group of mid 20th century housing in the north east corner of the settlement. It includes the former Dairy Crest site which lies immediately west of the main group of dwellings. This site is separated from the main village core as it is located to the west of the A442.

5.51 The bulk of the settlement's new housing should be delivered on the former Dairy Crest site which will deliver a proportion of affordable housing. Opportunities for new housing elsewhere should be restricted to small infill within Waters Upton but will also need to take account of policies in the Waters Upton Neighbourhood Development Plan if subsequently made (adopted).

Rodington/ Rodington Heath

5.52 Rodington is a small and largely compact settlement with some outlying areas of development with limited facilities.

5.53 Planning permission has been granted for additional housing development. Due to the small and intimate scale of both the settlement and the highways associated with the village it is not considered appropriate for further development other than in the exceptional circumstances set out in the NPPF.

Wrockwardine

5.54 This village has more limited facilities too. Its proximity to Allscott and the requirement of the British Sugar site application to fund extensive traffic management works in Wrockwardine to avoid rat running rule it out for consideration for extensive amounts of new housing.

Little Wenlock

5.55 This settlement scored the lowest of the top eight settlements. The absence of a primary school would indicate its unsuitability for family housing.

Implications

5.56 Arising from this overview, five settlements appear appropriate for a limited amount of new housing. The 80 homes figure is an indication of the overall scale and should not be set as an overall target given the government's requirement for councils to significantly boost the supply of housing. However, it is an indication of the scale of housing the Council is planning for.

5.57 Policies HO10 and HO11 of the Local Plan were prepared on this basis.

6 Review of comments during public consultation on the draft Local Plan

Review of Regulation 18 consultation

6.1 Over and above the statutory notification, Council officers held a number of meetings to discuss the Regulation 18 Local Plan policies covering the rural area and housing more widely. These included: parish and public meetings in the parishes of Ercall Magna, Waters Upton, Lilleshall, Tibberton & Cherrington, Edgmond and Chetwynd Aston & Woodcote Parish; and one workshop with housing developers and their agents.

6.2 Representations received around the rural area can broadly be split into three categories. These are:

- Representations which supported the Regulation 18 Local Plan policies affecting the rural area;
- Representations which objected to the relevant Local Plan policies either because they were too restrictive for growth or not restrictive enough; and
- General comments (for example, queries about policies or suggestions on how terms such as “limited infill” should be interpreted).

6.3 Brief comments on the representations on relevant policies are set out below.

6.4 SP3 – Rural area - there were a broad range of representations received. Some individuals recommended additional policies that would serve to restrict housing growth in the rural area (for example, giving specific policy protection for high quality agricultural land or emphasising that Edgmond should not coalesce with Newport). On the other hand, submissions from developers and the house building sector stated that the approach to the rural area was too restrictive and would not deliver rural housing need. One submission suggested that more housing be directed to the rural area more broadly given that the urban area of Telford only takes up 25% of the borough’s area. Another suggested that the policy should state the Council will plan for a **minimum** of 900 additional homes in the rural area.

6.5 One parish council suggested the spatial strategy should emphasise economic growth. One submission stated that the spatial strategy should also refer to the Newport to Shrewsbury Canal.

6.6 HO10 – Residential development in the rural area - again, there were polarised comments around this policy. A number of groups and individuals supported the Council’s approach relative to the previous Proposed Housing and Employment Sites consultation but suggested improvements to it, for example requiring new housing in the rural area to meet the needs of older people with bungalows and smaller homes. One submission supported the exclusion of Roden from the list of settlements to take housing growth. One parish council supported the policy approach but wanted infill within the five identified villages to be evenly spread instead. It is clear, both from comments made at the various public meetings and submissions received later, that some people interpret the reference to 80 additional new homes to be spread around five villages to be a **maximum** figure.

6.7 By contrast, other submissions were received which opposed the policy either because they thought it was too restrictive or not restrictive enough.

6.8 The submissions seeking a less restrictive approach to rural housing can be summarised as follows:

- The policy is overly reliant on two previously developed sites at Allscott and Crudgington and it is inappropriate to focus rural housing strategy around previously developed land.
- The overall approach will not deliver affordable rural housing.
- The numbers of new houses sought are too low.
- The reference to the five identified villages should be expanded to cover land in or adjoining these settlements.

6.9 The submissions seeking a more restrictive approach emphasised the following points:

- The approach to Edgmond is imprecise. The boundaries of Edgmond should not include Edgmond Marsh or Harper Adams. The policy should seek to prevent Edgmond from coalescing with Newport.
- The Lilleshall Gap Strategic Landscape concept is not precise enough. Lilleshall will also get an urban extension (Housing Site Allocation H1) over and above infill housing.
- Other villages should be included to take some of the infill housing (Roden/ Preston-upon-the Weald Moors) or the spread of housing should be distributed around all 68 rural settlements.
- The policy for infill in the five identified villages is too vague. It should use the terms “one or two dwellings” included in the Wrekin Local Plan Policy H10 to protect the character of individual settlements.
- The five villages should have boundaries.

6.10 Other representations have referred to the need to promote enabling development at Wappenshall associated with the restoration of the Shrewsbury and Newport canal.

6.11 HO11 – Rural exceptions – representations received generally supported this policy as a means of delivering additional housing (for example, for exceptional design, additional affordable housing to meet local needs).

Revisions to rural policies made as a result of the Regulation 18 consultation

6.12 Officers carefully reviewed these representations and have revised the rural areas policies to address potential soundness issues as well as to take account of other research conducted during the summer of 2015, most notably the findings of the Strategic Landscape Study which recommended that all of Lilleshall Village be included within a wider Lilleshall Village strategic landscape. The revisions took account of other changes in the planning landscape (the approval of planning permissions at Allscott and Crudgington). Finally, the opportunity to review all of the Local Plan was used as a chance to improve the general readability of the Local Plan and do some editing improvements.

6.13 The Strategic Policies SP1, SP2 and SP3 (Telford, Newport and the Rural Area) were revised to make clear the Council's preference to prioritise development, after taking into account of housing and employment land allocations, on previously developed land to protect high quality agricultural land. Policy SP3 has been simplified in form to accord stylistically with Policies SP1

and SP2 and to remove duplication with other policies around design (Policy BE1) and renewable energy in the rural area (Policy ER1). There is no overall change in the approach to the rural area of the borough as a result of this revision.

6.14 The proposed housing allocation H1 (Land at Muxton) was retained even though parts of it are in Lilleshall Parish. This allocation is clearly related to the urban area it adjoins and is not to be interpreted as a new settlement. Accordingly, the allocation was renamed Donnington and Muxton Sustainable Urban Extension.

6.15 Policy HO10 Residential development in the rural area was adjusted to provide an update on sites with planning permission or minded to grant approvals (Allscott and Crudgington). The supporting text also clarifies where new housing will be supported in Edgmond. For the purpose of interpreting this policy, Edgmond has been defined as the settlement of Edgmond and not Edgmond Marsh or Harper Adams University. It is considered that extensive expansion of Edgmond would run the risk of irreparably harming the size of the village and encouraging coalescence with Newport. The revised policy also clarifies that Lilleshall is now located within a Strategic Landscape. The effect of the revisions to this policy make clear that other rural settlements with some previously developed land such as Roden will not be supported as areas for extensive new housing other than in exceptional circumstances. Similarly, it would not be appropriate to promote substantial new development at Wappenshall even if it were successfully demonstrated that it would secure the regeneration/ restoration of the canal. The site is relatively isolated and its development would be inconsistent with the overall approach taken by the Council. The inspectors who examined the Core Strategy in 2007 took this view too.

6.16 The Council takes the view that its approach to planning for rural housing is consistent with government priorities to boost significantly the supply of housing generally but also takes account of the scale and context of the borough's villages which, as earlier sections of this study have shown, do not have extensive amounts of infrastructure. Applying the one or two dwelling definition in Wrekin Local Plan Policy HO10 would not be appropriate in this context. Similarly, it would not be appropriate to state that the figure of 80 dwellings across five villages is a maximum figure. The figure should be interpreted as a guide allowing for some flexibility to take account of changing circumstances over the lifetime of the Local Plan.

6.17 Policy HO11 was renamed as **Affordable rural exceptions** and redrafted to remove some of the repetition in Policy H10 and to confirm where exceptions to rural housing policy will apply. It is considered that such an approach conforms more closely with the NPPF. The Council's approach will still allow for affordable housing to be delivered on other sites across the borough in time to come.

6.18 Finally, Policy HO4 **Housing mix** was changed to encourage developers to broaden the mix of housing provided to meet the needs of an ageing and changing demographic profile in time to come. This would facilitate the provision of bungalows but also other forms of housing for smaller, older households.

Review of representations during Regulation 19 exhibition

6.19 Policy SP3 Rural Area has continued to generate mixed comments. On the one hand, Natural England wrote in to support the policy but others have suggested that the urban/ rural boundaries are inappropriate and untested; that the requirement of 900 homes in the rural area is too low; and that the strategy to prioritise housing to committed sites or housing allocations

was inappropriate. One representor questioned the hierarchy of centres set out in the rural settlement paper and suggested that other settlements (Sambrook) be considered for development. One rural parish stated that the policy does not clarify what will happen at Allscott and that it has been rewritten to allow the planning permission at Allscott to go through. Another representor stated that the requirement to protect best and most versatile agricultural land should be moved to Policy SP4.

6.20 Policies HO10 Housing in the rural area: 33 representations were submitted. Seven parishes wrote in to support it as did the developers of the Crudgington and Allscott sites. Some residents especially in the Edgmond area maintain that the "infill" requirement is still too open ended for a village with a conservation area and would prefer if infill could be defined as "one or two houses" consistent with Wrekin Local Plan Policy H10. Some residents have asked how Harper Adams University plans fit in to the future of Edgmond. By contrast, housebuilders and developers who responded to the exhibition found the term "infill" unnecessarily restrictive or imprecise. Some found the policy requirement of 900 homes to be too low or stated it should be 900 homes in addition to Crudgington and Allscott. Some promoters of sites identified other settlements for growth such as Roden or Sambrook or suggested that major site allocations be identified in villages.

6.21 HO11 Affordable rural exceptions: two representations received supported this policy as a means of delivering additional housing (for example, for exceptional design, additional affordable housing to meet local needs). Two objectors stated that the policy does not allow affordable housing through cross subsidy or that it would not deliver affordable housing.

6.22 The Council has carefully considered these representations as well but does not believe it is necessary or appropriate to offer further modifications to these policies.

7 Conclusions

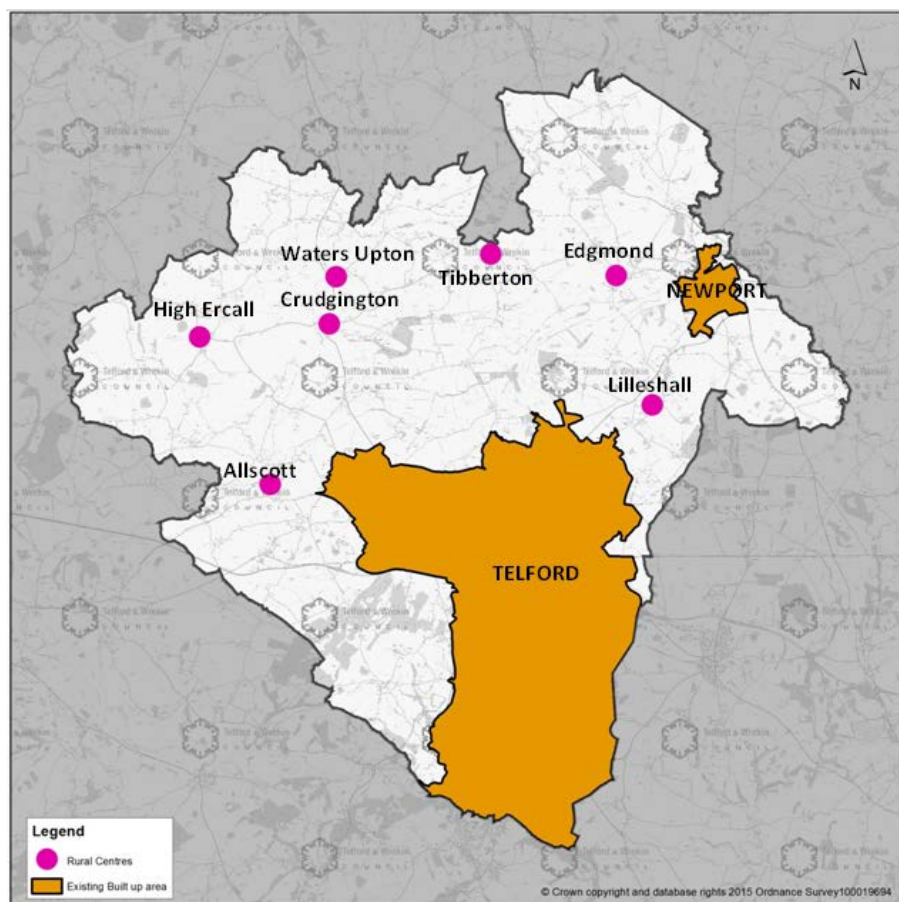
This technical paper has sought to justify how the Council should plan for rural housing. It has been based on an understanding of the landscape, economy and the socio-demographic factors.

With regard to housing, it has suggested that the Council should rely mostly on its existing planning permissions and two major brownfield sites at Allscott and Crudgington. The balance should be distributed between five villages and will be expected to be mostly infill.

When the Crudgington and Allscott permissions are built out, there is likely to be a new pattern of settlements in the rural area with Allscott becoming the biggest in the rural area and one with the most facilities (Figure 3).

Many residents have queried what would happen if the Allscott and Crudgington sites are not built out. The Council considers that this theoretical query is best addressed in a future review of the Local Plan. It is confident that both sites are deliverable.

Figure 3 Hierarchy of key settlements by 2031



Appendix: Census 2011 extracts

Table 8 Age Structure, Telford and Wrekin and Sub Areas, 2011

Age Bands	Rural Sub Area		Telford & Wrekin		West Midlands		England	
	No	%	No	%	No	%	No	%
Age 0 to 15	1,551	14.7	34,201	20.6	1,094,442	19.6	10,022,836	18.9
Age 16 to 17	259	2.5	4,675	2.8	146,021	2.6	1,314,124	2.5
Aged 18 to 24	1,352	12.9	15,428	9.2	532,377	9.5	4,970,636	9.4
Aged 25 to 44	1,861	17.8	45,217	27.1	1,472,931	26.3	14,595,152	27.5
Age 45 to 64	3,204	30.5	43,031	25.8	1,410,101	25.2	13,449,179	25.4
Age 65 plus	2,270	21.6	24,089	14.5	945,975	16.9	8,660,529	16.3
All Categories	10,497	100.0	166,641	100.0	5,601,847	100.1	53,012,456	100.0
Mean Age	43.5		38.1		39.3		39.3	
Mean Age Rank			274					
Median Age	46.0		38		39		39	
Median Age Rank			255					

(Source: KS102EW 2011 Census data, Office for National Statistics website, <http://www.ons.gov.uk> and NOMIS website, <http://www.nomisweb.co.uk> Contains public sector information licensed under the Open Government Licence v1.0 <http://www.nationalarchives.gov.uk/doc/open-government-licence/>)

(Source: Table KS105EW 2011 Census data, Office for National Statistics website, <http://www.ons.gov.uk> and NOMIS website, <http://www.nomisweb.co.uk>)

Table 9 Household Total and Composition, Telford and Wrekin and Sub Areas, 2011

Household Composition	Rural Sub Area		Telford & Wrekin			West Midlands		England	
	No	%	No	%	Rank	No	%	No	%
One Person Household:									
Aged 65 and over	475	12.2	7,113	10.7	300	289,571	12.6	2,725,596	12.4
Other	377	9.7	9,680	14.5	259	388,677	16.9	3,940,897	17.9
One Family Only:									
All aged 65 and over	499	12.8	5,035	7.6	259	196,969	8.6	1,789,465	8.1
Married or same-sex civil partnership couple: No children	747	19.2	9,221	13.8	156	277,113	12.1	2,719,210	12.3
Married or same-sex civil partnership couple: Dependent children	698	18.0	10,915	16.4	124	353,267	15.4	3,375,890	15.3
Married or same-sex civil partnership couple: All children non-dependent	326	8.4	4,075	6.1	128	143,155	6.2	1,234,355	5.6
Cohabiting couple: No children	148	3.8	3,793	5.7	97	109,972	4.8	1,173,172	5.3

Household Composition	Rural Sub Area		Telford & Wrekin			West Midlands		England	
Cohabiting couple: Dependent children	120	3.1	3,759	5.6	11	98,453	4.3	890,780	4.0
Cohabiting couple: All children non-dependent	19	0.5	399	0.6	61	11,684	0.5	108,486	0.5
Lone parent: Dependent children	111	2.9	5,394	8.1	67	172,682	7.5	1,573,255	7.1
Lone parent: All children non-dependent	106	2.7	2,416	3.6	95	86,064	3.8	766,569	3.5
Other household types:									
With dependent children	79	2.0	1,928	2.9	61	67,693	2.9	584,016	2.6
All full-time students	20	0.5	182	0.3	100	11,397	0.5	124,285	0.6
All aged 65 and over	18	0.5	165	0.2	223	6,379	0.3	61,715	0.3
Other	144	3.7	2,533	3.8	111	81,833	3.6	995,677	4.5
All Categories	3,887	100.0	66,608	100.0		2,294,909	100.0	22,063,368	100.0

Table 10 Household size

Household Size	Rural Sub Area		Telford & Wrekin		West Midlands		England	
	No	%	No	%	No	%	No	%
1 person in household	852	21.9	16,793	25.2	678,248	29.6	6,666,493	30.2
2 people in household	1,574	40.5	23,691	35.6	776,691	33.8	7,544,404	34.2
3 people in household	665	17.1	11,579	17.4	363,132	15.8	3,437,917	15.6
4 people in household	547	14.1	9,372	14.1	298,605	13.0	2,866,800	13.0
5 people in household	194	5.0	3,666	5.5	112,956	4.9	1,028,477	4.7
6 people in household	36	0.9	1,097	1.6	44,613	1.9	369,186	1.7
7 people in household	10	0.3	273	0.4	11,747	0.5	88,823	0.4
8 or more people in household	9	0.2	137	0.2	8,917	0.4	61,268	0.3
All categories	3,887	100.0	66,608	100.0	2,294,909	100.0	22,063,368	100.0
Average Household Size	2.4		2.5		2.4		2.4	

(Source: Table KS 105 EW and Table KS403EW 2011 Census data, Office for National Statistics website, <http://www.ons.gov.uk> and NOMIS website,

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Table 11 Ethnicity

Ethnic Origin	Rural Sub Area		Telford & Wrekin		West Midlands		England	
	No	%	No	%	No	%	No	%
White:								
English/Welsh/Scottish/ Northern Irish/British	10,017	95.4	149,096	89.5	4,434,333	79.2	42,279,236	79.8
Irish	54	0.5	729	0.4	55,216	1.0	517,001	1.0
Gypsy or Irish Traveller	14	0.1	166	0.1	4,734	0.1	54,895	0.1
Other White	132	1.3	4,424	2.7	139,386	2.5	2,430,010	4.6
Mixed/ Multiple Ethnic group:								
White and Black Caribbean	31	0.3	1,423	0.9	68,533	1.2	415,616	0.8
White and Black African	4	0.0	278	0.2	9,232	0.2	161,550	0.3
White and Asian	31	0.3	799	0.5	32,561	0.6	332,708	0.6
Other Mixed	12	0.1	483	0.3	21,388	0.4	283,005	0.5
Asian/Asian British:								
Indian	72	0.7	3,076	1.8	218,439	3.9	1,395,702	2.6
Pakistani	13	0.1	2,243	1.3	227,248	4.1	1,112,282	2.1

Bangladeshi	1	0.0	162	0.1	52,477	0.9	436,514	0.8
Chinese	72	0.7	647	0.4	31,274	0.6	379,503	0.7
Other Asian	15	0.1	863	0.5	74,997	1.3	819,402	1.5
Black/African/Caribbean/ Black British:								
African	8	0.1	1,023	0.6	64,253	1.1	977,741	1.8
Caribbean	13	0.1	607	0.4	86,794	1.5	591,016	1.1
Other Black	1	0.0	149	0.1	31,078	0.6	277,857	0.5
Other Ethnic Group:								
Arab	3	0.0	86	0.1	18,079	0.3	220,985	0.4
Any other ethnic group	4	0.0	387	0.2	31,825	0.6	327,433	0.6
All Categories	10,497	100	166,641	100	5,601,847	100	53,012,456	100.0

(Source: Table KS201EW 2011 Census data, Office for National Statistics website, <http://www.ons.gov.uk> and NOMIS website,

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Table 12 Highest Level of Qualification

Highest Level of Qualification	Rural Sub Area		Telford & Wrekin		West Midlands		England	
	No	%	No	%	No	%	No	%
No qualifications	1,719	19.2	32,612	24.6	1,196,794	26.6	9,656,810	22.5
Level 1 qualifications	971	10.9	20,055	15.1	616,225	13.7	5,714,441	13.3
Level 2 qualifications	1,389	15.5	23,731	17.9	695,544	15.4	6,544,614	15.2
Apprentice-ship	337	3.8	4,413	3.3	150,353	3.3	1,532,934	3.6
Level 3 qualifications	1,520	17.0	17,199	13.0	553,600	12.3	5,309,631	12.4
Level 4 qualifications and above	2,665	29.8	27,713	20.9	1,050,404	23.3	11,769,361	27.4
Other qualifications	345	3.9	6,717	5.1	244,485	5.4	2,461,829	5.7
All categories	8,946	100.0	132,440	100.0	4,507,405	100.0	42,989,620	100.0

(Source: KS501EW, Qualifications and Students, 2011 Census data, NOMIS website, <http://www.nomisweb.co.uk>. Contains public sector information licensed under the Open Government Licence v1.0 <http://www.nationalarchives.gov.uk/doc/open-government-licence/>)

Table 13 Occupation: Usual Residents aged 16 to 74

Occupation	Rural Sub Area		Telford & Wrekin			West Midlands		England	
	No	%	No	%	Rank	No	%	No	%
1. Managers, directors and senior officials	789	15.9	7,471	9.5	250	255,592	10.1	2,734,900	10.9
2. Professional occupations	905	18.3	10,919	13.9	256	401,102	15.8	4,400,375	17.5
3. Associate professional and technical occupations	585	11.8	8,841	11.3	218	282,595	11.1	3,219,067	12.8
4. Administrative and secretarial occupations	556	11.2	9,051	11.5	141	289,595	11.4	2,883,230	11.5
5. Skilled trades occupations	647	13.1	9,288	11.9	192	309,088	12.2	2,858,680	11.4
6. Caring, leisure and other service occupations	370	7.5	7,307	9.3	193	241,235	9.5	2,348,650	9.3
7. Sales and customer service occupations	265	5.4	6,775	8.6	140	216,918	8.6	2,117,477	8.4
8. Process, plant and machine operatives	331	6.7	8,431	10.8	34	223,017	8.8	1,808,024	7.2
9. Elementary occupations	499	10.1	10,289	13.1	63	317,734	12.5	2,792,318	11.1
All Categories	4,947	100.0	78,372	100.0		2,536,876	100.0	25,162,721	100.0

Table 14 Car Ownership

Cars or Vans Available	Rural Sub Area		Telford & Wrekin		West Midlands		England	
	No	%	No	%	No	%	No	%
No cars or vans in household	281	7.2	13,748	20.6	566,621	24.7	5,691,251	25.8
1 car or van in household	1,288	33.1	28,700	43.1	952,798	41.5	9,301,776	42.2
2 cars or vans in household	1,563	40.2	18,576	27.9	591,210	25.8	5,441,593	24.7
3 cars or vans in household	514	13.2	4,178	6.3	136,201	5.9	1,203,865	5.5
4 or more cars or vans in household	241	6.2	1,406	2.1	48,079	2.1	424,883	1.9
All categories: Car or van availability	3,887	100.0	66,608	100.0	2,294,909	100.0	22,063,368	100.0
Sum of all cars or vans in the area	7,083		84,671		2,757,999		25,696,833	

(Source: KS416EW 2011 Census data, Office for National Statistics website, <http://www.ons.gov.uk> and NOMIS website, <http://www.nomisweb.co.uk>)

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