

TELFORD & WREKIN CONSERVATIVE GROUP

RESPONSE TO THE AUTHORITIES LOCAL PLAN PROPOSALS SEPTEMBER 2015

1. Housing Requirement for the Borough

1. Policy HO1 – “The Council will make provision for delivery of 15,555 new dwellings across the borough up to 2031.”

1.1 Housing Numbers

The Labour Administration’s proposal to reduce housing numbers downwards, from around 20,000 to a figure of 15,555, is welcomed as a move in the right direction.

However, when considered against the findings and recommendations of the “*Telford & Wrekin Objectively Assessed Housing Need*” (OAN) commissioned by the Authority and undertaken by Peter Brett Associates in March 2015, the suggested figure of 15,555 is considered to be still too high and unsustainable.

We note that the OAN does not find any evidence of housing undersupply in the Borough during recent years and concludes that a minimum figure of 497 dwellings per annum (dpa) is required to meet the borough’s housing need resulting in a total of only 9,940 dwellings over the plan period of 2011 – 2031.

The OAN further states that this growth is compatible with projected housing need and “*a healthy economic future*” which, in the process, should see new housing commensurate with 17,000 new jobs created in the Borough during the plan period. The figure of 17,000 jobs is in line with national forecasts.

We consider that, should the 15,500 new dwellings target not be reduced, the Authority is in danger of oversupplying building land above achievable and viable levels of both future housing demand and job creation.

Neither has the Council identified where the additional 6,700 jobs (above and beyond the national forecast of 17,000 jobs) will come from as the Council may find itself in direct competition with a neighbouring Birmingham led Black Country consortium of local authorities. This West Midlands Combined Authority (WMCA) is likely to consist of eight Local Authorities; Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall, Wolverhampton and recently Tamworth, and will operate independently of Telford & Wrekin for economic growth and delivery.

1.2 Sustainable Development

Because of the Council's inflated housing targets of 15,555 new dwellings, the extra job creation needed in the borough is set at 40% over and above the national predictions for job growth as forecast by 'Experion's business-as-usual- expectation'.

This target becomes harder to attain when considering that the borough has a high proportion of jobs in the manufacturing sector; 17% of all jobs compared to 8% nationally. This is a sector which is losing jobs rather than gaining them and losses must be 'made good' in addition to the creation of new jobs.

Consequently, the inherent danger with the Council's housing target is that without matching jobs: -

- a) The allocated building land may not be taken up.
- b) Housing could remain empty or hard to sell, thus prompting a downturn in the local property market with a matching reduction in equity in homeowner's property.
- c) A third effect is that, without local jobs, occupiers would commute out of the Borough to find work in neighbouring areas such as *WMCA*.

We consider that all of the above points are deemed unsustainable within the National Planning Policy Framework.

1.3 The Conservative Group's Proposed Housing Numbers

We recognise that growth in the Borough will help to provide affordable housing and infrastructure requirements, but targets must be realistic, deliverable and sustainable.

Our proposed growth for the number of dwellings is therefore set above the 9,940 need established by the OAN but 20% lower than that proposed by the current Labour Administration. This will give a growth figure of 12,500 new dwellings which we consider will 'boost significantly' the number of new homes (as required by the NPPF) whilst setting a realistic target for economic growth and infrastructure requirements.

The Labour Administration's Local Plan is not due for adoption until December 2016 at the very earliest. The Administration's failure over the past 4.5 years to deal with this issue as a priority has led to a number of unwanted and speculative housing developments gaining planning permission by default across the borough. This unacceptable state of affairs is likely to continue until the Local Plan finally receives approval.

As a result, additional speculative developments and windfall sites* will inevitably occur across the borough but the hundreds of additional homes likely to be built will not be deducted from the Council's planned 15,555 new dwellings target. This will result in much more housing in the borough than the Council's target would seem to imply.

Windfall Site: - *Unforeseen and additional opportunities to develop sites not considered by the Local Plan which will inflate the Council's stated housing growth and demand for services.

To deal with this iniquity we would propose deducting the number of any further windfall* or speculative dwellings, built before the Local Plan's final adoption, from our target figure of 12,500 in order to be honest and transparent with our residents on the real number of new dwellings to be produced between 2011 and 2031.

In addition to this, a policy should be included within The Local Plan to ensure that local empty or derelict housing stock is linked to planning permissions in order that such properties are made habitable and/or returned into use. Numbers of dwellings gained for use in the Borough in this manner should likewise be deducted from the overall new dwellings target to relieve pressure on greenfield and employment sites etc.

1.4 Allowance for Non Implementation of planning permissions

The figure of 2,799 as a projected allowance for planning permissions that may not be delivered across the borough is high and also contributes towards The Plan's over provision of sites and new dwellings.

Therefore, the Council should investigate and consider means of ensuring that development does take place once planning permission is granted and do what is possible to enforce delivery. Methods such as financial incentives should be considered and schemes such as strategic operation of the Community Infrastructure Levy (CIL) included within the Local Plan.

1.5 Rural Housing Numbers

We note the proposed overall figure of 900 houses to be built in the rural area over the plan period in five 'Key Settlements' which, when taking into account dwellings already built or with planning permission, equates to 1 per year per settlement over the remaining plan period.

However, once again any additional dwellings built by windfall or speculative development in the rural area should be deducted from the overall rural allocation. This expedient would allow for dwelling numbers stated in the Local Plan to be rigorously enforced.

We would also wish to see a mechanism for ensuring an even dwellings distribution across the five Key Settlements (if adopted) to ensure that no location receives a disproportionate development allocation.

We also question the suggested designation of the 5 Key Settlements of Edgmond, High Ercall, Lilleshall, Tibberton and Waters Upton, as some other rural locations may be suitable and desire development to meet local need in their place.

Development schemes in the rural area of 5 or less dwellings should be allowed outside of the 'Key Settlements' to meet local need. This will provide additional flexibility in rural settlements for infill and the use of brownfield sites to provide homes for the local community.

Dwellings provided in such a manner should also be deducted from the overall rural dwellings allocation.

Therefore the 5 Key Settlements should be reviewed and reconsidered against the need, suitability and desire for development elsewhere in the rural area. Infrastructure necessary to support the sustainability of such areas could be included within any larger development schemes.

Also, where local housing need has been met within a given 'Key Settlement', consideration should be given for its removal to prevent overdevelopment.

2. Countryside and Green Fields

We note with concern the following statements contained within the Council's own Integrated Appraisal report: -

Paragraph 5.73 – “The appraisal has found that the majority of the preferred site options have the potential for negative effects of varying significance in relation to access to existing services, facilities, employment opportunities, and sustainable transport modes and as such are unlikely to alleviate reliance on the private vehicle. Development at these sites is considered to therefore have potential for indirect negative effects on air quality and therefore climate change. A number of preferred sites are located on Greenfield land with the potential for severance of green infrastructure.”

Paragraph 5.104 - “However, the level of growth proposed will ultimately lead to the loss of greenfield land surrounding Telford and Newport as well as within the countryside, changing the landscape to some degree, which has the potential for residual minor long term negative effects. The nature and significance of the effect will ultimately be dependent on the precise location, scale and design of development.”

2.1 Intrusions into the open Countryside.

The Local Plan supports major intrusions into open countryside on the following greenfield sites:

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- a) Muxton (750 new dwellings) where the council owns 20 acres.
- b) Newport Urban Area (120 new dwellings) where the Council owns several acres.
- c) Priorslee (1100 new dwellings)

The impression given is that the Council's motivation to include two of the above sites is partially one of financial return.

With our proposal to cut the Labour Administration's 15,555 housing target by 3,000 new dwellings, none of the above sites will be required to meet the borough's housing targets. We strongly believe that all should be removed from the plan to further protect the borough's green fields and countryside from unnecessary development.

However, it is noted that the Council has recently granted planning permission for the Priorslee extension and intends to submit a planning application in October 2015 for Muxton, actions which render this part of its consultation exercise disingenuous.

It is also noted that, at the Planning Committee of the 21st May 2014, during consideration of TWC2013/1033, at Haygate Road, Wellington, the Planning Committee was advised that particular site had not been included in the Council's "*Shaping Places Document*" as such an inclusion could be considered as predetermination.

If so, the same should have applied to the Priorslee site and should now apply to any planning application for 'Muxton' which lies in Lilleshall Parish. Further planning application for sites included within the Local Plan should be delayed until The Local Plan has received approval and final adoption.

The large extension into open countryside adjacent to Muxton makes a mockery of The Lilleshall Gap (see 2.5) as the proposed development not only lies within the rural parish of Lilleshall but further erodes the remaining agricultural land between the urban development of Telford and the rural settlement of Lilleshall.

The Muxton site is also partially located within a flood risk area and therefore does not comply with the NPPF.

The development at Station Road, Newport removes green space from an urban area recognised by the Council as having a shortage of open space (Newport Open Space Provision Review 2008). It also further erodes the boundary and community identity with the adjacent village of Church Aston and is consequently not supported.

2.2 Protection of Agricultural Land

To further protect the Borough's large rural area, which makes up around two thirds of Telford & Wrekin, the Authority should compile independent details of agricultural land grading and specify areas where the loss of valuable agricultural land would be unacceptable within the Plan. We would wish to see a clear policy within The Plan to protect grade 1 and 2 agricultural land from development (including renewable energy schemes) with the exception of associated rural activities.

The use of higher classified land without justification is contrary to the NPPF paragraph 112 and, as such, constitutes a considerable impediment to receiving planning permission. It is therefore surprising that the draft local plan does not have a specific policy to comply with this NPPF requirement.

It is noted that The Plan does not have a policy regarding the development of wind farms or solar farms, which should also be included.

2.3 Green Field Sites

We do not support the development of Greenfield sites except in exceptional circumstances. We further note the Labour Administration's refusal to adopt the Community Infrastructure Levy (CIL), which could be used to incentivise Brownfield sites while penalising Green field sites.

The Borough currently enjoys a surplus of employment land, all of which in the main, are designated as brownfield sites. These sites should alternatively be reconsidered for housing development to reduce the amount of Greenfield sites currently proposed in The Local Plan for housing use.

2.4 Village Development Boundaries

Although problematic in a few instances, we would wish to see development boundaries specified around rural villages to prevent unwanted extension into the open countryside.

To help accomplish this, The Local Plan should specify the need or desire that all Parish and Town Councils should similarly produce a local plan for their own communities. These should be targeted for completion before the final adoption of the Council's Local Plan currently planned for December 2016.

2.5 The Lilleshall Gap

The so called "*Lilleshall Gap*" is a title designated to an unspecified area of countryside to prevent further extension of the urban area at Muxton into open fields and, as such, the principle is welcomed.

However, the principle of protecting the integrity of the urban and rural boundaries at that place will only come into being after the existing urban boundary adjacent to Muxton has been breached as mentioned above.

As the Lilleshall Gap designation carries no detailed information about its status or operation, it is not possible to comment further except to support further discussions around the notion of a country park.

It is also noted that no such designation has been given to the area surrounding Newport despite a similar proposed extension of the urban boundary at this location into open countryside. We would like to see details included of a similar concept for a wider area than just between Lilleshall and Muxton

To further develop this notion we support the concept and creation of a Country Park which, coupled with the protection of Agricultural land (Para 2.2), will protect our open countryside and green fields from future development and urban erosion.

2.6 The Green Guarantee

We welcome the inclusion of a 'Green Guarantee' to afford protection to 150 green spaces throughout the borough. However, little thought seems to have been given to identify specific locations and a question mark hangs over their status and level of protection. The Plan indicates

that development on these sites may still take place which brings into question the term “guarantee.” We look forward to further clarification.

Until additional details are provided to the Council’s Cabinet in October 2015 it is not possible to comment on these particular proposals any further.

3. Infrastructure

3.1 Transport

We note that the ‘*Telford Strategic Transport Model*’ has not been completed and is not due to be available until November 2015. It would be expected that, as a key issue for sustainable communities, housing and business development (such as public transport to work), this report would help the Authority arrive at and determine projected growth figures and development, not the other way around. It is not possible to comment further.

3.2 Water

Much of the borough’s development will fall within the Shelton Water Resource Zone which the Severn Trent Water Resource Management Plan (WRMP) identifies as a supply which will suddenly decline in 2024/2025. To make up this shortfall increased groundwater extraction will be required which is dependent on ongoing discussions with the Environment Agency.

A Detailed water Study produced by the Council states that a secure water supply also depends on demand not exceeding the forecast level of growth within the WRMP. However Telford is one of three main urban areas within the Shelton Water resource Zone which has the potential to affect the balance between supply and demand.

Increased pressure on water resources is acknowledged as a key issue for the Borough and that there are *“a number of uncertainties with regard to delivery.”* This also supports our assertion that a 3,000 reduction in dwelling numbers is essential to maintain sustainability as, at the proposed Council level of growth, consumption will have to be managed at 110 litres per person per day.

The treatment of wastewater and sewage is likewise under pressure. The Council’s own Integrated Appraisal Report states that: -

“Based on the findings of the Water Cycle Study, it appears that there is currently not enough capacity at the majority of waste water treatment works to accommodate the level of growth proposed in policies HO1 and EC1.”

As the Council’s Integrated Appraisal Report further states; -

“Overall there is the potential for the Draft Local Plan to have major long term cumulative negative effects on water resources and quality. Mitigation provided through Draft Local Policies and current regulatory processes, such as the WRMP and discharge licenses, should help to ensure that negative effects are not significant but this is uncertain at this stage.”

“The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. There is the potential for major long term negative cumulative effects on the water environment.”

Although Severn Trent Water has confirmed that there will be capital maintenance work to increase capacity as required, the 15,555 new dwellings proposed by the Council appear to be more and more unsustainable as the statements above provide a stark consequence of the proposed growth figures.

3.3 Local Education

We have concerns which centre on the provision of secondary education in the borough and, in particular, on a cut in 400 school places over the past few years which have occurred at a time of unprecedented projected population growth.

In addition to the reduction in school places, the authority has been unable to collect capital monies via Section 106 payments from developers over much of the past 4 years because a current surplus of school places precludes developers from having to make such payments.

Had the Council’s Labour Administration adopted the *CIL* three years ago, when formally requested to do so, significant capital reserves could have been amassed to deal with the impending funding crisis.

In the absence of such reserves it will be difficult for the Council to provide new secondary schools to meet the demand which their growth figures and new housing targets will demand without significant and new borrowing which will add to the Authorities financial pressures.

3.4 Industrial Estates

Any Greenfield sites earmarked for industrial use (such as site allocation E27 on Grade 2 agricultural land opposite Newport’s Audley Avenue Industrial Estate) should be removed from The Local Plan and alternative brownfield or more suitable sites located.

We would also like to see additional and imaginative policies to positively drive the regeneration of the Borough’s older industrial estates, which were provided some 40 years ago by Telford Development Corporation.

The potential exists on some of these south Telford industrial estates for building live/work units or housing development as other new industrial facilities are provided in the borough. This would allow for capital to be raised and reinvested into the infrastructure of remaining estates.

Cllr. Andrew Eade – Conservative Group Leader.

Cllr. Nigel Dugmore – Deputy Leader & Shadow Cabinet Member Planning.

Cllr. Jayne Greenaway – Shadow Cabinet Member Family Care, Health & Wellbeing.

Cllr. Stephen Bentley – Shadow cabinet Member Environment.

SUMMARY

- Telford & Wrekin Council's suggested new dwellings target of 15,555 is a welcome reduction from the 20,000 target muted in its previous consultation document "Shaping Places." However this figure is still considered to be too high and unsustainable.
- The Objectively Assessed Housing Need Report (*OAN*) undertaken on behalf of the Authority by Peter Brett Associates in March 2015 suggests a base housing need figure of 9,940 dwellings over the plan period of 2011 – 2031.
- The target of 9,940 new dwellings suggested by the *OAN* is commensurate with 17,000 new jobs being created in the Borough during the plan period, in line with national forecasts.
- The Labour Administration's target of 15,555 new dwellings will require the creation of 40% more jobs in the borough than is forecast nationally.
- Should the additional new 6,700 jobs not be created to meet the Council's housing target; building sites may remain undeveloped, workers will commute elsewhere for jobs (which the *NPPF* deems unsustainable) or completed homes will remain empty. This latter risk could seriously damage equity in the local housing market.
- The Conservative group suggest a smaller maximum figure of 12,000 new dwellings, (20% reduction) the majority of which are now being built or have planning permission.
- This proposed lower target will remove the need for development on any Greenfield sites in the borough and keep rural and urban boundaries intact.
- The lower figure will also reduce infrastructure pressures such as; water supply, water treatment, schools, health facilities and highways etc.
- New dwellings from windfall sites and speculative developments must be deducted from rural and urban allocations and not be added to them as proposed. Otherwise the 15,555 Council target for new dwellings will be greatly exceeded bringing additional infrastructure pressures with it.

- A clear policy is needed to bring Empty dwellings back into use. Again, the number of dwellings brought back into use must be deducted from overall targets.
- A policy on incentivising delivery of dwellings within a reasonable time period is required to prevent sites enjoying planning permission from lying fallow.
- 'The current allocation of Key Settlements requires a review to include rural communities that wish development and exclude those that do not.
- Development should be spread evenly over Key Settlements and where local need has been met, Key Settlement status should be removed.
- Infill, windfall or speculative developments in none Key settlement areas should be deducted from the overall rural target.
- Rural settlements and villages should be allocated a development boundary.
- Development on Greenfield sites is not supported unless under exceptional circumstances.
- A specific policy is required for renewable energy in the borough.
- Grades 1 and 2 agricultural land should be identified by the Borough Council and excluded from residential or industrial development.
- The Green Guarantee is welcomed but lacks detail on future protection from development.
- The Lilleshall Gap concept is welcomed but lacks any detail whatsoever.
- A specific policy is required for regeneration of TDC industrial estates.