

Representor ID: E120 – Wain Estates

Telford and Wrekin Local Plan Examination – Matters, Issues and Questions

Matter 2 – Vision, Priorities and Development Strategy

Issue 1: Have the vision, priorities and development strategy been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?

Q19: Does the Plan set out an appropriate vision for the Borough based upon the evidence?

1. Our Client is generally supportive of the Vision set out within the Plan, considering it to be an ambitious, pro-growth statement of intent for the Borough over the Plan period. As stated within our previous representations, it is apparent that the Plan is heavily geared towards environmental matters, whilst also seeking to deliver sustainable, large-scale economic growth. Our Client is supportive of this, but would reiterate the need to acknowledge that said growth cannot be delivered without greenfield land release. As such, whilst the Vision acknowledges the delivery of over 20,000 new homes, it should also recognise that greenfield land will be key to achieving this.
2. Our Client also notes, and is supportive of the Vision where it sets out that development will contribute towards the health and wellbeing of residents and provide a mix of homes to meet the Borough's needs, noting that these should be located near to services and facilities. It should however also recognise the role that development can, and should play in protecting the vitality and viability of the existing services and maintaining the role of the sustainable centres (including Newport).

Q20: What does 'a Forest Community' mean?

3. The concept of a "Forest Community" is mentioned at the outset of the Plan's Vision, noting that it will have "*an enhanced and protected natural environment that local residents can enjoy close to their doorstep*". This would appear to be the only definition within the Plan, or the supporting evidence base given to the term "Forest Community", though it is noted that numerous references are made to it throughout the Plan and within some of the draft policies.
4. In multiple places, the Plan appears to advocate the implementation of Forest Community principles without setting out what they are, or setting out any specific requirements for development proposals to adhere to. The Plan is rather ambiguous in this respect and whilst one would not expect specific requirements or fine detail within the Vision, one would expect this to be defined, and underpinned by evidence within the main body of the Plan and the policies therein.
5. Our Client considers that the Plan would benefit from clarity in this respect. If it is something which the Council expects to inform all development proposals (particularly major residential and employment developments), then this should be explicitly stated within the Plan, and underpinned by an appropriate, robust evidence base.

Q21: Are the vision, priorities and the development strategy justified, have they been positively prepared, and do they accord with the evidence and national policy?

6. Our client has some concerns in relation to how the Vision, Priorities and Development Strategy address Newport. We draw attention to the points noted in response to Q19 and Q20 above.
7. In keeping with the above, we are concerned that the development strategy, and therefore population distribution figures for the Borough reflect that neglect towards Newport. That is not to say that Telford, as the principle settlement, should not be the focus of growth for the Borough. It clearly should, as the largest and most sustainable settlement. However, we do consider that the level of growth directed towards Newport (i.e. 7% of the Borough) is sufficient when it is considered in the context of the role that Newport plays in the borough. The Plan itself recognises that Newport is the secondary settlement within the Borough and that it plays an important role as a market town that supports the rural hinterland (which includes Harper Adams University).
8. To that end, our Client notes that Priority 3 looks at employment and the provision of jobs. This is something that our Client is fully supportive of but, in attracting such inward investment, it is vital that there is a sufficient labour force to support it. This labour force will in turn require somewhere to live and so it is essential that any growth in employment is supported by the provision of new homes. Noting specifically in relation to Newport, which the Plan proposes 2.9 ha of employment land through proposed employment allocation EC4, and therefore it is essential that the Plan provides new homes alongside this employment.
9. As reported within earlier Representations, the Plan seeks to deliver approximately 1,414 new homes for Newport. This is equivalent to 7% of the total provision and consistent with the population split discussed above. The Plan goes on to state that over 1,239 homes (equivalent to approximately 87%) of Newport's proposed provision has already been completed, or has planning permission meaning that, in reality, the Plan is only providing a further 175 new homes for Newport over the Plan period (equivalent to 9dpa). The reality is that this level of growth will starve Newport of development opportunities for a large part of the plan period; inevitably having negative knock on effects on the vitality and viability of services and facilities in the town. Our Client remains concerned that this strategy is at odds with the pro-growth agenda that the Vision sets out and fail to meet the objectives of the NPPF in boosting the supply of housing. As an important, growing market town, Newport should benefit from a level of growth that supports that role. As stated above, it is essential that Newport can sustain itself, as well as providing a valuable service in supporting the rural hinterland. Also noting the proposed economic growth of the town, it will be important that Newport is given the means to grow, and not simply maintain the status quo.
10. To be clear however, we are not suggesting that there should be any reduction on the provision for Telford, simply that Newport should benefit from an increased level of provision and that the strategy underpinning the Plan should place a greater emphasis on Newport. Such an approach would be in accordance with the aims of the National Planning Policy Framework (NPPF) in significantly boosting the supply of housing.

11. In addition to the above, priority 5 discusses delivering regeneration, renewal and stronger communities. Though Newport is mentioned within the objectives of priority 5, it is clear from the explanatory text at paragraph 3.10 of the Plan that the focus of this priority is very much on Telford. The priorities would benefit from greater clarity in this respect, noting the importance of Newport as a settlement in its own right, but also the important role Newport plays in supporting the rural hinterland which surrounds it.

Q22: Has the development strategy been fully informed by the SA and other evidence? Is it soundly based?

12. Linked to the response to Q21 above, our Client considers that the development strategy has been informed by the SA and other evidence and, in a broad sense, is soundly based (in that it seeks to deliver the majority of development in the principal settlement, with lesser amounts in the secondary settlement and rural areas). For the reasons as noted above however, our Client remains concerned on the level of provision that has been afforded to Newport as the SA does not appear to have fully considered what Newport needs to sustain itself and develop over the Plan period and maintain its role as a settlement in its own right but also in the role it performs in supporting the surrounding rural area..

Q23: Have reasonable alternatives been considered and clearly discounted on the evidence?

13. The Integrated Assessment (and SA within) comprehensively sets out a number of alternative strategies that have been considered in the evolution of the Plan. Our Client's principle concern is that the Plan reflects the pro-growth agenda in terms of its provision of Telford, but does not apply the same, or a proportionate approach to the other settlements in the borough, which is key for sustaining their long-term future, and the wider sustainability and prosperity related aims within the Vision.

Q24: Is the site selection process clear and suitably robust, supported by the SA and other evidence?

14. No. Whilst our Client considers that the methodology which forms the basis of the site selection process is capable of providing a robust method for assessing sites, they remain firmly of the view that individual sites have not been assessed consistently through the process. This is set out comprehensively within Section 5 of our Client's representations to both the Regulation 18 Consultation (January 2024) and the Regulation 19 Consultation (May 2025).
15. Our Client's land interest at Chetwynd Road is noted within the Strategic Housing and Economic Land Availability Assessment (SHELAA) (2023), which forms part of the evidence base to the Local Plan. The SHELAA considers the Site as not being suitable on account of it being outside of the settlement boundary for Newport (see Site 464). Clearly, in the context of assessing land for inclusion as a site for the purposes of plan making, the Site is not unique in this respect. The table goes on to set out that the Site is not currently achievable, although no qualification is provided in respect of this statement.

16. The SHELAA does recognise however, at paragraph 5.3, that the presence of a sustainability constraint does not necessarily render the site unsuitable, and that exercising planning judgement is required in order to establish whether any such constraint can be overcome, or is outweighed in any way. Our Client accepts that a planning judgement should be exercised, but said judgement should be done in a positive and justifiable way. As such, it should be consistent in its application. The consistency of this application is discussed further below.
17. Noting the above responses in terms of the quantum of new homes and development to be provided in the borough, consistent with the stated pro-growth agenda, our Client considers that the Council has little other option but to consider sites outside of the built-up area if it is to deliver the vision which underpins the Plan. Indeed, many of the sites considered by the Council will have some form of constraint which must be weighed in the balance.
18. By way of an example, our Client's land interest (Site 464) is referred to within the Technical Paper as being removed from the process at Stage 5 (the Technical Assessment stage), this is denoted on the Stage 5 map, which forms part of the Council's evidence base. A large number of sites, across the Borough and including in and around Newport were removed at this stage. In the case of Newport, almost all of the sites which have been promoted through the Local Plan have been discounted, with only sites within the settlement envelope being proposed for allocation. It is important to note however that Site 419, which was discounted at the Regulation 18 Stage owing to technical constraints, has now been brought back into the Plan and is now proposed for allocation.
19. Noting previous delivery trends, both borough-wide, as well as for Newport, it is apparent that both the Borough and Newport in particular are capable of sustaining a far greater level of growth than the Council have sought to cater for (either within the adopted Plan or the emerging one). We consider that the requirement for development at Newport should be significantly higher (particularly having regard to the relatively narrow gap that exists between the Borough's housing need and its housing requirement, arising from the updates to the Standard Method calculation. It clearly therefore needs to urgently identify additional sites to ensure it can meet its requirements to the end of the Plan period.
20. This is pertinent because we know from the Housing Technical Note that the Council has selected, or deselected sites based (amongst other matters) on their conformity with the preferred development strategy. However, based on the above, it would appear that the Council has failed to do this as, despite rightly focussing development towards Telford, it has failed to identify sufficient sites within Newport that it needs. Our Client remains concerned that sites have wrongly been dismissed too early in the process because of perceived technical matters, without considering whether these could have been addressed (despite what is stated within the updated technical paper around revisiting sites should new information come to light, as well as the aforementioned quote from the SHELAA which confirms that a constraint should not automatically render a site unsuitable.
21. In the case of our Client's land interest (Site 464), extensive evidence has been provided through the Local Plan process to demonstrate the acceptability of the Site and to also demonstrate that

any perceived constraints could be overcome through the design and development management processes. It seems like a similar process was undertaken in the case for site 419, which has subsequently been proposed for allocation, whereas our Client's Site was disregarded. The only differentiating factor is that 419 lies within the settlement envelope, whereas 464 lies adjacent to, but outside of it. In the context of a pro-growth agenda, as well as a national housing crisis and an unbalanced distribution of new housing across the borough, being outside of the settlement boundary should have been weighed into the planning balance, as opposed to being a default reason for rejection.

22. Notwithstanding this, the stage 5 technical assessment for Site 464 states that the site *"Fits within the Development Strategy for Newport. However, the site is adjacent to the Chetwynd Aston Deer Park, which is one of the Borough's Historic Parks and Gardens. The response from the Gardens Trust suggests further investigations with Historic England should be sought"*. The same proforma also notes that the Site is well located adjacent to the established urban area of Newport albeit concludes that its location is unsuitable because of its proximity to the listed Deer Park. It also confirms that the site is available and achievable. Coupling this with the Council's recognition (within the same proforma) that the Site fits with the development strategy for Newport, it seems that the Site was only discounted for heritage reasons, albeit the Council do not provide any heritage evidence confirming how and why they have reached such a conclusion. Said assessment also fails to acknowledge the heritage evidence provided by our Client to the Council as part of previous representations. This heritage evidence concluded that any perceived harm could be mitigated through detailed design, and so should not present a barrier to the Site's future allocation.
23. This position is important when considering the approach that the Council has taken to other sites that have been proposed for allocation, which too have been identified as having a number of other potentially significant technical constraints, yet, in these instances, the Council has deemed them to be acceptable (namely sites 419, 472 and 701). Technical constraints have been highlighted in relation to all of these Sites, but in all cases are more positively framed (please refer to Table 2 of our Client's Representations to the Regulation 19 consultation). These comments are equally true of site 464, particularly with the benefit of extensive technical evidence that was supplied by our Client, early in the process as part of the Issues and Options consultation. It is not clear, despite the publication of the site proformas, why the Council has sought to make a distinction between the proposed sites and our Client's land interest (as well as the other dismissed sites). Despite evidence to the contrary, the Council has decided that the "technical considerations" pertinent to the land at Chetwynd Road are insurmountable.
24. In light of the above shortcomings of the Site Selection Process, our Client must object to the proposed allocation of sites 419, 472 and 701 in the absence of equally suitable but unjustifiably omitted allocations such as Site 464. The clear inconsistency in approach here does not form the basis of a sound plan in the context of the NPPF and, mindful of the pro-growth agenda and vision of the Plan, as well as the national housing crisis and a very low level of proposed net housing delivery (175 in total) for Newport over the Plan period, that a reconsideration of sites should take place, with additional sites being allocated for housing development in and around Newport to maintain its vitality and sustain itself over the Plan period and beyond. In order to ensure

consistency and fairness in approach, our Client would recommend that the proposed allocations for Newport are deleted and reassessed, and a new list of proposed allocations (as well as reserve sites) identified.

Q25: Is the development strategy sufficiently clear about the respective roles of Telford, Newport and the rural area?

25. For the reasons stated in the answers above, our Client considers that whilst the role of Telford is sufficiently clear, and addressed through the provisions within the Plan, the same cannot be said for Newport. The Plan references the importance of Newport as a market town, as well as its role in supporting the rural areas, but fails in our Client's view to afford it sufficient development provision to sustain itself over the Plan period. The Plan seeks to deliver circa 1,400 new homes but notes that around 1,200 of them are already committed, leaving approximately 175 new homes to sustain Newport over the next 20 years.
26. As such, whilst the Vision for the Plan seems to recognise the role of Newport, the Plan itself fails to deliver for it, and as such it is our Client's view that additional sites should be identified to significantly boost the supply of housing for the Borough, but particularly for Newport.