

## TELFORD & WREKIN LOCAL PLAN REVIEW EXAMINATION

### MATTER 6 – DEVELOPMENT MANAGEMENT POLICIES

#### Define Planning and Design Ltd on Behalf of Bloor Homes (Regulation 19 Representations Ref. E135)

The following hearing statements relate to Bloor Homes Limited's (BHL) land interests that form part of proposed new Sustainable communities "SC1 Land at Bratton" and "SC2 Land North East of Muxton" as identified by emerging Local Plan (eLP) Policy HO2.

#### ISSUE 1: WHETHER THE OTHER HOUSING POLICIES ARE JUSTIFIED, EFFECTIVE, AND CONSISTENT WITH NATIONAL POLICY

##### Question 61: Are the provisions of Policy HO4 in terms of affordable housing requirements justified by the evidence and deliverable?

BHL have previously submitted representations (Respondent ID E135) in relation to the affordable housing requirement for the Sustainable Communities. HO4 applies a blanket requirement to development in Telford of 25% affordable housing which would include the three Sustainable Communities. This is not supported by the Council's own viability evidence work (VSO1, VSO1a and VSO2) which is clear that even requiring 20% affordable housing in the Sustainable Communities would not be viable alongside the other significant policy and infrastructure requirements (VSO2 Paragraph 6.10). Further, since this work was produced, it has become clear through pre-application discussions with the Council that the education and transport infrastructure requirements are likely to be substantially more than those considered in the assessment, which significantly exacerbates the issue.

Therefore, it is imperative that the affordable housing requirement for Sustainable Communities is re-considered and aligned with the Council's own evidence work and informed by the open discussions that have taken place between the Council and the promoters of the Sustainable Communities.

Without modification, the policy sets unrealistic expectations which will require viability assessments to be submitted at the application stage and could affect the ability to secure timely, local decisions on strategic scale developments which underpin the Local Plan development strategy.

The policy should also introduce further flexibility on tenure mix to allow negotiations during planning applications where viability is a concern to enable affordable home tenures which generate more revenue, such as discounted market sale. This will help increase the overall percentage of affordable homes that can be delivered on such sites.

**Question 62: Is it clear how Policy HO4 and Policy HO5 are expected to work together? In particular, are the policies clear and unambiguous in respect of reduced or zero provision in terms of how criterion 4 of Policy HO4 and criterion 3 of Policy HO5 apply and relate to each other?**

The relationship between Policies HO4 and HO5 needs to be further refined to ensure the requirements for development are clear and unambiguous as required by the National Planning Policy Framework (NPPF).

Significantly part 1d needs further clarification. When reading the first part of e) it appears that the Council are seeking 10% of the overall affordable housing requirement set out in Policy HO4 to be delivered off-site, but when reading the following bullet points it becomes unclear in what circumstances this would apply to development. Further, should such a requirement be applied it is unclear what evidence has been produced to justify the requirement or whether a strategy has been produced which establishes how such funds would be directed to ensure that affordable homes are delivered locally.

## **ISSUE 5: WHETHER THE DEVELOPMENT DESIGN (DD) POLICIES ARE EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY**

**Question 113: Is there unnecessary repetition of requirements set out in other policies (e.g. in sections 6 and 7 of the Plan), which may make the policy unclear and ineffective? (Policy DD1)**

Policy DD1 has a substantial number of design criteria to guide good place-making. However, the Plan has a number of policies which already set out design criteria specific to certain development types and technical areas such as flood risk and drainage, heritage, landscape, transport and climate change. It is unnecessary to repeat requirements over a number of policies which could make applying policies in practice difficult and inconsistent.

**Question 115: Is it clear how the policy will be applied to housing allocations and Sustainable Communities, given the design requirements for those sites/locations in policies HO1 and HO2? (Policy DD2)**

Policy DD2 sets out further design criteria for the development of housing. The preamble to the policy suggests it is intended to apply to the "development of housing estates in the borough" but it is unclear whether the Policy applies to allocated sites or Sustainable Communities which are also subject to the requirements set out in Policy HO1 and HO2. It is also repetitive of other policies in the Plan.

It is suggested that the policy is refined and clarified to apply to non-allocated sites to ensure the Plan can be consistently and appropriately applied to development proposals. Specific requirements for allocated sites should be set out in site specific policies.

**Question 116: In part 2, is the meaning of "Design codes/briefs", "estate developments" and "detail... proportionate to the size of development" clear and unambiguous? (Policy DD2)**

The Policy is not clear on the circumstances where a design code/brief would be required and what such a document should include. This ambiguity is also relevant in relation to the Sustainable Communities allocation policy as discussed further in the response to Matter 5 and in previous representations submitted on behalf of BHL.

For outline applications it would be more appropriate to require detailed design code type documents (should they be required) to be conditioned so that they are provided alongside or agreed prior to the submission of Reserved detailed design matters. This would enable development proposals to come forward in a timely manner by enabling developers to establish the principle of development, key parameters and required infrastructure early in the process, and without the costs associated with detailed design matters prior to the Reserved Matters stage.

## **ISSUE 6: WHETHER THE POLICIES FOR SUSTAINABLE TRAVEL (ST) AND TRANSPORT NETWORKS ARE JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY AND GUIDANCE.**

**Question 117: The Council's emerging Local Transport Plan (LTP) is referenced in paragraphs 11.2, 11.13 and 11.19. (a) When is the LTP expected to be finalised, and will the ST policies be effective before then? (b) Is the Local Plan Transport Strategy referred to in paragraph 11.17 the same as the LTP? If not, what is it and does this need to be explained?**

A clear, justified and appropriately evidenced Local Transport Plan is essential to the delivery of development in the Borough, particularly in relation to the cohesive development of the Sustainable Communities; and delivery of mitigation measures to ensure transport impacts are appropriately considered and addressed.

BHL's discussions with the Council to date, including the Local Highways Authority, have highlighted the need for a clear strategy to be established and evidence work including strategic transport modelling and proposed mitigation schemes to be made available to inform emerging development proposals. BHL are working proactively with the Council to bring forward their site at Land at Bratton as soon as possible and to ensure that assessment work is informed by that carried out at a strategic level by the Council to support the Local Plan.

**Question 122: Is the approach to assessing and mitigating the traffic impacts of development soundly based, including in relation to the SCs, allocated sites and impacts that cross administrative boundaries?**

Limited information on the Council's approach to assessing and mitigating the traffic impacts of the Plan and the proposed allocations is currently available. It is understood that a Highways Topic Paper is being produced which is to include details of the assessment work and proposed mitigation for the sustainable communities (and other allocated development proposals). However, this is not expected to be available prior to the submission deadline for

Hearing Statements and the opportunity to respond to such work would be welcomed in due course should it contain detail not previously made publicly available.

BHL will continue to engage with the Council in relation to the ongoing assessment work being carried out in relation to their land interests at SC1 and SC2.

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