

Dear Sirs,

T&W Shaping Places Local Plan – Proposed Housing and Employment Sites Consultation – Response from Newport Regeneration Partnership

Introduction

In our submission last year to the Strategy and Options Shaping Places consultation, we stressed that our overriding belief is that it is ‘... employment opportunities that are critical for the future of Newport. Simply building houses will not lead to significant employment opportunities being created in the town, it is only likely to lead to a ‘dormitory town’ status for Newport with the level of out-commuting not being ‘sustainable’ as per the concerns expressed as regards the Core Strategy 2007...’ Our position remains unchanged.

What has changed is the timetable for the production of the Local Plan. Last year it was stated that in effect the final draft of the Local Plan would be issued in April 2014, for a 6 week period for final public comment followed by Examination in the second part of the year and adoption by T&W before the year end i.e. at least 4 clear months before a general election on 7th May 2015. From what we now understand from the Local Development Scheme Timetable (LDST), the Local Plan is not likely to be adopted until some time in 2016, probably just before the existing Core Strategy 2007 expires.

The net effect of this for the many housing applications that have already been submitted and for those that we are aware of which are in the pipeline to be submitted (probably only a small proportion of those that are still to be submitted) is that any plan is rendered irrelevant as developers can submit applications for any greenfield land with any numbers of dwellings proposed to be built and that in the absence of an adopted Local Plan, residents can do nothing as the ‘presumption in favour of sustainable development’ is applied by the T&W Planning Department and the recommendation is to approve. So by the current timescales in the LDST, by the time a draft Local Plan gets to Examination, all the greenfield areas of land which of are any interest to developers whether on green spaces in the urban area of Telford or greenfield sites in/around market towns or encircling rural settlements, will have already received planning approval.

The net effect of the above is that T&W council tax payer have been ‘disenfranchised’ in relation to housing development in the area of Telford and Wrekin.

An example of this in operation can be seen from the consideration at the T&W Plans Committee on 30th April 2014, where for application number TWC/2013/0885 re. 51 homes on a greenfield site off Station Road, even a Labour Party member said he would vote against the officer recommendation to approve the application as ‘...too many ‘t’s needed crossing and ‘i’ s dotted’ as regards deficiencies in the details in the application. The application was, however, approved by a majority who said they believed that in the absence of a Local Plan, they had no option than to approve the application
In view of the above and due to deficiencies in the documents which have been published as part of the consultation, we will first turn attention to our proposals for employment land in and around Newport and then to housing issues.

Employment Land

We are both surprised and disappointed given the length of time that T&W have had to work on policy documents to be part of the May/June 2014 consultation, that a document stated to be an 'Interim Report 2012' and which in both the body of the document and as referenced in the Annual Monitoring Report 2013 (which itself has only just been published as part of the consultation i.e. around 7 months late) states that it was to be 'updated in 2013,' has been released and included in the consultation.

The reference in the Report to circa 3.5 hectares of employment land for Newport, is completely at odds with what T&W Cabinet approved in November 2013 i.e. minimum 8 hectares of employment land for Newport.

In view of the complete failure to produce a document on employment land which includes the details approved by T&W Cabinet 5 months before the consultation, we will not respond to the hopelessly-out-of-date document but will provide proposals which NRP have actively been working on. We would also say at this juncture, that we reserve our rights to bring the situation described above to the attention of the Inspector appointed to undertake the Examination.

NRP and other local bodies even before the vote by T&W Cabinet in November 2013, had made tentative approaches to land owners regarding the need for employment in Newport, inter alia, for the reasons set out in the NRP submission to the T&W Strategy and Options Consultation in July 2013 and as referenced in the Introduction to this submission. As land availability is only one half of the question relating to employment, NRP also undertook a review to identify what, if any, unique selling point(s) could be identified to distinguish Newport and its surrounding rural area from other similar locations across the country.

What NRP identified is the centre of excellence which is Harper Adams University (HAU). Given that HAU was to open an Agricultural Engineering Innovation Centre (AEIC) in a new purpose built centre on the campus and the potential opportunities arising from this plus the potential synergy on a number of fronts with engineering companies in and around Telford who faced declining workload due to reduced military spending, prompted NRP to set up a sub-group specifically tasked to examine the linked employment implications for the future of Newport.

Informal discussions have been taken forward with representatives from HAU; St. Modwen who own considerable areas of land zoned for employment in the south/south-east of Newport; representatives of other land owners in and around the south/south east of Newport; members of The Marches Local Enterprise Partnership; representatives from T&W; a senior representative from the Hereford Enterprise Zone; areas of funding both from the EU and from UK sources etc.

It is clear from the actions taken by the sub-group so far that the most realistic land area in/around Newport which can most readily accommodate an area of land of the size approved by T&W Cabinet is the land at the south of Audley Avenue together with land with outline planning on the opposite side of the A41 from the land on Audley Avenue. The proposed area of land for employment land thus uses the important and well connected A41 to form a corridor through the various parcels of land. As part of the land on Audley Avenue is currently used for employment purposes and other parts are zoned for employment use this is seen as a sensible and achievable proposal.

On the employment side of the equation, anything and everything that can be done to retain in and around Newport, the knowledge base, the expertise and development potential from the under-graduates, the post-graduates and research facilities for the 'agri-tech' centre of excellence at HAU would provide levels of employment both related to the strong agricultural industry in Shropshire and The Marches LEP generally, together with the global reach which HAU is extending further around the world and with the engineering and technological expertise which exists in firms in Telford which traditionally support both the need for military equipment (now in decline) and for the motor industry.

In addition to the above, development can also include and encourage 'incubator' type business units/operations for those under/post-graduates who at present leave the area and take with them the knowledge and business drive/acumen due to the absence/lack of both a local financial and intellectual infrastructure in addition to the land/building/communication infrastructure.

What is proposed is not a 'huge step into the unknown' but is based on what many other educational institutions have successfully developed e.g. UMIST in Manchester and Imperial College in London. The proposal not only benefits the local community but also is a benefit to HAU in developing additional income streams and a wider global reputation.

Housing Allocation

Together with many other groups/bodies in Newport and the rural communities, we have made strong representations to T&W from when we first became aware via a single paragraph entry in an officer report on an application to go before T&W Plans Committee in November 2013, of the change in belief on the availability of both housing land in T&W and required housing numbers.

We feel particularly aggrieved on this not only by the manner in which the changes were made public and the subsequent rush to get a paper before T&W Cabinet to approve the change but also by the fact that Mr. Barker, Assistant Director: Planning Specialist, has regularly attended meetings of NRP as a representative on behalf of T&W and as late as a special meeting on 16th July 2013, to consider responses to the Shaping Places Strategy and Options Consultation, Mr. Barker not only repeated that T&W had a more than adequate supply of housing land to meet NPPF requirements (in fact saying that T&W were almost embarrassed by how much land that could be used for housing) but also again affirmed his belief that the housing numbers put forward by T&W as part of the RSS process, were more than sufficient to meet both need and demand. It appears that this is no longer the case.

As stated in our Introduction, in effect, whatever we might say on housing numbers and the proposed locations of housing developments to meet the now upwardly revised numbers, is going to be rendered irrelevant as on the current timetable to take a Local Plan before Examination, the number/location of the housing sites and the number of houses will already have been exceeded in view of the current flood of housing applications which shows no sign of abating. The developers are clearly doing everything they can in the absence of an adopted Local Plan to maximise the land grab of green spaces/greenfield sites in and around both the urban area of Telford, the market town of Newport and rural settlements.

We will leave it for individual town and parish councils to comment on specific allocations in the Strategic Housing Land Availability Assessment (SHLAA) but would raise two issues on process and a comment about the effect of this on the rural settlement at Tibberton.

At a consultation meeting on 8th May 2014, regarding the current phase of the Shaping Places Consultation, when asked about overall housing numbers in the documents, the officers said that a further stage of a 'preferred sites option' would take place. How and when this is to take place is not apparent from the documents nor can it be reconciled with marks given to individual sites which appears to indicate that they are not suitable for development. Separately, an invitation was issued by T&W for parish councillors to attend an event in January 2014, at which T&W officers would explain how 'Parish Profiles' would replace the 'key settlement' policy in the 2007 Core Strategy. This event was cancelled at the last minute and has still not been re-arranged.

When the above two matters are taken into account in relation to the housing sites proposed for Tibberton, it would appear that the 'key settlement' policy has certainly been applied as regards the sites contained in the current documentation and the housing numbers proposed for Tibberton.

In addition, in relation to Tibberton, the market towns and rural areas in general, the annual Mansion House speech given by Chancellor George Osborne on 12 June 2014, highlighted a number of initiatives to encourage and speed up the development of brownfield sites. Sites such as Water Lane in Newport, the Roden Nursery site near Tibberton and the Motec/Centrex site near High Ercall, should be brought forward for development before any consideration is given to housing sites on greenfields.

The Chancellor indicated in his speech that in order to favour brownfield sites over greenfield sites, that he would require that local authorities bring forward Local Development Orders on over 90% of brownfield sites that are suitable for house building.

T&W Water Cycle Study

NRP and other groups/bodies have for some considerable time tried to get from T&W details regarding the above document which we were originally told would be produced in 2012. All that we have been provided with so far is a Water Cycle Scoping Report which appears to have been produced in 2012 but was not provided to us until some time afterwards.

We note that that paragraph 6.0.3 of the AMR 2013, states to the effect that T&W will complete a Water Cycle Study ‘...alongside the plan..’. In view of the above, we will be monitoring closely to see if the document is produced and reserve our right to bring this matter before the Inspector as part of the Examination if it is not.

The importance of the information that we would expect to see in such a document can be easily demonstrated by looking at the position in Tibberton, as an example, but the same or similar issues arise in the market towns and other rural settlements.

Severn Trent Water (STW) are required by law to allow a development to connect to the existing water/sewerage infrastructure. The STW response on any application appears to be that it cannot stop a development being approved but can seek to delay a development being constructed where STW believe the infrastructure cannot accommodate the additional capacity need arising from the development. However, as a basis of any investment plan it would appear self-evident that any initial investment would take place which provides the greatest benefit i.e. the lowest amount of investment to provide services to the maximum number of households.

In the absence of a water cycle study, how are T&W to decide on the locations, preferred or otherwise, of the housing developments that provide the best value for money not only for council tax payers but also for those who pay STW water/sewerage charges.

We are unable to determine the answer to this from the documentation which forms part of this current consultation.

Landscape Sensitivity Study

We will leave it for individual town and parish councils to comment on specific sites but we assume that part of the intent of the study is to identify land which should be retained as ‘open spaces’ for the benefit of the community as opposed to the play areas provided in housing developments which invariably seem to be for children up to the age of 12 and nothing is provided for those above the age of 12.

The amount of natural or semi-natural land available for use reduces as each application is treated as ‘an exception’ to even the existing 2007 Core Strategy and will seemingly disappear completely under this study.

The comments in the recent judgment of the Court of Appeal regarding the Audley Avenue application and the appeal brought by T&W re. the status of the land at Station Road and the efforts by T&W to subsequently hide both the designation of the land contained in the 2007 Core Strategy as well as to its use by local people, are informative to say the least.

Newport Town Council – Town (Parish) Plan

We have asked the Town Council to ensure that when the finalised Town Plan survey results are published that a copy is provided to you as part of the information gathering from this consultation.

Shrewsbury and Newport Canals

In relation to both housing and employment, the restoration of the Shrewsbury and Newport canals will bring extensive and long lasting benefits. They will make a significant contribution to the economy, health and well-being of the area by way of employment both during the time of re-construction and in the towns and villages along the length of the canals when the canals are in use.

The restoration will enhance regeneration potential as a focus for investment and in providing favourable conditions for the improvement of brownfield sites and an impetus to new development; the restoration will provide a 'green corridor' and provide a wide range of leisure activities e.g. boating, angling, walking, cycling, photography, wildlife studies etc. with all the associated health benefits.

We are disappointed that the Consultation documents have failed to include for the potential employment and brownfield regeneration aspects of the restoration of the Shrewsbury and Newport canals and reserve our right to bring these matters before the Inspector during the Examination process.

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