



Report

Telford & Wrekin Local Plan Examination

Matter 4 Hearing Statement

October 2016

3 Brindleyplace
Birmingham
B1 2JB

T: +44 (0)8449 02 03 04
F: +44 (0)121 609 8314



Homes & Communities Agency

Prepared By: Eleanor Suttie/Rob Gardner
Status: Final Draft
Draft Date: October 2016

For and on behalf of GVA Grimley Limited

4. Matter 4: Economy & Community

4.1 Is the Council's assessment of the additional employment land required during the Local Plan period (76ha, as stated in policy EC1) sufficiently justified in line with the Framework, most particularly paragraph 22, and national Planning Practice Guidance (PPG)?

4.1.1 The decisions taken by the Council in respect of the amount of additional employment land required during the Local Plan period have been made in the context of Telford as a new town. The town has some significant characteristics which distinguish it from other settlements in the UK. The relevance of these is set out in the following paragraphs.

4.1.2 Telford was created with the express intention of delivering significant amounts of new housing and employment land. Throughout its history it has consistently identified significantly more land for growth than is required to meet the needs of its current population. That has been its purpose as a new town.

4.1.3 Whilst the town is no longer run by a New Town Commission its role as a focus for new growth remain. The identification of the employment target for the Borough is entirely compatible with its role as a focus for new growth. In this regard, the requirement of 76ha should be seen as a minimum amount of land to be identified within the supply, to ensure that sufficient land is made available to meet Telford's growth agenda.

4.1.4 Paragraph 22 of the NPPF seeks to prevent the retention of allocated employment land in circumstances where such land is very unlikely to come forward for that use. The Framework advises that such land may be better put to other uses, including housing. This is an appropriate approach to take in local planning authority areas where a balance must be struck between the delivery of employment and housing and where it is not possible, due to other constraints, to sufficiently deliver both.

4.1.5 Telford, however, is in the rare position of having sufficient land available for substantial amounts of new housing and employment growth without having to compromise the delivery of either. The majority of the HCA's employment sites are in existing and established employment areas. These sites are not suitable locations for residential development due to the proximity of existing commercial and industrial uses, which would negatively impact on future resident's amenity if the sites came forward for residential development. Moreover, if the HCA's employment sites were to be developed for residential uses, this may impact on established commercial and industrial occupiers due to the potential for complaints from future residents, as a result of noise or other nuisances.

4.1.6 Shifting the allocations from employment to residential would not boost the supply and delivery of housing land as the sites would not be suitable for residential development. It

would however remove sites from the Borough's portfolio of employment locations to the detriment of the attractiveness of the town to potential future occupiers.

4.1.7 Telford has always offered a range of employment land, of different types, to prospective occupiers and this has contributed significantly to its successful growth in the past.

4.1.8 In summary, we conclude that the proposed employment target is entirely compatible with paragraph 22 of the NPPF on the basis that there is no harm to the supply and delivery of housing land arising from proposed allocations and employment sites. The target will enable Telford to meet its growth agenda in the longer term by ensuring sufficient employment land is available to meet current and future requirements.

4.2 Is the scale and distribution of the Plan's intended employment allocations (some 148 hectares, as set out in Appendix B) sufficiently justified in line with the Framework and PPG? Specifically can it be shown that (1) the intended uplift from the identified need is both deliverable and sustainable and (2) that the Plan's approach makes best use of land?

4.2.1 The scale and distribution of the proposed employment allocations within the Local Plan must be considered in the context of Telford's status as a new town and as a focus for future growth. The two issues raised in the question are considered in turn.

The Deliverability and Sustainability of the Intended Uplift from the Identified Need

4.2.2 Telford has always maintained a significant and diverse supply of employment land in order to meet the needs of as many businesses as possible that might be attracted to relocate or set up in the town. This approach has been fundamental to its success, and will be vital to ensure growth is able to continue in the longer term.

4.2.3 Moreover, the Borough has seen a number of significant inward investments that have growth plans over the short, medium and long term. It is therefore paramount that sites are available for such companies to grow. The provision of such sites therefore requires the allocation beyond the minimum requirement to enable companies to realise their long term plans whilst ensuring other sites are available for immediate development for other businesses.

4.2.4 The requirement for 76ha of employment land to be delivered within the plan period should be seen as a minimum, and the Council's approach of allocating land above this requirement is justified to enable the growth and expansion of employment development within the town in the longer term.

4.2.5 We conclude that the intended uplift is deliverable and sustainable and reflects the extraordinary circumstances that arise from its new town status.

The Planned Approach Makes the Best Use of Land

- 4.2.6 As stated previously, the allocation of a significant amount of employment land does not come at the expense of the under delivery of housing land. On the contrary, the proposed housing target is in excess of that required to meet local needs. In any event, the employment sites allocated are not considered to be appropriately located for residential development.
- 4.2.7 The employment sites identified in the Local Plan that are controlled by the HCA are in demonstrably sustainable locations. Furthermore, most are in established employment areas identified within the plan as strategic employment areas and as such are both suitable and deliverable. Whether or not the sites are developed during the plan period will be determined by market demand. This is likely to fluctuate significantly during the plan period.
- 4.2.8 The employment site allocations controlled by the HCA have been detailed in previous representations, however a summary of the suitability and deliverability for each site is provided below.

Hortonwood Sites (E1, E3, E5, E6, E9 and E10)

- 4.2.9 These sites are located within the existing Hortonwood Industrial Estate, a strategic employment area. The sites benefit from the availability of services and utilities and no significant constraints to development have been identified on the sites.

Hadley Park East (E11 and E12)

- 4.2.10 These sites are located within an industrial area close to the large Hortonwood Industrial Estate, a strategic employment area. The sites are unconstrained and provide a logical infill development between existing employment uses.

Donington Wood, Deer Park Court (E16)

- 4.2.11 This site was previously constrained by the presence of mineshafts. However these have been capped as a part of a land reclamation contract. As a result there are no significant constraints and the site could provide a high quality employment opportunity.

Central Telford, Colliers Way, Old Park (E18)

- 4.2.12 This site provides the opportunity for employment development in a very sustainable location within the town centre. Whilst there are potential geological constraints, there is a developable area of approximately 0.9ha which could be used for high quality employment development.

T54 Naird Lane, Nedge Hill (E19)

4.2.13 The employment development at T54 is partially developed, with land allocated for expansion. T54 is identified as a strategic employment area within the plan, and is highly accessible, benefiting from good vehicular connections with the M54. There are no significant constraints to development.

Halesfield (E20, E21 and E22)

4.2.14 These sites are located within the existing Halesfield, a strategic employment area that has been popular with the market. There are no significant constraints to delivery, and services and utilities are available, enabling the sites to be developed quickly if required.

Shawbirch (E28)

4.2.15 Although not located within an existing employment area, the scale of this site and its accessible locations means that this could be an attractive site for commercial or industrial occupiers requiring a large site. The scale of the site could also enable it to be partially developed for employment, as well as other uses.

4.2.16 We conclude that in respect of the sites promoted by the HCA, the proposed approach does make the best use of land as these are locations where employment uses are most appropriate.

4.3 The HCA make no comment in relation to Q4.3 to Q4.7.