

**Church Aston Parish Council (CAPC): Local Plan Review Draft Plan
Objection to proposed housing development Site 472 - Land South of The Dale,
Church Aston**

1. Site Assessment process - Strategic Housing Land Availability Assessment (SHLAA)

1.1 In rolling forward the current Telford & Wrekin Local Plan a further 10 years to 2040 as part of the Local Plan Review, the Council has identified sites for housing and economic development in its Draft Plan, and is proposing that a further 517 (net) houses are built in Newport. This is on top of the 1144 houses built over the period 2011-2022 (Annual Monitoring Report (AMR), Nov 2023), and a further 154 under construction/not started (3 sites); 371 currently under construction (Station Rd West), 215 with outline planning approval (Tilia Homes, Station Rd East), and a pre-enquiry application for 68 adjoining Station Rd West; a total of 1952 (an increase of 40% since 2011). In fact Newport's household population has grown faster (+19%) than Telford's (+14%) over the period 2011-2021 (Nomis Census data).

1.2 Only two sites have so far been identified; a small redevelopment site off Audley Ave (43 homes) where a planning application is pending, and a site for 160 houses to the south of The Dale in Church Aston, which is outside of the Newport urban area, and by definition within the rural area. All other potential sites put forward as part of the Call for Sites, totalling some 2400+ houses, have been rejected (SHLA Stage 7 Assessment) as being not suitable for development '*due to being outside of the built up area of Newport*'. As the Council's own assessment shows, Site 472 is not deliverable and should have been ruled out during the Stage 7 SHLAA process as other prospective sites on the Newport boundary have been.

1.3 Site 472 is outside the boundary of the built up area of Newport as shown on the Draft Policies Map and is not located in any of the key settlements identified by Policy HO12 in the rural area. It therefore does not comply with Policy HO12.

1.4 The proposed 160 houses on this greenfield site on Grade 2 agricultural land would have a significant impact on the character of Church Aston and on the local community in terms of traffic congestion, school provision, local health services and the environment.

The Parish Council views this as unnecessary and unwanted development and objects strongly to this site being put forward within the Draft Plan and would ask that it is removed from the proposed list of development sites.

2. Development Strategy

2.1 The identification of a specific housing requirement for Newport is based again on the breakdown of the overall future housing requirement as set out in Policy HO1 (Housing Development Principles) in the current T&W Local Plan (2018), which has been apportioned in line with the corresponding breakdown of households across the Borough, based on the 2011 Census. For Newport, this equates to approximately 8% of the total number of households in the Borough.

2.2 As we previously commented on the current adopted (2018) Local Plan, we do not believe that this 'fair share' strategy represents a sound basis for allocating future housing

development across the Borough. Telford is a former New Town and sub-regional growth point/‘urban powerhouse’ within the Marches LEP area, with infrastructural capacity to take more than its ‘fair share’ of future housing and employment development’. Therefore the proposed housing allocation policy does not appear to align with the Draft Plan’s Development Strategy which states that Telford ‘will remain ‘the major service centre for the Borough’ and that regeneration and investment, wherever possible, will be directed towards the principal urban area of the Borough (i.e. Telford).

2.3 Allocating future housing development on a pro-rata/fair share basis (the Council’s expressed ‘growth strategy’) would therefore not appear to be a sound basis for achieving the Draft Plan’s Spatial Strategy and future development requirements. Moreover, the Telford Land Deal between the Council and the Homes & Community Agency (HCA), through which HCA housing land with the capacity to generate around 2,500 homes in Telford will be put on the open market, and the proposed 3 Sustainable Urban Extensions (SUEs) would suggest that Telford’s contribution to providing the additional housing land required over the period to 2040 would be greater than that set out in the Draft Plan, and conversely that Newport’s contribution would be less. This would call into question the need to allocate further housing land on a greenfield site adjacent to (i.e. outside) the built up area of Newport.

3. Draft Policies Map

3.1 As with the Draft Policies Map produced for the consultation on the now adopted (2018) Local Plan, it is misleading that the current Draft Policies Map does not show the full extent of the existing housing supply, those under construction and with outline planning approval. The proposed new site allocation (Land South of The Dale) needs to be viewed in the context of the existing/committed supply in order to properly assess whether the development/spatial strategy, as set out in the Draft Local Plan Policies Map 2023, delivers a coherent and sustainable form of development.

3.2 Site 416 – Land East & West of Station Rd - is not shown as under-construction on the Draft Policies Map, and on the SHLA Assessment Table is shown as having only outline planning approval (TWC/2011/0871) for a ‘mixed use development of up to 350 dwellings and 4.5ha of employment land’ and ‘as a brownfield site within the built up area with no policy constraints’. This outline planning approval has subsequently been superseded by detailed planning approval in 2021 (TWC/2021/0795 & 0796) for 301 dwellings and extra-care home (70 units), with a further 215 with outline approval (TWC/2022/0854), and the potential for further housing through the redevelopment of the existing, Council owned, Audley Avenue Industrial Estate.

3.3 Confusingly, Site 416 is shown as being removed at Stage 7 of the Site Assessment Process? The boundary of Site 416 also excludes the area of land south of Springfield (TWC/2015/0057) which has been subsumed within planning approval TWC/2021/0795 and which is now under construction. Consequently the Draft Policies Map does not give a true picture of the extent of current/planned house building in Church Aston, Chetwynd Aston and south Newport which would provide a better context for commenting on the proposed development of Site 472.

4. Housing Land Supply

4.1 The 2022 Housing Land Supply Statement demonstrates that the Council has in excess of a five year housing land supply and that housing delivery is expected to exceed the annual requirement for the foreseeable future. The latest position demonstrates that there is a robust housing land supply (AMR, November 2023). Therefore Site 472, which is shown in the SHLAA as having a likely timeframe for development of 0-5 years, is not needed and should be removed from the list of proposed housing sites in the Draft Plan.

4.2 We consider that sufficient housing land has already been identified to meet local housing needs over the plan period (to 2040) in the Newport Urban Area, which includes more than sufficient to meet local needs up to 2040 and provide a range of choice, and more than represents a 'fair share' for Newport as regards future housing development across the Borough. Any additional housing above that already built/committed should only be approved on brownfield sites within the Newport Urban Area and not on greenfield sites such as the proposed Site 472 outside of the built up area.

4.3 The scale of housing development already approved for Newport (+29%, 2011-31), as compared with the rest of the Borough (+22%), is beyond that required to meet local needs, and means that Newport will be taking more than its 'fair share' of the Borough's planned development over the plan period. This is therefore contrary to the Draft Local Church Aston and areas of new housing built and under construction on its periphery. Planning approvals for around 1900 houses have already been given (since 2011) which is Plan policy which is to focus growth on Telford as a regional 'growth hub' and where the infrastructure has the potential to accommodate more than its "fair share" of new development over the plan period.

4.4 Whilst we recognise that the Government (through the NPPF and Planning Guidance) is encouraging Councils to set higher targets to boost the supply of new homes and to bring forward land in public ownership for development, 'this must be deliverable, realistic, proportionate, preferably brownfield, and sustainable, and not at the expense of local environments and local quality of life'. The Council has demonstrated that it has an over supply of deliverable housing land and so has in excess of a five year housing land supply and its housing supply policies are therefore considered up to date for decision taking purposes.

5. Changes to Government Planning Policy

5.1 Following the announcement by the Sec. of State for Levelling Up, Housing & Communities (13/12/23), local authorities will no longer be forced to set aside green field land for future housing needs and will be able 'to reduce the number of houses to be built if development would significantly alter the character of their areas'. Councils are also to be given exemptions from building on prime agricultural land. Both these Government planning policy changes now need to be taken on board in this Review of the Local Plan.

6. Loss of Grade 2 agricultural land

6.1 The CPRE has identified that there has been a hundred-fold increase in our best farmland lost to development in little more than a decade, and the loss of the Best and Most Versatile (BMV) farmland is now threatening our future food security. This is exacerbated by the fact that 60% of the BMV farmland is at risk of flooding due to climatic change. Maintaining agricultural land for domestic food production is critical (see DEFRA “UK Food Security Report, 2021) and this must be achieved in the context of addressing and adapting to climate change, reversing the loss of nature and increasing demands on land for other purposes, not least housing. This would suggest that there is an urgent need for a firm presumption against development on our best agricultural land, which would now appear to be reflected in changes to the Government’s National Planning Policy Framework (NPPF). Given that Site 472 is Grade 2 agricultural land (Agricultural Land Classification map), its proposed use for housing development should be rejected.

7. Strategic Local Plan Priorities

7.1 We would argue that the development of Site 472 is contrary to a number of the Council’s Strategic Local Plan priorities and policies as set out in the Local Plan Draft 2023:

7.1.1 *Protection and enhancement of the green, natural and historic environment* (Policy S1) - the urban area of Newport lacks access to public open space, in particular to the south of the town (PBA Roger Tym Consultants, Newport Open Space Provision Review for Telford & Wrekin Council, December 2012) and does not enjoy the extensive green network enjoyed in Telford. Consequently it is imperative that access to the surrounding agricultural land is protected. Moreover, developments are expected to protect, maintain and enhance biodiversity and geodiversity (Policy S2). The Council states that biodiversity is not only important intrinsically but creates health and well-being benefits and that as a borough it understands the benefits of nature conservation and its fragility and therefore expect developments to avoid harm. The proposed development of Site 472 would appear contrary to these strategic priorities.

7.1.2 It is essential that all the remaining fields around Church Aston are protected against development in order to retain the character of the village and to protect the multiple number of trees with Preservation Orders on the site. Moreover, the Councils Policy NE2 (Trees, Hedgerows and Woodlands) states that ‘Development that would lead to the removal of ancient or veteran trees, hedgerows and/or woodlands, will only be supported where appropriate justification has been provided’. The wider benefits of the scheme do not outweigh the potential loss of some 14 trees with TPOs, and in fact the Council’s own site assessment scores its impact against trees and hedgerows as a ‘red’ (Integrated Site Assessment - site entirely or 75% or greater within hard constraint, does not require further assessment).

7.1.3 *Tackling climate change and achieving carbon neutrality* - the proposed development of Site 472 does not comply with Policy S5 in the Draft Plan which sets out

that in determining whether development supports adaptation to climate change, including resilience to climate change, and does not make other areas more susceptible to the impacts of climate change, the Council will consider how proposals might impact on the risk of flooding. There are well documented and unresolved existing drainage issues in Church Aston due to lack of capacity in the existing drainage systems and impermeable soil. These issues have already been exacerbated by developments in the area at Liddles Bank (Rectory Fields) and Station Road West. Site 472 is waterlogged in places and causing flooding problems in Wallshead Way and The Close, and a development of 160 houses would add large areas of impermeable surfaces that would increase surface run off putting huge pressure on the existing inadequate drainage system downstream.

7.1.4 As the Council's own Drainage Engineers' comment in the SHLAA, Site 472 *'drains to a watercourse which has become a flood risk due to the input of flashy urban run off. Additional development will exacerbate this situation, and therefore strategic site attenuation must be provided'*. However, mitigating features to allow excess surface water to drain into the ground or into existing drainage systems at Station Road have failed due to the soil type and therefore cannot be relied upon as a solution to the proposed development on site 472.

8. Pressure on Local Services

8.1 Any further housing development in or around Newport should be resisted given the enormous pressure now being exhibited on the local social and community infrastructure due to the rate and scale of housing development locally over the past 12 years which has not been sustainable. Schools and health services are already operating at or beyond capacity and the transport system is in danger of gridlock. Whilst Section 106 monies secured from developers are important, these are not sufficient to address the need for additional investment in education and health care provision when existing facilities and sites have no physical capacity to expand, and in the case of GP surgeries an inability to recruit new full-time doctors.

Local schools

8.2 There is also a requirement, identified in the Planning Committee report January 2022 recommending approval of the Bloor Homes development (TWC/2021/0795) on the Land West of Station Rd, to identify additional primary school places. This included the option of relocating Church Aston Infant School, which is at capacity and with no potential for expansion, to an alternative site and expanding it to a primary school. None has yet been identified. Any further housing development, such as that being proposed on Site 472, would only exacerbate this already serious situation.

8.3 The comments provided in the SHLAA on the education infrastructure do not appear to relate to Site 472? It states that - *'Primary: Five of the primary school sites are not suitable for expansion, the other three are possible, but would require funding including developer contributions. Development around Edgmond could potentially be accommodated at St Peters Edgmond as majority of pupils come from out of catchment area. The impact of additional development in Edgmond and the likely pushback of pupils*

to Newport schools would mean developer contributions would be necessary. Secondary: There is limited scope to expand HLC due to costs involved in expanding a PFI school. Ercall Wood and Charlton are potentially expandable by 150 places. There are a lot of potential sites to the north of this planning area around Muxton, Wappenshall, Humbers, Shawbirch if a large proportion of these sites were to be permitted there would be a need to look at a secondary school to accommodate these sites. A suitable site would be required and discussion would be needed to ensure that costs for the secondary school were fairly spread across these sites'. We would ask that the Council's Education Department review their comments on the impact of developing Site 472 on the Church Aston and Newport primary and secondary school infrastructure.

GP Surgeries

8.4 The issues with providing primary health care infrastructure to support the growth in population from housing developments is significant. As the NHS Shropshire, Telford & Wrekin Integrated Care Board (ICB) outlined in responding to the proposed housing development by Tilia Homes at Station Rd East, the NHS does not currently have access to capital funds to address this matter although it actively seeks funding where possible. In order to demonstrate both value for money and affordability any applications for funding will look to supplement the request for NHS capital with other sources of funding, these can include Section 106 contributions from housing developers. Should any such bids for capital prove unsuccessful the ICB still needs to address the issues emanating from the increased demand that these types of development place on the primary and community care services. On the basis of an average household size of 2.4, the likely impact of the development of Site 472 on primary care health services within Newport is an additional 384 patients.

8.5 Not surprisingly the ICB is now requesting that the Council considers the impact of prospective housing developments on the stretched capabilities of the local surgeries. Where surgeries can no longer cope with new demand due to workforce issues or lack of accommodation to address the demand they will have to resort to closing their lists, meaning that they will no longer take on new patients. Where this occurs patients are likely to have to travel much longer distances to practices that can accommodate them. However, if a patient is not in a practice's catchment area they do not have to accept those new patients.

8.6 The ICB states that current patient lists of the two practices are: Linden Hall Surgery – 14,623; Wellington Road Surgery – 15,366; a combined patient list size of 29,989. In 2019 the ICB commissioned an independent study of the capacity of practices across the Newport Primary Care Network (PCN) area. This study identified that there was a significant shortfall of space to deal with the patient lists at that time across the whole PCN. This relates to both of the practices identified here, with a total of 630 m² shortfall in space based upon the patient population at that time of 29,532. The combined patient list size has increased by 457 since the study was undertaken in 2019. Based upon the above the proposed development of Site 472 places a further pressure on these practices and there is a clear need for investment in the current infrastructure to accommodate the additional patients that will be generated from this development. This investment

requirement cannot be guaranteed and it will be important that the ICB is asked for comment on Site 472 as part of the Regulation 18 consultation process on the Draft Plan..

9. Access

9.1 There is no suitable highway access to Site 472. We would totally agree with the Council's own Highways Department technical assessment as set out in the SHLAA in that *'the site exceeds the number of dwellings we would see off a single access point and no secondary access is proposed. Further access to the A518 (not the A41, as stated in site assessment!) bypass is not supported, and without this the site is effectively landlocked due to the constraints on the highways network servicing Church Aston (Strategic Planning Team comment). Access was shown to be by the old railway bridge which raises issues with visibility and safety (opposite Church Aston Infants school). The existing road through Church Aston (Liddles Bank) has an extended section of single carriageway, (with no provision for footpath), which would be an issue if traffic flows intensify. There are existing parking pressures in the area associated with school pick up /drop off (and speeding issues on The Dale). The proximity of the proposed access and any mitigation will likely result in a significant increase in vehicular/pedestrian conflict. In addition, there appears to be an area of land forward of the site boundary which is outside the control of the landowner. They only have access at a standard field gate when access for development will require a far wider corridor'*.

10. Prematurity

10.1 It would appear that the Council is already in discussion with a planning agent (Marrons) and developer (Bellway Homes) regarding the future development of this site, and have been since early 2021 (see Bellway Homes Vision Document, January 2021). This would seem premature given that the public examination of the publication version of the Draft Plan is not scheduled until 2025. This is contrary to what is supposedly a Regulation 18 consultation process.

10.2 CAPC has previously written (18/12/23) to the leader of the Council to express its serious concerns about the request received (12/12/23) from Marrons development consultancy re their client Bellway Homes to meet with our Council. This followed an earlier request to take part in the drop-in session convened by our Council (13/12/23) for local residents at which T&WC planning officers attended. Both requests were refused.

10.3 We feel that this approach from Marrons is premature to say the least and would suggest that the Council and its officers may have already come to a view regarding the proposed development of the land south of The Dale (Site 472 on the Draft Plan), whereas the consultation process on the Local Plan Review Draft Plan has only just begun and the public examination of the final plan before an Inspector will not take place before January 2025. This unsolicited approach would seem to be prejudicial and contravenes the statutory public consultation process which is the key element in any local plan review.

10.4 CAPC has therefore sought assurances that despite this premature approach from Marrons/Bellway, no decision has yet been made by the Council and its planning officers

as to the suitability of this site for future housing development, and that the Council will ensure that the fundamental processes required by the Review of the Local Plan are honoured and observed throughout.

10.5 CAPC has subsequently had assurances from the Council (21/12/23) that the decision on sites would be subject to due process and will be put before the Cabinet and Full Council before being released to the public and stakeholders for final comments (Regulation 19). Following this the plan plus any final comments will be submitted to the Governments Planning Inspectorate for examination.