

TWC/2022/0914

Site of former Reynolds House/former Boyd House/Bishton Court/Addenbrooke House, Ironmasters Way/Boyd Close, Telford Town Centre, Telford, Shropshire
HYBRID PLANNING APPLICATION – PART (A): Full planning application for a multi-phased and severable mixed-use development comprising the erection of 189 no. dwellings (Class C3), a Digital Skills & Enterprise Hub incorporating serviced office accommodation, a hotel, commercial units with flexible retail, leisure and food and drink uses permitted (Class E (a-b)), public realm improvements to Ironmasters Way and Lawn Central, layout of associated access roads, landscaping and parking following demolition of the existing Lawn Central footbridge.

PART (B): Outline application with all matters reserved for a multi-phased and severable mixed-use development comprising dwellings (Class C3), and/or residential care units (Class C2), and/ or office floorspace (Class E (g[i])) and/ or educational floorspace (Class F1 (a)) in addition to commercial floorspace with flexible retail, leisure and food and drink uses permitted (Class E (a-b)) and associated access, landscaping and parking, regrading of land associated with removal of Lawn Central footbridge, and demolition of Addenbrooke House and Bishton Court ***AMENDED PLANS, INFORMATION AND DESCRIPTION***

APPLICANT

Telford and Wrekin Council

RECEIVED

10/11/2022

PARISH

Lawley and Overdale

WARD

Malinslee and Dawley Bank

THIS APPLICATION HAS BEEN REFERRED TO PLANNING COMMITTEE AS IT REQUIRES A MEMORANDUM OF UNDERSTANDING AND INVOLVES LAND OWNED BY THE COUNCIL

Online planning file:

<https://secure.telford.gov.uk/planning/pa-applicationsummary.aspx?applicationnumber=TWC/2022/0914>

1.0 SUMMARY RECOMMENDATION

1.1 It is recommended that **DELEGATED AUTHORITY** be granted to the Development Management Service Delivery Manager to **GRANT FULL AND OUTLINE PLANNING PERMISSION** (for this hybrid planning application) subject to Condition(s), Informative(s) and the Applicant entering into a Memorandum of Understanding (MoU) to secure Financial Contributions.

2.0 SITE AND SURROUNDINGS

2.1 The site subject to this application comprises approximately 5.91ha of land at Ironmasters Way, Telford Town Centre. The site is bounded by Rampart Way, Ironmasters Way, Hollinsgate and Lawn Central.

2.2 Following commencement of the enabling works, the site is now largely derelict having previously hosted the 'Boyd House' and 'Reynolds House'

office complexes. There are tree groups located parallel to a number of the site boundaries.

- 2.3 The area to which this site relates, now known as Station Quarter, is the gateway leading into the Telford Town Centre, from Telford Central Train Station. It is currently dominated by cleared sites, once occupied by unsustainable and outdated office buildings.

3.0 PROPOSAL

- 3.1 This is a hybrid planning application which has been presented in two parts, as set out below:

PART (A): Full Planning Application for a multi-phased and severable mixed-use development comprising the erection of 189 no. dwellings (Class C3), a Digital Skills & Enterprise Hub incorporating serviced office accommodation, a hotel, commercial units with flexible retail, leisure and food and drink uses permitted (Class E (a-b)), public realm improvements to Ironmasters Way and Lawn Central, layout of associated access roads, landscaping and parking following demolition of the existing Lawn Central footbridge.

PART (B): Outline Application with all Matters Reserved for a multi-phased and severable mixed-use development comprising dwellings (Class C3), and/or residential care units (Class C2), and/or office floorspace (Class E (g[i])) and/ or educational floorspace (Class F1 (a)) in addition to commercial floorspace with flexible retail, leisure and food and drink uses permitted (Class E (a-b)) and associated access, landscaping and parking, regrading of land associated with removal of Lawn Central footbridge, and demolition of Addenbrooke House and Bishton Court ***AMENDED PLANS, INFORMATION AND DESCRIPTION***

- 3.2 The site will provide a mix of residential and commercial development, pockets of formal and informal open space, and parking. Additionally, the existing Lawn Central footbridge will be removed and replaced with a street-level crossing, leading on from a newly created public realm along Ironmasters Way.
- 3.3 The application has been subject to amendments, in response to comments made by internal technical consultees - these are discussed in the assessment below.
- 3.4 In September 2019, the Government formed the 'Towns Fund' – a £3.6billion initiative with the objective to regenerate towns. Telford was selected as one of the 101 towns invited to develop proposals for a 'Town Deal' and has been offered £22.3million funding to help regenerate Telford Town Centre, Wellington and Oakengates. This proposal forms part of that Town Deal.
- 3.5 In addition to the Towns Deal funding, the project has secured, or is in the process of securing, grant funding from other public sector bodies including

the Marches LEP, West Midlands Combined Authority and Homes England in order to support land assembly, the delivery of affordable housing and address viability issues associated with development on this complex brownfield site.

- 3.6 The Planning Statement which supports the applications, sets out that the 'Station Quarter Redevelopment' seeks to provide five aims:
- i) Improved connectivity between the Telford Central Train Station and key amenities;
 - ii) High-quality, low-carbon homes, and commercial space;
 - iii) A high-tech digital skills and enterprise hub;
 - iv) New and enhanced public realm;
 - v) Sustainable infrastructure that reduces reliance on car and carbon emissions.

4.0 PLANNING HISTORY

EIA/2022/0005 - Enabling works and redevelopment of land for mixed residential/commercial as hybrid planning application (Phase 1 and Phase 2)
AMENDED DESCRIPTION - EIA Not Required, 11 November 2022

TWC/2022/0424 - Enabling and engineering works comprising ground remediation, re-profiling, demolition of the existing substation and diversion of existing utilities ***AMENDED INFORMATION RECEIVED*** - Full Granted, 21 October 2022

TWC/2022/0423 - Installation of construction hoarding for a temporary period of up to 5-years ***AMENDED PLANS RECEIVED*** - Full Granted, 05 August 2022

TWC/2018/0218 - Application for prior notification of proposed demolition of Boyd House - Prior Approval Granted, 16 May 2018

TWC/2017/0887 - Erection of three storey office development with associated landscaping, parking and infrastructure (Site of Reynolds House) - Full Granted, 31 January 2018

TWC/2017/0649 - Application for prior notification of proposed demolition of office block (Reynolds House) - Prior Approval Granted, 21 September 2017

5.0 RELEVANT POLICY DOCUMENTS

5.1 National Planning Policy Framework (NPPF)

5.2 Telford and Wrekin Local Plan (TWLP) 2011-2031:

SP1 Telford

SP4 Presumption in Favour of Sustainable Development

EC1 Strategic Employment Area – Central Telford

EC5 Telford Town Centre
EC11 Improving Links to Tourist Destinations
HO1 Housing Requirement
HO4 Housing Mix
HO5 Affordable Housing Thresholds and Percentages
HO6 Delivery of Affordable Housing
HO10 Residential Development in the Rural Area
NE1 Biodiversity and Geodiversity
NE2 Trees, Hedgerows and Woodlands
NE4 Provision of Public Open Space
NE5 Management and Maintenance of Public Open Space
COM1 Community Facilities
COM2 Culture
C1 Promoting Alternatives to the Car
C3 Implications of Development on Highways
C4 Design of Roads and Streets
C5 Design of Parking
BE1 Design Criteria
ER1 Renewable Energy
ER8 Waste Planning for Residential Developments
ER11 Sewerage Systems and Water Quality
ER12 Flood Risk Management

5.3 Homes for All: Providing Accessible, Supported and Specialise Housing in Telford and Wrekin Supplementary Planning Document (SPD), adopted January 2022

5.4 First Homes Policy Position Statement, January 2022

6.0 NEIGHBOUR REPRESENTATIONS

6.1 Two letters of representation were received during the first round of consultation from neighbouring properties/landowners, both objecting to the application on the following grounds:

- support redevelopment of the site in principle;
- apartments (Plot 12) will be six-storeys high and block light to neighbouring building - previous buildings being only 2-3storeys in height;
- one of the largest proposed blocks is outside Kendal Court (the narrowest part of the site);
- significant under provision of car parking in an area already limited on parking;
- concerns of highway impacts on already congested roads;
- concerns over the amount of residential in what is currently primarily a commercial area;
- impact on vitality of Town Centre and requests to limit floorspace on certain uses;
- cumulative impact of development;

- clarity sought on management of public space.

6.2 No further representations were received during the second round of consultation.

7.0 STATUTORY REPRESENTATIONS

7.1 Hollinswood & Randlay Parish Council: **Comment:**

1st Consultation 22 November 2022

- will have significant impacts on the residents and infrastructure of our Parish;
- disappointing that this is described as within Lawley & Overdale Parish, where it has closer links and will affect Hollinswood and Randlay Parish both during construction and when complete – a boundary review would be appreciated;
- it appears to Members that this is very late in coming forward for consultation, especially as work has been taking place on the site for some weeks;
- application comprises numerous documents which Members have found quite daunting to assess;
- concerns raised regarding the lack of car parking in areas and insufficient parking for residents and hotel guests;
- capacity of the local doctors and other health providers such as a dentist;
- provision of solar panels, electric car chargers, appropriate insulation and air source heat pumps should be compulsory;
- appropriate vehicle access, to avoid congestion and delays appropriate landscaping and avoiding excessive use of tarmacadam.

2nd Consultation 16 May 2023

- given the site location no being within the boundary of Hollinswood & Randlay Parish, Councillors chose to comment rather than offer support (or not)
- the location of this development needs to have high quality design, effective access and egress and sustainable development;
- as a result of the proximity to the Parish Council's boundary, can consideration be included for this to be identified as within Hollinswood and Randlay Parish boundary to enable them to work with the developer and future tenants to ensure the site is maintained to a high standard, especially relating to landscaping.

7.2 Lawley & Overdale Parish: **No Comment**

7.3 Ward Members: **No Comment**

7.4 Education: **Support subject to Condition(s) and Financial Contributions:**

- there is adequate capacity within the local primary and secondary schools for Phase 1 of the proposed development. Financial Contributions will only be sought therefore on Phase 2 of the development.

7.5 Tree Officer: **Support subject to Condition(s):**

- the existing tree belts/groups around the periphery of the site should be retained and protected during construction, and a detailed landscaping plan conditioned.

7.6 Ecology: **Support subject to Condition(s):**

- the previous enabling application (TWC/2022/0424) set out a baseline for the sites habitat value prior to demolition/enabling and a Memo of Understanding (MOU) was agreed to ensure that any future application either secured no net loss on-site or an off-site financial contribution towards ecological enhancements in the local area;
- the site will achieve a net loss of 3.71 biodiversity units (35.42%) and will therefore require financial contribution towards off-site enhancements to this value, which is secured by an MOU;
- Phase 2 reserved matters (REM) will need to be supported by an updated metric assessment. Condition(s) relation to Landscape Management, BNG Monitoring and nesting boxes will be required.

7.7 Drainage: **Support subject to Condition(s)**

- following receipt of additional information, the application can be supported subject to conditions;
- the outstanding information for the full application relates mostly to the design of the rain gardens and a review of the hydraulic models;
- the outline application is acceptable in principle, subject to a full drainage scheme being Conditioned.

7.8 Public Protection: **Support subject to Condition(s):**

- all supporting reports submitted with this application and the previous enabling application (TWC/2022/0424) have adequately addressed the

impacts of noise, air quality, contamination and overheating subject to appropriate Condition(s).

7.9 Housing: **Support**:

- the development meets the requirements for affordable housing and the accessibility standards required by the Homes for All SPD, and local planning policies;
- it is understood that affordable housing will be provided on-site through grant funding, and not secured by s.106 Agreement.

7.10 Historic Environment: **No Comment**

7.11 Healthy Spaces: **Support subject to Condition(s) and Financial Contributions**:

- the detailed design of the NEAP has been agreed with the applicants and can be conditioned accordingly, to be built prior to the occupation of any overlooking dwellings;
- the NEAP 'in principle' design is acceptable, with full details to be conditioned. No off-site contribution towards sports and recreation is proposed and it is understood that this is due to the sites viability constraints; this will need to be considered in the planning balance;
- detailed landscaping and Landscape Management Plan (LMP) will need to be conditioned - the phasing plan is acceptable.

7.12 Local Highways Authority: **Support subject to conditions**

- The principle of this modal shift towards sustainable travel is acceptable to the LHA subject to appropriate Travel Plans to demonstrate how this will be secured and monitored, in addition to other conditions and financial contributions.

7.13 National Highways: **Holding Objection**:

- requested information still remains outstanding – see analysis of formal comments below.
- Revised Transport Assessment (TA) and Framework Travel Plan (FTP) submitted 31.05.2023 and sent to NH for review.

7.14 Planning Policy: **Support subject to Condition(s)**:

- the proposal for a mixed use development on this site broadly aligns with Local Plan policy and National Planning Policy;

- if consented, suitable Condition(s) should be attached to maintain an appropriate balance of uses and protect the Telford Town Centre, by restricting uses/quantum of development.

7.15 Cadent Gas: **Support subject to Informative** due to proximity of existing infrastructure.

7.16 Shropshire Fire Service: **Comment** consideration should be given to Shropshire Fire and Rescue Service's 'Fire Safety Guidance for Commercial and Domestic Planning Applications' document.

7.17 West Mercia Police: **Comment**: Standard Informative for 'Secured by Design.'

7.18 Environment Agency: **No comment**

8.0 APPRAISAL

8.1 Having regard to the development plan policies and other material planning considerations, including comments received during the consultation process, the planning application raises the following main issues:

- Principle of Development
- Design
- Ecology and Trees
- Drainage & Flood Risk
- Highway Impacts
- Other Matters
- Viability
- Planning Obligations

8.2 Principle of Development

Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that planning applications must be determined in accordance with the adopted development plan unless material considerations indicate otherwise. In this instance, the development plan consists of the Telford & Wrekin Local Plan (TWLP). The National Planning Policy Framework (NPPF) sets out policy guidance at a national level and is a material consideration in planning decisions.

8.3 The site lies within the built-up area of Telford whereby the principle of development is accepted.

8.4 The whole of the site is designated as part of the Telford Town Centre (TTC) (Policy EC5) and a Strategic Employment Area (Policy EC1).

8.5 The site does not form part of the TTC Primary Shopping Area (PSA) and is not impacted by any other planning policy designations.

8.6 Design

Of the 189 dwellings proposed in the Full Application (Part A), these are all fully NDSS compliant and the appropriate number of M4(2) and M4(3) homes have been provided as per the recently published Homes for All SPD. The apartments comprise 62no one-bed and 53no two-bedroom dwellings. The townhouses comprise 38no two-bedroom and 36no three-bedroom dwellings.

- 8.7 In terms of private amenity space, a proportion of the townhouses (Plots 8 and 9) are provided with rear gardens albeit under the Councils standard requirement for private amenity space of dwellings of this size. Additionally, a number of properties within Plots 6 and 12 (apartments) are provided with outdoor balcony spaces. All other properties are to utilise the public amenity space which forms part of the overall development proposal, with other local green spaces being readily accessible in this central location.
- 8.8 Various forms of public open space are to be provided including children's play areas (in the form of a LEAP and NEAP), enhanced public realm along Ironmasters Way and small pockets of open space/planting throughout the development. The mature tree belt to the north of the site which separates it from Rampart Way is to be maintained and enhanced.
- 8.9 It is intended that Ironmasters Way would become a high-quality permeable space with integrated foot/cycle routes incorporating a variety of landscaping features (including tree planters) and street furniture. This would create a welcoming open space leading from the Train Station to the Town Centre, with opportunities for pop-up events. This route will prioritise pedestrians, with vehicular access to Lawn Central from Ironmasters Way being restricted to taxis only (one-way).
- 8.10 Improvements would also extend beyond Lawn Central where a new street-level crossing would be created following the demolition of the existing footbridge. It is considered that this would improve accessibility for all users given the arrangement and inclines of the existing bridge; with the new crossing having a disabled access ramp leading from Lawn Central to the Telford Shopping Centre and beyond.
- 8.11 The design of the site has been subject to significant discussions with the applicants and involved a number of revisions to ensure a cohesive design throughout both the full and outline planning applications, making nods to Telford industrial heritage whilst still promoting the site as a contemporary sustainable community forming part of Telford New Town.
- 8.12 The modern new town approach is presenting in the scale, with larger footprints focused around Ironmasters Way creating verticality and marking key focal points, whereas the industrial heritage invites interpretation of traditional buildings styles and design elements, such as roof pitches, materiality, and repetitive window detailing. The combination makes for a sustainable contemporary design which pays homage to its past.

8.13 The outline application relates to Plots 1 (former Boyd House), Plot 3 (Addenbrooke), Plot 13 (Bishton Court) and Plot 7 (former mound). The full application relates to all other plots.

8.14 The Full Application comprises:

Digital Skills & Enterprise Hub

The hub will incorporate suites and teaching labs capable of accommodating 200 students, in addition to start-up enterprises/spaces and a café/break out space at ground floor. The intention is for the hub to focus on mathematics and digital skills, playing a key role in the levelling up agenda. The 5-storey building would take on a cube-like form comprising of strong vertical windows and contrasting brickwork creating a mosaic effect. The ground floor breakout space differs, with overhang and glazed façade opening out to the public realm and creating active frontages.

Hotel

The hotel is proposed to be six-storeys in height, creating a focal point in this prominent location (particularly following the removal of the footbridge). At the request of the Council, the design of the building has undergone distinct revisions to its external appearance, to secure an active frontage at ground floor (opening up the foyer/restaurant with use of full-height glazing and entrance foyer) and materiality revisions to better reflect the design influence of 'industrial heritage' with red/brown cladding to compliment the tones seen on the recently refurbished Ironbridge.

Residential

A large proportion of Phase 1 (Part A – Full Application) is to be occupied by residential dwellings in the form of townhouses and apartments, equating to a total of 189no units.

Plot 5 is split into two buildings containing apartments at ground floor (inward facing/access) and townhouses on the above levels (outwards facing/access). 5b would be three-storeys and 5a four-storeys in height, both of similar design taking references from Telford industrial path with the use of factory-style asymmetrical roofs.

Plot 6 is a three-storey apartment building comprising a mix of 1 and 2-bed units. Again the roof design is asymmetrical, with the façade seeking to incorporate design elements from the other apartment buildings (Plot 12) on Ironmasters Way with simple window detailing and incorporation of balcony features.

Plot 8 and 9 comprise four terrace townhouses with associated rear gardens. Plots 8a and 9a which front the main highway spine road through the urban neighbourhood, also benefit from on-plot parking to the house-frontage. Plot 10 and 11 are two-bedroom back-to-back style townhouses with off-plot

parking adjacent. Again, similar designs are seen on these townhouses, ranging from two to three storey in height to provide variation in the streetscene.

Plot 12 is the largest apartment building, containing 84no. 1 and 2-bed dwellings. The building would be six-storeys in heights incorporating balconies on a number of the two-bed units to provide variety in the relatively streamlined façade, being finished with a flat roof containing photovoltaic panels. The ground floor of the building would, in addition to a foyer for the apartments, contain a commercial unit with flexible use being sought; the intention to be a small convenience store.

- 8.15 The Outline Application looks to set out wide-ranging parameters to allow flexibility at the Reserved Matters stage, which can be led by need and demand at that time. Given the location of plots covered by the Outline, being in key locations on the periphery of the application site, it will be important to ensure that these buildings are of exceptionally high-quality.
- 8.16 Within their Planning Statement the applicants have included their requested indicative development concept for Phase 2 (Part B - Outline Planning Application) as set out in the table, below. In order to protect the Town Centre (specifically in relation to the proposed commercial units), these will be Conditioned accordingly, restricting each plot to specific parameters.

	Option 1 (Residential Led Scheme)	Option 2 (Mixed Use Scheme)
Plot 1	150 dwellings and 1 no. commercial unit	9,400sqm of office/ education floorspace and 1 no. commercial unit
Plot 3	300 dwellings and 2 no. commercial unit	16,400sqm of office/ education floorspace and 2 no. commercial unit
Plot 7	100 dwellings or residential care	100 dwellings or residential care
Plot 13	20 dwellings	20 dwellings
Total	570 dwellings and 3 no. commercial units	25,800sqm of office/ education floorspace, 120 dwellings and 3 no. commercial unit

- 8.17 At the request of the Council, the package of revisions included an Outline Design Code to ensure that any subsequent Reserved Matters Applications align with the principles agreed within the full application and the parameters set out at outline stage. The 'Outline Design Code' will be conditioned on any Outline Planning Application.
- 8.18 It is considered that the revised application submission responds to site context, creating a bespoke multi-use development and therefore complies with the requirements of Policy BE1.
- 8.19 Ecology & Trees:

The application was supported by a Preliminary Ecological Appraisal and Biodiversity Net Gain (BNG) Assessment.

- 8.20 As part of the enabling application (TWC/2022/0424) a baseline for the sites habitat value prior to demolition/enabling was agreed and secured through an MOU. This was to ensure that any future application either secured no net loss on-site or an off-site financial contribution to secure enhancements in the local area was provided.
- 8.21 A Biodiversity Metric Report supports the application and demonstrates a net loss of 3.71 biodiversity units (35.42%). As such, an off-site financial contribution equivalent to the value of these units and their management, will be secured through an MOU to be used to enhance biodiversity within other green spaces in the Borough.
- 8.22 The proposals have been considered by the Council's Biodiversity Officer who raises no objections to the proposals subject to conditions and informatives and securing off-site contributions. As such, the proposals comply with Policy NE1.
- 8.23 The application is supported by an Arboricultural Impact Assessment including a Tree Retention Plan (TRP) (ref.: C155847-02-01-RevB-RevB). Tree groups on or immediately adjoining the north and north-east of the site will be retained, in addition to those specimens immediately adjoining (but outside of) the western boundary.
- 8.24 A landscaping strategy has been submitted to demonstrate how the site could be developed to offer greening throughout this dense urban neighbourhood, which includes tree-lined highways and small pockets of amenity land. Planting along Ironmasters Way is restricted due to the presence of a number of utilities and their easements and as such, street trees in their standard form (i.e. tree pits) is not achievable.
- 8.25 With the importance placed on trees within the recently revised NPPF (para. 131) the Council consider it important that alternative measures are explored to ensure that this important part of the public realm is not devoid of mature landscaping of height. As such, the Council's Arboricultural Officer has recommended that trees are placed in large planters of corsten steel (2000mm x 2000mm x 800mm with feet fitted to enable them to be lifted with fork-lift to access utilities below) and planted with a mix of pleached trees (Holm Oak, Holly Oak, Evergreen Oak, Sweet Gum, Hornbeam, Oriental Plane etc).
- 8.26 Subject to the Conditioning of the AIA and TRP, and a detailed landscaping plan, the proposal complies with the requirements of Policy NE2.
- 8.27 Drainage & Flood Risk

The application site is located within Flood Zone 1, the area least likely to be affected by flooding and subject to satisfactory surface water drainage proposals, there will be no flood risk to the site or other nearby properties.

- 8.28 The site is served by existing foul and surface water drains, some of which are to be diverted as part of the approved enabling works.
- 8.29 Given underlying geological conditions (sandstone with superficial clay deposits) and no nearby watercourses, infiltration of surface water is unviable and therefore surface water drainage will be managed utilising underground attenuation tanks to control discharge with an expected 80% betterment to the existing drainage arrangement. Additionally, further efforts have been made to incorporate sustainable drainage techniques to harvest rainwater through the inclusion of rain gardens along the public highways to capture, store and treat run-off.
- 8.30 The proposals have been assessed by the Lead Local Flood Authority (LLFA) who have raised no objections to the proposals, subject to Condition(s) for a detailed drainage strategy for the Outline Application and further details relating to rain gardens and the model for the Full Application. As such, the proposals are in accordance with Policy ER12.

8.31 Highway Impacts

The planning application has been supported by a number of documents including a Transport Assessment (TA), Framework Travel Plan (FTP), Pedestrian and Cycle Audit, Parking Allocation Plans and Strategies, Road Safety Audits, Pedestrian Crossing Design Review and Controlled Crossing Technical Notes; along with supporting model data.

- 8.32 Ongoing dialogue regarding highway matters has been retained between the applicants and the Local Highways Authority (LHA) both in pre-application discussions and during the course of this application. The premise of a sustainable town centre community is understood and acknowledged but further information as to how the development makes this step-change from adopted policy, is required. A substantial proportion of the submissions made to justify this approach have been made/ revised during April and May 2023 and formed part of the second round of consultation.

8.33 **National Highways (09 May 2023)**

During the second round of consultation, National Highways (NH) were consulted due to potential impacts on the national highway network and have issued a 3month holding objection. This time period allows the applicants sufficient time to submit additional supporting information in relation to trip generation, distribution, junction capacity assessments and methodology as set out in full within NHs formal comments.

- 8.34 Following a meeting between the applicants and NH on the 18th May 2023 and submission of additional information responding to the above points from

the applicants, National Highways have provided the following informal comments relating to outstanding matters.

- 8.35 *Trip Generation*: A revised TA or technical note should be submitted to include justification for the filtering criteria utilised and additional information in relation to the likely car parking numbers associated with the future phases (outline application). Additionally, clarification on the potential demolition timescales for Bishton Court is required.
- 8.36 Whilst overall NH are content with the trip generation assessments, this is subject to the confirmation of the above points through revised submissions.
- 8.37 *Trip Distribution*: Based on the review of the flow bundle plots provided, NH acknowledge the applicant's findings that the impact of the development is not significant at the M54 junction 4 and 6.
- 8.38 Whilst NH acknowledge the above, the full set of TSTM outputs are required for review to confirm these findings.
- 8.39 *Junction Capacity Assessments*: NH acknowledge the opening year of 2024 and that all of the anticipated infrastructure schemes will become operational before the opening year of development and therefore do not anticipate any new infrastructure between the opening year '2024' and the assessment year of '2031'.
- 8.40 In line with this observation, NH are content with the approach and acknowledge the findings for the future year assessments of 2031 as a worst-case scenario. This approach should however be justified in a revised TA or separate technical note to be submitted and reviewed.
- 8.41 LinSig model files relating to the impacts on the M54 Forge roundabout need to be submitted and reviewed.
- 8.42 *Travel Plan (TP)*: NH acknowledge that local and regional policies have now been summarised in the revised TP. On the basis of the under-provision of car parking provision, NH would like to review the sustainable travel measures which will be implemented to accommodate the generated trips and would like to review this in due course.
- 8.43 The applicants have confirmed that detailed TP for each phase/land use will be produced prior to occupation and would expect detailed TPs to be conditioned to any planning consent.
- 8.44 In order for the NH holding objection to be removed, the following list of documents require revision/submission to respond to the above outstanding matters. A revised FTP and TA were received on the 31st May 2023 and have been sent to NH for review,
- Revised TA or Technical Note, responding to trip generation, car parking numbers, and junction capacity assessments justification;

- TSTM outputs for M54 Junction 4 and 6;
- LinSig model files for the M54 Forge Roundabout.

8.45 **Local Highways Authority (30 May 2023)**

8.46 *Road Safety Impact:*

The TA analysis of collisions didn't reveal any identifiable issues associated with the expected movements from the proposed development, using the latest five-year period of available data. The LHA are satisfied with the conclusions made and raise no concerns over road safety.

8.47 *Traffic Impact*

The Applicant has undertaken junction capacity assessment at seven junctions in the vicinity of the application site. It has been done for a number of different scenarios that capture future year scenarios with associated growth assumptions. The LHA are content that, based on the proposed vehicle trip generation, the proposed development would not have a severe residual cumulative impact on the highway network, or have an unacceptable impact on highway safety.

8.48 However, this relies on the proposed development achieving its predicted trip generation assumptions for all travel modes, to ensure vehicle trips rates and subsequently the vehicle trip generation remains as per the traffic assessment.

8.49 *Trip Generation Projections*

The vehicle trip generation presented in section 6.2 of the TA for the hotel, residential and digital skills hub (business hub) are acceptable. However, this acceptance relies upon the uptake of sustainable transport modes to ensure vehicle trip rates remain as per the submitted assessments. A thorough and rigid Travel Plan (including monitoring) will be required to facilitate this.

8.50 However, the vehicle trip generation for the Digital skills hub (education) remains a matter that requires clarity in the detailed Travel Plans.

8.51 The modal shares of transport used in Table 5 of the TA (and as referenced below in para 8.7.40) are based on travel data associated with the existing campus at Haybridge Road and are considered a more realistic assessment of likely future trip generations, specifically for bus use. However, the mode shares included in Table 4 of the FTP differ significantly with 30% (instead of the 5% at the existing campus) of students accessing the site by car, and as such the level of car parking would not be commensurate with this uptake of car use set out in the FTP.

8.52 *Sustainable Travel Initiatives:*

At Section 2.6 of the FTP, a number of measures to enhance sustainable travel credentials of the site including:

- New level crossing for pedestrians/cyclists, to replace the existing footbridge – with the enhanced public realm along Ironmasters Way improving connectivity between the Train Station and Town Centre;
- 2no car parking spaces within the Digital Skills Hub car park for a ‘car club’ to promote car sharing. The FTP seeks to demonstrate how they will measure if the car club supply needs to be increased to meet demand.

8.53 The positive assessment of the proposals by the LHA are reliant upon the proposed development achieving the predicted mode shares for all modes, and promoting sustainable transport.

8.54 *Cycling:*

It is demonstrated in the applicants submissions that a number of plots do not meet the minimum cycle parking standards required by the Local Plan current adopted standards – this is analysed further below. Given that the development is proposed to be a step-change, setting a precedent for sustainable living, it is considered that more than the minimum (in fact maximisation of) cycle parking should be sought.

8.55 It is acknowledged that there is good existing cycle infrastructure in and around the site however, opportunities for enhancement have not been maximised.

8.56 It is further acknowledged that the applicants continue to hold dialogue with the Council’s Active Travel Delivery Specialist and to promote cycling, the FTP states that ‘adequate cycling will be provided in well-lit locations across the site’.

8.57 The LHA consider that on the basis of the desire for this site to set a precedent for future centrally located development, promoting sustainable modes of travel, further improvements should be made with respect to the quantity and quality of cycle provision and potential enhancements to the local cycle infrastructure; this will be secured by condition.

8.58 *Bus:*

Discussions made between the applicants and a local bus operator concluded that an additional/diverted bus service through the development would be purely demand/commercially driven and Phase 1 isn’t consider large enough to justify re-routing any existing services. The possibility of subsidy has not been considered at this stage.

8.59 Again, on the basis of the of the desire for this site to set a precedent for sustainable travel and reduced parking provision, improvements should be made with respect to re-routing or providing additional bus services –

particularly in light of the likely high level of use from college students (based on the Haybridge Road campus data). The FTP should also incorporate incentives for students to promote public transport such as bus taster tickets.

8.60 The LHA are satisfied that the Matheson House bus stops on Grange Central could service this site in the interim, allowing approval of Phase 1 in full.

8.61 Given the level of users proposed on the site as a whole, enhancements would be expected at Phase 2, and a review of this is conditioned accordingly, to be submitted concurrently with the reserved matters application.

8.62 *Travel Plan:*

The measures to promote sustainable transport and minimise the number of vehicle trips generated by the site outlined in the FTP, are to be funded by the applicant. The FTP offers three potential ways in which the measures can be funded but there needs to be a mechanism in place to secure this funding and guarantee the measures can be delivered.

8.63 Whilst the FTP is acceptable in principle, further justification and promotion/incentives for sustainable travel (across all land uses in the development) are required to ensure that the measures proposed achieve the proposed mode shares – and comply with the sustainable premise of the proposed development.

8.64 *Parking Provision:*

The number of car parking and cycle spaces required for all developments are set out in Appendix E of the Local Plan.

8.65 The applicants provided a Table (3) within their TA which provides a comparative understanding of the policy requirements against the proposed development. This is copied at the end of the report for ease of reference.

8.66 With respect to car parking provision, the applicants consider that the proposal is appropriate to accommodate the likely demand generated by the development in encouraging the modal shift to sustainable transport modes in this central location, with its residential focus being on young professionals.

8.67 The ratio of residential parking spaces to townhouses is 1 space per unit; with each townhouse having its own dedicated space. For apartments, the ratio is 1 parking space for every 2 apartments and it is understood that the an 'allocation policy; will be developed as part of the marketing literature with balance made between demand and prioritisation given to 2bedroom units and M4(2) units. The applicant's justification is that this development is aimed towards young professionals who are less likely to own a car and utilise sustainable modes of transportation.

8.68 It is claimed by the applicants that a considerable level of cycle parking has been provided across the site, with the approach taken by the applicants to

provide 1 allocated cycle space per residential unit. This is below the TWC adopted standards, particularly for the apartment block (Plot 12) which has an under-provision of 36 cycle parking spaces.

- 8.69 It is suggested that should demand necessitate, further cycle storage could be provided but it is not demonstrated how or where on the site this would be possible. The LHA consider that the cycle standards should be met and this will be conditioned accordingly.
- 8.70 The hotel incorporates 142 bedrooms, with the LP requiring a maximum of 142 car parking spaces. The development provides 37 spaces equating to approximately 1 space per 4 bedrooms. The applicants has provided evidence of similar town centre hotels to demonstrate that the level of car parking is commensurate with their proposed operation. It should be made clear in any supporting Travel Plans that this parking is focused towards guests, not staff as is suggested in the supporting documents.
- 8.71 The digital skills hub, to be policy compliant, requires 132 car parking spaces whereas the proposal provides 22 parking spaces. The applicants advise that these parking spaces are to accommodate staff members at the facility and incorporates the 2no 'Car Club' spaces for all users of the development.
- 8.72 The education part of the hub is to be operated by Telford College and is expected to enrol students between the ages of 16 to 18, typically accommodating 200 students and 19 staff. Telford College have indicated that students would be encouraged to travel to the facility by sustainable modes of transport rather than drive or be dropped off. Data collected from the Haybridge Road campus suggests 5% of students arrive by car, 5% are dropped off by car, with the remainder coming by sustainable modes of transport (primarily bus - 75%).
- 8.73 In order to establish a similar sustainable approach, firm targets and expectations would need to be set out within a detailed Travel Plan with students being made aware of the college's expectations and commitments to sustainable travel. Consideration needs to be given to bus taster incentives to further encourage sustainable travel.

8.74 *Conclusions:*

The development proposes an under-provision of car parking on the basis of a modal shift of town centre residents utilising sustainable travel modes. The principle of this modal shift is acceptable to the LHA subject to appropriate Travel Plans to demonstrate how this will be secured and monitored.

- 8.75 In light of this shift, greater expectations should be placed on encouraging users to utilise alternative sustainable method of travel such as bus, cycling and walking. It is disappointing therefore that the applicants have not sought to provide greater quantity of cycle parking and improvements to the local bus network at this stage,

- 8.76 However, the Applicants have however committed to offering a review of the demand for cycle spaces (which will be conditioned) and bus services part of the Phase 2 development.
- 8.77 The LHA would expect the detailed Travel Plan for the skills hub to utilise the mode shares given at Table 5 of the TA (reflecting those at the Haybridge Road Campus) to set their targets for sustainable travel – with a greater focus on bus travel and incentives to promote this.
- 8.78 Accordingly the LHA raise no objection to the development in highway safety terms and consider it to be in accordance with Policy C3 of the Local Plan, subject to the conditions and informatives outlined in the recommendation.
- 8.79 The application is contrary to Policy C5 in that it does not comply with the Councils adopted local plan standard for cycle and car parking. Nevertheless, the principle of this modal shift to sustainable travel (in a town centre location) is acceptable in principle subject to appropriate measures being set out within a detailed Travel Plan, and implemented and monitored accordingly alongside the proposed conditions. As such, on balance, the scheme can be supported on this basis, subject to appropriate conditions and informatives.
- 8.80 It should be noted that the application cannot be approved until the holding objection from National Highways has been revoked and as such, the recommendation is made subject to receipt of their support.

8.81 Other Matters

8.82 *Education*

Of the 189 dwellings proposed in Phase 1, 62 units are 1-bed which would not trigger the need for a financial contribution towards education.

- 8.83 The development has been assessed by our Education Team and it is concluded that schools within the vicinity of the development have adequate capacity to accommodate the level of development and number of pupils likely to be associated with Phase 1 (127 units of 2 or 3-bed) and as such, no financial contributions are required for Phase 1.
- 8.84 Phase 2 will however require contributions towards primary and secondary education, to accommodate the additional pupil numbers generated by this development. However, the contribution cannot be determined until the form (number and mix of dwellings) is set out at reserved matters stage but a per-dwelling calculation has been provided for the MOU.

8.85 *Homes For All*

In order to be compliant with Policy HO5, Phase 1 of the development would require a provision of 25% (48 dwellings).

- 8.86 Based on the Viability Appraisal submitted and the independent assessment undertaken, the site will not be providing affordable housing in a policy compliant form, in that it will not be secured by a s.106 Agreement.
- 8.87 Phase 1 however includes 117 build-to-rent dwellings being delivered by NuPlace, alongside 72no (38%) affordable tenure dwellings including affordable and shared ownership which will be delivered through Homes England funding. The legal agreement to which the applicants are entering into with the house builders for the affordable units, mirrors the relevant clauses in our legal templates and therefore whilst not forming part of the MOU, they will be bound by similar expectations.
- 8.88 The Applicants envisage that Phase 1 will kick-start a new community which promotes the values of town centre living and increase demand for Phase 2 which will incorporate a mix of owner-occupied (open market) housing and further build-to-rent affordable tenures. It is expected that Phase 2 would meet the minimum requirements of 25% Affordable Housing.
- 8.89 As the proposed development is looking to provide affordable housing on-site (albeit outside of the scope of any MOU) it is considered compliant with Policy HO6.
- 8.90 In terms of accessibility, Phase 1 provides a mix of M4(2) and M4(3) designed homes making it compliant with the Council's Homes for All SPD and it is again expected that Phase 1 will meet these requirements.
- 8.91 *Healthy Spaces*
- Healthy Spaces have confirmed that they raise no objection to the application subject to a condition requiring the submission of a Landscape Management Plan (LMP), design of the LEAP and a more detailed landscaping plan(s).
- 8.92 A LEAP will be created in the centre of the urban neighbourhood, and has been designed at a standard, including details of all play equipment, agreed with the Healthy Spaces Officer.
- 8.93 A NEAP will be created adjacent the Digital Skill Hub and Addenbrooke site; principles have been established with a detailed design to be conditioned. It is intended that this space will be a bespoke design to assimilate into the unique nature of this location. It may incorporate non-standard features such as parkour, raised performance 'Tiktok' stage and boules; adding to the diversity and innovation of play facilities seen throughout the Borough.
- 8.94 *Sequential Assessment*
- The site falls outside of the Telford Town Centre Primary Shopping Area (PSA) and therefore triggers the requirement for a sequential test. The applicants assessment demonstrates that there are other sequential preferable units within the PSA but argues that the proposed retail/leisure

units are for the convenience of the occupants of the development, to ensure its sustainability, and they therefore would not be suitable.

8.95 The Council acknowledge this argument and understand that the basis of their inclusion in the development is to provide a small-scale local centre to meet the immediate needs of the residential development without detracting from the Town Centre. It has been suggested that these commercial units could incorporate a small convenience store, hairdressers, pharmacy, takeaway etc.

8.96 On balance, the Council are happy to support this approach albeit contrary to policy, on the basis of meeting the needs of this bespoke town centre residential development. However, in order to protect the Telford Town Centre, any commercial units permitted on the site will be limited in size and use, to ensure they are ancillary to the wider-mixed development and do not exceed the limits of Policy EC8 (which would then trigger a Retail Impact Assessment).

8.97 *Sustainability Credentials*

A number of the larger units (Plot 12 apartments, Plot 4 Hotel, Plot 2 digital skills hub) will incorporate solar panels – the details and design of which will be conditioned but shown indicatively on roof plans. Air Source Heat Pumps will also be considered.

8.98 Electric vehicle charging (EVC) points will be incorporated into the development at a level commensurate with the recently updated Building Regulations.

8.99 To reduce water consumption, the development will incorporate measures such as dual flush WCs, water meters and low flow fittings.

8.100 Homes will be designed to incorporate smart energy systems; utilise sustainable materials to reduce the embodied carbon footprint of the development, designed in accordance with the cooling hierarchy and recently updated building regulations on overheating, and meet the requirements of the Future Homes and Future Building standards to achieve carbon reduction.

8.101 Viability

In support of the application, a Viability Appraisal has been carried out by the Applicants, which has been independently assessed by CBRE acting on behalf of the Council.

8.102 The Viability Appraisals submitted by the Applicants sought to demonstrate that a wholly policy-compliant scheme is unviable and the return for the developers/sales risk would not be sufficient should s.106 Contributions be sought from the Council.

8.103 The development has come forward through the accumulation of funding sources from a variety of avenues. The purpose of the development is not to

be profit-driven but instead regenerate this part of Telford through the Telford Town Fund – creating a sustainable gateway from the Telford Central Train Station.

- 8.104 The National Planning Practice Guidance (NPPG) states that an appropriate range for developer's return (for the purpose of Plan-making, which should subsequently inform decision-taking) equates to a range of 15-20% on Gross Development Value (GDV), with the rate appropriately adjusted for risk.
- 8.105 The Viability Assessment undertaken by CBRE, subject to some adjustments to the figures produced by the applicants, concluded that a policy-compliant scheme would not generate an appropriate level of profit.
- 8.106 Neither would an appropriate level of profit be accrued on the basis of 0% affordable housing and nil planning obligations, nor with the projected public sector grant funding package.
- 8.107 It is nevertheless the intention of the applicants to endeavour to comply with local planning policy where possible in creating a sustainable community. They will provide contributions towards Healthy Spaces (through on-site provision with a LEAP & NEAP; towards Education (through off-site financial contributions as requested); towards Biodiversity (through on-site provision and off-site financial contributions towards BNG) and towards Highways (through contributions towards Travel Plan Monitoring, TRO orders and the Strategic Highway Network improvements).
- 8.108 Based on this, the appraisal generated an outturn residual developer's returns of circa 0.76% profit on gross development value (GDV) and 0.26% profit on cost.

8.109 Planning Obligations

- 8.110 Any planning consent would be conditional on the agreement of an MOU to secure the following (plus indexation):

- i) £5,000.00 towards Travel Plan Monitoring;
- ii) £5,000.00 towards TRO (order only)
- iii) £77,093.63 Strategic Highway Improvements
- iv) £25,000.00 towards MOU Monitoring

Phase 1 (Part A – Full Planning Application):

- i) Provision of LEAP;
- ii) £77,910.00 towards off-site biodiversity net gain enhancements

Phase 2 (Part B – Outline Planning Application):

- iii) Provision of NEAP;

- iv) £3,404.56 per dwelling (2-bed or larger) towards Primary Education;
- v) £1,383.92 per dwelling (2-bed or larger) towards Secondary Education;
- vi) £21,000.00 per unit of net loss, towards off-site Biodiversity Net Gain (BNG) enhancements (metric calculations for Phase 2 TBC at REM Stage)

8.111 In determining the required planning obligations on this specific application the following three tests as set out in the CIL Regulations (2010), in particular Regulation 122, have been applied to ensure that the application is treated on its own merits:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development;
- c) fairly and reasonably related in scale and kind to the development.

9.0 CONCLUSIONS

9.1 Having regard to the above considerations, and in the overall planning balance, the proposal represents a sustainable form of development and complies with the National Planning Policy Framework, together with relevant policies in the Telford and Wrekin Local Plan.

10.0 DETAILED RECOMMENDATION

10.1 Based on the conclusions above, it is recommended that Delegated Authority be granted to the Service Delivery Manager to **GRANT FULL PLANNING PERMISSION FOR PART (A) AND GRANT OUTLINE PLANNING PERMISSION FOR PART (B)** (with the authority to finalise any matter including Condition(s), legal agreement terms, or any later variations) subject to:

- A) The removal of National Highways holding objection;
- B) The applicants entering into a Memorandum of Understanding to secure the following (plus indexation):
 - i) £5,000.00 towards Travel Plan Monitoring;
 - ii) £5,000.00 towards TRO (order only)
 - iii) £77,093.63 Strategic Highway Improvements
 - iv) £25,000.00 towards MOU Monitoring

Phase 1 (Part A – Full Planning Application):

- v) Provision of LEAP;
- vi) £77,910.00 towards off-site biodiversity net gain enhancements

Phase 2 (Part B – Outline Planning Application):

- vii) Provision of NEAP;
- viii) £3,404.56 per dwelling (2-bed or larger) towards Primary Education;
- ix) £1,383.92 per dwelling (2-bed or larger) towards Secondary Education;
- x) £21,000.00 per unit of net loss, towards off-site Biodiversity Net Gain (BNG) enhancements (metric calculations for Phase 2 TBC at REM Stage)

C) The following Condition(s) (with authority to finalise conditions and reasons for approval to be delegated to Development Management Service Delivery Manager):

Full Application (Part A):

Time Limit Full
 Materials
 Samples of Materials
 Landscaping Design
 Landscape Management Plan
 Approval of LEAP Design
 Landscape & Environmental Management Plan
 BNG Monitoring Strategy
 Bat & Bird Boxes
 Site Environmental Management Plan
 Detailed Foul & Surface Water Drainage Scheme
 Accordance with AQA – Dust Soiling
 Accordance with Noise Assessment – Glazing Spec.
 Accordance with Noise Assessment – Skills Hub Ventilation
 Approval of Phasing Plan
 In accordance with AIA & TRP
 Restrictions on Use/Size of Commercial Unit (Plot 12)
 Lighting Strategy
 EVC Charging
 Solar Panel – Design/Spec.
 C38: Accordance with Plans
 Car Park Allocation & Management Plan
 Cycle Provision
 Road Design inc surface water, traffic calming etc.
 Road/footway/cycleway construction
 Parking, turning, servicing – per plot
 Travel Plan

Outline Application (Part B):

Time Limit Outline
 Time Limit Reserved Matters
 In accordance with 'Outline' Design Code
 Landscaping Design
 Landscape Management Plan
 Design of NEAP (Accordance with OUT Principles Plan)

Landscape & Environmental Management Plan
BNG Monitoring Strategy
Bat & Bird Boxes
Site Environmental Management Plan
Foul & Surface Water Drainage Scheme
Exceedance Flow Routing
SuDS Management
Accordance with AQA – Dust Soiling
Contamination Assessment
Noise Impact Assessment
Phasing plan
Accordance with AIA & TRP
Principles of REM – Illustrative Masterplan and ‘Outline Design Code’
Parameters of REM – Use Classes/Quantum
C38: Accordance with Plans (Location Only)
Road Design inc surface water
Parking, turning, servicing – per plot
Review of bus service
Stopping up of adopted highway/removal of bridge
Travel Plan

Informatives:

MOU
Outline Conditions
Shropshire Fire Authority
Street Name & Numbering
West Mercia Police
Severn Trent – Proximity of Public Sewer
Cadent Gas – Proximity of Infrastructure
Coal Authority – High Risk Area
Coal Authority – Mine Entry (Custom)
Stopping up - S247 Act
S278 license
TRO