



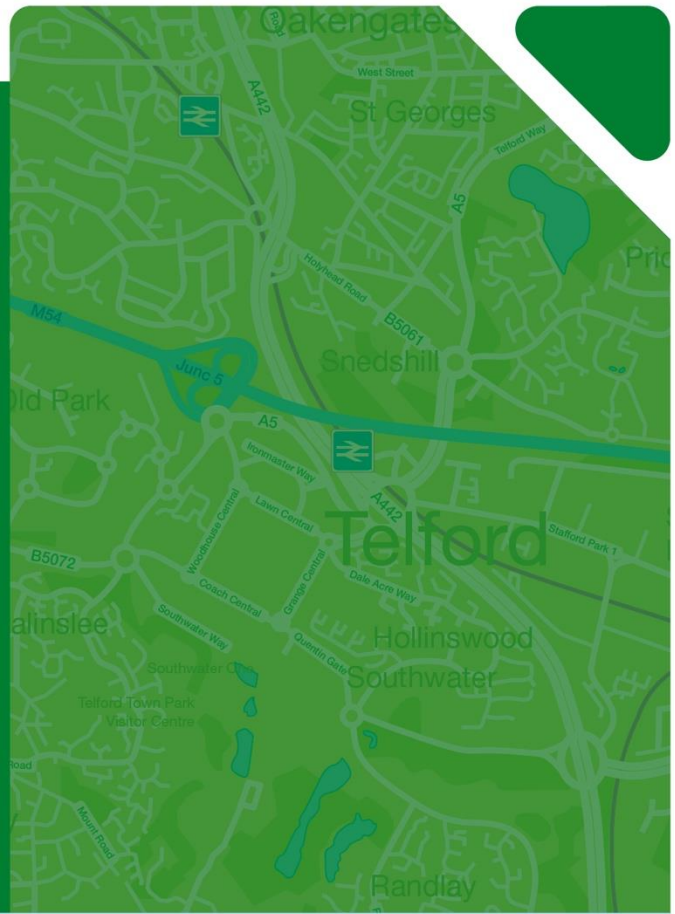
Telford & Wrekin  
Co-operative Council

Protect, care and invest  
to create a better borough

# Telford and Wrekin Local Plan Review

## DRAFT PLAN

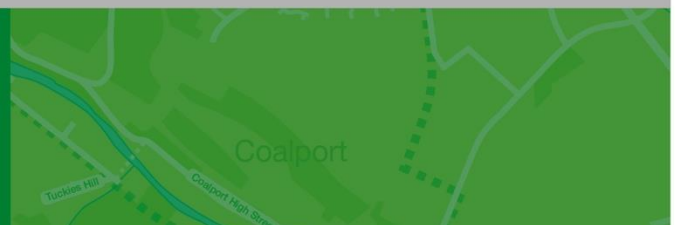
Strategic Housing & Economic  
Land Availability Assessment 2023



2020 - 2040



October 2023



# Contents

<b>1</b>	<b>Introduction</b> .....	<b>2</b>
<b>2</b>	<b>Planning policy context</b> .....	<b>4</b>
<b>3</b>	<b>SHELAA methodology</b> .....	<b>5</b>
<b>4</b>	<b>Stage 1 - Site and broad location identification</b> .....	<b>5</b>
<b>5</b>	<b>Stage 2: Site and broad location assessment</b> .....	<b>8</b>
<b>6</b>	<b>Stage 3 - Windfall assessment</b> .....	<b>13</b>
<b>7</b>	<b>Stage 4 - Assessment review</b> .....	<b>14</b>
<b>8</b>	<b>Stage 5 - Final evidence base</b> .....	<b>15</b>

# Strategic Housing & Economic Land Availability Assessment

## 1 Introduction

### Purpose of this report

**1.1** Telford & Wrekin Council is required to have a clear understanding of the land available in its area. The strategic housing and economic land availability assessment (SHELAA) is a technical assessment which identifies a future supply and mix of suitable, available and achievable sites for housing and economic development uses<sup>(1)</sup>.

**1.2** The SHELAA provides information on the range of sites that could potentially meet the Council's housing and employment land requirements, but it does not allocate land for development. A separate process will therefore be undertaken to allocate sites through the Telford & Wrekin Local Plan Review.

**1.3** The inclusion of a site in the SHELAA does not imply that the Council would necessarily grant planning permission or preclude other uses from coming forward; nor does the exclusion of a site mean that development may not come forward in the future.

**1.4** The purpose of this document is to set out the methodology by which the Council will assess potential housing and economic development sites as part of the SHELAA process. There is a process to follow in preparing this evidence and the national Planning Practice Guidance (PPG) indicates what inputs and processes can lead to a robust assessment of land availability; Figure 1 summarises the PPG methodology.

**1.5** The assessment is an important source of evidence to inform plan making, decision taking and the identification of a five year supply of housing land. It can also inform as well as make use of sites in brownfield registers, which list brownfield sites appropriate for residential development. Further information on these issues is provided in this document.

**1.6** The Council has undertaken a call for sites consultation to identify as many potential opportunities as possible. The call for sites invites submissions for a range of potential uses; however, the SHELAA process will focus on sites put forward for housing or employment uses.

**1.7** This SHELAA will supersede all previous land availability assessments prepared by Telford & Wrekin Council.

**1.8** Set out below is the SHELAA methodology flowchart<sup>(2)</sup>.

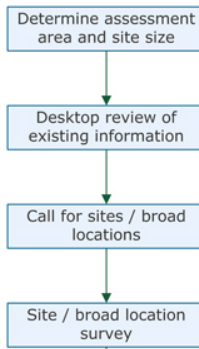
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1 Paragraph 67, National Planning Policy Framework (2023)

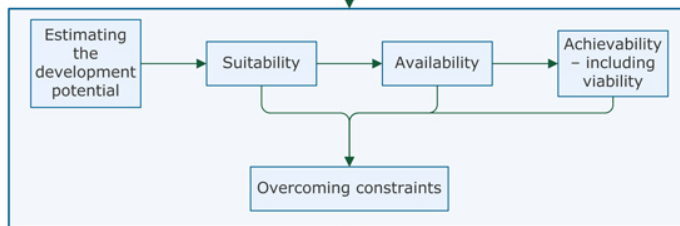
2 Methodology flowchart Planning Practice, paragraph: 005 Reference ID: 3-005-20190722. Revision: 22 07 2019

# Strategic Housing & Economic Land Availability Assessment

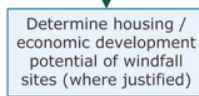
**Stage 1 - Site / broad location identification**



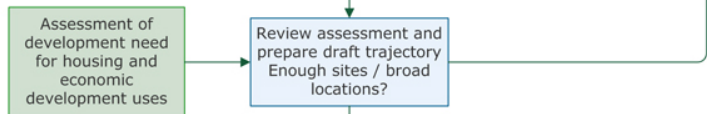
**Stage 2 - Site / broad location assessment**



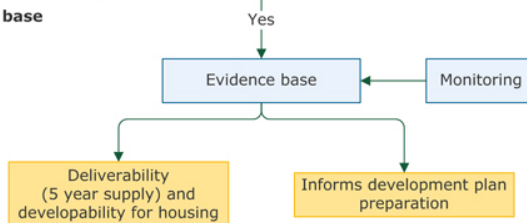
**Stage 3 - Windfall assessment**



**Stage 4 - Assessment review**



**Stage 5 - Final evidence base**



# Strategic Housing & Economic Land Availability Assessment

## 2 Planning policy context

### National planning policy

**2.1** National Planning Policy Framework (NPPF) states that a local planning authority should have a clear understanding of the land available in its area through the preparation of a strategic housing land availability assessment<sup>(3)</sup>.

**2.2** From this, planning policies should identify a supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a. specific, deliverable sites for years one to five of the plan period<sup>(4)</sup>; and
- b. specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

**2.3** National Planning Practice Guidance (PPG) states<sup>(5)</sup> it is the role of the land availability assessment to provide information on the range of sites which are available to meet the Council's requirements for housing and economic development uses, but it is for the development plan itself (the Telford & Wrekin Local Plan and any made neighbourhood plans) to determine which of those sites are the most suitable to meet those requirements. The guidance advises that land availability assessments for housing and economic development uses are carried out as part of the same exercise in order to identify the most appropriate use(s) for sites.

**2.4** The land availability assessment should:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

**2.5** The Council is expected to have regard to this guidance in preparing its assessment which needs to be thorough but proportionate, building where possible on existing information sources<sup>(6)</sup>.

**2.6** The Council should demonstrate a five year supply of deliverable housing sites on an annual basis, set against the Local Plan housing requirement<sup>(7)</sup>. This can be demonstrated using the latest available evidence including the SHELAA and data on site delivery in the Annual Monitoring Report<sup>(8)</sup>.

**2.7** The land availability assessment can also support the brownfield land register, a list of previously developed sites that may be suitable for potential future residential development. The Council has a duty to prepare, maintain and publish a register of previously developed (brownfield) land which is published online and updated<sup>(9)</sup>.

3 Paragraph 67, NPPF

4 A minimum 5% buffer would be required to ensure choice and competition in the market for land, as set out in paragraph 73 of the NPPF.

5 Planning Practice Guidance: Housing and economic land availability assessment, paragraph: 001 Reference ID: 3-001-20190722. Revision date: 22 07 2019

6 Planning Practice Guidance: Housing and economic land availability assessment, paragraph: 004 Reference ID: 3-004-20190722. Revision date: 22 07 2019

7 Paragraph 73, NPPF

8 Previous Annual Monitoring Reports are available at: [https://www.telford.gov.uk/info/20455/monitoring/124/annual\\_monitoring\\_report\\_amr](https://www.telford.gov.uk/info/20455/monitoring/124/annual_monitoring_report_amr)

9 The Town and Country Planning (Brownfield Land Register) Regulations 2017

# Strategic Housing & Economic Land Availability Assessment

## Local planning policy

**2.8** The development plan for the borough of Telford & Wrekin comprises the Local Plan and made Neighbourhood Plans. The Local Plan was adopted in January 2018 and allocates sites for uses including housing and employment. Several parishes have brought forward Neighbourhood Plans and this process also allows for sites to be allocated in plans.

**2.9** The Council has commenced a review of its Local Plan. This process will review the housing and employment land requirements and whether additional sites need to be allocated. The SHELAA will form part of the Local Plan Review evidence base but it does not determine whether sites should be allocated. The Local Plan Review will be informed by the SHELAA and other technical assessment reports in determining which sites are most suitable to meet the housing and employment requirements.

**2.10** The Council maintains a brownfield land register which is available on its website<sup>(10)</sup>. The register identifies previously developed sites in the borough that have been assessed as suitable for housing. For a site to be included on the register it must be at least 0.25ha in size or capable of providing at least five homes, it must be suitable for residential development, it must be available for residential development and should be achievable (that is, development is likely to take place within 15 years of the entry date). The SHELAA process will therefore be used to identify sites that may be suitable for inclusion in the brownfield land register.

## 3 SHELAA methodology

### Overview

**3.1** The methodology for undertaking a SHELAA is set out in PPG and summarised in Figure 1. The Council is proposing to follow this approach and the following sections detail the assessment stages.

## 4 Stage 1 - Site and broad location identification

### Assessment area

**4.1** PPG advises that the assessment should cover the entire plan-making area unless there are reasons to consider an alternative. Telford & Wrekin Council is the local planning authority for its area. The adopted Local Plan covers the authority area and the authority is its own housing market area. It is therefore reasonable to apply the SHELAA to the entire local planning authority.

### Site size

**4.2** PPG advises that a site size threshold should be considered for the assessment. In line with the thresholds identified in PPG and to ensure consistency with the brownfield register regulations, the Council will consider sites and broad locations capable of delivering the following:

- For housing, all sites with an area of at least 0.25 hectares, or are capable of supporting at least five dwellings; and
- For economic development, all sites with an areas of at least 0.25 hectares, or capable of accommodating at least 500 square metres of floor space.

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10 [https://www.telford.gov.uk/info/20456/local\\_registers/3270/brownfield\\_register](https://www.telford.gov.uk/info/20456/local_registers/3270/brownfield_register)



# Strategic Housing & Economic Land Availability Assessment

## Types of sites

**4.3** The SHELAA needs to identify sites and broad locations in order to provide an audit of available land, regardless of the amount of development needed. PPG advises<sup>(11)</sup> that all available types of sites and sources of data that may be relevant should be considered. The Council will use a range of data sources to identify potential sites that could be considered in order to meet future development needs as set out in Table 1. Some sources will be captured via the Annual Monitoring Report process, such as sites with planning permission and sites under construction, these sites will be counted toward existing supply.

**Table 1: Types of sites and potential data sources**

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	<ul style="list-style-type: none"> <li>● Telford &amp; Wrekin Local Plan</li> <li>● Made and emerging Neighbourhood Plans</li> <li>● Planning application records</li> </ul>
Planning Permissions for housing and economic development that are unimplemented or under construction	<ul style="list-style-type: none"> <li>● Planning application records</li> <li>● Annual Monitoring Reports</li> </ul>
Planning applications that have been refused or withdrawn	<ul style="list-style-type: none"> <li>● Planning application records</li> </ul>
Land in the local authority's ownership	<ul style="list-style-type: none"> <li>● Call for sites</li> <li>● Local authority records</li> </ul>
Surplus and likely to become surplus public sector land	<ul style="list-style-type: none"> <li>● Call for sites</li> <li>● National register of public sector land</li> <li>● Engagement with strategic plans of other public sector bodies</li> </ul>
Sites with permission in principle, and identified brownfield land	<ul style="list-style-type: none"> <li>● Call for sites</li> <li>● Telford &amp; Wrekin brownfield land register</li> <li>● National Land Use Database</li> <li>● Valuation Office database</li> <li>● Active engagement with the sector</li> </ul>

11 Type of site and potential data source. Planning Practice Guidance, paragraph: 011 Reference ID: 3-011-20190722. Revision date: 22 07 2019

# Strategic Housing & Economic Land Availability Assessment

Type of site	Potential data source
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	<ul style="list-style-type: none"> <li>• Call for sites</li> <li>• Property databases and registers within the Council and external (e.g. estate agents and property agents)</li> <li>• Active engagement with sector</li> <li>• Brownfield land register</li> </ul>
Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks)	<ul style="list-style-type: none"> <li>• Call for sites</li> <li>• Ordnance Survey maps</li> <li>• Aerial photography</li> <li>• Planning applications</li> <li>• Site surveys</li> </ul>
Business requirements and aspirations	<ul style="list-style-type: none"> <li>• Call for sites</li> <li>• Enquiries received by local planning authority</li> <li>• Active engagement with sector</li> </ul>
Sites in rural locations	<ul style="list-style-type: none"> <li>• Call for sites</li> <li>• Telford &amp; Wrekin Local Plan</li> <li>• Made and emerging Neighbourhood Plans</li> <li>• Planning applications records</li> <li>• Call for sites</li> <li>• Ordnance Survey maps</li> <li>• Aerial photography</li> <li>• Site surveys</li> </ul>
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in adjoining villages and rural exceptions sites	
Potential urban extensions and new free-standing settlements	

## Call for sites and broad locations

**4.4** As part of the site identification work, the Council issued a call for sites. The aim of the call for sites is to identify as many potential opportunities as possible for development. Stakeholders have been notified and the process will consider site submissions for a range of uses. Sites submitted for potential housing and economic development uses will be assessed for inclusion in the SHELAA.

**4.5** A call for sites form has been created on the Council's website and respondents have been asked to provide information on the suitability, availability and achievability of potential development sites. The information is recorded in a database, plotted on a Geographical Information System (GIS) map and officers assess each site submission using the guidance in this methodology.



# Strategic Housing & Economic Land Availability Assessment

**4.6** As set out in PPG<sup>(12)</sup>, the site/broad location survey will record the following information on the SHELAA/call for sites database:

- Site size, boundaries, and location;
- Current land use and character;
- Land uses and character of surrounding area;
- Physical constraints (e.g. site access, land contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);
- Potential environmental constraints;
- Consistency with the development plan's policies (Telford & Wrekin Local Plan and made Neighbourhood Plans);
- Proximity to services and other infrastructure, such as public transport;
- Where relevant, development progress (e.g. ground works completed, number of units started, number of units completed); and
- An initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

## 5 Stage 2: Site and broad location assessment

### Estimating the development potential

**5.1** Following the stage 1 collation of sites, stage 2 of the SHELAA process will estimate the development potential of each site/broad location. PPG advises that estimates for the development potential of each identified site can be guided by the existing or emerging plan policy including locally determined policies on density<sup>(13)</sup>.

**5.2** Tables 2 and 3 provide assumptions on the amount of housing development that could be delivered on a site. The figures are based on an assessment of housing sites undertaken as part of the Local Plan evidence base, which were then applied to the proposed site allocations<sup>(14)</sup>. The net developable area ranges in Table 3 apply a discount factor to the gross site area to account for the provision of infrastructure including roads, public open space and other ancillary uses. In most instances the gross to net ratio decreases on larger housing sites as more space is required for infrastructure provisions.

**Table 2: Developable site area assumptions**

Gross site size (hectare)	Development ratio and net developable area
Less than one hectare	95-100%
Between one and two hectares	75-95%
Greater than two hectares	50-75%

**5.3** Table 3 provides the density assumptions that will be used for assessing housing sites based on the Local Plan evidence base work which included analysis of a sample of sites.

12 Planning Practice Guidance, paragraph: 015 Reference ID: 3-015-20190722. Revision date: 22 07 2019

13 Planning Practice Guidance, paragraph: 016 Reference ID: 3-016-20190722. Revision date: 22 07 2019

14 Telford & Wrekin Local Plan 2011-2031 - Density and Net Site Area Study. December 2015

# Strategic Housing & Economic Land Availability Assessment

**Table 3: Housing site density assumptions**

Site location	Density assumption range
Newport	45 - 55 dwellings per hectare (dph)
Telford less than four hectares	35 - 45 dph
Telford four hectares and above	30 - 40 dph
Central Telford (in and around Telford Town Centre)	45 - 75 dph

**5.4 Note:** No density assumptions were identified for the rural area (outside Telford and Newport) were identified. The Council's SHLAA<sup>(15)</sup> and Local Plan viability<sup>(16)</sup> studies applied densities below 30dph and this will be used as a starting point, having regard to the local context and any submitted information.

**5.5** An indicative housing capacity of each site submitted for housing development via the call for sites has been included on the SHELAA assessment table. This exercise used the above assumptions to provide a consistent starting point for the potential dwelling capacity of each site.

**5.6** For employment sites, net site area capacities will vary between uses, for example, a single serviced plot on an existing industrial estate may have a greater developable area than a large greenfield site, where landscaping, drainage and service roads will be required. As a starting point the assumption is that 45% of a gross site area can provide developable floorspace. This assumption was used in the Council's Local Plan Viability Study and similar figures used in SHELAA elsewhere<sup>(17)</sup> and Fareham Borough Council Strategic Housing and Employment Land Availability Assessment 2019. The Council will consider any site specific information. Floorspace areas will also vary, for example office buildings could be multi-storey whereas industrial or warehouse uses are likely to be single storey buildings. Where proposed floorspace areas have been specified in the site submissions, this will be noted for information purposes.

**5.7** It is acknowledged that the site area and density assumptions provide a starting point for estimating site capacity. Several site specific factors may affect the capacity, for example areas of flood risk or tree preservation orders and the presence of heritage designations. The Council will consider any information submitted through the call for sites process, further evidence base studies, any relevant existing schemes or permissions, and both the site specific and surrounding land use constraints, all of which could influence the final site capacity which will be determined via the Local Plan site assessment process.

## **Site assessments**

**5.8** The Council will assess the suitability, availability and achievability of sites, including whether the site is economically viable<sup>(18)</sup>. This will help with making a judgement on whether housing sites can be considered deliverable within the next five years, developable over a longer period or neither.

15 Telford & Wrekin Strategic Housing Land Availability Assessment – September 2016

16 Telford & Wrekin Local Plan - Viability Study – January 2016

17 Shropshire Council – Strategic Land Availability Assessment (2018), Ashfield District Council Strategic Housing and Employment Land Availability Assessment Methodology 2019

18 Planning Practice Guidance, paragraph: 017 Reference ID: 3-017-20190722. Revision date: 22 07 2019

# Strategic Housing & Economic Land Availability Assessment

## Assessing site suitability

**5.9** A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated<sup>(19)</sup>.

**5.10** The following information will be collected along with the initial site survey information from Stage 1 of this process:

- Relevant national policy;
- Appropriateness and likely market attractiveness for the type of development proposed;
- Potential impacts including the effect upon landscapes having considered landscape features, nature and heritage conservation. Factors include nationally designated sites and assets, and important trees and woodland. Sites will be assessed against the physical constraints in paragraph 4.4.3 and the following environmental designations:
  - Sites of Special Scientific Interest
  - Local Nature Reserves
  - Local Wildlife Sites
  - Local Geological Sites
  - Ancient Woodland
  - Tree Preservation Orders
  - Flood zones
  - World Heritage Site
  - Listed Buildings
  - Conservation Areas
  - Scheduled Ancient Monuments
  - Historic Parks and Gardens
  - Area of Outstanding Natural Beauty

**5.11** PPG advises that the status of the Local Plan and Neighbourhood Plans will need to be taken into account, in terms of how up to date their policies are. No judgements are made as to any future policy changes; this would be undertaken through the Local Plan Review.

**5.12** Sites will be assessed on the basis of whether they are **suitable, not currently suitable** or **unsuitable**:

**5.13** The presence of a suitability constraint does not necessarily mean a site is unsuitable. The assessment requires planning judgement to decide if the constraint is significant enough to make the site unsuitable, or whether the constraint(s) could be factored into any future site design and layout.

**5.14** It is acknowledged that this assessment of site suitability is a starting point in the Local Plan evidence base and further constraints may be identified if a site is assessed for allocation in the Local Plan Review.

# Strategic Housing & Economic Land Availability Assessment

## Assessing site availability

**5.15** PPG states that a site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development.

**5.16** The call for sites process requires confirmation that a site has been submitted with the support of the landowner and/or developer. Sites have therefore been considered available based on the following factors:

- They have been actively promoted through the call for sites or site identification processes;
- There has been a recent planning permission, or application which demonstrates site availability (the applicant has provided evidence of interest in the land). Sites meeting the definition of deliverable (see paragraph 5.2.2) should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, subject to further evidence being presented<sup>(20)</sup>;
- Evidence demonstrates there is a landowner or developer willing to bring forward the site;
- Any legal or ownership constraints can be overcome either in the first five years (for 'deliverable' sites) or in years 6-10 and/or years 11-15 (for 'developable sites'), for example issues with multiple ownerships, ransom strips, tenancies or operational requirements. Evidence will be required through the call for sites process;
- Larger sites or broad locations with multiple ownership will need to demonstrate there is an agreement in principle from relevant land owners to deliver the scale of development proposed within certain timescales and for the area to be assessed as a single site;
- The delivery record of developers or landowners putting forward sites can also be considered in the assessment of site availability, and whether the planning background of a site shows a history of unimplemented permissions.

**5.17** Each site will be assessed based on the above factors including any information provided by developers and landowners. Sites will be categorised as **available**, **not currently available** or **unavailable** in the study.

## Assessing site achievability

**5.18** PPG states that sites are:

**5.19** "...considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period."

**5.20** Information on existing site viability and any known likely abnormal construction and development costs will be considered. Relevant factors include:

- The planning status of a site – allocations and/or planning history;
- Legal constraints preventing site delivery;
- Site location – whether the location or adjacent uses have impacted on the site's marketability;

# Strategic Housing & Economic Land Availability Assessment

- Access and highways issues affecting site delivery, for example the need for a new access or third party land required; and
- Site delivery – abnormal or exceptional costs, where these are known; if no information is provided an assumption will be made with the best available information.

**5.21** The Local Plan Viability Study<sup>(21)</sup> provides a high level assessment of viability for a selection of residential and employment developments that represent site typologies required to deliver the Local Plan including allocations and windfall sites. It follows a standard methodology and is based on a broad set of assumptions which take account of the cumulative impact of policies to provide a high level assurance that development is viable, rather than concluding on the viability of every individual development likely to come forward over the plan period. The study found a surplus after costs is shown for all development site types with the exception of one brownfield redevelopment site in Telford.

**5.22** The findings of the Local Plan Viability Study together with information submitted through the call for sites will inform the assessment of achievability. Sites will be categorised according to the typologies in the Viability Study and the assumptions around viability will be applied to sites.

## **Timescales and rates of development**

**5.23** PPG advises that where constraints have been identified, the assessment of site suitability, availability and achievability will need to consider what action could be taken to overcome them. This information can also inform the timescales within which a site is capable of development, including indicative lead-in times and build-out rates for the development of different scales of sites<sup>(22)</sup>.

**5.24** The Council assesses timescales and rates of development through its annual Housing Land Supply Statement<sup>(23)</sup>. Estimate lead-in times for site commencements are based on an analysis of bringing forward sites under construction and information from applicants and agents where possible. Larger, strategic sites typically have longer lead-in times due to the requirements for site preparation including infrastructure provision.

**5.25** Allowances are provided in the housing land supply statement for determining applications, including signing legal agreements (six months in most cases), considering outline applications (six months from validation to committee), determination (four months), discharging pre-commencement conditions (six months for larger sites, three months for smaller sites) and for selling sites (six months) where relevant.

**5.26** Assumptions for lead-in times to first dwelling completions vary between 3 and 12 months depending on the likely preparation work required. Build rates are applied for each site based on an assessment of recent delivery records in Telford & Wrekin. On larger sites allowances are made for several developers to be involved. The assumptions in the housing land supply statements will be used to inform timescales alongside evidence submitted through the Call for Sites.

21 Telford & Wrekin Local Plan - Local Plan Viability Study (2016)

22 Planning Practice Guidance, paragraph: 022. Reference ID: 3-022-20190722

23 Telford & Wrekin Housing Land Supply Statement. Available from:

[https://www.telford.gov.uk/info/20457/housing/123/five\\_year\\_housing\\_land\\_supply\\_statement](https://www.telford.gov.uk/info/20457/housing/123/five_year_housing_land_supply_statement)

# Strategic Housing & Economic Land Availability Assessment

**5.27** Build rates are applied for sites in the Housing Land Supply Statement based on information from developers/agents and an assessment of recent delivery records. A national volume house builder is assumed to deliver up to 50 new build completions per year, whilst regional and local builders are likely to deliver approximately 25 and 10 dwellings per year respectively. Where some sites are judged to have capacity to deliver more than 50 dwellings per year, for example at Lawley, this is normally due to there being multiple outlets on these sites, or where a builder (for example a Registered Provider) is building homes that are pre-sold to meet specific needs rather than open market dwellings.

## **Site conclusions**

**5.28** The conclusions on the development potential and suitability, availability and achievability for each site informs its categorisation. The NPPF requires policies to identify a supply of specific, deliverable sites for years one to five and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan<sup>(24)</sup>.

## **6 Stage 3 - Windfall assessment**

### **Windfall allowance**

**6.1** Windfall sites are not specifically identified in the development plan. The NPPF states where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the SHELAA, historic windfall delivery rates and expected future trends.

**6.2** To ensure consistency with the SHELAA thresholds and assessment process, the Council has reviewed past completions for all small sites below five dwellings. Table 4 lists small sites completions since the beginning of the current Local Plan period in 2011.

**Table 4: Small site completions 2011-18**

<b>Year</b>	<b>Completions on small sites (below five dwellings)</b>
2011	68
2012	72
2013	38
2014	57
2015	76
2016	66
2017	63
2018	67
2019	81



# Strategic Housing & Economic Land Availability Assessment

Year	Completions on small sites (below five dwellings)
2020	61
2021	134
2022	88
<b>Average 2011-2018</b>	<b>72</b>

**6.3** This analysis shows that on average 72 dwellings have come forward each year on small sites (below five dwellings) since 2011. Assuming 2021 figures are an outlier the average for all other years would be 67 dwellings per annum. For the purposes of the Local Plan review a windfall figure of 60 dwellings per annum is considered appropriate.

**6.4** Past analysis has shown several large-scale windfall sites coming forward; however, they are less reliable as a source of housing to factor in the supply. With the potential for sites being identified in the SHELAA and sites coming forward through allocations in the Local Plan Review, the rate of windfall delivery on larger sites may reduce; however, smaller windfall sites are more likely to continue coming forward and should be included in the assessment.

## 7 Stage 4 - Assessment review

### Assessment review

**7.1** The SHELAA will categorise sites into ‘**deliverable**’, ‘**developable**’ and ‘**not currently developable**’, with an individual profile for each site prepared based on the findings.

**7.2** The NPPF states<sup>(25)</sup> that to be considered deliverable, sites for housing should:

**7.3** “...be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

**7.4** Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

**7.5** Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

**7.6** To be considered developable, NPPF states that:

**7.7** “...sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

# Strategic Housing & Economic Land Availability Assessment

**7.8** An overall risk assessment will be made as to whether sites will come forward as anticipated. Once all sites and broad locations have been assessed and windfall allowance applied, the development potential of all sites are collected to produce an indicative trajectory. The trajectory sets out how much housing and economic development can be provided, and at what point in the future (i.e. within the category years 1 to 5 'deliverable', or years 6 to 10, or 11 and beyond for 'developable' sites).

**7.9** The Council's Housing Land Supply Statement and Annual Monitoring Report set out in full the deliverable housing supply set against the Local Plan requirement. There are currently sufficient sites with planning permission to meet the housing requirement for the next five years; however, this will be kept under review as work on the Local Plan Review progresses.

**7.10** If it becomes apparent that there are insufficient sites/broad locations to meet future needs, the Council will revisit the SHELAA and consider carrying out a further call for sites, or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land.

**7.11** The assessment of deliverability does not take account of future policy changes that could mean sites that are currently considered not currently developable can become developable in the context of a new Local Plan.

## 8 Stage 5 - Final evidence base

### Outputs

**8.1** The following set of outputs are expected to be produced for the SHELAA:

- A list of all sites or broad locations considered, cross-referenced to their locations on maps;
- An assessment of each site or broad location, including:
- Where these have been discounted, evidence justifying reasons given;
- Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when; and
- An indicative trajectory of anticipated development based on the evidence available.

**8.2** The assessment will be published on the Council's website and inform future plan making and decision taking including the Housing Land Supply Statement.

**8.3** The SHELAA will be finalised and published alongside the Draft Local Plan consultation. It will be kept under review and updates will be carried out to ensure it remains an effective and up to date document.

### **Summary of delivery**

**8.4** 8.2.1. Table 5 'SHELAA figures' shows the total number estimated dwellings on based on the call for sites submissions that are considered deliverable through the SHELAA process. These estimated figures have been identified on the basis of the criteria outlined in this report. The results indicate:

# Strategic Housing & Economic Land Availability Assessment

- Based on the policies in the Telford & Wrekin Local Plan 2011-2031, there is a limited amount of estimated dwellings that are considered deliverable, arising from the call for sites process / SHELAA process.
- It can be assumed that some of those dwellings may have secured planning permission since the call for sites process was undertaken in 2020 and 2022.
- The deliverable dwellings are contained within the Telford and Newport urban areas only.
- Some sites are considered deliverable (in the SHELAA process) however when considered as a whole there may be policy and technical constraints that will require mitigation to enable a site to come forward – these will be considered further in the Local Plan site assessment process.
- It can be assumed that if further deliverable supply is required as part of the Local Plan review this may need to be drawn from sites that, under current Local Plan policies (and boundaries) would not be considered deliverable.
- There is approximately 40ha of deliverable employment land based on the SHELAA findings.

**8.5** Existing supply including sites with permission, under construction and allocated within the current Local Plan are captured through the annual monitoring process.

**Table 5: SHELAA figures**

	Deliverable		Total	
	Estimated dwellings	Amount of land (ha)	Potential dwellings	Amount of land (ha)
Borough	4,282	237	35,004	2,197
Telford	3,517	204	3,625	208
Newport	765	33	765	33
Rural (includes sites adjacent to built-up areas)	0	0	30,614	1,956