

Telford & Wrekin Council
Local Plan 2021 - 2041

**Note on Implications of the Amended
Plan Period**

November 2025

Introduction

- 1.1 As part of the modifications to the emerging Telford & Wrekin Local Plan, the Council proposes to amend the plan period from 2020-2040 to 2021-2041. This ensures that the Plan covers a period of at least 15 years from the anticipated date of adoption, in accordance with the National Planning Policy Framework (NPPF, December 2024). Paragraph 22 of the NPPF states that:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

- 1.2 The Council delayed submission of the Local Plan to align with the most recent revision to the NPPF (2024), ensuring that the evidence base and policy framework reflect the latest national planning policy requirements.
- 1.3 To account for this change, the Council has considered which planning areas are most affected by the amendment to the plan period. It was recognised that the greatest impact was upon the application of housing and employment evidence for the purposes of the NPPF2024 (particularly paragraph 22) to inform strategic policies covering 15 years from adoption while continuing to reflect the context for this evidence. Accordingly, a suite of topic papers has been prepared, including the Employment Land Delivery Topic Paper, the Housing Delivery Topic Paper, and the Affordable Housing Topic Paper.
- 1.4 This note summarises the implications of the amended plan period for the Local Plan’s housing and employment land requirements, comparing need and provision under the two plan periods, 2020-2040 and 2021-2041. While the change marginally adjusts the total and annualised need figures and related elements such as supply buffers, the underlying methodologies and assumptions remain consistent. The adjustment does not materially affect the overall development strategy or the balance between housing and employment growth across the borough.

Housing Requirement and Supply Implications

- 1.5 The proposed amendment to the plan period from 2020-2040 to 2021-2041 does not alter the methodology used to assess housing need or supply. The Council continues to apply the Standard Method in accordance with the NPPF and the Planning Practice Guidance. The Standard Method remains the Government’s prescribed approach for assessing local housing need, for present purposes using housing stock and affordability data to provide a consistent national basis for plan-making.
- 1.6 Applying the latest Standard Method calculation gives an updated Local Housing Need (LHN) of 881 dwellings per annum, equating to 17,620 dwellings across the 20-year plan period. This calculation is based on the most recent housing stock data (published in June 2025) and the latest median workplace-based affordability ratio (updated in March 2025).
- 1.7 In accordance with paragraph 62 of the NPPF, the Council remains committed to assisting in meeting the unmet housing needs of the Black Country Authorities within the wider housing market area. The basis for this contribution is expanded upon in response to Initial Questions 3(a) – (c).
- 1.8 This contribution was introduced at the Regulation 19 stage (Policy S4) having first being discussed in section 10 of the Housing Requirement Technical Paper (2023) at the Regulation 18 stage of planning making This follows engagement under the Duty to Co-

operate and subsequent correspondence with all four Black Country Authorities, each of which confirmed in writing that they welcome and accept the contribution. The contribution remains unchanged under the revised plan period, and the additional monitoring year does not affect its scale or deliverability. The total housing requirement for 2021-2041 therefore remains 1,034 dwellings per annum (20,680 dwellings in total), combining the local housing need of 881 dpa with the 153 dpa unmet needs contribution.

- 1.9 The total identified housing supply for the 2021-2041 period is 21,918 dwellings, made up of:

Table 1: Updated Housing Supply

Component	Dwellings
Completions to 2023/24	4,470
Allocations	9,859
Major commitments	5,429
Minor commitments	517
Windfall allowance	1,680
Lapse allowance	-37
Total identified supply	21,918

- 1.10 This provides a surplus of 706 dwellings above the plan requirement, ensuring an adequate buffer in line with paragraph 77 of the NPPF, which requires local plans to demonstrate and maintain a deliverable five-year housing supply.
- 1.11 The inclusion of a windfall allowance remains consistent with paragraph 71 of the NPPF, which permits such an allowance where there is compelling evidence that sites will continue to come forward. Analysis of completions over the last ten years demonstrates a sustained average of around 120 units per year from small sites. The allowance is restricted to years 6-20 of the trajectory and excludes double-counting with existing permissions or allocations.
- 1.12 The adjustment to the plan period represents a technical re-base rather than a change in methodology. The Council's approach to identifying an appropriate housing requirement, applying the starting point provided by the revised standard method but taking into account demographic trends and market signals together with requests to contribute towards unmet needs, is consistent with the PPG at ID: 68-031-20190722 which sets out that the requirement in emerging strategic policies may reflect that a plan is being prepared part-way through its proposed plan period. This Council's view is that this requires performance since the base-date, including any evidence of oversupply or undersupply, to be taking into account and enables the positively prepared housing requirement to be rolled-forward to 2041.
- 1.13 The 2020/21 completions previously included in the 2020-2040 assessment now fall outside the revised plan period, while an additional year of projected completions for 2040/41 is included. This realignment ensures that monitoring corresponds with the revised plan base year, but it does not materially alter the overall level of need, supply, or trajectory. Completion and permission data for 2024/25 will be available ahead of hearings to maintain an up-to-date evidence base.
- 1.14 The Affordable Housing Topic Paper confirms that the total housing requirement incorporates an estimated affordable need of approximately 370 dwellings per annum, equating to roughly 36% of LHN. The Plan's policy requirement for 25% affordable housing in the Telford built up area and 35% in Newport and the rural area on qualifying sites remains appropriate and viable. In 2020/21, 223 affordable homes were delivered, representing around 27.3% of the 817 total completions recorded that year. Extending the plan period by one year replaces this historic year of fixed delivery with 2040/41, a future year in which new qualifying development may generate further affordable housing contributions. Accordingly, the

adjustment is marginally positive in delivery terms, while the overall evidence base and assumptions remain unchanged.

Employment Land Supply implications

- 1.15 The amendment of the plan period from 2020-2040 to 2021-2041 does not alter the methodology for assessing employment land need or supply. The Part One EHDNA (2020) remains the principal source of evidence on the need for employment land and floorspace, and the Employment Land Delivery Topic Paper confirms that the 2020 baseline forecasts were retained and rolled forward to 2041 to reflect the revised plan period and provide an up-to-date position for the purposes of supply. This approach ensures consistency with the NPPF (December 2024), which requires plans to look ahead for at least 15 years (paragraph 22), and with paragraph 81, which seeks a flexible supply of employment land to meet changing business needs.
- 1.16 For the original plan period (2020-2040), the EHDNA identified an employment land need of 166.7 ha based on the baseline growth forecast. To account for the revised period (2021-2041), the same baseline forecast was retained and rolled forward by one year, resulting in an updated total need of 169 ha. This uplift does not simply represent the addition of one year's annualised average (i.e. $166.7 \div 20$), as the baseline forecast applies compound employment growth assumptions derived from sectoral GVA and jobs projections rather than a fixed linear rate. Rolling the model forward by one year therefore re-applies the growth trajectory to 2041, which marginally increases the cumulative requirement beyond a simple pro-rata adjustment.
- 1.17 The residual requirement for the plan period 2021-2041 has been recalculated by removing completions for 2020/21, which fall outside the revised period. This results in a proportionate adjustment but does not change the underlying forecast or economic assumptions used in the assessment.
- 1.18 The Topic Paper explains that an updated forecast was unnecessary, as the existing evidence already reflects a realistic assessment of local economic prospects and employment density assumptions, and the one-year roll-forward has no material bearing on model outcomes. Although the baseline evidence dates from 2020, the methodology remains robust and continues to compare favourably with more recent monitoring of employment land take-up. The approach is positively prepared and broadly consistent with labour supply assumptions generated by the revised Standard Method and the proposed housing requirement, demonstrating that the evidence continues to provide an appropriate and up-to-date basis for plan-making.

Table 2: Updated Employment Land Requirement

Calculation of Need for Land and Floorspace by Plan Period	2020-2040	2021-41
Years over which Annualised Need Applied	20	21
Total Need	166.7ha	169ha
Completions 2020/21	N/A	-0.05ha
Residual Need Less Completions	N/A	169.05ha
Annualised Need for Land and Floorspace	8.335ha	8.05ha

- 1.19 The Employment Land Delivery Topic Paper also updates the employment land supply

position using the most recently available 2022 monitoring data. The Plan previously referred to an employment land supply of approximately 219 ha (Local Plan paragraph 4.34), based on an earlier monitoring year which included both existing and new allocations. The updated supply identified in the Topic Paper totals 172.5 ha, made up of the components outlined in Table 3 below.

Table 3: Updated Employment Land Supply

Component	Area (hectares)
Existing allocations	36.8
Emerging allocations	47.0
Sustainable Communities (employment components)	75.6
Existing permissions	13.2
Total identified supply	172.5

- 1.20 The difference between the 219 ha previously reported and the 172.5 ha now identified arises from the change in monitoring base year and updated classification of sites. Between 2020 and 2022, a number of sites were completed and have therefore been removed from the remaining supply.
- 1.21 Whilst completed monitoring data for the years 2022/23 to 2024/25 is still in the process of being collated, the Council is aware that around 10 ha employment floorspace has been delivered on existing allocations (sites E2, E4 and E6) during the monitoring periods 2022/23 to 2024/25. These are still included in the 36.8 ha figure for 'existing allocations' shown in the table above but will be removed from the supply-side figures once total completions data for these years has been confirmed.
- 1.22 Other commenced sites also remain within the updated figures where they continue to represent live permissions forming part of the 13.2 ha of employment land with planning permission. In addition, some long-standing allocations within the Strategic Employment Areas have been consolidated to avoid double counting with new allocations. There have been no methodological changes in the way supply is calculated.
- 1.23 The 13.2 ha of employment land with planning permission forms part of the overall supply and represents live permissions located across several sites in the borough, primarily within existing Strategic Employment Areas. The Council confirms that these permissions do not overlap with the proposed allocations or with the employment land included within the Sustainable Communities.
- 1.24 The revision of the plan period effectively represents a re-basing of the evidence rather than a re-assessment of need. Completions recorded in 2020/21 are no longer counted within the updated plan period, while an additional year of forecast need for land and floorspace (2040/41) is incorporated. The net effect is neutral in scale, ensuring that the employment evidence aligns with the same 2021-2041 monitoring framework used for housing.