

## Telford and Wrekin Council – Responses to Matters, Issues and Questions

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#### Matter 3, Issue 2

##### **Issue 2: The five-year supply and overall housing supply position**

Q28. Will there be a five-year supply of specific, deliverable sites from the intended date of adoption of the Local Plan?

Yes. As set out in the Updated Housing Delivery Topic Paper (January 2026) (TW11), assuming adoption of the Local Plan in 2026, the Council anticipates that it will be able to demonstrate a five-year supply of deliverable housing sites as at 1 April 2026.

The Updated Housing Delivery Topic Paper indicates that the Council's five-year housing land supply at adoption is expected to be 6.2 years, having regard to national guidance at PPG Reference ID: 68-032-20190722, which confirms that: *“Where areas deliver more completions than required, the additional supply can be used to offset any shortfalls against requirements from previous years.”*

Between 2021/22 and 2025/26, the Council anticipates 7,057 completions, which reduces the five-year housing requirement from 1 April 2026 to 4,768 dwellings (including the 5% buffer and the 153 dpa contribution to the Black Country unmet need). This is against a deliverable supply of 5,912 dwellings, equating to approximately 6.2 years' supply.

For completeness, the Council has also tested the position using the full requirement (including 881 dpa local housing need, 153 dpa unmet need contribution, and the 5% buffer), which produces a five-year requirement of 5,429 dwellings. Against the same supply of 5,912 dwellings, the Council would still demonstrate in excess of five years supply at adoption (approximately 5.4 years).

Q29. Does the plan make provision for a supply of specific, developable or broad locations for growth for the subsequent years 6-10 and where possible years 11-15 of the remaining plan period?

Yes. In accordance with NPPF paragraph 72(b), the Council has considered supply for years 6-10 and, where possible, years 11-15 of the remaining Plan period. The Council's housing trajectory and supply evidence are set out in the Updated Housing Delivery Topic Paper (January 2026) (TW11).

From the intended adoption date (assumed 2026):

- Years 6-10 (2031/32 to 2035/36) provide for 4,936 dwellings.

- Years 11-15 (2036/37 to 2040/41) provide for a supply of 3,205 dwellings principally through allocations and the windfall allowance (as evidenced in TW11)

Supply component	5 years (2026/27–2030/31)	Years 6-10 (2031/32-2035/36)	Years 11-15 (2036/37-2040/41)	Beyond plan period
Housing allocations	2,924	4,308	2,605	1,595
Major site commitments	2,428	28	0	0
Minor site commitments	219	0	0	0
Windfall allowance	360	600	600	0
Lapse allowance	-19	0	0	0
<b>Total</b>	<b>5,912</b>	<b>4,936</b>	<b>3,205</b>	<b>1,595</b>

Accordingly, the Plan makes provision for supply in years 6-10 and years 11-15 through a combination of specific developable allocations and an evidenced windfall allowance, consistent with national policy.

Q30. Are the allowances for windfalls and lapses soundly based? Are they justified?

Yes. The Council's approach to both windfall and lapse allowances is soundly based and justified. The methodology and supporting evidence are set out in the Updated Housing Delivery Topic Paper (January 2026) (TW11).

In respect of windfalls, the Council's approach accords with NPPF paragraph 75, which requires “*compelling evidence*” that windfalls will provide a reliable source of supply. Following consultation and review of the evidence, the Council has revised the windfall allowance to 120 dwellings per annum, applied from 2028/29 to 2040/41 (equating to 1,560 dwellings).

For consistency with development management practice and monitoring conventions, the Council defines minor sites as those delivering fewer than 10 dwellings, aligning with the DMPO 2015 definition of major development (10 or more dwellings). The windfall allowance is therefore derived from the demonstrated delivery of minor windfalls. Historic monitoring shows that minor windfalls have

provided a consistent supply of housing over time, averaging 126 dwellings per annum (2013/14 to 2023/24). The allowance of 120 dwellings per annum is therefore considered conservative and realistic, and avoids reliance on sporadic major windfall sites, which can materially skew averages in particular years (including years prior to adoption of the current Local Plan).

In respect of lapses, the Council applies a 10% lapse allowance to small sites (fewer than 10 dwellings) with planning permission which have not yet commenced. This allowance is narrowly and proportionately applied, i.e. it is not applied to sites under construction, nor to major sites where deliverability is addressed through lead-in times and build-out assumptions. This reflects where non-implementation risk is most likely to arise.

A 10% lapse allowance is consistent with recent practice and sits within the range of approaches adopted by comparable authorities, as noted in section 4 of the Updated Housing Delivery Topic Paper (January 2026) (TW11).

Locally, the Council's strong delivery performance supports the use of a proportionate lapse allowance. The AMR records 1,265 net completions in 2023/24, and the Housing Delivery Test results have consistently exceeded 200% in recent years (including 327% in 2023). The lapse allowance will be kept under review through the AMR, and adjusted if local monitoring indicates a materially different non-implementation rate for minor permissions not yet started.

Accordingly, both the windfall and lapse allowances are justified, evidence-led, and proportionate.

Q31. Are the Sustainable Communities fundamental to the housing delivery strategy such that they should be referred to in Policy Strategic S4?

The Sustainable Communities sites represent around 30% of the housing supply over the plan period as set out in the updated Housing Delivery Topic Paper (TW11). Individually they represent circa 10% of the supply. The Council recognise that the reference to the Sustainable Communities sites within Policy Strategic S4 would help strengthen the link between the strategic policy and Policy HO2.

Q32. What does criterion 4 of Policy Strategic S4 mean? Is it unambiguous in what it is requiring? Is the trigger level clear? Having regard to the policy and para 4.41 of the supporting text, are the actions which the Council would then take clear and achievable?

Criterion 4 of Policy Strategic S4 sets out the Council's monitoring and contingency mechanism for housing delivery. It confirms that where monitoring indicates housing delivery is likely to fall below the level required to maintain an adequate supply of deliverable sites, the Council will proactively seek to increase delivery through the planning process.

The criterion is clear in its intent and effect, and should be read alongside criterion 3, which commits the Council to managing and monitoring housing delivery annually

against the housing trajectory. Criterion 4 then requires the Council to take proactive action where under-delivery places the maintenance of an adequate supply of deliverable sites at risk.

The policy trigger is linked to the maintenance of an adequate supply of deliverable sites (i.e. the ability to demonstrate and maintain a five-year supply of deliverable housing land). In practical terms, the Council will use annual monitoring to identify when delivery materially diverges from the trajectory to the extent that it may undermine the maintenance of an adequate deliverable supply.

To provide clarity and ensure consistent implementation, the Council intends to apply a quantitative monitoring trigger whereby intervention will be initiated where delivery is forecast to be materially below the housing trajectory.

For the purposes of implementing criterion 4, the council will treat "*likely to fall below*" as a material shortfall of approx. 20% below the required delivery rate / trajectory, consistent with the housing delivery test measurement framework.

This provides a clear and proportionate threshold which distinguishes minor fluctuations from a sustained or material risk to maintaining an adequate deliverable supply.

Paragraph 4.41 confirms the Council will take a proactive approach to ensuring delivery, including:

- maximising brownfield land opportunities; and
- regularly monitoring consents which have not started, and preparing an action plan to assist delivery of stalled and not started sites.

These measures are within the Council's control through development management, monitoring (AMR), and engagement with landowners/developers, and are intended to support delivery and reduce the risk of speculative development.

Accordingly, criterion 4 is clear in intent and implementation. The Council's monitoring framework, together with the proposed trigger approach above, ensures the trigger is clear and the intervention measures are realistic and deliverable.

Q33. What does criterion 5c of Policy Strategic S4 mean when it refers to a 'brownfield first' approach to windfalls? Is this justified? Is it clear as to how it would be applied?

Section 11 of the NPPF seeks to make best use of previously developed land. The Council has reflected this national approach in policy by seeking a 'brownfield first approach', however it is recognised that this is a preferential approach and there may, in some instances, be other suitable windfall sites that could be acceptable in planning terms. Therefore, the Council have suggested a modification in document CD08 to 'windfall development on suitable brownfield sites'. To help clarify how this criterion could be clearly applied further text to state that it is 'preferable' for windfall on brownfield sites could be included as part of the modification.

