
Representor ID: E120 – Wain Estates**Telford and Wrekin Local Plan Examination – Matters, Issues and Questions****Matter 3 – Strategic Policies (Housing)*****Issue 1: The Housing Requirement***

Q26: Is the housing requirement figure of 1,010 dwellings per annum/20,200 over the plan period as set out in Policy Strategic S4 soundly based, and does it accord with the evidence and national planning policy and guidance?

1. In the first instance our Client notes the provisions of document TW01a, which is an annex to the Council's response to the Inspector's initial questions and provides a note on the implications of the proposed plan period change, which would see the plan period amended to 2021-2041, as opposed to 2020-2040 as it is currently prepared. The Note explains that applying the latest Standard method calculation gives an updated Local Housing Need (LHN) of 881 dwellings per annum, equating to a total of 17,620 new dwellings over the revised Plan period. When combining this revised figure with the unmet needs contribution (153 dwellings per annum) the revised total housing requirement is 1,034 dwellings per annum, equating to 20,680 new dwellings over the Plan period.
2. TW01a also provides a revised table (Table 1) which sets out the components of the Council's housing land supply, noting a total supply of 21,918. Of this however, only 9,859 dwellings (45%) are provided by new allocations, with a further 10,416 dwellings (or approximately 48%) coming through completions and existing commitments.
3. There is a clear need to make adjustments to Policy S4 (and the wider Plan) to reflect the amended Plan period and the requirement figures therein. Our Client agrees with the Council's commentary within TW01a where it states that this represents a technical re-base, rather than a change in methodology.
4. As reported within previous Representations, our Client has historically been supportive of the Council's approach, in that it has sustained a level of housing growth far in excess of its LHN figure. It remains the case that the Council is seeking to deliver in excess of its LHN figure, however, the extent of the excess has been substantially reduced when measured against the level of delivery over previous years (which too has exceeded the LHN figure for those years). Moreover, when factoring-in the unmet need contribution for neighbouring authorities, this gap is narrowed further, to the extent where the Council now accounts for its minimum requirement (plus the unmet need contribution).
5. There is no objection from our Client to this approach per-say, however, mindful of the pro-growth agenda that the Council has set itself within its Vision (as set out in response to Matter 2), as well as previous delivery trends, which indicate that the Council has averaged approximately 1,322 dwellings per annum over previous years, indicates that the Borough could sustain a far greater level of growth than is currently accounted for, in the context of a national housing crisis, our Client would suggest that the Council should maximise its delivery. As such, our Client remains

of the view that the Plan could, and should include an increased housing requirement which reflects this greater level of delivery.

6. Noting our Client's previous comments in respect of the delivery of new Homes in Newport, they consider that the town is well-placed to provide for additional dwellings. Doing so would align with the pro-growth agenda and Vision for the Plan whilst also sustaining the vitality of Newport as a settlement is sustained by ensuring an elevated, but manageable level of growth and population increase for the town. Our Client remains of the view that their land interest at Chetwynd Road, Newport is a suitable candidate and, having regard to the comments made in response to Matter 2, remains suitable for allocation noting its sustainable location, and being demonstrably deliverable (noting the steps which can be taken to address any perceived constraints).
7. Notwithstanding the above, in the event that the housing requirement were to remain as per the revisions set out in TW01a, our Client remains of the view that the Plan should still seek to identify a pool of "reserve" sites across the borough, that would not specifically be identified for development in the Plan period but could be brought forward early should housing delivery start to slip to an unsustainable level. As per the above, our Client considers that the land interest at Chetwynd Road would be well served as a reserve site should it not be allocated for development within this Plan.

Q27: Is the inclusion of 153 dwellings per annum as a contribution to the unmet needs of the Black Country Authorities justified and supported by evidence?

8. Our Client has no objection, and indeed is supportive of the Plan's intentions to deliver some of the unmet need of the Black Country Authorities. They would however re-iterate their commentary above around the overall housing requirement and the case for increasing the requirement having regard to past delivery trends and the pro-growth agenda.

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?

9. Our Client has not sought to challenge the Council's immediate land supply. However, as we set out later in this Statement, we do consider that the parts of the Council's housing trajectory are dominated by larger and difficult to deliver sites which can often be subject to delay. We support the Policy S4 Part 5 that seeks to support delivery of homes but consider the Council's policy should be supported by a mechanism to bring forward further sites which can come forward in the event that allocations do not come forward as envisaged and that there is slippage in delivery. This should include a pool of additional sites which would support immediate delivery and bolstering of the Council's 5 year supply of housing land.

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?

10. As above, our Client has not sought to challenge specific sites within the identified supply. Notwithstanding that however, and as set out in response to Q26 above, approximately 48% of the Council's claimed supply is coming from either existing completions or minor and major commitments. It is anticipated that much of this will form the supply for the first 5 years of the Plan period
11. The updated Housing Trajectory provided at Figure 6 of the Housing Delivery Topic Paper (TP01) (September 2025) is noted. This should be inserted into the draft Plan as part of any future updates, noting that it is reflective of the revised Plan period. The trajectory indicates that the Plan will meet well in excess of the housing requirement in the early years. Four of the first five years are based on actual completion, with the fifth and sixth years 2024-2025 and 2025-2026 being based solely on existing commitments. From 2026-2027 onwards, there is a growing reliance on new allocations coming forward.
12. For the first 12 years of the Plan period the trajectory indicates that delivery will exceed the requirement, by circa 300 dwellings. Based on past delivery rates, as referred to in the responses above, this would appear to be realistic though as the years progress up to 2033, the margin for slippage decreases significantly. Between 2033 and 2041, the trajectory indicates that delivery will be far below the annual requirement. There is an increasing reliance on windfall sites but, at its lowest, delivery from allocations drops to approximately 50% of the requirement.
13. As an average across the Plan period this may level out somewhat, but this is of course predicated on allocations coming forward as envisaged, as well as all exiting commitments being honoured. This raises a number of issues. Firstly, whilst the Council's intention is to meet its overall housing requirement through the plan period (indeed, in part by front loading development) it will lead to a scenario where the Council will deliver far below its yearly housing requirement for the last 8 years of the Plan and, consequently, far below the level of housing growth it has demonstrated it can achieve. We don't consider that this meets the Council's own pro-growth ambitions and we would support the introduction of a commensurate level of growth through the latter years of the plan.
14. Notwithstanding where we consider the Council's ambitions should be, the Council's current trajectory is precarious in the latter parts of the plan period. Whilst allocations make up less than half of the envisaged supply for the plan period, they are the primary source of delivery from 2028 onwards, it is clear that they will all need to come forward as planned in order for the council to meet its requirement, as an average. Moreover, a number of the proposed allocations have known constraints, with Telford also being heavily reliant on the development of sustainable communities (which themselves will be challenging, and will take long periods of time to deliver). Both of which may cause delays in delivery not currently reflected within the Plan. This provides further justification, in our Client's view, for both the identification of additional sites for development within this Plan period, but also sites to be reserved to provide a back-up plan in the event that any of these sites do not come forward as the Council envisages. Noting the lack

of net new homes proposed for Newport, there is a real possibility of Newport being starved of development, particularly during the latter years of the Plan. It is essential therefore that additional sites are identified in order to sustain Newport throughout the Plan period.

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

15. Our Client has no comments to make in response to this question, noting that it is something that the Council are best placed to answer.

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

16. Yes. The sustainable communities are fundamental to the housing delivery strategy and should therefore be referred to within Policy Strategic S4.
17. There are three proposed allocations that make up the sustainable communities and in combination these three communities provide for a total of 7,900 dwellings, of which 6,595 are to be delivered within the Plan period. This equates to approximately 67% of the total identified supply to be delivered through new allocation and approximately 30% of the overall supply as a whole. The Plan, and delivery strategy within therefore places a significant level of reliance on the delivery of these three communities, as well as being reliant on them beyond the Plan period to some degree.
18. Whilst it is noted that the sustainable communities benefit from their own dedicated policy within the Plan (HO2), and that including them, to some degree, within Policy S4 may create repetition, the significance of their role is such that they should be included within the strategic policies of the Plan. Failure to deliver the sustainable communities would go to the heart of the Plan and so it is right that they are recognised as a key aspect of the development strategy.

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?

19. Our Client considers that it is for the Council to set out what it means at criterion 4 of strategic policy S4 and we reserve the right to comment further. It appears that the Council is intending to boost the supply of housing in the event that the housing trajectory slips but we are not clear on how this would be realised; notwithstanding a commitment to be pro-active.
20. The NPPF already mandates (paragraph 39) that Local Planning Authorities work proactively with applicants, and so it should not take a slump in housing delivery for the Council to do this.
21. The explanatory text at paragraph 4.41 of the Plan provides further explanation, in that it sets out that the Council will seek to maximise brownfield land opportunities and regularly monitor consents which have commenced and identify an action plan to ensure the sites can come forward. If this is the Council's intention, then our Client considers that criterion 4 should be re-written to include some degree of qualification, so that stakeholders can see what is expected and understand what the policy seeks to achieve.

22. It is noted however that there is no trigger for the action noted at criterion 4 beyond the statement of "*If monitoring indicates that delivery is likely to fall below the level required to maintain an adequate supply of deliverable sites*". This is not considered to be sufficiently precise and gives no clear indication of when any action will be taken. The use of the words "*likely to fall below*" suggest that, if the 5 year housing supply figure is taken as the "*adequate supply*" figure in the text, then action would be taken before the supply falls below five years. The text would suggest that should there be a downward trend such that supply is looking to fall below 5 years, then action will be taken, but it does not explicitly state this. A more precise wording would perhaps state "*if monitoring indicates a housing supply figure of 5.5 years or less, and delivery levels have decreased for 2 or more consecutive years...*". Such a wording would provide a clear trigger for action and would be supported by our Client.
23. In any event however, our Client remains unconvinced that "*proactively seek[ing] to increase the delivery of sites through the planning process*" would solve the problem. There are a plethora of reasons for a development stalling (noting from the wording at 4.41 that stalled sites appear to be the target for this criterion), many of which will be beyond the Local Planning Authorities control. Whilst our Client would be supportive of the Council's attempts to get stalled sites up and running again, it may not be as simple as engaging with the applicant.
24. In any event, the Plan has introduced Policy HO10 (Stalled Development Sites), which specifically seeks to deal with stalled development sites. Our Client has no objection to this policy but notes that the measures set within the policy, including the Option to pursue Compulsory purchase powers to progress sites, will take a long time to bear fruit, and so whilst strategic policy S4 may want to link to policy HO10, to provide some degree of clarity, our Client considers that a different option is required in tandem, which could see homes delivered much quicker, and provide a genuine, realistic prospect of bucking a downward trend in housing delivery. Our Client considers that a stockpile of "*reserve sites*" would be the best option for this, and whilst they would not specifically be allocated for development within the Plan period, they could be linked to Policy S4 so that, in the event of a slump in delivery (as suggested in the wording above), reserve sites would be considered favourably during the Plan period.
25. Such an option, coupled with the amendments to the wording of Policy S4 as detailed above, would provide the council (and the Plan) with the tools to be proactive, and to take swift action should delivery rates start to falter. Whilst our Client remains firm of the view that their land interest at Chetwynd Road should be allocated for development as part of this Plan, they would be content for it to be identified as a reserve site should this option be pursued, noting that the site is deliverable and available, and capable of addressing any perceived technical constraints (as noted in our responses to Matter 2 and as set out extensively through previous Representations).

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?

26. Our Client is unclear what is meant by criterion 5c of Policy S4. Whilst utilising brownfield land is supported by our Client, as it also is by the NPPF, the adoption of a "brownfield first" approach would not be consistent with the NPPF, and so should not be included in the Plan.
27. If a brownfield windfall site comes forward for development, then the re-use of previously developed land would be a material consideration in favour of that proposal, but whether it is previously developed or not should not be determinative to the overall success of the application. Each application is to be considered on its own merits in the context of the prevailing context at that time. It may be the case that a greenfield windfalls site presents itself at a time where the Council is unable to demonstrate an appropriate supply of housing land. Criterion 5c, as written, would preclude a development, which may otherwise be acceptable from coming forward. This is not considered to be an appropriate wording and should either be amended, or removed in its entirety.
28. It should also be borne in mind that the Plan itself recognises that there are limited opportunities to develop brownfield land, stating at paragraph 4.5, in specific regard to Telford, that "it also recognises that as the town has matured there are fewer opportunities for large scale brownfield development that can help meet the boroughs development needs." As such, whilst advocating the reuse of previously developed land supported, it is not reasonable, nor practical, nor sound, to proceed on a brownfield first approach.

