

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

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Matter 5, Issue 1

Matter 5 – Allocations

Issue 1: Whether the allocations and their requirements are justified, effective, and consistent with national policy.

Q43. Are the site allocations in Appendix 15 justified? Do they accord with the development strategy? Are they deliverable/developable and supported by the evidence? Is the estimated housing number for each site a reasonable figure based upon the evidence?

(a) - Yes, the Council held two Call for Sites (2020 and 2022) where potential land was submitted for consideration as part of the Local Plan making process. Sites were assessed in accordance with the Council's assessment methodology published at the Issues and Options stage (PD13). This process was undertaken to ensure the allocations were sustainable and deliverable. The site selection process adheres to the principles as laid out in the NPPF Para 67 with the final site allocations (included at Regulation 19 stage) having been assessed on the best available information and the use of planning judgement.

(b) - Yes, Sites were screened against the preferred Local Plan growth strategy. Housing and employment sites that did not clearly fit this strategy did not progress, with the exception of site HA28 due to its brownfield credentials (as per the Submission Version of the plan CD08).

(c) - Yes, Stage 9 of the site assessment process analysed sites on their suitability, availability and achievability. Information included in the site assessment sheets, at this stage gives a clear direction as to whether the site can be delivered. Supporting evidence includes the following:

- AS01 Telford & Wrekin Site Selection Technical Paper and accompanying Site Assessment Sheets

A number of additional technical papers contribute to the site allocations evidence, these include:

- PD10 Telford and Wrekin Integrated Impact Assessment Scoping Report
- WF02 Strategic Level 2 Strategic Flood Risk Assessment Report (SFRA) and accompanying Summary Maps.
- WF06 Telford & Wrekin Water Cycle Study Phase 2
- TW02 Heritage Impact Assessment

(d) - Yes, The Council used the following methodology for determining indicative site yields. As a starting point site yields were calculated using the Telford & Wrekin's Density and Net Site Area Study. Yields were subject to further refinement as the review progressed based on further evidence and / or emerging policy requirements. At the Regulation 18 stage, site yields were from estimates by the Council or were provided by the site promoters.

Q44. Are the requirements within Policy HO1 justified, sufficiently clear and unambiguous?

Yes, Part 1 of the policy establishes that housing allocations contribute towards meeting the boroughs housing requirement as required in national policy.

Part 2 sets out what is required for major housing developments and multiple sites where there is a need to work together. The Local Plan allocates several sites expected to deliver over 100 dwellings (as covered within paragraph 9.7). Due to the scale of these sites, it is important to deliver sustainable communities and key infrastructure. Therefore, part 2 of policy HO1 sets out guiding development principles with policies DD1 and DD2 setting out more detailed requirements for the design of residential development. HO1.2 d. addresses the need for transport assessments, in some cases, these may need to take account the potential impact of multiple site allocations to determine an appropriate localised highway strategy. The Council considers this to be clear and unambiguous.

As further stated in Para 9.8, it is important that the information required in policy HO1 is provided at an early stage in the planning process. This is to ensure that decision makers have all the necessary information to aid in the determination of applications and to secure sustainable development. The Council considers this justified.

Q45. Do any of the proposed site allocations in Appendix 15 have specific requirements which should be set out in the Plan?

No, all site allocations have been assessed using the site selection process. Policy HO1 addresses the requirements for major allocations and sets out what information is to be submitted alongside a planning application. It is the Council's view that, for sites of the scale in Appendix 15, detailed site-specific matters should be considered at the application stage. When developers are creating proposals, they should read the plan as a whole and should therefore be cognisant of the key issues that will shape a proposal. These include requirements for built development, protection of ecological and heritage assets as well as strategic infrastructure requirements. At the allocation stage, in the absence of layout plans, it is not reasonable for the Council to determine site specific requirements up front.

Q46. Do the 'carried forward' employment allocations need to be included in the Plan for it to be sound?

Yes, the Telford and Wrekin Employment Land Delivery Topic Paper (TP09) breaks down the Council's employment land supply. The Council have a total supply of 172.5ha of employment land with a surplus of 16.9ha. The carried forward allocations account for 36.8ha. A further update shows that the Council has a surplus of 40.5ha with existing employment allocations accounting to 58ha of which the Council can demonstrate there is a continued need and responsible prospect of the employment land being developed within the plan period. For clarity a further modification is proposed to include a schedule of carried forward employment allocations in the Local Plan to reflect the Policies Map.