

**Representor ID: E120 – Wain Estates**

**Telford and Wrekin Local Plan Examination – Matters, Issues and Questions**

**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?**

1. In line with our comments made in respect of Matter 2, we do not consider that site allocations (419, 472 and 701) within Newport are justified on account of the site selection process having not been applied consistently. We consider that process requires revisiting.
2. Moreover, they would also emphasise their previous comments that, given the Council's pro-growth stance, and previous delivery rates which have surpassed the housing need figure, there is evidence to indicate that the borough can sustain a far greater level of growth than has been planned for, and that, noting the relatively low provision of net new homes for Telford over the Plan period, there remains a case for additional housing allocations to be delivered within this Plan period
3. They would also reiterate that, as currently planned, there is little margin for slippage given that the proposed delivery figure accounts solely for the Borough's housing need, as well as an allowance for meeting the unmet need of neighbouring authorities. As such, there remains merit in allowing for a series of "reserve sites" that could be brought forward in the event that housing delivery starts to split (noting the additional amendments requested to Strategic Policy S4, set out in the response to Matter 3).

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

4. Our Client has limited comments in relation to the wording of Policy HO1 but does note that criterion 1 refers to the housing allocations listed in Appendix C. This would appear to be a typographical error, as Appendix C appears to relate to mixed-use allocations (though it is accepted that they provide a degree of housing), but this should primarily relate to Appendix A, which lists the Housing Allocations at Table 1.
5. In addition to the above, our Client would have some concerns with the provisions of criterion 2(i) of policy HO1 which, as currently drafted states that major housing development proposals must provide "demonstration of how the entire site will comply with a relevant planning policy within the Local Plan". Such wording is not considered to be sound or justified as it requires a development proposal to adhere to all relevant parts of the local Plan in its entirety. It does not provide any mechanism for a balancing exercise to be carried out nor does it afford any flexibility should there be any degree of conflict with any parts of the development plan. Whilst it would be desirable for a proposal to comply with the Local Plan in full there will invariably be some situations where a

development cannot demonstrate full compliance, but may compensate for any discrepancies in other ways, which, having regard to the provision of the NPPF, would fall into the planning balance. As written, criterion 2(i) would not be consistent with the NPPF in this respect and therefore would benefit from modification.

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

6. Our Client considers that this is a question best answered by the Council noting that there are no additional requirements set out within the Plan as it stands. To that end, our Client notes that the Council has provided additional clarity to this question at section 6(a) of document TW01, which sets out the Council's responses to the Inspectors' initial questions, within which the Council confirm that no specific requirements are required beyond the more generalised criteria set by policy HO1.
7. For the avoidance of doubt, our Client has no objection to this approach, although they would recommend that a note be added to Appendix A to confirm this, and to provide a clear signpost to the requirements of Policy HO1. Our Client would however re-iterate their comments in relation to some of the wording to HO1 as set out in response to Q44 above.

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

8. Our Client has no specific comment to make in relation to employment allocations but would suggest that any allocations carried forward should be included within this Plan, for ease of reference.

