

Telford & Wrekin Council
Local Plan 2021 – 2041

June 2026

**Housing Delivery Topic Paper
Updated Version**



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1.0 INTRODUCTION

- 1.1 This Housing Delivery Topic Paper has been updated following the Local Plan hearing sessions to support the forthcoming Main Modifications consultation. It sets out the Council's position on housing need, housing requirement, and contribution towards the unmet housing needs of neighbouring local planning authorities.
- 1.2 The Regulation 19 consultation on the draft Local Plan was undertaken between February 2025 and May 2025. The Local Plan was subsequently submitted for independent examination, and hearing sessions have now taken place. The Plan is now progressing towards Main Modifications consultation, supported by an updated housing trajectory and associated evidence.
- 1.3 The Local Plan sets out the overarching housing strategy within **Policy S4: Housing Delivery Strategy**, which establishes the approach to meeting the borough's housing requirement of 20,200 dwellings over the plan period. The policy states:
1. *"The council has 55% of its identified housing requirement of 20,200 homes consented, under construction or already built. The Council is planning to deliver an average of 1,010 dwellings a year through existing supply and land allocations.*
 2. *The delivery of new dwellings will be managed and monitored on an annual basis against the housing trajectory.*
 3. *If monitoring indicates that delivery is likely to fall below the level required to maintain an adequate supply of deliverable sites then the Council will proactively seek to increase the delivery of sites through the planning process.*
 4. *Housing development will be supported and delivered through:*
 - a. *The completion of sites with planning permission;*
 - b. *The allocation of new housing sites as shown on the Policies Map and in accordance with Policy HO1 (Housing development principles);*
 - c. *Well-designed windfall development in the built-up areas on a 'brownfield first' approach;*
 - d. *Where supported in the rural area by Policies HO12 (Housing development in the rural area) or HO13 (Rural exception sites); and*
 - e. *Well-designed self-build homes where they are in accordance with Policy HO11."*
- 1.4 This paper addresses the following matters:
- Housing Need Calculation Using the Standard Method
 - Evolution of the Housing Requirement
 - Components of the Housing Requirement (2021–2041)
 - Components of Housing Supply
 - Balance Between Supply and Requirement
 - Justification for Windfall Allowance
 - Housing Delivery Trajectory
 - Assumptions Behind Build-Out Rates
 - Post-2041 Housing Delivery
 - Contribution to Black Country Unmet Need
 - Conclusion: Summary of the Council's Supply Position

2.0 HOUSING NEED CALCULATION USING THE STANDARD METHOD

2.1 Paragraph 62 of the National Planning Policy Framework (NPPF) 2024 states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Standard Method in national planning practice guidance.”

2.2 The latest Standard Method for calculating local housing need was set out in the 2024 NPPF, representing a fundamental change in the methodology. It revised how housing need is calculated and interpreted for plan-making purposes.

2.3 The Planning Practice Guidance¹ (PPG) confirms:

“Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.

The housing need figure generated using the Standard Method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.

However, local housing need calculated using the Standard Method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination”

2.4 The most recent housing stock data were published in June 2025, and the median workplace-based affordability ratios were updated in March 2025. Both datasets influence the Standard Method calculation and have affected the resulting housing need figure. The most recent EHDNA Update, prepared prior to these revisions, identified a need for 857 dwellings per annum (dpa). This figure has since increased to 881 dpa.

2.5 The PPG (Reference ID: 2a-004-20241212) sets out the Standard Method calculation in stages, as set out below.

Step 1: Setting the baseline – 0.8% of existing housing stock for the area

2.6 Live Table 125 estimates that the housing stock in Telford & Wrekin was 83,516 dwellings in 2024.

2.7 Applying the 0.8% baseline results in a starting point of 668 dwellings per annum ($83,516 \times 0.008$).

Step 2: An adjustment to take account of affordability

2.8 The median workplace-based affordability ratio for Telford & Wrekin, based on the five-year average from 2019 to 2024, is 6.67.

2.9 Applying the standard adjustment formula results in an uplift factor of 1.32:

$$((6.67 - 5) / 5) \times 0.25 + 1 = 1.32)$$

Baseline Local Housing Needs Figure

2.10 The resulting baseline local housing need figure is **881 dwellings per annum** (668×1.32). This figure does not include any potential buffers and is based solely on the most recent data released in 2025. It is subject to change as the inputs are updated annually.

¹ PPG ID: 2a-008-20241212

3.0 EVOLUTION OF THE HOUSING REQUIREMENT

- 3.1 The housing requirement of 20,200 dwellings over the plan period 2020-2040 was established through the Local Plan Review process and set out in the objectives of the Regulation 19 version of the Plan. The proposed revised Local Plan period is 2021-2041, and the overall requirement has now increased to 20,680 due to an increase in the Council's housing need figure.
- 3.2 This figure was informed by the Government's Standard Method for calculating local housing need and reflected a commitment to support wider housing market area pressures, particularly those arising in the Black Country.
- 3.3 The most recent Economic and Housing Development Needs Assessment (EHDNA) Update (February 2025) (EH01) notes that the Government's Standard Method represents the minimum starting point for assessing housing need and identified a figure of 857 dwellings per annum at the time of publication. It also explored a range of demographic and market-adjusted scenarios, supporting the Council's decision to plan for a higher level of housing delivery. The evidence presented in the EHDNA Update also emphasises that a requirement above the minimum need would, during this plan review, allow Telford & Wrekin to contribute towards addressing wider housing market pressures, particularly unmet housing needs identified within the West Midlands Housing Market Area.
- 3.4 The approach to housing delivery has been shaped by both the need to meet the borough's own assessed need and the position within the West Midlands Housing Market Area. The Black Country authorities have identified a substantial unmet need which cannot be accommodated within their administrative areas. As a result, Telford & Wrekin has sought to contribute constructively to meeting that need through its Local Plan strategy.

Contribution to Black Country Unmet Need

- 3.5 In line with national policy, Telford & Wrekin Council recognises the importance of positively addressing unmet housing needs that arise within the wider housing market area. The NPPF 2024 states at paragraph 62:

"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

- 3.6 The Black Country authorities (Dudley, Sandwell, Walsall and Wolverhampton) have previously identified a significant housing shortfall which cannot be accommodated within their administrative areas due to physical and environmental constraints. As part of Duty to Cooperate the Black Country LPA's have formally requested that Telford & Wrekin Council assist by providing a contribution towards their unmet housing needs. Telford & Wrekin, as a relatively unconstrained authority within the proximity of the West Midlands Housing Market Area, is well placed to provide support in helping to meet this wider need.
- 3.7 At the Regulation 18 stage the Council had identified a contribution of 81 per annum. At the Regulation 19 stage of the Local Plan Review, the Council proposed to contribute 3,060 dwellings (equivalent to 153 dwellings per annum) towards the Black Country's unmet housing need. This contribution was in addition to the borough's own housing need, which at that time was calculated at approximately 857 dpa using the Government's Standard Method.
- 3.8 The Council's review of migration patterns drew upon ONS internal migration data at local authority level (mid-2022 estimates), assessing flows between Telford & Wrekin and the Black Country authorities. This methodology translated household migration into a dwelling equivalent figure, which indicated a contribution of around 126 dwellings per annum. Recognising the importance of supporting the wider Housing Market Area, the Council has

taken a positive approach in going beyond this demographic baseline. A higher contribution of 153 dwellings per annum (3,060 dwellings in total) has been adopted and confirmed in Policy S4 of the Local Plan as the borough's agreed contribution to the Black Country's unmet housing need.

- 3.9 Following updates to the Standard Method calculation, the borough's minimum local housing need has increased to 881 dwellings per annum. In order to accommodate this uplift while the overall housing requirement figure is now 20,680 dwellings over the plan period 2021–2041, the Council's contribution to unmet need from the Black Country remains at 3,060 dwellings (153 dpa). This is confirmed in Policy Strategic S4 – Housing delivery strategy.
- 3.10 This revised contribution continues to represent a significant and positive response to unmet need within the wider housing market area. It ensures that Telford & Wrekin's own housing needs are met in full, and that the overall strategy remains consistent with the principles of sustainable development, infrastructure capacity and environmental limits.
- 3.11 In response to representations from the Black Country authorities, the Council has carefully considered the need to demonstrate that all reasonable capacity has been explored. The Local Plan is underpinned by a robust site selection process which has identified a sufficient and deliverable supply of sites, including an 'over-allocation' that provides flexibility and contingency. In doing so, the Council has avoided allocating sites that would be poorly located or inaccessible, consistent with the sustainable development objectives of the NPPF. It is also recognised that the market's ability to deliver housing at scale must be taken into account to avoid overheating and ensure a realistic and deliverable trajectory.
- 3.12 Importantly, paragraph 34 of the NPPF requires all local plans to be reviewed at least once every five years, providing a nationally consistent mechanism for reassessing housing needs and supply. On this basis, the Council does not consider that an additional 'early review' clause, as suggested by neighbouring authorities, is necessary or justified.
- 3.13 The Council remains committed to ongoing engagement with the Black Country authorities under the Duty to Cooperate, and this contribution reflects the outcome of constructive cross-boundary dialogue.

Components of the Housing Requirement (2021–2041)

- 3.14 The Council's housing requirement is set at 20,680 dwellings over the revised plan period 2021 to 2041, equating to 1,034 dwellings per annum (dpa). This position reflects the increase in the area's housing need figure from the Regulation 19 version of the Local Plan.
- 3.15 The current calculation identifies a local housing need of 881 dpa, reflecting revised dwelling stock estimates and affordability ratios. The Council has proportionately increased its housing requirement figure to reflect this, and the contribution to the Black Country authorities' unmet needs remains unchanged at 153 dwellings per annum.
- 3.16 The current components of the housing requirement are as follows:

Table 1: Breakdown of Housing Requirement: Annual and Plan Period Totals

Component	Dwellings (2021–2041)	Annual Equivalent (dpa)
Local housing need (Standard Method)	17,620	881
Contribution to Black Country authorities' unmet need	3,060	153
Total Requirement	20,680	1,034

4.0 BALANCE BETWEEN SUPPLY AND REQUIREMENT

- 4.1 Chapter 5 of the National Planning Policy Framework (NPPF 2024) sets out the Government’s objective to “deliver a sufficient supply of homes”. In line with paragraph 72 of the NPPF, the Council has prepared a comprehensive understanding of land availability through the Strategic Housing Land Availability Assessment (SHLAA). From this, the Council has identified a sufficient supply and mix of sites to meet the borough’s housing requirement of 20,680 dwellings over the plan period 2021–2041, taking into account site availability, suitability and viability.
- 4.2 Paragraph 72 of the NPPF 2024 also requires planning policies to identify:
- specific, deliverable sites for five years following the intended date of adoption; and
 - specific, developable sites or broad locations for growth for years 6–10, and, where possible, for years 11–15 of the plan period.
- 4.3 The Council’s housing trajectory confirms that there is a deliverable five-year housing land supply at the point of adoption, and that sufficient developable land has been identified to meet the remainder of the requirement over the long term.
- 4.4 The Council’s approach is supported by detailed monitoring data and site-level evidence provided through the Five Year Housing Land Supply and Annual Monitoring Reports. These confirm that committed development, Local Plan allocations, and windfall allowances together provide a robust, flexible and deliverable supply of land for housing.
- 4.5 In accordance with paragraph 73 of the NPPF, the Council has ensured that small and medium-sized sites form an important part of the housing supply. The Council does this through the supporting the delivery of windfall development, particularly on previously developed land within the built-up area, consistent with the NPPF’s emphasis on using brownfield land and delivering homes within existing settlements. A detailed justification for the windfall allowance is set out in Section 5 of this paper.

Components of Supply

- 4.6 The supply is made up of extant planning permissions, proposed site allocations, and a windfall allowance. A detailed justification for the windfall figure is set out in Section 5 of this paper. The supply is anticipated to comprise the following components:

Table 2: Summary of Housing Supply Components (April 2026 Update)

Contribution to Supply	2020-2040	2021-2041
Existing completions from start of plan period to 24/25	6,706	5,889
Housing allocations	9,601	10,231
Major site commitments	3,530	3,530
<i>Under Construction</i>	2,792	2,792
<i>Not Yet Started</i>	738	738
Minor site commitments	328	328
<i>Under Construction</i>	109	109
<i>Not Yet Started</i>	209	209
Windfall allowance	1,440	1,560
Lapse allowance	-21	-21
Total	21,584	21,517

4.7 Within the housing allocations component, a proportion of the supply is derived from the Sustainable Communities (SC) sites. Collectively, the Sustainable Communities sites contribute 6,955 dwellings, equating to 33.6% of the housing requirement and 32.3% of the total housing supply over the plan period.

4.8 The contribution of each Sustainable Communities site to the housing requirement and overall supply is summarised below.

Table 3: Contribution of Sustainable Communities Sites to Housing Requirement and Supply

Site Name	2021-2041		
	Supply Contribution	% Contribution to Requirement	% Contribution to Supply
SC1: Land at Bratton	2,100	10.2%	9.8%
SC2 : Land North East of Muxton	2,665	12.9%	12.4%
SC3: Land North of A442 Wheat Leasows	2,190	10.6%	10.2%
Total	6,955	33.6%	32.3%

4.9 In the Inspectors' Further Initial Questions, clarification was sought in relation to housing supply, specifically requesting a table setting out the expected delivery and completion figures for each housing allocation (including the Sustainable Communities) and commitments by plan period year. A detailed schedule presenting anticipated delivery and completion figures for each housing allocation, disaggregated by plan period year, is provided at **Appendix 2**.

4.10 Further evidence of deliverability for all Housing Allocations and Major Site Commitments was requested by the Inspectors during the Examination hearings. This evidence is presented in an accompanying spreadsheet which is published alongside this Topic Paper.

4.11 For the purposes of the housing supply, sites are categorised into three distinct and mutually exclusive components: housing allocations, major site commitments (excluding any allocations), and minor site commitments (excluding any allocations). Each component is recorded once only within the supply.

4.12 Accordingly, any site identified as a major or minor site commitment does not form part of the housing allocations supply, and all proposed allocations are wholly additional to existing commitments.

Lapse allowance

4.13 For the purposes of the Local Plan housing trajectory, we apply a 10% lapse allowance to small sites (fewer than 10 dwellings) with planning permission that have not yet commenced. This allowance is confined to minor permissions not yet started only; it is not applied to sites under construction or to major sites whose deliverability is addressed through lead-in and build-out assumptions. This approach reflects where non-implementation risk is typically concentrated.

4.14 A 10% allowance is consistent with recent practice and sits in the mid-range of approaches taken by comparable authorities, such as those outlined below:

- South Kesteven applies 10% to small sites with permission, noting the Examining Inspector's observation that such a discount is "typically 10% on small sites but local monitoring may indicate an alternative".
- Stafford Borough applies 10% to smaller sites for five-year supply purposes. Other authorities adopt more conservative rates where local evidence justifies it: South Staffordshire applies 19% to small sites not yet under construction (with none to

- large sites).
- Stoke-on-Trent applies 19% to permissions not yet started.

4.15 These examples demonstrate the accepted principle of applying a lapse allowance to small, not yet started schemes.

4.16 Data from other authorities also supports a stronger differential between minor and major schemes:

- Watford's AMR reported a year with 0% lapses on major applications versus around 40% on minor applications, with a 15% allowance assumed at Local Plan examination based on historic trends.
- Wyre Forest applies a lower 4% allowance grounded in long-run monitoring since 2002, further illustrating that an evidence-led range exists and that 10% is a reasonable middle position.

4.17 Locally, Telford & Wrekin's recent delivery performance is strong, which supports adopting a proportionate (rather than highly conservative) lapse allowance. The Annual Monitoring Report records 1,265 net completions in 2023/24, continuing a sustained pattern of delivery in the borough. The Housing Delivery Test results reinforce this position, with outcomes consistently well above 200% over recent years:

Table 4: Summary of Housing Delivery Test Scoring 2020 - 2023

Housing Delivery Test Year	Scoring
2020	226%
2021	233%
2022	264%
2023	327%

Source: HDT 2022, 2021, 2022, 2023

4.18 The Council acknowledges that lapse rates may vary between monitoring periods. Accordingly, the 10% allowance will be kept under review through the AMR and adjusted if local monitoring demonstrates a materially different non-implementation rate for small, not yet started permissions.

Post-2041 Housing Delivery

4.19 Within the allocations there are three large strategic sites. Two of these are anticipated to continue to deliver beyond the plan period. Whilst these completions beyond the plan period are not included in the supply to 2041, they remain important to note. The sites are:

- SC1: Land at Bratton
- SC2: Land North East of Muxton
- SC3: Land North of A442 Wheat Leasows

4.20 As Sustainable Communities (SCs), it is reasonable to assume delivery will extend beyond the existing plan period given their scale and build-out rates. It is anticipated that a total of **945 dwellings** will be delivered **post-2041**, as set out in Table 5 below.

Table 5: Breakdown of SCs and contribution beyond the plan period

Site Name	Total Dwellings	Expected to be delivered in the plan period	Expected completions beyond the plan period
Land at Bratton	2,100	2,100	0
Land North East of Muxton	2,700	2,665	35
Land North of A442 Wheat Leasows	3,100	2,190	910
Total	7,900	6,955	945

4.21 The expected completions beyond the plan period reflects anticipated build-out rates and delivery trajectories which are discussed in Section 6 of this paper.

5.0 JUSTIFICATION FOR WINDFALL ALLOWANCE

5.1 In the Regulation 19 Plan, the windfall allowance for minor sites was set at 60 dwellings per annum. Paragraph 75 of the NPPF states:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

5.2 Following consultation with planning consultants, we have increased the “minor” site threshold from below 5 dwellings to below 10 dwellings. In the Regulation 19 draft, “minor” was used to describe sites below 5 dwellings; for this Topic Paper we now define “minor” residential sites as those delivering fewer than 10 dwellings.

5.3 This aligns our terminology with the Town and Country Planning (Development Management Procedure) (England) Order 2015 (“DMPO”), which defines “major development” for housing as proposals involving “10 or more dwellinghouses”, or where “the site area is 0.5 hectares or more and it is not known whether the development provides for 10 or more dwellinghouses” (Article 2). By extension, schemes below this threshold are treated as “minor”.

5.4 This adjustment reflects professional feedback and supports consistency with common development management practice and monitoring conventions. Any analysis and allowances presented in this Topic Paper are therefore based on sub-10 dwelling (“minor”) sites.

5.5 Further analysis indicates that the figure of 60 dwellings per annum represents a conservative estimate. A more accurate and justified windfall allowance would be **120 dwellings per annum** (equating to 1,560 dwellings over the 13 years from 2028/29 to 2040/41) based on recent evidence and delivery trends. This conclusion is drawn from the analysis set out below.

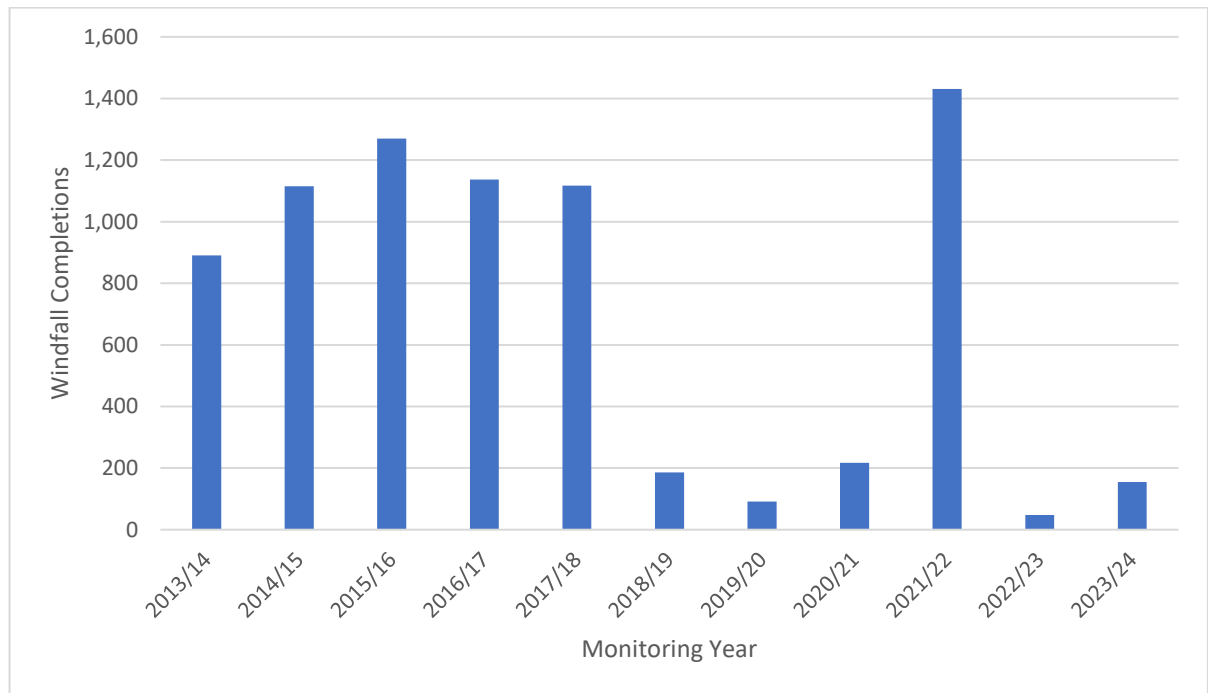
5.6 While the majority of justification for the windfall allowance is derived from analysis of minor and major windfall sites, it is useful to examine this within the context of overall windfall trends.

5.7 Between 2013/14 and 2023/24, total windfall completions have fluctuated significantly, ranging from a high of 1,431 dwellings in 2021/22 to a low of 48 dwellings in 2022/23. The average number of windfall completions per annum across this period is 696 dwellings. This is illustrated in the table and figure below.

Table 6: Average number of Windfall Completions

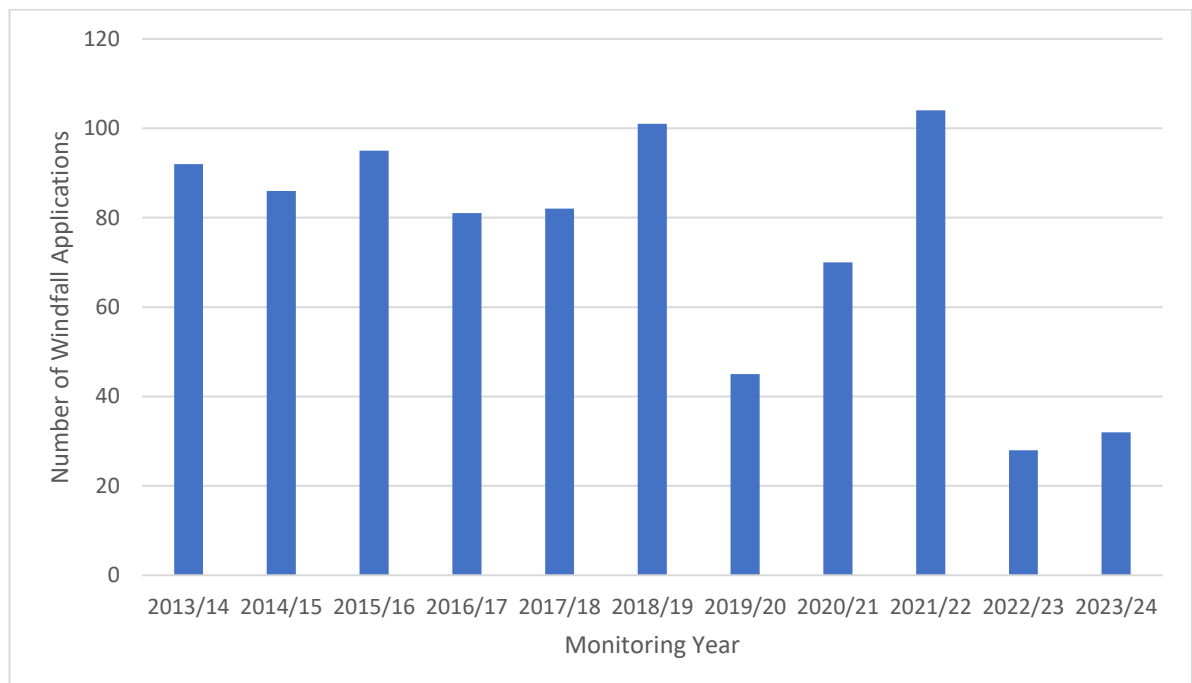
	3 years	5 years	8 years	All Years
Windfall completions	545	388	548	696

Figure 1: Windfall Completions by Monitoring Year



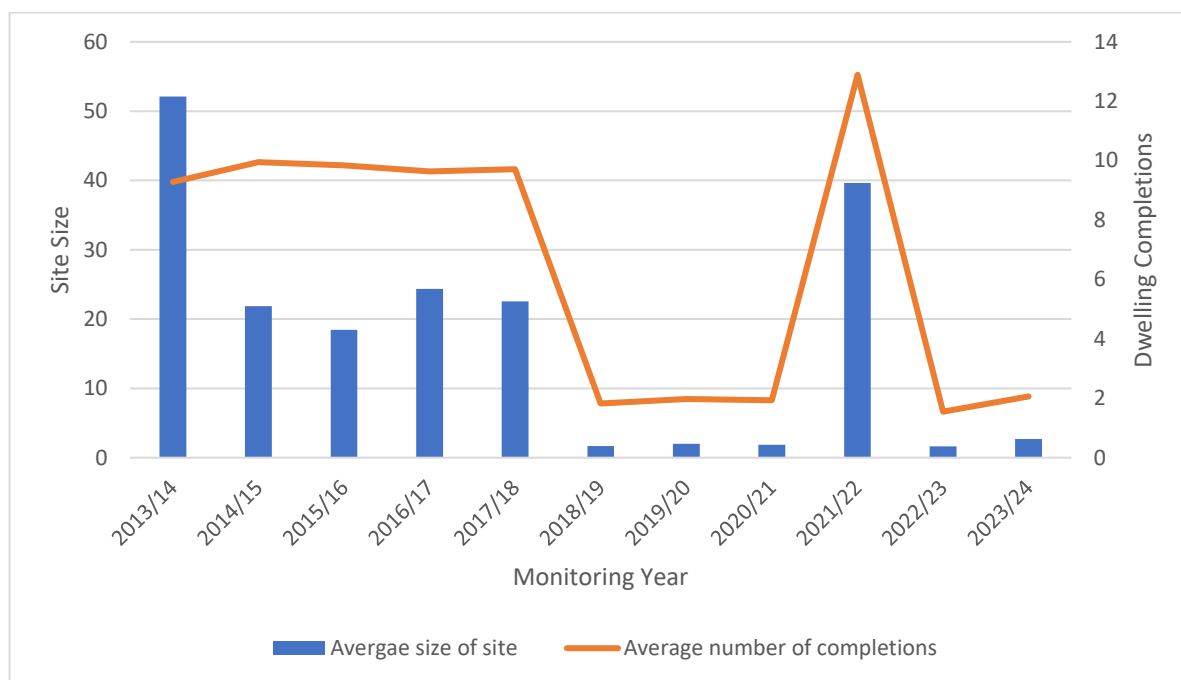
5.8 The number of individual windfall applications (permissions leading to completions) per year has ranged from 28 to 104, with an average of 74 applications annually.

Figure 2: Annual Count of Windfall Sites (First Completion Year)



5.9 The average site size has varied considerably, peaking at 52 dwellings per site in 2013/14, but typically falling within the 2–24 dwellings per site range in most years.

Figure 3: Average Completions and Site Size by Year



5.10 Correspondingly, the average number of completions per site has remained relatively modest in recent years, typically 2–3 dwellings per site since 2018/19, indicating the predominance of small-scale windfall developments. This underlines the continued relevance of minor windfall as a reliable source of supply.

Minor and Major Windfall

5.11 It is important to distinguish between the contributions of major and minor windfall development when determining an appropriate allowance.

5.12 The average total windfall completions between 2013/14 and 2023/24 is 696 dwellings per annum. However, this figure is heavily skewed by significant contributions from major windfall sites. Over this period, major windfall completions averaged 570 dwellings per annum, whereas minor windfall completions averaged just 126 dwellings per annum.

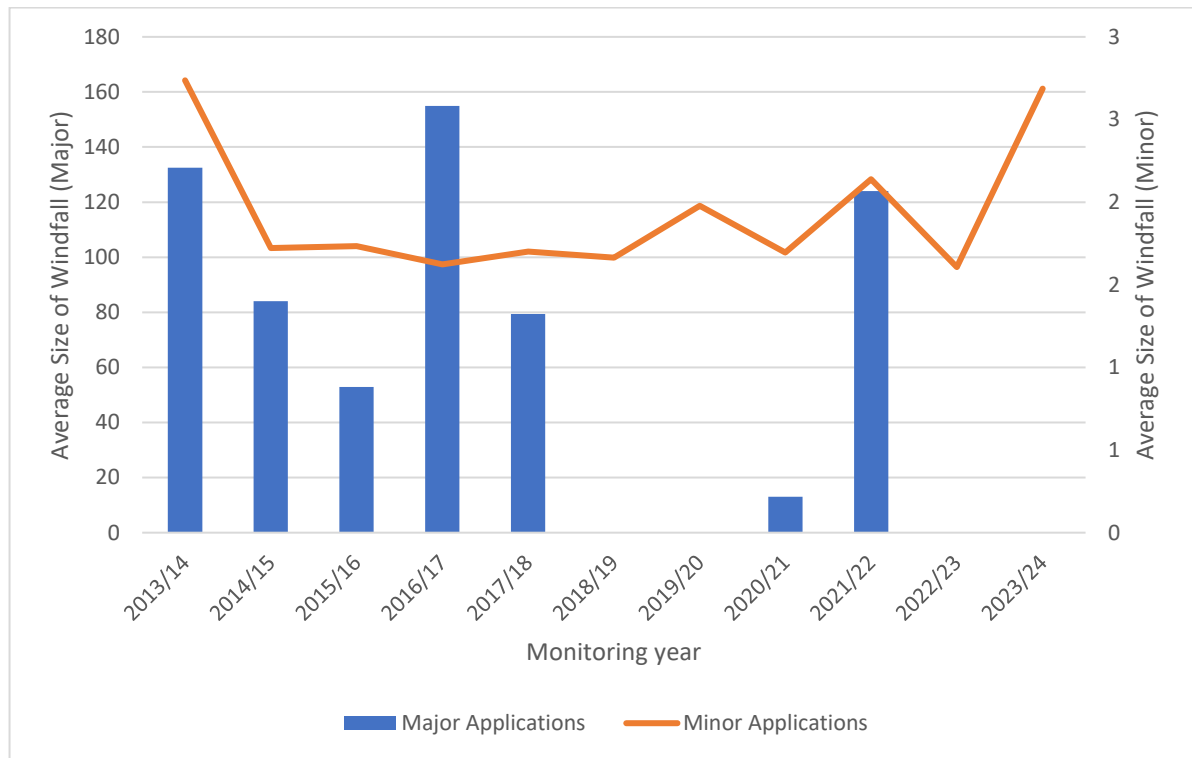
Table 7: Average number of windfall completions in the past 3 years, 5 years, 8 years and all years 2013/14 – 2023/24

Monitoring Year	3 years	5 years	8 years	All Years
All Windfall Data available	545	388	548	696
Major Applications	423	256	416	570
Minor Applications	122	132	132	126

5.13 These figures demonstrate that, while major applications have delivered large numbers of homes in specific years, they are less consistent and less frequent in occurrence. In contrast, minor windfall completions have remained more stable over time.

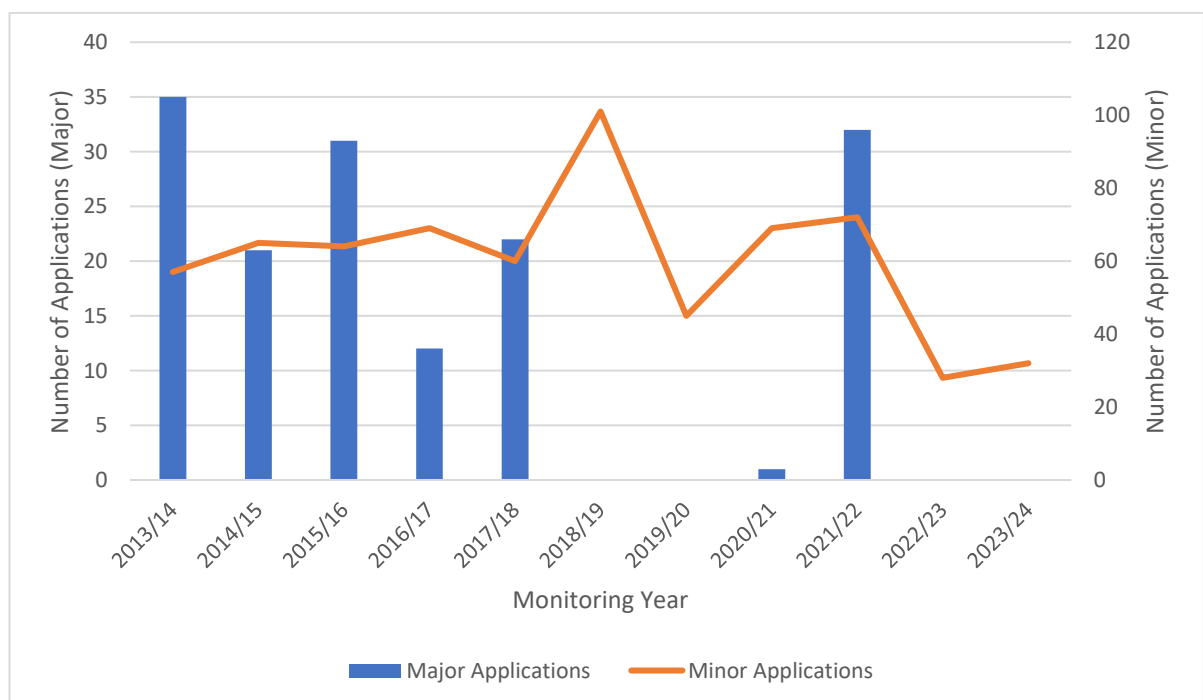
5.14 When considering the average size of windfall applications, there is no clear trend. Minor windfall applications tend to yield between 2 and 3 dwellings on average, whereas major sites deliver significantly larger numbers. The average size of a major windfall site peaked at 155 dwellings in 2016/17, prior to the adoption of the current Local Plan.

Figure 4: Average Windfall Site Size by Monitoring Year



- 5.15 The contribution of major sites is sporadic. Major windfall is typically a product of the absence of an up-to-date Local Plan or delayed allocations. Whereas, minor windfall development tends to occur regularly through infill, small redevelopment, or conversions.
- 5.16 It is also relevant to consider the number of windfall permissions granted (noting that figures relate to the year of first completions, rather than the year of decision). This provides insight into the frequency of windfall development.

Figure 5: Number of Windfall Applications by Monitoring Year



- 5.17 While major applications have delivered a significant proportion of total windfall completions, they account for just 15.4% of all windfall permissions between 2013/14 and 2023/24. Minor windfall applications comprise the remaining 84.6%, demonstrating their greater consistency and reliability over time.

Table 8: Proportion of Windfall Completions and Permissions by Site Type

Monitoring Year	3 years	5 years	8 years	All Years
Completions				
Major Applications	29.5%	18.9%	34.5%	49.6%
Minor Applications	70.5%	81.1%	65.5%	50.4%
Permissions				
Major Applications	10.3%	6.4%	9.2%	15.4%
Minor Applications	89.7%	93.6%	90.8%	84.6%

- 5.18 Over the full monitoring period, major applications delivered approximately 49.6% of total windfall completions, with minor applications accounting for 50.4%. The contribution from major sites is likely influenced by the transitional period following the adoption of the current Local Plan in 2018, during which large unallocated sites continued to come forward.
- 5.19 On the basis of the evidence set out above, the windfall allowance should be revised to **120 dwellings per annum**, based on the consistent historic delivery of minor windfall sites. While major windfall sites can contribute significantly, its irregular nature and dependence on wider supply factors means it should not be relied upon within the annual allowance, particularly where a Local Plan is up to date and provides a clear development framework.

6.0 ASSUMPTIONS BEHIND BUILD-OUT RATES

- 6.1 Paragraph 77(d) of the NPPF (2024) states that when planning for large-scale development, authorities should “*make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites*”.
- 6.2 The Council has reviewed historic monitoring data from the Annual Monitoring Reports (AMRs) and Five Year Housing Land Supply alongside national research, particularly the Lichfields Start to Finish (2024) study. This demonstrates that delivery rates in Telford & Wrekin increase with site size, consistent with national trends. The evidence also shows that lead-in times are proportionate to site complexity and scale, with smaller sites generally starting more quickly than larger strategic sites.
- 6.3 Based on this analysis, the Council has identified the following average lead-in times different site sizes:

Table 9: Telford and Wrekin Lead in times

Site Size (Dwellings)	Approx Lead-In Time	Mean Annual Delivery as % of Total Units
5–9	< 6 months	100%
10–49	< 6 months	40%
50–99	1 year	29%
100–499	2 years	21%
500–999	3 years	9%
1,000+	4 years	9%

- 6.4 The introduction of additional tiers for sites below 100 dwellings reflects the borough’s particular delivery characteristics. Lichfields – Start to Finish (3rd Edition, 2024) confirms that sites of less than 100 units tend to have much shorter lead-in times and build-out periods, often completing within one to two years of commencement.
- 6.5 Due to the volume of small scale development in recent years the Council has split this between very small (5–9 dwellings), small (10–49 dwellings), and medium (50–99 dwellings) categories, rather than combining all sub-100 unit sites into a single delivery assumption. This allows the trajectory to better reflect the borough’s mix of site sizes and the more rapid delivery profile of smaller schemes.
- 6.6 These assumptions are further refined by recognising the type of housebuilder active on a site, with national builders averaging **40 dpa per outlet**, regional builders **20 dpa**, and local builders **10 dpa**. This reflects market capacity and absorption rates identified through past delivery performance. In comparison to the findings of Lichfields these are noted below.

Table 10: Average build-out rates by size of site (Lichfields)

Site Size (Dwellings)	Mean Build out rate (dpa)			Median Build out rate (dpa)	
	First Edition	Second Edition	Third Edition	Second Edition	Third Edition
50 - 99	27	22	20	27	18
100 - 499	60	55	54	54	44
500 - 999	107	80	87	73	68
1,000 - 1,499	120	104	104	88	87
1,500 - 1,999	137	110	113	104	104
2,000+	160	138	137	137	138

Source: Lichfields Start to finish Data: Third Edition Table 4.1

Table 11: Average lead in times by size of site (Lichfields)

Site Size (Dwellings)	Lower Quartile (years)	Median (years)	Upper Quartile (years)
50 - 99	1.4	1.5	5.9
100 - 499	2.6	2.8	9.0
500 - 999	2.7	3.4	6.6
1,000 - 1,499	3.7	4.9	8.3
1,500 - 1,999	3.7	5.0	6.9
2,000+	4.1	5.1	7.9

Source: Lichfields Start to finish Data: Third Edition Table 3.1

- 6.7 This methodology is consistent with the NPPF and PPG in providing a realistic yet positively prepared assessment of delivery, supported by both local monitoring evidence and nationally recognised research.
- 6.8 A blended approach has therefore been adopted which takes account of local delivery characteristics while being benchmarked against the national trends identified in Lichfields' Start to Finish (Third Edition, 2024). In particular, the Council has disaggregated sites below 100 dwellings into three distinct categories (5–9, 10–49, and 50–99) to reflect the significant role of small and medium sized schemes in the borough and their faster delivery profile compared with larger sites. This refinement is not explicitly identified in the national data but responds directly to the scale and pattern of development observed in Telford & Wrekin. The build-out rates applied in the trajectory are therefore as follows:

Table 12: Adopted build-out assumptions applied to the housing trajectory

Site size	Average timeframe from validation to first completion	Average build rate (dwellings per annum)
5 to 9	1 year	All
10 to 49	1.5 years	20
50 to 99	2 years	30
100 to 499	2.5 years	60
500 to 999	3 years	80
1,000 to 1,499	3.5 years	130
1,500 to 1,999	4 years	140
2,000+	5 years	180

- 6.9 When compared with the national averages reported in Start to Finish (Third Edition, 2024), the Council's assumptions are generally in line with expected delivery rates. In some categories, particularly sites of 50–99 and 1,000+ dwellings, the applied rates are slightly higher. This reflects local evidence that sites in Telford & Wrekin have historically delivered at stronger rates than the national average, particularly where multiple outlets are operating.
- 6.10 The Council considers that it is especially important to ensure robust assumptions for smaller sites, which make up a significant element of supply and typically do not benefit from Statements of Common Ground or other agreements with developers. For these sites, the Council has introduced additional tiers to reflect the more rapid delivery profile observed locally.
- 6.11 For larger strategic sites, delivery is supported by Statements of Common Ground, Section 106 agreements and active engagement with promoters, which provide greater certainty on build-out. As a result, while the assumptions applied are consistent with national benchmarks, the actual delivery trajectory for these sites is largely informed by site-specific evidence agreed with developers.
- 6.12 This approach ensures that the trajectory is realistic, based on both national evidence and local circumstances, while providing sufficient flexibility to support a positive housing land supply position.

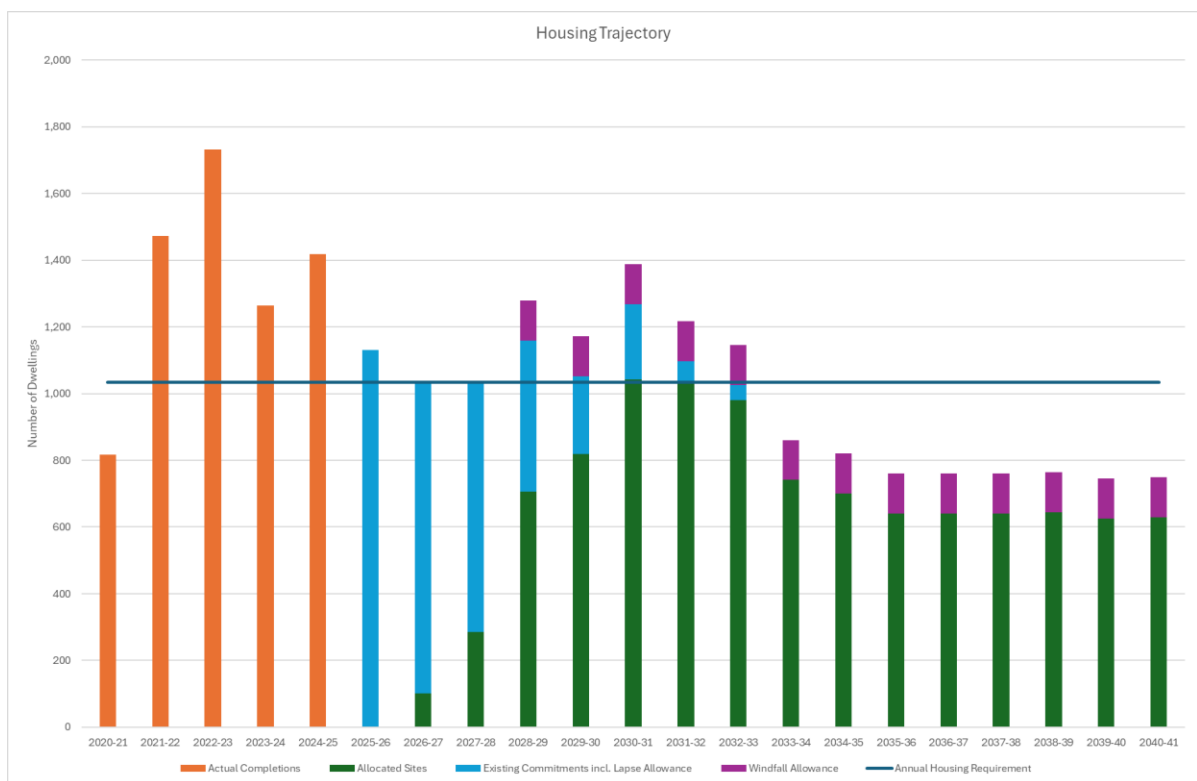
7.0 HOUSING DELIVERY TRAJECTORY

7.1 The NPPF 2024 states at paragraph 78 that:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”

7.2 In accordance with this requirement, the Council has prepared a housing trajectory which demonstrates how the housing requirement of 20,680 dwellings over the plan period 2021–2041 is expected to be delivered. The trajectory draws upon detailed site-level evidence relating to commitments, allocations, and windfall allowances, and takes into account assumptions around lead-in times and build-out rates. The trajectory is provided at **Appendix 1** of this paper.

Figure 6: Local Plan Housing Trajectory - Annual Requirement and Components of Supply



7.3 Figure 6 illustrates the housing trajectory, showing actual completions to date, existing supply, allocated sites and windfall allowances, set against the Local Plan annual requirement. The figure visually highlights that the Council’s identified supply is sufficient to meet the numbers required in the early years of the Plan period. This shows that annual completions have already exceeded the requirement in the years prior to adoption, and that this level of delivery is projected to continue beyond an assumed adoption date of 2026/27.

7.4 The comparatively high level of completions in 2024/25 is reflective of a number of schemes delivering more quickly than would normally be anticipated, including around 450 units which have been delivered on affordable housing sites. This has resulted in a slightly lower level of delivery expected in 2025/26, although the majority of this delivery will be on sites currently under construction.

7.5 Paragraph 78 also requires local planning authorities to identify and update annually a supply

of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement.

- 7.6 The Council anticipates being able to show between **6.2 years' and 5.4 years' supply** of deliverable housing land at adoption. This calculation is detailed in Section 8 of this paper.

8.0 CONCLUSION: SUMMARY OF THE COUNCIL'S SUPPLY POSITION

Anticipated Supply Position During the Plan Period

- 8.1 The housing requirement for the plan period 2021–2041 is 20,680 dwellings. Taking into account existing commitments, the windfall allowance, and both existing and proposed allocations, the identified supply amounts to 21,517 dwellings. This represents an oversupply of 837 dwellings against the plan period requirement.
- 8.2 In addition, two strategic sites and a housing allocation are anticipated to continue delivering completions beyond 2041. Together these sites are expected to provide approximately 1,310 dwellings post-2041, meaning that the Local Plan has capacity to deliver around 2,147 dwellings more than the identified requirement over and beyond the plan period. This equates to approximately a 10.4% buffer against the plan requirement.
- 8.3 This additional provision provides a contingency to accommodate any slippage in delivery from other sites or potential lapses of planning permissions. With the inclusion of a windfall allowance, the Council is confident that the allocations identified in the Local Plan are sufficient to deliver the full housing requirement within the plan period

Anticipated Housing Land Supply Position at Adoption

- 8.4 Based on the analysis above, it is anticipated that the Council will be able to demonstrate a sufficient supply of housing across the plan period, with anticipated delivery exceeding the overall housing requirement. At the point of adoption (2026/27), modelling indicates that the Council would be able to demonstrate between **6.2 years' and 5.4 years' supply** of deliverable housing land.
- 8.5 Two scenarios have been tested:
- The first assumes anticipated completions are delivered up to 2026/27 and then rolled forward against the residual requirement.
 - The second applies the Local Plan requirement directly, without taking account of completions already achieved.
- 8.6 Under both scenarios, the borough demonstrates a substantial margin above the minimum five-year requirement. This is shown in Table 13 below.

Table 13: Anticipated five year supply at adoption (2026/27)

Housing requirement	Expected position at adoption (taking account of existing completions)	Expected position at adoption (not taking account of existing completions)
Expected cumulative completions (2021/22-2025/26)	7,020	
Residual requirement (20,680 – 7,236)	13,660	
Adjusted five year requirement (accounting for projected completions) / Plan five year requirement (5 x 881dpa)	3,788	4,405
Contribution to Black Country unmet need of 153 dpa (5 x 153dpa)	765	765
5% Buffer	228	259
Total 5 year requirement	4,781	5,429
Annual requirement	956	1,086
Housing Supply		
Housing allocations	2,953	2,953
Major site commitments	2,401	2,401
Minor site commitments	219	219
Windfall allowance	360	360
Lapse allowance	-19	-19
Total Supply	5,914	5,914
Years Supply	6.2	5.4

- 8.7 On this basis, the Council can demonstrate a robust five-year housing land supply on adoption, significantly above the minimum five-year requirement, and providing flexibility to respond to changing circumstances.

Application of a buffer

- 8.8 A 5% buffer has been applied to the supply position at adoption in accordance with paragraph 78 of the NPPF. Paragraph 78 requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement (or local housing need where strategic policies are more than five years old). The NPPF confirms that the supply of deliverable sites should also include a buffer (brought forward from later in the plan period) of:

*“a) 5% to ensure choice and competition in the market for land; or
b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or
c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.”*

- 8.9 Telford & Wrekin's most recent Housing Delivery Test (2023) result was 327%, well above the 85% threshold that would otherwise trigger a 20% buffer. On this basis, the application of a 5% buffer is appropriate. Whilst future HDT scores may vary over the plan period, the current evidence supports applying the 5% buffer consistently to the housing requirement. This approach ensures both competition and choice in the market for land, in line with national policy.

Appendix 1 Housing Trajectory

	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	2038-39	2039-40	2040-41	Plan Period Total	Delivery beyond the plan period
Plan period year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	210	
Remaining years	21	20	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	230	
Annual housing requirement (Plan Period)	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	1,034	20,680	
Supply																						
Exiting completions	1,473	1,732	1,265	1,419	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5,889	
Housing allocations	0	0	0	0	0	101	285	706	818	1,043	1,036	981	741	700	640	640	640	645	625	630	10,231	1,310
Major site commitments	0	0	0	0	1,024	847	650	445	234	225	61	44	0	0	0	0	0	0	0	0	3,530	
Under Constuction	0	0	0	0	1,024	716	530	247	158	100	17	0	0	0	0	0	0	0	0	0	2,792	
Not Yet Started	0	0	0	0	0	131	120	198	76	125	44	44	0	0	0	0	0	0	0	0	738	
Minor site commitments	0	0	0	0	109	96	114	9	0	0	0	0	0	0	0	0	0	0	0	0	328	
Under Constuction	0	0	0	0	88	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	109	
Not Yet Started	0	0	0	0	21	65	114	9	0	0	0	0	0	0	0	0	0	0	0	0	209	
Windfall allowance	0	0	0	0	0	0	0	120	120	120	120	120	120	120	120	120	120	120	120	120	1,560	
Lapse allowance	0	0	0	0	-2	-7	-11	-1	0	0	0	0	0	0	0	0	0	0	0	0	-21	
Anticipated supply position																						
Annual Completions	1,473	1,732	1,265	1,419	1,131	1,038	1,038	1,279	1,172	1,388	1,217	1,145	861	820	760	760	760	765	745	750	21,517	1,310
Cumulative completions	1,473	3,205	4,470	5,889	7,020	8,057	9,095	10,374	11,546	12,934	14,151	15,296	16,157	16,977	17,737	18,497	19,257	20,022	20,767	21,517		
Residual requirement	19,207	17,475	16,210	14,791	13,660	12,623	11,585	10,306	9,134	7,746	6,529	5,384	4,523	3,703	2,943	2,183	1,423	658	-87	-837		
Residual oversupply/shortfall	439	1,137	1,368	1,753	1,850	1,853	1,857	2,102	2,240	2,594	2,777	2,888	2,715	2,501	2,227	1,953	1,679	1,410	1,121	837		

Alloc Ref	Call for Sites Ref	Site Address	Local Plan Area	Total Net Dwellings	Expected Completions in Plan Period	Expected Completions beyond Plan Period	Completions before plan Period	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	2038-39	2039-40	2040-41	Five-Year Supply
HO23	689	Land southern side of Waters Upton	Rural	40	40	0	0	0	0	0	0	0	0	0	0	18	22	0	0	0	0	0	0	0	0	0	0	0	40
HO24	411	Land at junction of Hay Street, Tibberton	Rural	7	7	0	0	0	0	0	0	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7
HO25	483	Car Park adjacent to Police Station, Legges Way	Telford	21	21	0	0	0	0	0	0	0	0	0	0	21	0	0	0	0	0	0	0	0	0	0	0	0	21
HO27	707	Little Dessert Shop, Bratton	Telford	17	17	0	0	0	0	0	0	0	0	0	17	0	0	0	0	0	0	0	0	0	0	0	0	0	17
HO28	685	Land south and west of Somerfield Road	Telford	515	150	365	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	50	50	50	0	
HO29	647	Long Barn Stables Equestrian Centre	Rural	15	15	0	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	15
HO30	714	Land South of St Michaels Church, Lilleshall	Rural	10	10	0	0	0	0	0	0	0	0	0	0	5	5	0	0	0	0	0	0	0	0	0	0	0	10
HO31	342	Land at Badhan Factory	Telford	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	0
HO32	339	Land between hartbridge Road and Beverley Roundabout, Oakengates	Telford	10	10	0	0	0	0	0	0	0	0	0	0	0	0	5	5	0	0	0	0	0	0	0	0	0	5
HO33	337	Land Opposite Shawbirch PH	Telford	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	10	0	0	0	0	0	0	0	0	0	0
HO34	341	Former Cross Keys Public House	Telford	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	0
HO35	443	Land at 2 Arleston Lane	Telford	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0
MU1	301	Land off Ironmasters Way	Telford	333	333	0	0	0	0	0	0	0	0	94	95	94	50	0	0	0	0	0	0	0	0	0	0	0	333
MU2	515	Blue Willow Car Park	Telford	158	158	0	0	0	0	0	0	0	0	0	0	0	0	79	79	0	0	0	0	0	0	0	0	0	158

Alloc Ref	Call for Sites Ref	Site Address	Local Plan Area	Total Net Dwellings	Expected Completions in Plan Period	Expected Completions beyond Plan Period	Completions before plan Period	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2036-37	2037-38	2038-39	2039-40	2040-41	Five-Year Supply
MU3	516	Lime Green Car Park	Telford	138	138	0	0	0	0	0	0	0	0	0	0	0	69	69	0	0	0	0	0	0	0	0	0	0	138
MU4	303	Land at Southwater Phase 2	Telford	46	46	0	0	0	0	0	0	0	0	0	0	46	0	0	0	0	0	0	0	0	0	0	0	0	46
MU5	630	Agriculture House, Southwater Way	Telford	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0
MU6	720	Former Wilkinson Site	Telford	15	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	0	0	0	0	0	0	0
MU7		Telford Station	Telford	100	100	0	0	0	0	0	0	0	0	0	0	0	0	0	50	50	0	0	0	0	0	0	0	0	0
SC1	SC	Land at Bratton	Telford	2100	2100	0	0	0	0	0	0	0	0	0	0	0	105	220	220	220	220	220	175	175	175	130	120	120	325
SC2	SC	Land North East of Muxton	Telford	2700	2665	35	0	0	0	0	0	0	0	0	0	0	0	150	215	295	280	265	265	265	265	265	200	200	150
SC3	SC	Land North of A442 Wheat Leasows	Telford	3100	2190	910	0	0	0	0	0	0	0	0	0	0	0	140	200	200	200	200	200	200	200	200	225	225	140
TOTAL					10,231	1,310	0	0	0	0	0	0	0	101	285	706	818	1,043	1,036	981	741	700	640	640	640	645	625	630	2,953