

EXAMINATION OF THE TELFORD & WREKIN LOCAL PLAN (2011-2031)
INSPECTOR'S NOTE TO TELFORD & WREKIN COUNCIL – 1 August 2016

1. In line with the PINS Procedural Guidance (updated June 2016), I have carried out an early appraisal of the Plan and other submitted documents. While I have yet to complete my initial preparation, I am pleased to say that I have not identified any matters of such seriousness to require the holding of an Exploratory Meeting. I am therefore content that the examination should progress to the hearings stage. I am liaising with the Programme Officer (PO) in order to identify mutual suitable dates.
2. I will issue a paper setting out the Matters, Issues and Questions to be considered during the examination in due course. This will cover the key soundness issues to be addressed. However, there a number of matters which potentially involve serious soundness concerns upon which I would welcome your initial comments. These are set out below.

Meeting Housing Needs from the West Midlands Conurbation

3. For the avoidance of doubt, and in line with usual practice, the examination will be based on the Submission Version of the Local Plan that was the subject of public consultation. Paragraph 1.3.2.3 of the Plan sets out the Council's approach towards accommodating housing demand from outside the Plan area, with particular reference to the West Midlands conurbation. In summary, this states that the Council is not convinced that it should be a participant in any redistribution of such housing growth. However, it adds that further clarification has been sought and that discussions will continue on the matter.
4. I note that the Council now proposes to delete this paragraph from the Plan. (You will be aware that any substantive change to the Plan being examined would require to be recommended as a 'Main Modification' through the examination process: justification for such changes will therefore be required.) However, the suggested replacement text does not explain the Council's current position in respect of this matter. Bearing in mind that the examination will need to consider both the Duty to Co-operate and the justification for the Plan's housing requirement (see below), it is important that its stance on this matter is made clear before the hearing sessions. I am aware that requests have been made by other local planning authorities for Telford & Wrekin to accommodate a proportion of the needs arising from the Greater Birmingham and Black Country Housing Market Areas.

Justification of Housing Requirement

5. Policy HO1 of the Plan identifies a Borough-wide housing target of 15,555 new dwellings over the Plan period. This is set against an identified housing need of 9,940 dwellings for the same period.

While the National Planning Policy Framework seeks to boost significantly the supply of housing, it also requires Local Plans to be justified and effective as part of its soundness requirements. Given that the housing target markedly exceeds the Borough's identified needs, and bearing in mind the comments set out in the supporting evidence (notably the PBA OAN Report, March 2015¹), the Plan's stance in this respect will need to be robustly justified – notably with respect to the availability of employment and the potential effect on commuting patterns.

Housing Supply

6. The Planning Practice Guidance states that housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the five year supply². However, the submitted Housing Land Supply Statement (June 2016)³ applies a 'housing requirement' derived from the above-noted OAN figure. For the purposes of the examination, this calculation should be revisited on the basis of the housing requirement contained in the submitted Local Plan. It is likely that the components of housing supply will be discussed in more detail at the relevant hearing session.
7. In addition, it is noted that it is intended that the 2016 SHLAA Update will form a 'post-submission document'. This should be added to the examination library, and made publically available, as soon as possible – and, in any event, well before the hearing sessions.

Gypsies and Travellers

8. Paragraph 5.2.5.3 of the Plan states that the GTAA has identified a net need for 32 additional permanent pitches. As is recognised by the Council's Technical Paper⁴, the Planning Policy for Traveller Sites (PPTS) requires Councils, when preparing Local Plans, to identify a supply of specific deliverable and developable sites. However, there appears to be a shortfall between the provision listed in the Technical Paper and the identified requirement. It will be necessary for the Council to demonstrate (as with general housing) that supply is adequate to meet that requirement.

Conclusion

9. I look forward to receiving the Council's comments on the above matters. For the avoidance of doubt, the comments in this note do not represent the complete list of the matters, issues and questions that I intend to raise during the examination and are issued without

¹ Document C2a-i, notably the conclusions at paras 6.14-6.16.

² PPG Ref ID 3-030-20140306.

³ Document E4.

⁴ Document B2e.

prejudice to my final report. If you have any queries about this note, then please contact me via the PO.

Michael J Hetherington
Inspector
1 August 2016