

Please Note: This document is in draft form. It is issued for comment only (to be sent to the Programme Officer for receipt by **5pm** on **Monday 26 September 2016**) and will be superseded by a final version following that date.

Matter 1 – Housing – Needs, Requirement and Supply

- 1.1 Is the Council's full objective assessment of housing needs (totalling 9,940 homes for the Plan period) sufficiently justified in line with the National Planning Policy Framework (the Framework) and Planning Practice Guidance (PPG)? Has appropriate account been taken of demographic and economic information, as well as market signals? Has an assessment been made of affordable housing needs as part of this process?
- 1.2 Is the Plan's proposed housing requirement (totalling 15,555 homes for the Plan period) sufficiently justified in line with the Framework and PPG? In particular, can it be shown that this figure is both deliverable and sustainable?
- 1.3 The PBA Objectively Assessed Housing Need Report (para 6.15) states that the Plan's intended growth option would "*add 6,700 workers to the resident labour force over and above the Trends scenario; but other things being equal the number of workplace jobs would increase only by hundreds.*" Can the Council clarify how this likely imbalance will be addressed and explain the likely source of this additional population?
- 1.4 Can an adequate and flexible supply of housing land be demonstrated in respect of (1) the Local Plan's housing target and (2) the five year housing land supply as required by the Framework and PPG? In both of these cases, are the components of housing supply clearly set out and appropriately justified? [*Inspector's note: It is suggested that the Council revises its Housing Land Supply Statement¹ to cover the components of overall land supply (through the Local Plan period) and to update five year land supply data to accord with the Plan's proposed housing requirement.*]
- 1.5 Are adequate safeguards in place to address any unanticipated shortfalls in housing supply during the Plan period?

Matter 2 – Duty to Co-operate & Relationship to Other Plan Areas

- 2.1 Has the Council satisfied the Duty to Co-operate set out in section 33A of the Planning and Compulsory Purchase Act 2004?
- 2.2 Given that the Plan seeks to set a housing requirement that exceeds its stated assessment of Telford & Wrekin's housing needs, is the Council's position of not seeking to meet any unmet housing demand from the West Midlands conurbation or South Staffordshire sufficiently justified? [*Inspector's note: the Council is also asked to comment on findings in paragraph 6.13 of the PBA Objectively Assessed Housing Need Report²*]

¹ Document E4.

² Document C2a-1.

Matter 3 – Development Strategy

- 3.1 Does the Local Plan plan positively for the development and infrastructure required in the area, in line with the presumption in favour of sustainable development set out in the Framework? *[Inspector's note: The Council is also asked to consider whether the criteria-based approach set out in policy SP4 represents either duplication or potential confusion with other policies, both in the Local Plan and the Framework.]*
- 3.2 Is the Local Plan's settlement hierarchy and proposed distribution of development, particularly between the urban and rural areas, sufficiently justified? With reference to paragraph 28 of the Framework, is adequate provision made for development in rural settlements?
- 3.3 Are (1) the prioritisation of previously developed sites within Telford and Newport (policies SP1, SP2 and SP4), (2) the focus on the development of publically-owned land and (3) the approach to best and most versatile agricultural land (policies SP1-SP3) sufficiently justified and in line with national policy in the Framework?
- 3.4 Has the Local Plan been subject to adequate sustainability appraisal?
- 3.5 Does the Local Plan provide satisfactorily for the delivery of development, with particular reference to transportation and other infrastructure, consistent with the intended introduction of a CIL Charging Schedule?

Matter 4 – Economy & Community

- 4.1 Is the Council's assessment of the additional employment land required during the Local Plan period (76 hectares, as stated in policy EC1) sufficiently justified in line with the Framework, most particularly paragraph 22, and national Planning Practice Guidance (PPG)?
- 4.2 Is the scale and distribution of the Plan's intended employment allocations (some 148 hectares, as set out in Appendix B) sufficiently justified in line with the Framework and PPG? Specifically, can it be shown that (1) the intended uplift from the identified need is both deliverable and sustainable and (2) that the Plan's approach makes the best use of land?
- 4.3 Is the range of uses provided for in strategic employment areas sufficiently justified?
- 4.4 Are the Local Plan's policies for the development of shopping and town centre uses, including (1) the growth assumptions set out in section 4.2, (2) the hierarchy of centres contained in policy EC4, (3) the limitations on non-retail uses set out in policy EC6 and (4) the retail impact assessment thresholds set out on policy EC8, based on robust and up-to-date evidence and consistent with national policy and guidance?
- 4.5 Is the Local Plan's application of the 'sequential approach' to the location of town centre uses consistent with the Framework?
- 4.6 Does the Local Plan provide adequately for, and appropriately ensure the protection of, community facilities?
- 4.7 Should the Local Plan make explicit reference to the Newport and Shrewsbury Canals project?

Matter 5 – General Development Requirements & Specialist Housing

- 5.1 Are the Local Plan's detailed requirements for new development clearly expressed and adequately justified, with particular reference to viability? Specific comments are requested in respect of the following matters:
- housing mix and housing standards (policy HO4)
 - affordable housing (policies HO5 and HO6)
 - biodiversity and woodland enhancement (policies NE1, NE2 and ER12)
 - open space provision (policy NE4)
 - promoting alternatives to the private car (policy C1)
 - renewable energy and reduction of carbon emissions (policy ER1)
 - waste planning (policy ER8)
 - water conservation and efficiency (policy ER10) - parking standards (Appendix F).
- In addition, do the requirements of policies HO4 and ER10 accord with the Written Ministerial Statement dated 25 March 2015?
- 5.3 Are the criteria for specialist housing set out on policy HO7 adequately justified?
- 5.3 Does the Local Plan's approach to traveller sites accord with national policy in the Planning Policy for Traveller Sites (PPTS)? Specifically:
- (a) Has the need for Gypsy and Traveller pitches been robustly assessed in line with the PPTS?
 - (b) Has an adequate supply of sites been identified in accordance with the PPTS? *[Inspector's note: the Council's response on this matter in document F2a is noted: this does not need to be restated.]*
 - (c) Do policy HO9's criteria for traveller sites accord with the PPTS?

Matter 6 – Environment

- 6.1 Is the highest level of protection that national policy requires for Areas of Outstanding Natural Beauty adequately reflected in the Local Plan? Does policy NE7 make a sufficient distinction between the AONB and Strategic Landscapes?
- 6.2 Are the Local Plan's Strategic Landscapes sufficiently justified and consistent with national policy in the Framework?
- 6.3 Is the Green Network identified in the Local Plan (policy NE6) and Strategic Landscapes (policy NE7), sufficiently justified and consistent with national policy in the Framework? Is it clear why specific areas have been included within or excluded from the Green Network? *[Inspector's note: the Council's comments on the specific changes to the Green Network that are sought by representors are requested.]*
- 6.4 Is the Local Plan's approach to the conservation of the built environment consistent with national policy in the Framework, particularly in terms of the relationship between the significance of a heritage asset and the weight that should be given to the asset's conservation (paragraph 132 of the Framework)?

Matter 7 – Environmental Resources

- 7.1 Is the Local Plan's approach to the safeguarding of mineral resources, bearing in mind the changes to policy ER2 that are now suggested, clearly expressed and sufficiently justified?
- 7.2 Are the extent and nature of the Mineral Safeguarded Areas, including the exclusion of urban areas, sufficiently justified with reference to the evidence base and relevant policy and guidance?
- 7.3 Is it clear which areas are now proposed as buffer zones in the Council's proposed changes?
- 7.4 Has adequate provision been made for the supply of mineral resources in accordance with relevant national policies? *[Inspector's note: the Council's response to the comments of representors on this matter, including in respect of site allocations, are particularly requested.]*
- 7.5 Has adequate provision been made for waste management facilities in line with relevant national policies?
- 7.6 Is the Local Plan's approach to flood risk management, including the allocation of sites for development, sufficiently justified with reference to up-to-date evidence and consistent with national policy?

Matter 8 – Site Allocations

- 8.1 Are the allocated sites appropriate and deliverable, having regard to the provision of the necessary infrastructure and facilities, and taking account of environmental constraints?
- 8.2 Is the overall site selection methodology robust and transparent?
- 8.3 Are relevant development requirements for the site allocations, in particular the Sustainable Urban Extensions proposed at Donnington & Muxton (H1) and Priorslee (H2), clearly set out and sufficiently justified? *[Inspector's note: The Council should refer in particular to PPG paragraph 12-010-20140306 which states that "Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)".]*

Inspector's note: It is noted that a number of additional housing and employment sites are proposed by representors for allocation in the Local Plan. For the avoidance of doubt, the need for any further such sites to be allocated as a matter of general principle is a matter that will be considered during the examination, with reference in particular to Matters 1, 2 and 3. In the event that it is considered that further site allocations are required, my intended approach would be to refer the matter back to the Council so that it can consider how best to address the relevant concern.

Michael J Hetherington
Inspector for the Examination of the Telford & Wrekin Local Plan
16 September 2016