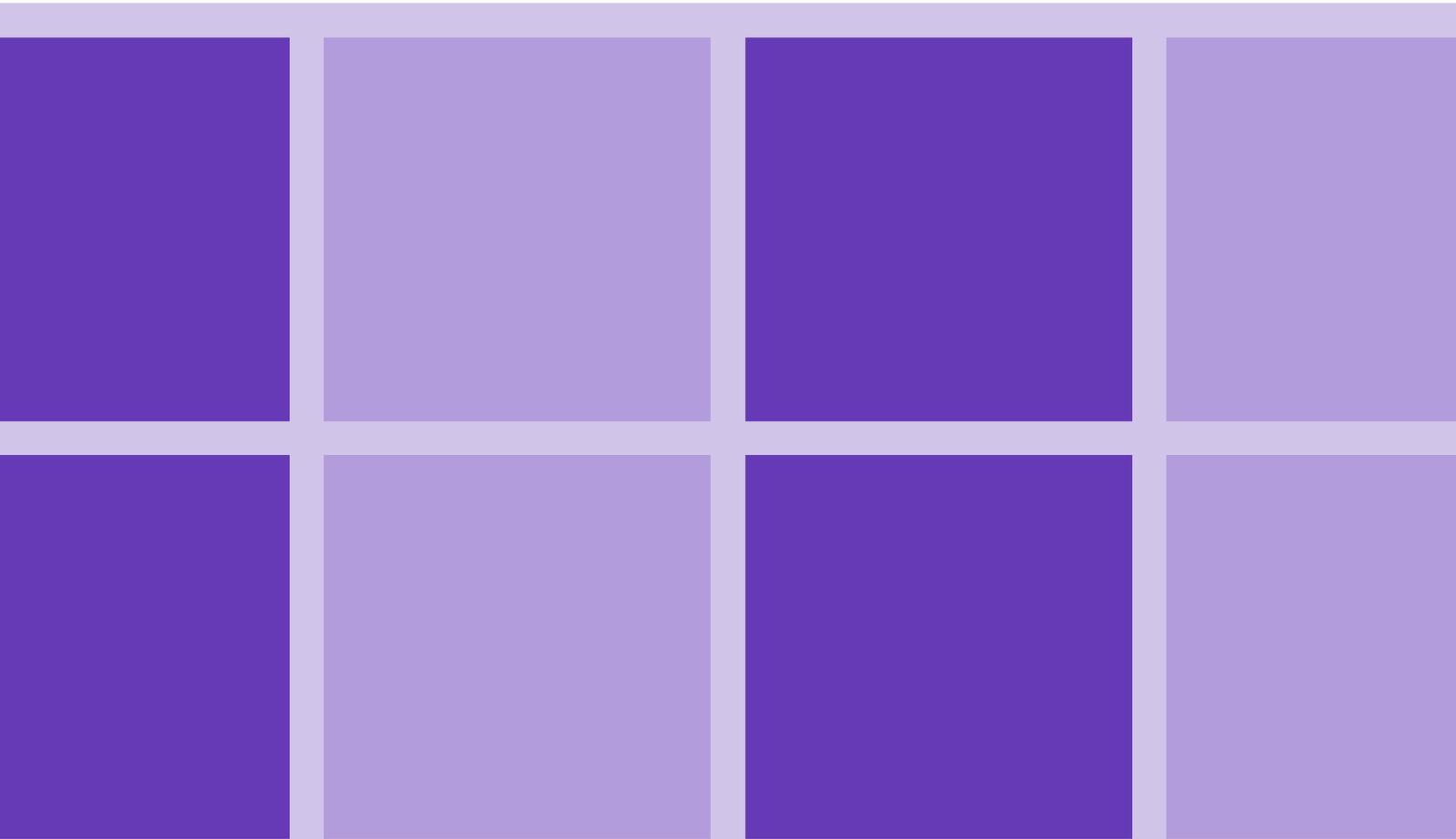


Telford and Wrekin Housing Land Supply Statement 2016-2021 (update Oct 2016)



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1 Introduction

1.0.1 This statement is an update to the previous statement issued in October 2015 (and updated in November 2015). It includes updated figures on housing completions and existing commitments up to April 2016, and a revised land supply calculation for the period 2016-2021. The statement also updates the supporting commentary, as appropriate, on matters relating to housing land supply in Telford and Wrekin. The housing land supply calculation indicates that the council has in excess of 10 years supply of housing land at April 2016.

1.0.2 The National Planning Policy Framework⁽¹⁾ (NPPF), published in March 2012, requires all local authorities as part of their strategic planning function to identify a continuous five-year supply of housing land. The ability to demonstrate whether or not a five year supply exists forms an important material consideration when determining planning applications for new housing. It does not, of itself, however, provide justification for approval or refusal of a planning application.

1.0.3 The statement comprises four main parts:

- the calculation of the five year housing land requirement;
- the sources and methods used that form the housing land supply;
- the calculation of the five year housing land supply position;
- a schedule of sites related to the current housing land supply for the period (2016-2021) in the appendices.

Local Plan

1.0.4 The Telford & Wrekin Local Plan (TWLP) is moving forward through the process towards adoption and covers the period 2011-2031. The plan identifies a revised housing requirement and the various sources of land that will deliver it. At this stage, the local plan has limited weight in determining planning applications and, so, the approach set out in this statement will continue to form the basis for the assessment of five year land supply, until the Local Plan gains development plan status.

Update

1.0.5 Please note that this update only covers matters in response to the Local Plan examination inspector's MIQs (Matters, Issues, Questions). It is not an update of the requirement or the supply.

1 Paragraph 47

2 Summary

2.0.1 The Council is able to show that it has more than five years' supply of deliverable land for the period 2016-21. It has carried out an update to the 2015 statement and has applied the advice in the National Planning Policy Framework (the NPPF) and the Government's Planning Practice Guidance (PPG).

2.0.2 Having calculated both the housing requirement and the deliverable supply of dwellings over the next five years, the Council considers that it now has 12.9 years supply of housing land (if applying an OAN-based housing requirement), and 8.24 years (if applying a proposed local plan housing requirement with a 5% buffer). The methodology used to derive this figure is explained in the rest of this statement.

3 Determining a five-year requirement

3.0.1 This section updates the Council's approach to calculating the housing requirement against which land supply will be measured. The calculation has been prepared in line with the NPPF and the PPG, as well as reflecting a number of High Court rulings on the subject of housing land supply.

3.0.2 The process involves a number of stages:

- Identifying the base housing requirement;
- Assessing the significance, or otherwise, of past delivery;
- Applying an appropriate buffer; and then
- Adjusting the requirement to take account of the buffer.

3.0.3 The statement will deal with each point in the rest of this section.

3.1 Base housing requirement

3.1.1 In line with paragraph 47 of the NPPF and more recent High Court rulings⁽²⁾ the starting point for establishing an appropriate housing requirement is the 'full, objectively assessed need for market and affordable housing'. The council therefore commissioned consultants Peter Brett Associates (PBA) to determine the objectively assessed needs for the borough up to 2031⁽³⁾, in line with the TWLP. In doing so, the Council is able to measure the deliverable supply of land against a five year requirement based on the PBA report that covers the period 2016-21.

3.1.2 The Council published the findings of the PBA study in March 2015. This represents the most up to date measure of objectively assessed need (OAN) for a five year period. In assessing the need, the council has not made any adjustment to reflect actual delivery during the period 2006-11. In doing so, the Council relies on the ruling in Zurich Assurance⁽⁴⁾. This ruling helpfully clarifies how shortfalls (or 'backlog') from previous plan periods should be dealt with in assessing future housing need.

Table 1 Five-year housing requirement for the period 2016-21

A	Objectively assessed need (OAN) for the period 2011-31	9,940
B	Five-year housing requirement for the period 2016-2021 (A divided by 20, multiply by 5)	2,485
	Annualised five-year housing requirement (B divided by 5)	497

3.1.3 The work carried out by PBA calculated an OAN figure of 9,940 homes for the period 2011 to 2031, or 497 dwellings per year. As explained in Table 1 above, the base requirement figure for the five year housing supply calculation is therefore 2,485 dwellings.

2 Most notably, *Hunston Properties Ltd v SSCLG and St Albans City and District Council* 2013 EWHC 2678 (Admin); and *Gallagher Homes Ltd and Lioncourt Homes Ltd v Solihull MBC* 2014 EWHC 1283 (Admin)

3 *Telford and Wrekin Objectively Assessed Need 2011-31: Final Report*, March 2015

4 *Zurich Assurance Ltd v Winchester City Council and South Downs National Park Authority* 2014 EWHC 758 (Admin)

3 Determining a five-year requirement

3.2 Assessing past delivery

3.2.1 The assessment of past delivery falls into broadly two categories; firstly, whether any shortfall has occurred when measured against up to date requirements; and, secondly, making a judgement on the significance, or otherwise, of any observed under-delivery in the past and whether this has been persistent.

Comparing current delivery against the housing requirement

3.2.2 In terms of shortfall, this is relatively straightforward to calculate and involves comparing delivery of new dwellings against the five year requirement (identified in paragraph 3.6). This is set out in Table 2.

Table 2 Comparison between delivery and the OAN-based housing requirement 2011-16

	Net completions (5)	Five year housing requirement (per year)	Comparison (delivery vs requirement)	Cumulative difference
2011-12	720	497	+223	-
2012-13	607	497	+110	+333
2013-14	842	497	+345	+678
2014-15	1074	497	+577	+1,255
2015-16	1,255	497	+758	+2,013
Total	4,498	2,485	N/a	N/a

3.2.3 Table 2 illustrates the delivery performance in Telford and Wrekin during the last five years. It can be seen that, at least when considered against an OAN-based housing requirement, that there is no evidence of any shortfall.

3.2.4 It is recognised that the emerging local plan does not have the full weight of an adopted plan but, nonetheless, it is useful to compare delivery against the housing requirement that the Council intends to adopt. This will give an indication of whether a shortfall is evident against the Plan.

5 Data based on Telford & Wrekin Council annual monitoring figures up to April 2016.

Table 3 Comparison between delivery and the TWLP-based housing requirement 2011-16

	Net new completions ⁽⁶⁾	Housing Requirement (per year)	Comparison (delivery vs requirement)	Cumulative difference
2011-12	720	778	-58	-
2012-13	607	778	-171	-229
2013-14	842	778	+64	+165
2014-15	1074	778	+296	+131
2015-16	1,255	778	+477	+608
Total	4,498	3,890	N/a	N/a

3.2.5 Table 3 indicates that over the last five years delivery has exceeded the housing requirement set out in the TWLP⁽⁷⁾, averaging about 900 net new dwellings per year since 2011. The figures also illustrate that a shortfall in the early part of a five year period can not only be made up but also exceeded in the latter part.

Past-delivery

3.2.6 Paragraph 47 of the NPPF requires the Council to assess the record of housing delivery, and to make a judgement as to whether or not any under-delivery has occurred and whether this has been persistent. If it is judged that persistent under-delivery has occurred to such an extent then an appropriate buffer should be added to the requirement, usually 20%, so that under-delivery can be addressed. Unlike the shortfall, the matter of under-delivery cannot be measured simply by calculation. It is based on a planning judgement taking into account all the relevant considerations including the scale of any under-delivery observed. The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle⁽⁸⁾.

3.2.7 The Council's record of past performance each year since 2006 is presented in its Annual Monitoring Reports (AMRs). A summary comparison of delivery and the housing figures set out in the Core Strategy is set out in Figure 1 below.

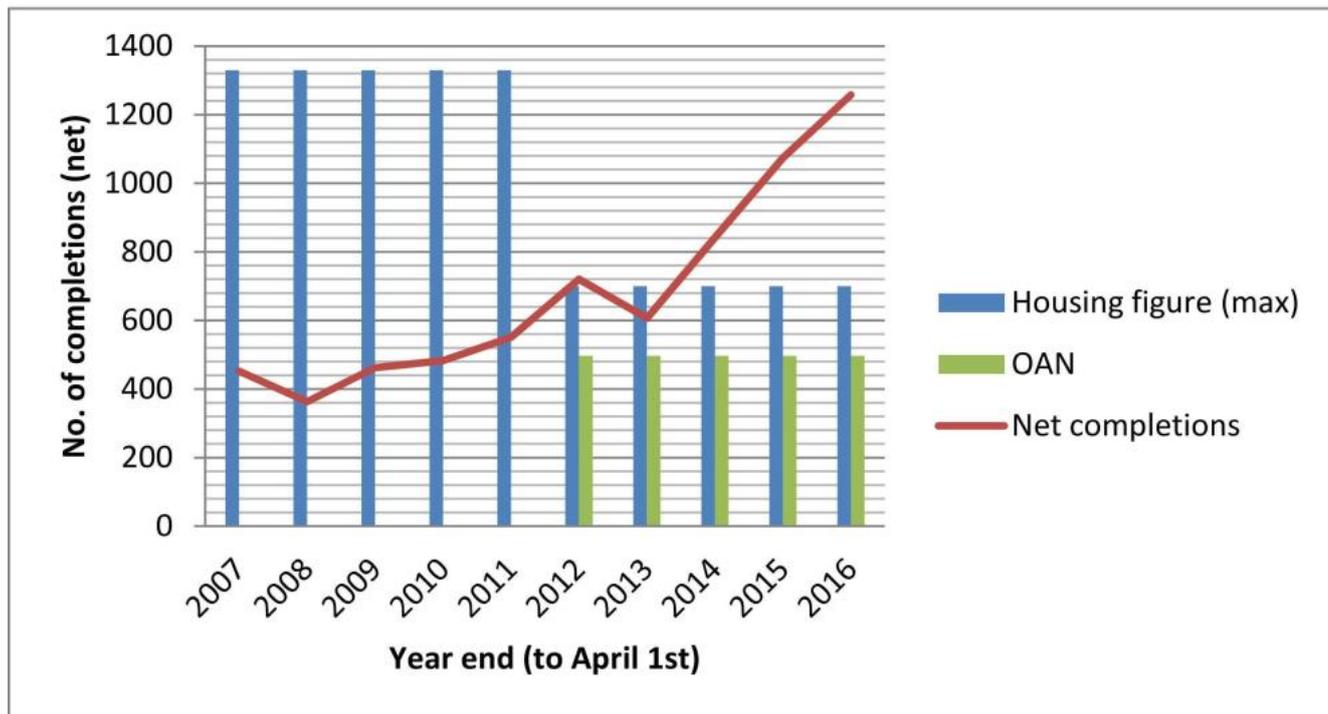
6 Data based on Telford & Wrekin Council annual monitoring figures up to April 2016. The AMR 2016 report will be published shortly

7 As stated in Policy HO1 of the Telford and Wrekin Local Plan

8 Planning Practice Guidance Paragraph: 035 Reference ID: 3-035-20140306

3 Determining a five-year requirement

Figure 1 AMR completions v Plan housing figures/OAN 2006-16



Source: Telford and Wrekin Annual Monitoring Reports, PBA.

3.2.8 For the period since 2006, the housing figures used as a comparator here are derived from the existing Core Strategy Policy CS1. These, in turn, replicated directly the housing figures set out in the West Midlands Regional Planning Guidance (WMRPG) adopted in 2004, thus predating both the NPPF and the recent worldwide economic recession. Figure 1 illustrates the mismatch between (net) delivery and the aspiration of the WMRPG. The WMRPG figures adopted for Telford & Wrekin identified the borough, and in particular Telford urban area, reflected the role of the borough as a sub-regional foci for growth in the western part of the region. However, in the longer term, the WMRPG sought to direct development back into metropolitan area as part of the wider strategy of urban renaissance. This is why the figures step down significantly from 2011 onwards. Consequently, the housing figures set out in the core strategy did not represent a measure of overall housing need, rather they represented the 'policy-on' objectives taken forward through the regional planning process.

3.2.9 Even if the figures for recent delivery rates were compared to the previous housing figures, the Council considers that this would not assist in the discussion on the significance or otherwise of historic development rates. This is due to previous housing figures being expressed as 'maxima', rather than 'requirements to be met'. Furthermore, no minimum targets were ever set covering the previous plan period (2006-16), therefore delivering homes at below the maximum would not constitute failure on the Council's part. Taken further, even if no houses had been built in the borough this would not constitute under-delivery against the development plan. The figures were expressed as maxima because the Council was not expected to deliver the completion levels assigned to it, given that a significant proportion of the new households would be the result of significant levels of migration into the borough from other parts of the region. So if those households do not move to Telford as envisaged then those homes would not be needed.

3.2.10 When assessing delivery over the last ten years, the period is clearly formed of two parts; 2006-11; and 2011-16. Delivery did fall short of the maximum over the first five years, but then exceeded the housing figures in the latter period. Furthermore, if taken at face value, Figure 1 shows that the Council, in fact, exceeded the housing figures on four out of the ten year assessment period. And where the OAN is used as the measure, delivery has exceeded the OAN-based requirement every year since 2011. Consequently, on the basis of the evidence presented here, the Council does not consider that this constitutes persistent under-delivery or failure on the part of the Council to ensure sufficient homes are delivered that would necessitate a significant adjustment to the base housing requirement.

3.3 Applying an appropriate buffer

3.3.1 In establishing a robust housing requirement, the Council must also consider adding an appropriate buffer to the basic figure of 2,485 referred to previously. The NPPF identifies that this should be 5%, to account for choice in the local market or, alternatively, 20% to reflect a record of persistent under-delivery. The key point of contention is whether this Council should, apply a 5% or 20% buffer to its housing requirement. This issue has been the subject of some considerable debate at a number of recent planning appeals.

3.3.2 The two main factors of influence are shortfall and under-delivery. These factors have been assessed in paragraph 3.7-3.16 of the statement. On the basis of that assessment, the Council is not a "20% authority". No shortfall has occurred since 2011. Moreover, the Council has not under-delivered on housing completions given recent performance and the nature and purpose of the housing figures in question.

3.3.3 Consequently, the Council has applied a 5% buffer in line with the advice in paragraph 47 of the NPPF. By adding 5% to the base housing requirement, this increases the overall figure to 2,609, or 522 per year up to 2021.

4 Components of supply

4 Components of supply

4.0.1 In determining whether or not a sufficient supply of housing land exists to meet the housing requirement established in Table 2, the Council must assess the deliverability of the sites currently identified for housing. Deliverability is defined in the NPPF as sites that, "*should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.*"⁽⁹⁾.

4.0.2 It is necessary to point out that planning permission is not a prerequisite to a site being assessed as 'deliverable' (in line with the *Wainhomes* ⁽¹⁰⁾). Indeed, many councils include additional sources of land within their five year supply calculation; sites with resolution to grant subject to legal agreements being signed which it can be demonstrated will come forward in five years, or existing site allocations and windfall allowances. Telford & Wrekin Council has included only those sources it considers justified in forming part of the five year supply, In line with the *Wainhomes* ruling, the Council has kept under review the other potential sources of supply, that is sites that the Council has resolved to grant permission for subject to a signed legal agreement, and has included additional sites which it considers have realistic prospects of coming forward within the next five year period.

4.1 Recent legal rulings

4.1.1 An important factor in assessing 'deliverability' is the appropriate application of the term 'available now'. Broadly speaking, the view amongst both applicants and many local authorities has been that in order for a site to be judged available now it must have the benefit of an extant planning permission. Indeed, this approach has formed the basis for the previous housing land supply statements issued by Telford and Wrekin Council.

4.1.2 However, a recent High Court case ⁽¹¹⁾ in April 2016 provides some very helpful clarification on the proper meaning of 'available now'. At paragraph 21 of the ruling, Ouseley J stated:

" "...Availability now" cannot be demonstrated by showing that development on a site is "achievable with a realistic prospect that housing will be delivered on the site within five years..." But that last phrase covers an important aspect of "deliverability". The planning judgment as to "deliverability" can clearly be made in respect of sites which do not have planning permission now, but can reasonably be expected to receive it so as to enable housing to be built on them within the next five years. These would include allocations in an emerging local plan, once assessed for the purpose of inclusion in the housing land supply, or indeed in an adopted plan... "Now" means "now", and I accept that "available now" looks to the present availability of the land in question. But...argument that that phrase covers the grant of planning permission and requires planning permission to have been granted "now", lacks a sound planning basis, and that is the first reason why it is wrong."

4.1.3 Ouseley J went on to say, in paragraph 23:

9 NPPF paragraph 47, footnote 11

10 *Wainhomes (South West) Holdings Limited v SSCLG v Wiltshire Council 2013 EWHC 597 (Admin), paragraph 34*

11 *St Modwen Developments Ltd v SSCLG and East Riding of Yorkshire Council and Save Our Ferriby Action Group [2016] EWHC 968 (Admin)*

"...if the Secretary of State had intended to require that only sites with planning permission were to be included within the five year supply figures, something of a radical change to what had hitherto been done, the obvious way to have done that would have been to use express words to that effect, rather than by using such oblique language as "available now", and in a footnote to "deliverable". The need for planning permission, in order for a site to be included in the supply figures, would have been an obvious criterion to specify by itself. I find it impossible to accept that such a critical, and simply expressed, factor was left to be spelt out from "available now"."

4.1.4 The implications of this ruling are clear. It is that there is no sound planning reason to specifically exclude any site solely on the basis that that site does or does not have the benefit of planning permission on day one of the relevant five year period, given that deliverability is measured over five years. Furthermore, it is even less credible in planning terms to measure deliverability on the basis of whether or not those sites in the supply 'will' deliver new homes, given that a site can be considered 'deliverable' without planning permission. As Ouseley J states, in paragraph 20:

"...I can see no planning rationale for depriving the planning authority and Inspector of the opportunity to reach a judgment on the general criteria for deliverability on sites in an emerging local plan. Planning permission clearly goes to the issue of deliverability because a site with permission is suitable for housing development, and a barrier to delivery has been removed. But it cannot sensibly be argued that planning permission is required now for a site to be realistically deliverable over the next five years."

4.1.5 The next section deals with the components of supply, in a manner that is consistent with this judgment.

4 Components of supply

4.2 Sources of supply

4.2.1 The Council has updated the assessment of deliverable supply up to April 2016. The following sources of supply are considered to be appropriate for inclusion:

- Sites with planning permission with dwellings under construction as at April 2016;
- Sites with planning permission but not yet started, as at April 2016;
- Sites with planning permission, subject to signing a legal agreement (oft described as 'resolution to grant'), as at April 2016;
- Other sites considered to be deliverable, as at April 2016; and
- An allowance for windfall sites.

4.2.2 The results of the assessment of sites are set out in the appendices. Table 4 below sets out the various assumptions and figures underpinning the total five year supply. Based on the various sources of supply set out in Table 1, the Council has identified a deliverable supply of 6,727 dwellings for the period 2016-2021.

Table 4 Summary of supply calculation 2016-21 (at April 2016)

A	Dwellings from major sites ⁽¹²⁾ currently under construction, at April 2016	2,185
B	Dwellings from major sites not yet started, at April 2016 ⁽¹³⁾	2,569
C	Dwellings from small sites ⁽¹⁴⁾ currently under construction, at April 2016	153
D	Dwellings from small sites not yet started, at April 2016	348
E	Dwellings from sites with resolution to grant, at April 2016	493
F	Dwellings from housing site allocations considered deliverable up to April 2021	745
G	Other deliverable sites at April 2016	174
H	Allowance for windfalls in the period 2019-21 ⁽¹⁵⁾	60
	Total deliverable housing land supply, at April 2016	6,727

Sites with Planning Permission

4.2.3 In line with the NPPF, the principal source of land supply for the purposes of the five year calculation is sites with planning permission. The NPPF states that:

12 Major sites are classed as comprising ten dwellings or more
13 comprising sites with full and outline planning permission
14 classed as sites comprising 9 dwellings or less
15 sites less than 0.1 hectare

"Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."⁽¹⁶⁾

4.2.4 This is important for Telford & Wrekin as a significant amount of current supply is related to a small number of large, strategic sites, principally those identified in the Core Strategy (Lawley, Lightmoor, and Telford Millennium Community) plus a number of other large development sites approved across the borough, which continue to be delivered in a phased manner. Therefore, the assessment recognises where certain sites have either lead-in times that extend over a number of years, or which are subject to phased delivery. Therefore, where development of sites is expected to take more than five years to complete, only that part of the supply is included within the five year period. This is achieved by applying appropriate lead-in times and assessing the likely rate of delivery, otherwise known as build out rates. See Appendices 1-3 for details.

Sites with planning permission (resolution to grant)

4.2.5 As in 2015, a number of sites that have the benefit of planning permission, subject to the signing of a legal agreement before development can commence, have been included in the deliverable supply. Whilst not being available at the start of the period, the council considers that these sites have the potential to deliver over the next five years. See Appendix 4 for details.

Proposed local plan allocation site

4.2.6 The deliverable supply also includes a number of proposed allocations that are already being progressed through the development process and which, it is envisaged, could deliver new homes during the next five years. These sites have been included because there is an expressed interest from the landowner to sell the land for development, or a developer/builder intends to submit a planning application in the near future.

Windfall sites

4.2.7 An allowance has been included for those dwellings that could be delivered during the five year period, but which currently are not specifically identified. The council has included a very modest allowance for future windfall sites (0.1 ha or less) likely to come forward during the next five year period, based on assessment of past delivery during the last ten years. The modest nature of the allowance recognises that many small sites may have already been identified through the SHLAA ⁽¹⁷⁾ process, or will have planning permission already and so, by definition, cannot be defined as new windfalls.

4.2.8 It is also important to point out that the allowance has only been applied to an assessment of windfalls involving previously-developed sites, for example conversions. This is to exclude residential garden land from within the allowance, in line with paragraph 48 of the NPPF.

4.2.9 In addition, and in line with other councils across England, the allowance is only applied in the latter stages of the period (2018/19 and 2019/20)⁽¹⁸⁾. This is to ensure that, as far as reasonably possible, the risk of double-counting is minimised within the windfall allowance by

16 NPPF, paragraph 47, footnote 11

17 Strategic Housing Land Availability Assessment

18 This approach follows the method applied by Shropshire Council in their 2014 HLS statement

4 Components of supply

excluding from the allowance those dwellings that are already approved and in the process of coming forward. The analysis indicates that an average of 30 dwellings have come forward on windfall sites since 2001.

4.2.10 The average has then been multiplied by two to establish the allowance for the last two years of the period, as set out in Table 4.

4.3 Lead-in times and build out rates

4.3.1 A critical aspect in assessing likely future delivery is to apply lead-in times and build out rates that are a fair and reasonable reflection of the local housing market. Rather than applying a blanket or mechanistic approach, the applied rates for the identified sites has been determined by the council's Development Delivery Group Specialist, who works closely with developers both on the delivery of both small and large-scale, strategic sites and therefore has a thorough understanding of local market and can apply rates that are informed rather than being arbitrarily set.

4.3.2 Whilst no legal definition exists, 'lead-in' time is the period from when a developer or house builder physically commences on site to the point of first legal completion. Typically, this is around six months, but can be extended to nine or 12 months where demolition is involved or where other constraints or 'abnormals' associated with the site have to be dealt with prior to the physical construction of dwellings.

4.3.3 Similarly, build out rate is the estimate of what a site or outlet (ie. one sales centre) will achieve in any 12 month period once the lead-in period has been completed. Therefore, a volume house builders should, generally, achieve around 40 new build completions per annum (potentially more) once the site is under construction, whilst regional and local builders are likely to deliver at a slightly slower rate (36 dwellings per annum, dpa, and 20 dpa, respectively). Where some sites have been judged to have capacity to deliver above the 40 dpa built out rate, this is normally due to there being multiple outlets on these sites, or where a builder (for example a Registered Provider) is building homes to meet specific needs rather than building homes in response to market demand.

4.4 Accounting for demolitions

4.4.1 The Council has accounted for losses in the existing stock, both in terms of past delivery and future supply, as part of the five year supply calculation. Annual delivery (dwelling completions) is presented as of losses as part of the annual monitoring process. This means that each year the gross number of dwellings completed in given period is discounted by the number of demolitions that occur in the same monitoring period. In terms of the supply from future sites, the losses will be accounted for slightly differently depending on when those losses have occurred, or are likely to occur. For example, where an existing dwelling or dwellings has/have been demolished or converted in the preceding period up to April 2016, these will be accounted for in the net completions figure. The performance of the plan against the requirement will then be judged using the net figure.

4.4.2 However, if any losses proposed in relation to a new housing proposal have not yet occurred as at April 2016, then the future supply will take account of this by being discounted from the total number of new dwellings proposed on those sites. This is to ensure that future

supply (during the period 2016-2021) does not over estimate future delivery. This approach ensures that the figures that are presented properly account for losses in the existing stock on the April monitoring date each year.

5 Five year housing supply calculation

5 Five year housing supply calculation

5.0.1 Table 5 below sets out the housing land supply position for the period 2016-21, as at April 2016. The table incorporates information from table 1 and 4, in particular the housing requirement and the number of dwellings considered to be deliverable.

Table 5 Five year supply of housing land for Telford and Wrekin 2016-2021

A	Five year housing requirement (2016-21) - see table 1	2,609
B	Annual rate (A divided by 5) ⁽¹⁹⁾	522
C	Total deliverable housing land supply (see table 4)	6,727
	Number of years housing land supply (c divided by B)	12.9

5.0.2 The result of the assessment delivery and likely supply over the next five years, compared to the five year housing requirement, demonstrates that the Council has far in excess of the minimum five years worth of housing land supply.

5.0.3 As stated above, Telford & Wrekin Council is required to demonstrate that there is an additional buffer of 5% to ensure choice and competition in the market for land. Based on the figures presented in this assessment, it is clear that the Council has not only met this requirement but has considerably exceeded it.

19 includes 5% buffer

6 Additional Commentary in light of Inspector's MIQs

6.0.1 The inspector presiding over the examination of the Local Plan has requested that the Council update certain information relating to the components of overall housing supply through the plan period, and present an updated five year supply calculation based on the proposed housing requirement ⁽²⁰⁾. The following commentary deals with these matters.

6.0.2 The inspector's question is repeated here in full, for reference.

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? [*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.*] (Matters, Issues and Questions Paper, September 2016)

6.0.3 In response to (1), the Council has updated the components of overall supply set out in the Telford & Wrekin Local Plan (submission version) ⁽²¹⁾. The revised table is set out below.

Table 6 Housing Land Provision for the borough 2011-31 (as at April 2016)

		Gross	Net
A	Net Completions (2011-16)		4,498
B	Dwellings with Planning Permission (under construction)		1,068
C	Dwellings with Planning Permission	7,719	
	Less 20% allowance for non-implementation	(1,544)	
D	Net supply from dwellings not started		6,175
E	Total existing supply (A+B+D)		11,741
F	Supply from resolution to grant sites	2,341	
	Less a 20% allowance for non-implementation	(468)	1,873
G	Site allocations	2,255	
	Less a 20% allowance for non-implementation	(451)	1,804
H	Windfall allowance (sites less than 0.1 hectares)		450
I	Madeley Neighbourhood Development Plan		50
J	Total Future Supply		4,177
	Total housing land provisions 2011-31		15,918

20 See examination library document F3 for the exact wording

21 Table 10

6 Additional Commentary in light of Inspector's MIQs

6.0.4 The main differences between the previous table and the revision are the addition of another year's completions, and a reduction in the site allocations component as a result of H2 (Land off Castle Farm Way, Priorslee) receiving the benefit of planning permission (subject to resolution of a section 106 agreement). Hence, the increase in the resolution to grant figure from 1,680 to 2,341. Other changes relate primarily to the progress of sites through the construction process, with an increase in dwellings under construction and a consequential fall in the number of dwellings with planning permission not yet started.

6.0.5 In response to (2), the Council has prepared a revised five year supply calculation based on the Local Plan proposed housing requirement. This is set out in Table 7. The deliverable supply figures remain unchanged.

Table 7 Five year supply of housing land for Telford & Wrekin 2016-21 (based on 'Plan-led' requirement)

Component		5%	20%
A	Five year housing requirement ⁽²²⁾	4,080	4,840 ⁽²³⁾
B	Annual rate (A divided by 5)	816	968
C	Total deliverable housing land supply	6,727	6,727
	Number of years supply	8.24	6.95

6.0.6 For illustration purposes only, an extra column has been added to show how the supply compares to a Plan-led housing requirement which includes a 20% buffer. As can be seen, even after applying a buffer for under-delivery, sufficient deliverable land has been identified to ensure supply exceeds five years, as required by the NPPF.

23 Assumes the base five year requirement of 4,670 (778 plus 20%, multiplied by 5), plus the difference between the requirement (4,670) and total net completions since 2011 (4,498), resulting in a shortfall of 172, which is in turn is added back onto the requirement.

22 Based on a housing requirement-led five year requirement of 816 dwellings per year (778 multiplied by 5 and assuming a 5% buffer) multiplied by 5

7 Appendix 1 Deliverable sites schedule 2016-21

7.1 See separate schedule

Appendix 1 Telford & Wrekin Housing Land Supply - deliverable sites (April 2016-2021)

1 Major Sites under construction at 1st April 2016							
PlanAppRef	Site Address	Total left	5 year delivery	Under Construction at 01/04/16	TWC comments	Lead-in times from start on site	Build - Out Rate pa per outlet
W2009/0051	Park Lane, Woodside, Telford	27	27	24	National house builder on site	Already on site	40 units
W2010/0259	Rough Park House, Woodside Ave, Woodside	23	23	13	Local house builder on site (under TWC/2014/0323)	Already on site	10 units
W2011/0488	Phases 3 & 4 Lawley Village, Lawley	6	6	0	Consortium of national house builders on site	Already on site	120 units
W2011/0506	Phases 3 & 4, Lightmoor Village, Telford	7	7	7	National house builder on site	Already on site	40 units
W2011/0769	Homelands Caravan Park, Mossey Green, Telford	9	9	1	Site under construction with 2 units completed	Already on site	5 units
W2011/1037	Hartsbridge Road, Oakengates	8	8	8	Local house builder on site	Already on site	20 units
W2012/0419	Lawley Phase 6, Dawley Road, Lawley, Telford	94	94	61	Consortium of national house builders on site	Already on site	120 units
W2013/0096	Telford Millennium Community Phases 3,4 & 5 Ketley	266	266	50	National house builder on site with 2 outlets proposed (TWC/2014/1151) submitted for 60 units	Already on site	60 units
W2013/0265	The Mount, Haygate Road, Wellington	2	2	2	Local house builder on site	Already on site	20 units
W2013/0649	Land to rear of Holly Acres, Long Lane, Telford	11	11	11	Site under construction and plots being marketed	Already on site	5 units
W2013/0693	Heath Court, Cliff Crescent, Ellerdine	12	12	4	Local house builder on site	Already on site	20 units
W2013/0720	Sommerfeld Road, Hadley, Telford	51	51	8	National house builder on site	Already on site	40 units
W2013/0928	Phase 1, Wellington Road, Newport	2	2	0	National house builder on site	Already on site	40 units
W2013/0938	Land off Holyhead Road, Wellington, Telford	109	109	77	National house builder & Housing Association on site	Already on site	40 units
W2013/0995	Church Street, Oakengates	20	20	20	Housing Association on site	Already on site	50 units
W2013/1003	Hadley Park West, Leegomery	51	51	2	National house builder on site with 25% affordable housing	Already on site	50 units
W2014/0036	Green Lane, Newport	10	10	10	Site under construction and plots being marketed	Already on site	5 units
W2014/0221	Sommerfeld Rd, Hadley	42	42	25	Regional house builder on site	Already on site	36 units
W2014/0237	Doseley Works, Doseley	175	175	40	National house builder on site with 25% affordable housing known as Phase 2 (approval for a total of 192 dwellings)	Already on site	50 units
W2014/0258	Brick Kiln Bank, Lightmoor	30	30	30	National house builder on site	Already on site	40 units
W2014/0333	Stafford Road, Newport	79	79	25	National house builder on site	Already on site	40 units
W2014/0370	Limekiln Lane, Arleston	14	14	14	Regional house builder on site	Already on site	36 units
W2014/0401	Edgmond Road, Newport	50	50	27	National house builder on site	Already on site	40 units
W2014/0437	Phase 2, Wellington Road, Newport	6	6	5	National house builder on site	Already on site	40 units
W2014/0526	St.Georges Bypass, St.Georges	17	17	17	Housing Association on site	Already on site	50 units
W2014/0656	Shifnal Road, Priorslee	14	14	12	Local house builder on site	Already on site	20 units
W2014/0769	Hadley Park West, Leegomery	37	37	24	National house builder on site	Already on site	40 units
W2014/0796	Hadley Park West, Leegomery	16	16	7	National house builder on site	Already on site	40 units
W2014/1098	Walker Street, Wellington	10	10	6	Local house builder on site	Already on site	20 units
W2014/1122	Randlay Avenue, Randlay	16	16	16	Main contractor on site for developer of the NuPlace initiative	Already on site	50 units
W2014/1124	Woodlands Primary School, Madeley	101	101	96	Main contractor on site for developer NuPlace	Already on site	50 units
W2015/0028	Frome Way, Donnington	79	79	20	National house builder on site	Already on site	40 units
W2015/0058	Hadley Park West, Leegomery	28	28	20	National house builder on site	Already on site	40 units
W2015/0060	Wellington Road, Trench	29	29	29	Housing Association on site	Already on site	40 units
W2015/0143	Charlton Street, Wellington	31	31	31	Housing Association on site	Already on site	50 units
W2015/0151	The Barns, Church Aston	23	23	12	Regional house-builder on site	Already on site	36 units
W2015/0177	Park Road/Royal Way, Malinslee	81	81	81	Housing Association on site (supercedes previous application TWC/2014/0882)	Already on site	50 units
W2015/0233	Phase 8, Lawley Village, Lawley	561	561	33	Consortium of national house builders on site	Already on site	120 units
W2015/0518	Phase 3, Wellington Road, Newport	24	24	24	National house builder on site	Already on site	40 units
W2015/0579	47 Wrekin Road, Wellington	14	14	14	Local house builder on site	Already on site	20 units
	Sub-total	2185	2185	906			
2 Major Sites with Full Planning n/s at 1st April 2016							
PlanAppRef	Site Address	Total left	5 year delivery	Under Construction at 01/04/16	TWC Comments	Lead-in times from start on site	Build - Out Rate pa per outlet
W2009/0326	Randlay Centre, Randlay, Telford	12	12	N/A	Regional developer owns site with 6 units completed from total of 18 dwellings	6 months	12 units
W2010/0487	Charlton Arms Hotel, Church Street, Wellington	41	41	N/A	Site to commence construction in May 2016-2 demo's accounted in 2015/16 period	None	20 units
W2012/0961	Back Lane, Tibberton	10	10	N/A	Greenfield site sold to developer with start on site confirmed for 18th April 2016	6 months	20 units
W2014/0272	Ivydale, Coalport	12	12	N/A	Local house builder commenced site operations. Development known as Riverside Walk	6 months	20 units
W2014/0602	Plot E, Pool Hill Road/Doseley Road, Dawley	50	50	N/A	Reserved matters application granted in Aug 2015 for regional house builder-owned site. Telephone conversation with the agent on 14th June 2016 confirmed intention to commence development in early 2017	6 months	40 units

W2014/0765	1-3 Castle Lane, Hadley	11	11	N/A	Local house builder acquired site and will commence in May 2016-1 demo accounted in 2015/16	6 months	20 units
W2014/0998	Land adjacent Windermere House, Farm Lane, Horsehay	13	13	N/A	Full application approved 2nd April 2015. Site for sale and marketed by local agents since March 2016	6 months	20 units
W2014/1072	The Paddocks (Land north of Lightmoor Way), Lightmoor Village, Lightmoor	200	200	N/A	Reserved matters application approved 25th November 2015. Site commencement by national house builder in Q3 2016	6 months	50 units
W2015/0217	Site A, Pool Hill Road, Horsehay	14	14	N/A	Full application approved on 11th November 2015. Housing Association contracted to develop the site, which is owned by HCA with start in Q3 2016	6 months	40 units
W2015/0362	Broomfield Road, Newport	30	30	N/A	Reserved matters application approved 30th July 2015. Site owned by a Housing Association with Homes and Communities Agency (HCA) funding enabling start on site Q3 2016.	6 months	40 units
W2015/0997	Former Malinslee Primary School, Matlock Avenue, Malinslee	92	92	N/A	Full application approved on 23rd March 2016. Site to be developed by TWC as part of the NuPlace initiative, with start on site expected in Q3 2016	6 months	50 units
	Sub-total	485	485	N/A			
3	Major Sites with Outline Planning n/s at 1st April 2016						
PlanAppRef	Site Address	Total left	5 year delivery	Under Construction at 01/04/16	TWC Comments	Lead-in times from start on site	Build - Out Rate pa per outlet
W2002/0392	Land at Lightmoor Village, Telford	320	100	N/A	This outline application is related to a larger site, known as Lightmoor, which was originally approved on 23rd September 2003 for 800 dwellings and has been delivering homes in a number of phases. The landowner, Bournville Village Trust, are shortly intending to market Phase 2 of the Croppings (for 100 dwellings) and are projected to be on site 2017-2019. Therefore, the site is considered deliverable in five years.	6 months	50 units
W2004/0980	Land at Lawley Village, Telford	1620	280	N/A	This outline application was originally approved on 21st October 2005, and has been delivering homes in a number of phases. A reserved matters application for Phase 7 (280 units) to be submitted by Ironstone consortium (comprising three housebuilders) in Q2 2016	6 months	120 units
W2009/0914	Southwater, Telford Town Centre	330	53	N/A	This outline application for mixed-use development was approved on 17th June 2010. An element of the approval of 330 dwellings is to be developed for NuPlace with start on site expected in Q3 2017	6 months	40 units
W2010/0152	Redhill Clay Pit, Redhill Way, St Georges	120	120	N/A	The outline application was approved on 13th May 2011. Remaining numbers to be completed from outline consent of 337 dwellings to be sold by landowners as serviced site	6 months	40 units
W2011/0002	Alexandra Road, Wellington	18	18	N/A	This outline application was approved on 13th December 2013. Site has now been acquired by local house builder, with demolition already completed in 2015/16.	6 months	20 units
W2011/0541	Land off, Peregrine Way, Apley	100	100	N/A	This outline application is a renewal of the previous application (w2006/0291), and was approved on 21st September 2012. The site was owned by the HCA but has now been acquired by a national house builder with a reserved matters application now submitted (TWC/2015/0843).	6 months	40 units
W2011/0821	Land north, east and south of Aston Grove, off Wellington Road, Newport	145	136	N/A	This outline application was approved on 8th January 2013. The site is being progressed by a national house builder and a reserved matters application (TWC/2016/0059) for 136 dwellings was approved on 22nd April 2016.	3 months	50 units
W2011/0949	Gladstone House, Hadley Local Centre, Hadley	24	24	N/A	This mixed-use outline application was approved on 25th January 2012 with permission granted for 8 years, with NuPlace to build the residual housing element.	6 months	40 units
W2011/1102	Beech Road, Ironbridge	90	90	N/A	This outline application was approved on 18th March 2015. The site is available with planning expiring in March 2018. No known constraints to bringing this site forward within five years.	6 months	40 units
W2012/0056	39 Stafford Road, Oakengates	14	14	N/A	This outline application was approved on 22nd December 2014. Telephone conversation on 14th June 2016 with the agent confirmed that a reserved matters application was being prepared, with the intention to submit an application within the next 6 to 10 months. If achieved, this would take the start of delivery into the 2017/18 period. Due to the number of dwellings involved, the council therefore considers that the whole site is deliverable in the next five years.	6 months	20 units
W2012/0069	Ercall Wood Technology College, Wellington	80	80	N/A	This outline application approved on 29th June 2012 for 130 dwellings. A total of 50 dwellings have already been built on part of the site and are accounted for under a separate reserved matters planning application (W2012/1021). All these dwellings were built out at April 2015. Remaining prime greenfield site (for 80 dwellings) sold by the Council with start on site due in 2017. The site is being brought forward as part of the council's borough-wide school redevelopment programme.	6 months	40 units
W2012/0240	Land at, Arleston, Telford	153	95	N/A	A reserved matters application (TWC/2015/0836) was submitted in September 2015 for 95 private units and 50 extra-care homes and was approved on 2nd June 2016.	6 months	40 units

W2012/0530	Priorslee East, Priorslee	395	160	N/A	This planning application was approved on 25th September 2014. The proposal involves prime serviced sites (4 parcels) marketed by HCA with first parcel sold to regional house-builder. For clarification, in February 2016 the landowner (Homes and Communities Agency, HCA) applied for a Deed of Variation (DoV) to the s106 agreement in relation to triggers for payments (no change proposed to the amount of financial contributions). This is the first stage of the overall marketing of the four parcels. The DoV was approved by Planning Committee on the 3rd February. There is no proposed change to the affordable housing requirements. Plot D3 is under offer and is now unconditional now the DoV has been approved. No constraint to delivery of the site within the next five year period.	6 months	40 units
W2012/0650	Doseley Works, Doseley, Telford	268	100	N/A	This outline application pertains to a larger site for up to 460 dwellings, approved on 10th March 2014. The site was being developed by a national house builder in two phases, under two separate reserved matter applications, and dwellings were under construction at April 2016 (see above relating to TWC/2014/0237 - described by the applicant as 'Phase 2' for 192 dwellings). The second reserved matters application (known as 'Phase 3') was submitted and then registered on 5th April 2016 for the remaining 268 dwellings (under TWC/2016/0293).	6 months	50 units
W2013/0567	Caravan and Camping Centre, Stadium Way, Hadley	14	14	N/A	Planning application still extant at April 2016, and expires on 14th January 2017. Site being marketed by local agents since November 2014.	6 months	20 units
W2013/0592	Hinkshay Road, Dawley	165	80	N/A	Site available with planning permission expiring in October 2017. The applicant confirmed via telephone conversation on 15th June 2016 the intention to submit a reserved matters application following completion of site investigations.	6 months	40 units
W2013/0769	Castle Farm Way, Priorslee	600	80	N/A	Site available with planning permission expiring in March 2017. The application process is progressing following approval on 10th June 2016 of the partial discharge of condition 9 relating to drainage matters.	6 months	40 units
W2013/0777	Moorfield Lane, Church Aston	9	9	N/A	Site available with planning permission expiring in December 2016. Prime site for sale and marketed by regional agents since March 2014-1 demo accounted in total.	6 months	20 units
W2013/0806	Wrockwardine Wood Arts College, New Road	53	53	N/A	Site available with planning permission expiring in February 2017. The intention is for the landowner, TWC, to sell land in 2016 to a Housing Association interested with HCA funding available.	6 months	36 units
W2013/0808	Grange Park Primary School, Stirchley, Telford	37	37	N/A	Site available with planning permission expiring in January 2017. The intention is for the landowner, TWC, to sell land on the open market to a developer in 2018, as part of the council's borough-wide school redevelopment programme.	6 months	36 units
W2013/0901	Gower Street, Oakengates	20	10	N/A	Site available with planning permission expiring April 2017. Site for sale and marketed by local agents since April 2015. No email/telephone details available so unable to contact the agent for an update on progress (as at 15th June 2016).	6 months	20 units
W2013/0902	Wellington Road, Horsehay	23	23	N/A	Site available with planning permission expiring in April 2017. Site for sale and marketed by local agents since August 2014.	6 months	20 units
W2014/0230	Back Lane/Plantation Drive, Tibberton	26	26	N/A	Prime site available with planning expiring in February 2018. The agent confirmed, as of 15th June 2016, that the site was currently for sale and was under offer, but no contracts had been exchanged. The agent also suggested that the applicant would most likely submit a reserved matters application by March 2017 regardless of progress on the sale of the site.	6 months	20 units
W2014/0415	The Knoll, Church Aston	17	17	N/A	Site available with planning permission expiring in December 2017. Site now sold with reserved matters submitted in March 2016 for 17 units (TWC/2016/0260) by regional house builder.	6 months	20 units
W2014/0484	The Cedars, Rodington	14	14	N/A	Site available with planning permission expiring January 2018. Site sold with Reserved Matters application submitted by local house builder.	6 months	20 units
W2014/0671	Doseley Road, Doseley	13	13	N/A	Site available with planning permission expiring in June 2018. Site currently for sale and marketed by local agents since Dec 2015.	6 months	20 units
W2014/0746	Maxell site, Shawbirch	495	160	N/A	Site available with planning permission expiring September 2018. Site currently for sale and marketed by national agents since Oct 2015.	9 months	40 units
W2014/1080	Mill Lane, Tibberton	22	22	N/A	Planning approval issued in March 2016 on appeal. Site available with planning permission expiring in March 2019.	6 months	20 units
W2015/0157	Former Dairy Crest site, Crudington	111	111	N/A	Site available with planning permission expiring in November 2018. Site currently for sale and marketed by national agents since Oct 2015. The agent stated, on 15th June 2016, that the applicant is still in the process of disposing of the site and once this process has been completed that the new freeholder would move this forward in the short term	9 months	36 units
W2015/0369	Garfield Road, Ketley Bank	45	45	N/A	Site available with planning permission expiring in Dec 2018	6 months	36 units
	Sub-total	5341	2084	N/A			

4 Major Sites with Resolution to Grant at 1st April 2016							
PlanAppRef	Site Address	Total left	5 year delivery	Under Construction at 01/04/16	TWC Comments	Lead-in times from start on site	Build - Out Rate pa per outlet
W2011/0827	Audley Avenue, Newport	215	215	N/A	At April 2016, the site had the benefit of outline planning permission, subject to resolution of the s106. Land jointly owned by TWC and a developer who wishes to develop the site. The s106 is currently being resolved prior to formal issue of consent in June 2016.	6 months	40 units
W2013/0809	Former Swan Centre, Grange Avenue, Storchley	28	28	N/A	Land owned by TWC with outline application approved at Plans Board on 21/5/2014, subject resolution of highway issue. No obvious constraints to bringing forward the site for development within five years.	6 months	36 units
W2013/0855	Station Road, Newport	50	50	N/A	The site is owned by a regional house builder. A planning application taken back to committee in June 2015 solely for consideration after the position changed regarding five year land supply published in March 2015. This was granted, subject to resolution of the s106. Consequently, at April 2016, the development could proceed, subject to resolution of the legal agreement. The only impediment to delivery was an unsigned s106 agreement due to highways issues relating to access and roundabout to serve an adjacent site. This has now been resolved, subject to alternative access arrangements being approved by Planning Committee on 29th June 2016. Given the acceptability of the development for residential use in principle, the existing resolution to grant approval, and the landowner's continued interest in the site, the council considers the site to be deliverable. Once planning permission is granted, this will allow the site to proceed towards commencement.	6 months	36 units
W2014/0113	Former British Sugar site, Allscott	470	50	N/A	Site available with outline planning permission granted in June 2015, subject to s106. The s106 agreement was then signed off on 9th May 2016, so development can now proceed. Land to be offered in parcels with infrastructure in place.	12 months	20 units
W2014/0980	Priorslee East, Priorslee (H2 in Local Plan)	1100	150	N/A	Land owned by national house-builder with planning application submitted (TWC2014/0980). The application was approved in August 2015, subject to resolution of s106.	12 months	50 units
	Sub-total	1863	493	N/A			
5 Major Sites with Housing Allocations at 1st April 2016							
PlanAppRef	Site Address	Total left	5 year delivery	Under Construction at 01/04/16	TWC Comments	Lead-in times from start on site	Build - Out Rate pa per outlet
W2013/0861	Former Sutherland School, Trench (H3 in Local Plan)	123	123	N/A	Land owned by TWC with outline planning permission granted 31/5/2016. TWC intend to sell the site to a developer.	6 months	40 units
W2015/0057	Station Road, Newport (H13 in Local Plan)	120	120	N/A	Planning application submitted during 2014/15. Land owned by national house-builder who intends to bring forward the site.	6 months	40 units
W/2016/0096	New Trench Road, Donnington (H1 in Local Plan)	650	200	N/A	Land jointly owned by TWC and Private Owner with planning application submitted	12 months	40 units
W2016/0165	Former Madeley Court School (H6 in Local Plan)	53	53	N/A	Site to be developed for NuPlace with planning application submitted in Feb 16	6 months	50 units
TBC	Former Beeches Hospital, Ironbridge (H5 in Local Plan)	89	89	N/A	Site acquired by regional house-builder with planning application to be submitted for start in 2017	9 months	36 units
TBC	Former Phoenix School, Manor Road, Dawley (H7 in Local Plan)	200	50	N/A	Site owned by TWC and designated as a site under a Local Development Order	12 months	36 units
TBC	Holyhead Road, St.Georges (H11 in Local Plan)	40	40	N/A	Site owned by HCA and to be sold under Telford Land Deal	6 months	40 units
TBC	North of Priorslee Roundabout, St.Georges (H12 in Local Plan)	70	70	N/A	Site owned by HCA and to be sold under Telford Land Deal	6 months	40 units
	Sub-total	1345	745	N/A			
6 Other deliverable sites at April 2016							
PlanAppRef	Site Address	Total left	5 year delivery	Under Construction at 01/04/16	TWC Comments	Lead-in times from start on site	Build - Out Rate pa per outlet
W2008/0108	Orleton Lane, Wellington, Telford	165	144	N/A	This proposal was originally approved on 3rd April 2009. A renewal of that permission was withdrawn in September 2011 (under TWC/2011/0706). Development started shortly after this time. The original approval was therefore extant at April 2016 (confirmed via email by the applicant). Contact was made with the applicant (Lovell) on 24th May 2016, who also confirmed their intention to submit a new planning application on the same plot of land in 2016. The applicant intends to be on site in early 2017, subject to achieving planning permission.	9 months	36 units
W2009/1015	Church Farm, Preston upon the Weald Moors, Telford	20	20	N/A	This planning application was extant at April 2016. Contact made with applicant's agent (John Mason Associates Ltd) on 23rd May 2016. The agent confirmed that the applicant had gone through company restructuring but was now in a position to progress the site. Delivery likely to begin during the 2016/17 period.	9 months	20 units
W/2015/0146	Wesley House, 4 Station Road, St Georges, Telford	10	10	N/A	This planning application was extant at April 2016. Contact was made with the agent (Penn Architecture Ltd) on 27th May 2016, who confirmed there is developer interest in progressing the site as drawn. Consequently, the site will go to auction so development can proceed.	9 months	20 units
	Sub-total	195	174				