

Telford & Wrekin Local Plan – Inspector’s Matters, Issues & Questions (MIQs)

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This paper provides the Council’s response to the Inspector’s MIQs -

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?

- 8.1.1 The Council’s approach to the identification, appraisal, and selection of site allocations is set out in the Technical Paper – Housing Delivery¹, and Technical Paper - Employment². The preferred sites and reasonable alternatives were appraised in terms of their contribution towards delivering sustainable development as part of the Integrated Appraisal (IA) process³. The preferred sites were also subjected to a screening process, in line with the Habitats Directive⁴, to determine whether or not ‘appropriate assessment’ was required. The conclusions of that process are set out in the HRA Screening Report⁵. In addition, the Council has considered the infrastructure implications of the Plan strategy in terms of overall growth and its distribution⁶.
- 8.1.2 The sites allocated for housing and employment development are appropriate for a number of reasons.
- 8.1.3 Principally, the selected sites as a whole reflect the borough-wide distribution options that were appraised through the IA process and selected as the option for distributing development. The main focus of future development on urban Telford and Newport - the areas in closest proximity to existing infrastructure - represents the most appropriate option. There is broad support for this option. No representations have been received that seek to move the focus of future development away from these areas, albeit a small number of site-related representations promote further extensions to Telford and Newport and others have asked for a higher rural housing requirement. As stated in the Plan, “...the spatial strategy directs new investment to sites and locations that make

¹ B2b and B2c

² B1a

³ A3 (see paragraph 30 for a summary of the overall approach)

⁴ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, Article 6(3), and s21(1) of The Conservation of Habitats and Species Regulations 2010 (2010 No.490), March 2010

⁵ A4, Appendix III, p4

⁶ E3

*best use of existing infrastructure without harming the borough's substantial heritage and environmental assets*⁷.

8.1.4 In addition, the Council considers the approach taken to selecting individual sites to be logical, proportionate and based on sound planning judgments. The Council has followed a number of clearly defined steps in reaching its final set of site allocations for housing and employment.

Housing allocations

8.1.5 The approach taken to identifying housing allocations is set out in the Technical Paper - Housing Delivery⁸. The number of housing sites was reduced from 720, mainly drawn from the SHLAA (2012) report⁹, down to an eventual 24 individual sites, consolidated into 17 allocations. The Council assessed all 720 sites against a range of site-specific and more strategic criteria. A desk-based assessment of known environmental constraints, including biodiversity, landscape, heritage, and flood risk was applied at an early stage in order to assess whether sites should progress to the next stage. The Technical Paper – Housing Delivery¹⁰ sets out the justification for the selection of the housing allocations.

8.1.6 The Plan allocates a range of sites varying in yield from 21 to 1,100 dwellings. The allocations comprise 18% of the total supply needed to deliver the overall housing requirement¹¹. Only five of the sites exceed 200 dwellings, with two of those at or greater than 750 dwellings. The other allocations are therefore relatively small and will most likely generate a site-specific or local demand for infrastructure. The Infrastructure Development Plan (IDP) has identified the potential for new or improved infrastructure provision likely to be generated to support delivery of the allocations.

Employment allocations

8.1.7 In terms of employment, the site selection process is set out in the Technical Paper - Employment¹² which confirms that the borough has an extensive supply of employment land. By contrast with the housing allocations, all of the employment allocations¹³ - with the exception of sites E13 and E27 - benefit from New Towns Act consents. The majority of employment sites are located within existing employment areas¹⁴. This is a legacy of the New Town distribution of employment and non-employment uses and the location of

⁷ A1, paragraph 3.0.2

⁸ B2b, Section 2

⁹ C2c, and updated in G2 and G2a

¹⁰ B2b, Section 5

¹¹ 2,799/15,555

¹² B1, section 5.2

¹³ C1a and C1b

¹⁴ B1, paragraph 5.2.6

potential employment allocations included in the selection process. Table 6 of the Technical Paper identifies the areas within which the proposed allocations are located, and includes a justification for the sites allocated within those locations. These sit almost exclusively within the built-up area of Telford.

- 8.1.8 The Council has identified one employment site allocation in Newport based on research which has identified the need for such land¹⁵. The town is constrained in where this could go as a result of a number of planning permissions for housing north of the A518. It is logical that new employment growth be located close to existing industrial uses at Audley Avenue to promote one larger industrial area straddling the A518. This would provide synergies between existing and new industrial users and provide new employment close to areas of residential growth. Site E27 – an allocation south of the town off the A518 - is manifestly the most suitable option for the town's employment growth. Seventy percent of the £3m needed to dual the stretch of A518 to accommodate this employment use is in place from s106 agreements associated with other sites in the Newport area. The Council, supported by Harper Adams University, has made an application through the Marches LEP for Local Growth funding to cover the balance and support site preparation.
- 8.1.9 Some representations have suggested that land be allocated for employment use east of the A41 instead¹⁶. By contrast to the A518, the A41 is a major strategic corridor connecting the West Midlands with Birkenhead and Ellesmere Port. It is already a very busy route for HGV traffic with limited scope to improve it. The A41 would need significant improvements along this stretch at Newport to deliver an employment site on this side of the A41, including possible dualling. The ability of a developer to do this is also constrained by land in third party ownership. Moreover, there is no funding in place to dual this stretch of the road. Finally, this site is known to have extensive sand and gravel deposits¹⁷. It is far less likely to be delivered than Site E27.

No constraints to delivery

- 8.1.10 The Council is confident that these housing and employment allocations will be delivered over the plan period. At a strategic level, the Council has undertaken a comprehensive assessment of the likely infrastructure requirements in relation to the planned growth and for the site allocations¹⁸. The conclusion of the infrastructure delivery planning work is that there are no critical infrastructure requirements to support existing housing and

¹⁵ C1a

¹⁶ PUB168, PUB298, PUB142 and PUB155

¹⁷ B6d, page 6

¹⁸ E3, Section 3

employment development and allocations within the next five years (2016-21)¹⁹. The Council, in partnership with infrastructure providers and other relevant bodies – including the HCA and Highways England, has devised a delivery strategy to ensure that funding required to support the provision of future infrastructure beyond the next five years²⁰ can be secured.

8.1.11 There is no evidence of any constraints that would prevent development of the allocations either. For housing, the Plan trajectory envisages a relatively small number of dwellings being delivered on site allocations within the next five years, given the extensive supply from existing committed sources.

Consequently, the vast majority of site allocations are considered to be ‘developable’ under the NPPF definition²¹. One major site at Priorslee (H2) has planning permission²² and a number of other allocations are being progressed through the planning application process at this time (H1, H3, H5, H6, H9, and H13) and, whilst none of these sites have the benefit of planning permission²³, the Council is confident that delivery of site allocations will commence in the next five years. For employment, sites are predominantly located in existing employment areas with limited or no known constraints to prevent delivery. Much of Site E19 - the largest allocation (T54) - benefits from detailed planning permission.

8.1.12 Evidence will be submitted separately by Harper Adams University, the LEP²⁴, the consortium of developers at Site H1, the HCA, St Modwen and Miller Homes in support of individual allocations to demonstrate they are deliverable.

8.1.13 Consequently, and based on the foregoing analysis, the Council considers the allocations to be appropriate and deliverable.

8.2 Is the overall site selection methodology robust and transparent?

8.2.1 The NPPF²⁵ requires all local planning authorities to allocate specific housing sites, in order to demonstrate an adequate supply of deliverable²⁶ and developable²⁷ housing land to meet the housing requirement. The Council considers the approach to site appraisal and selection to be both robust and transparent. The site selection methodology²⁸ establishes a three-stage

¹⁹ E3, paragraph 4.39

²⁰ E3, Section 4

²¹ Paragraph 47, footnote 11

²² Apart from Site H2 – TWC/2014/0980 Priorslee

²³ H6 has a minded to grant approval subject to a s106 agreement which is expected to be signed in November 2016.

²⁴ This has been provided in Appendix 3 to Matter 4

²⁵ NPPF, paragraph 47

²⁶ The definition of *deliverable* is that a site is available now, offers a suitable location for housing development now and there is a reasonable prospect (achievable) that housing will be delivered on the site within five years from the date of adoption of the Plan.

²⁷ The definition of *developable* is that a site in a suitable location for housing development and there should a reasonable prospect (achievable) that is will be available for and could be developed during the plan period.

²⁸ B2b

approach informed by the process of Sustainability Appraisal²⁹. The process has also been subject to public consultation throughout the preparation of the Local Plan. It has also been carried out alongside a Whole Plan Viability Assessment and the IDP. The Housing Delivery Technical Paper³⁰ sets out the approach that Telford & Wrekin has undertaken to assess the suitability of sites proposed for allocation in the Local Plan.

- 8.2.2 The principal source of sites utilised in the site selection process is the Strategic Housing Land Availability Assessment³¹. A ‘call for sites’³² was undertaken in May 2012 to establish which sites landowners and developers wished to see considered for development. Following the update to the SHLAA in 2014³³ a total of 720 sites were put forward for consideration for allocation. Since the ‘call for sites’, a number of additional sites³⁴ have been put forward to the Council for consideration through the Local Plan process. Only two sites which have not been considered previously were put forward for consideration during the formal consultation stages.
- 8.2.3 In broad terms, the process involved assessment of sites^{35 36 37} against a range of planning criteria. This comprised primarily of a desk-based exercise applying GIS mapping of planning and other technical constraints to help inform the analysis of sites. Whilst there is no single nationally agreed set of criteria for site selection in either the NPPF or PPG, the Council considers the various criteria it has applied to be logical and proportionate to the process of site selection.
- 8.2.4 The process has involved three stages. The first stage (Stage One³⁸) involved the elimination of sites with severe constraints. The criteria applied are set out in Appendix A of the Technical Paper - Housing Delivery³⁹. The reason(s) for elimination of each site at Stage One is set out in the Council’s evidence⁴⁰. Sites that met the site size threshold⁴¹ and that did not exhibit any major constraints were carried forward to Stage Two. In total, 303 sites were eliminated and 417 sites were taken forward.

²⁹ including Strategic Environmental Assessment and in line with the Habitats Directive.

³⁰ B2b

³¹ C2c

³² C2c

³³ C2d removed sites with planning permission, and together with additional sites that have been submitted informed the list of total of 720 sites which were used as the starting point for the site selection process.

³⁴ B2b, section 4

³⁵ C2c

³⁶ C2c includes sites introduced during the latest ‘Call for Sites’ which took place in May 2012

³⁷ C2d removed sites with planning permission, and together with additional sites that have been submitted informed the list of total of 720 sites which were used as the starting point for the site selection process.

³⁸ B2b, section 2.2

³⁹ B2b, Table 6 (page 18)

⁴⁰ G10

⁴¹ One of the criteria is that sites smaller than 0.5 ha are not considered, which based on national guidance as deemed to be too small to allocate through the Local Plan.

- 8.2.5 The objective of Stage Two⁴² was to consider the potential for allocation, taking into account the known physical and sustainability attributes of each remaining site. The full details of the assessment carried out at this stage is set out in Appendix C of the Technical Paper – Housing Delivery⁴³. Factors that were considered included any known site-specific issues that might impact on deliverability for example topography, site shape or configuration, relationship to adjacent uses, consideration of any known permanent features that might impact on capacity, and any known land ownership issues. Sites that were judged to have potential for allocation were carried forward to the next stage (Stage Three).
- 8.2.6 The purpose of Stage Three⁴⁴ was to assess how the remaining sites compared to the overall strategy and objectives of the Local Plan, otherwise described as ‘strategic fit’. The justification for each criteria that was applied to each site is presented in Table 1 and 2 of the Technical Paper - Housing Delivery⁴⁵. The summary of the assessment of each site against the criterion is set out in Appendix IX of the Integrated Appraisal Report, including the reasons for the selection of the site allocations and rejection of the alternatives⁴⁶. The strategic fit includes criteria relating to whether the sites are in public ownership. This is entirely consistent with the borough’s legacy as a New Town, which has seen the significant delivery development on public land and the resulting proliferation of publicly-owned sites that still exists particularly across parts of Telford, as well as a reflection of the Government’s broader objectives for the disposal of public land to assist in alleviating the national shortage of housing.
- 8.2.7 Representations have been submitted that seek to undermine the Council’s approach to site selection and the relationship to Sustainability Appraisal. However, it must be understood that the IA process itself does not allocate sites. It is, rather, another part of the evidence used to inform the overall decision-making on matters concerned with site selection and the consideration of reasonable alternatives. Enfusion worked closely with the Council to develop standards and thresholds to determine the nature and significance of effects against the IA Framework. This has helped to ensure that a consistent comparative appraisal of site options was carried out. Assumptions, uncertainties or standards and thresholds used to determine the nature and significance of effects against IA objectives for site options are presented in the IA Report⁴⁷. Summary findings of the IA are provided in

⁴² B2b, section 2.3

⁴³ B2c

⁴⁴ B2b section 2.4 and 3

⁴⁵ B2b, section 2.15-2.16 and Section 3

⁴⁶ A3a,

⁴⁷ A3, Table 2.6

Section 4 of the Report with the detailed appraisal matrices presented in Appendix IV.

8.2.8 The Employment Land Review (2012)⁴⁸ identified 66 potential employment site options, which formed the basis for subsequent work on selection of employment site allocations. A further two employment sites were proposed during the consultation at an early stage⁴⁹. The Council assessed all employment site options as part of the IA process including the reasons for rejection of alternatives and selection of allocations⁵⁰.

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)].]

8.3.1 Most of the housing allocations in the borough are modest and, as they will only have one land use (with ancillary play space), it is not necessary to provide any more detail in the plan than that set out in Appendix D. Final layouts of the sites including mix and design will be determined at the planning application stage when the proposals will be assessed against the provisions of the development plan. Site H10 – The Hem – benefits from a section 7(1) New Towns Act consent⁵¹ and thus the indicative scale of development has already been established.

8.3.2 The Council has applied the term 'Sustainable Urban Extensions' at Donnington and Muxton (H1) and Priorslee (H2) by reason of their scale, mix of uses and anticipated role in delivering sustainable communities. Although there are many examples of large sites being considered in the same way⁵², the Council recognises site size and amount of development to be only one element of such a description in these two allocations. The critical issue is to set out through the plan process how large allocations can be sustainable urban extensions⁵³. The Council recognises that the location and

⁴⁸ C1b, paragraph 2.1

⁴⁹ D3a

⁵⁰ A3a, Appendix IX, p67/72-72/72

⁵¹ G1, page 3 T91/0242

⁵² A TCPA case study shows SUEs being applied to developments as low as 385 dwellings
<http://www.tcpa.org.uk/data/files/nsue.pdf>

⁵³ The Planning Portal defines an urban extension as follows: "Involves the planned expansion of a city or town and can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a range of facilities, and when developed at appropriate densities".

‘sustainable’ elements such as the mix of uses, design, connectivity/accessibility, mix of housing tenures, community facilities, energy conservation, green transport plan, cycling/walking links of these two sites justifies their allocation as such in the Plan.

8.3.3 The Council considers the allocated employment and housing sites and the two sustainable urban extensions are fully justified through the site selection process, information contained in the SHLAA⁵⁴ and updated in the Housing Land Supply Statement⁵⁵ and Technical Papers on Housing Delivery⁵⁶.

8.3.4 The Council accepts additional information could be provided for the two sustainable urban extensions to provide some further clarity to developers, local communities and other stakeholders⁵⁷, consistent with the PPG. In order to do this the Council proposes a minor modification (refer Appendix 1) to revise and expand Local Plan Appendix D – Housing Site Allocations with relevant information.

⁵⁴ C2d

⁵⁵ E4, updated by G5

⁵⁶ B2b, updated by G5; and B2c

⁵⁷ This would only be relevant for site H2 if the Miller Homes development (planning permission reference TWC/2014/0980) does not proceed

Appendix 1

Site Allocation H1 (Donnington and Muxton Sustainable Urban Extension, Telford)

Land at Site H1 will deliver a Sustainable Urban Extension to Telford with a mix of uses that represents an extension of the existing communities at Muxton and Donnington and which addresses shortfalls in local infrastructure. The new development will be sensitively integrated into both the existing urban areas of Muxton and Donnington and the wider landscape including the Lilleshall Strategic Landscape (refer Policy NE7). This will be achieved through high quality design and measures to achieve sustainable development.

The development will be assessed against the following principles:

-) a housing-led, mixed use development;
-) an indicative yield of around 750 homes, comprising a mix of market and affordable housing consistent with Policies HO5 and HO6;
-) a broad range of house types as well as other forms of residential accommodation (extra care or sheltered housing) consistent with Policies HO4 and HO7;
-) provision of other built uses to support the wider community of Donnington and Muxton that will reduce the amount of off site car movements consistent with Policy C1. These are likely to include (but not be limited to): retail facilities to serve the daily needs of the development and to complement existing provision in the wider community; a primary school; recreational facilities including open space and playing pitches; community centre and other community meeting spaces (such as a crèche or GP facility);
-) the principal vehicular access to the site shall be off the A518 (Newport to Telford road) with a secondary access off Station Road;
-) connectivity between different parts of the site;
-) the development shall be designed to ensure that it can be connected by bus with Telford town centre and other measures shall be incorporated to promote alternative modes of transport to the car, including improved pedestrian and cyclist links;
-) extensive green infrastructure to address the site's sensitive interface with the countryside and the Lilleshall Strategic Landscape beyond;
-) a site layout that respects the site's interface with housing to the south at Breton Park;
-) the protection, maintenance and enhancement of known ecological assets; and
-) a commitment to sustainable urban drainage systems with built development avoiding parts of the site prone to inundation.

Site Allocation H2 (Priorslee Sustainable Urban Extension)

Land at Site H2 will deliver a Sustainable Urban Extension to Telford. It will have a mix of uses including housing, employment, retail, recreational and community uses to serve existing and future residents of Priorslee and the wider area. It will be sensitively integrated into the existing urban fabric of Priorslee and the wider landscape, through high quality design and measures to achieve sustainable development.

The development will be assessed against the following principles:

-) a housing-led, mixed use development;
-) an indicative yield of around 1100 homes at a mix of densities comprising a range of market and affordable housing consistent with Policy HO5 and HO6;
-) a broad range of house types as well as other forms of residential accommodation (sheltered housing or extra care) consistent with Policies HO4 and HO7;
-) the provision of other built uses to support and consolidate the growing neighbourhood of Priorslee and reduce off site car movements from this site consistent with Policy C1. These are likely to include (but not be limited to): retail facilities to serve the daily needs of the population; employment uses within the B1 Use Class; a primary school; recreational facilities including playing pitches, orchards and spaces for passive recreation; a community centre and space for other community facilities (such as a crèche);
-) a site layout that respects its undulating topography and its sensitive interfaces (such as the southern boundary's proximity to the M54 and a motocross operator off site);
-) a site layout that respects its interfaces with housing to west including at Lichfield Close, Ely Close, Waterlow Close and Eltham Drive and with the open countryside to the east;
-) primary vehicular accesses will be off the A4640 (Castle Farm Way) with one access from the A5. Access to the site from Salisbury Avenue will be restricted to cyclists, pedestrians and local bus services;
-) the provision of a bus service to connect the site with Telford town centre and other measures to promote alternative modes of transport to the car, including improved connectivity to and use of the Sustrans National Route 81 which crosses the site;
-) extensive green infrastructure to address the site's sensitive interface with the open countryside;
-) the protection, maintenance and enhancement of known ecological assets;
-) the protection, conservation and, where possible, enhancement of known heritage assets including the listed building at Woodhouse and the Watling Way Scheduled Ancient Monument. This will require an evaluation of the archaeological importance of the area; and
-) a commitment to sustainable urban drainage systems with built development avoiding parts of the site prone to inundation.