Gladman Developments Ltd Matter 1 Hearing Statement Telford and Wrekin Local Plan (2011-2031)

Housing Supply



October 2016

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1.1 Q1.4 - 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?

- 1.1.1 Gladman consider that the Council's housing land supply is not robust and is not compliant with NPPF §47, which requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% or 20% (where there has been persistent under delivery) to ensure choice and competition in the market for land.
- 1.1.2 The Telford and Wrekin Local Plan does not over allocate against its housing requirement. Table 10 sets out the housing land supply position for the Local Plan and includes a number of categories of both current and future supply. It is supported that a 20% allowance is made for non-implementation of the existing and future supply as this builds in an element of flexibility and allows for unforeseen circumstances.
- 1.1.3 However, Gladman would point out that the supply figure included in the Plan should be robust and be based upon realistic assumptions regarding deliverability, lead in times and rates of development. Emphasis should be placed on the guidance contained in Para 47 and footnotes 11 and 12 of the Framework which state that to be considered deliverable, a site should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on site within the five years.
- 1.1.4 The Council, in allocating two large SUEs to deliver a significant part of their remaining housing requirement over the Plan period are placing all of their eggs in two baskets. In allocating suitable, available and deliverable housing sites, the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

1.1.5 The provision in Policy HO1 (Housing Requirement) is restrictive and is not drafted in compliance with the NPPF. The policy, for 15,555 dwellings, states that the housing requirement is a target but this does not seek to boost significantly the supply of housing, as outlined in §47 of the NPPF, nor does it provide any flexibility in the event of housing development not coming forward as anticipated. Housing Requirements in Local Plan should be expressed as a minimum to ensure the delivery of the full, objectively assessed needs for market and affordable housing in the housing market area. Gladman considers this to be 17,100 dwellings for the period 2011-2031 (855 dwellings per annum).

Telford and Wrekin Housing Land Supply Statement 2016-2021

- 1.1.6 The Housing Land Supply Statement (Updated October 2016) shows the Council consider they can demonstrate an 8.24 year housing land supply, applying a 5% buffer, or a 6.95 year housing land supply applying a 20% buffer.
- 1.1.7 Looking at the Council's Deliverable Sites Schedule (2016-2021), it is difficult to reach a conclusion as to how the Council have arrived at these delivery figures. The Sites Schedule is vague, and does not show the anticipated year on year completion figures. The Council provide limited information on the lead-in times, which means it is difficult to form a view as to how the Council have concluded how many dwellings may come forward within the 5 year period.
- 1.1.8 An example of this is that the Council states that the lead in times from start on site is the same for a Full Planning permission, as it is for Major Sites with Outline Planning Permission, which do not yet benefit from an approved reserved matters application.
- 1.1.9 The Council's projected Build-Out rates per annum, per outlet, are also particularly misleading. For example, for W2004/0980, for Land at Lawley Village, Telford, per outlet the annual delivery figure is anticipated to be 120 units, however, for the 5 year delivery, the figure is 280 dwellings. The comments from the Council state that "A reserved matters application for Phase 7 (280 units) to be submitted by Ironstone consortium (comprising three housebuilders) in Q2 2016." Clearly each housebuilder is not likely to be able to deliver 120 dwellings per annum each.

The Appropriate Buffer to be applied

1.1.10 The matter of the appropriate buffer to be applied in Telford and Wrekin has been considered by Inspector Wildsmith in a recent S78 appeal at Haygate Road, Wellington (APP/C3240/W/15/3025042). The Inspector concluded:

"On this matter I note that Inspector Hand reported that from 2005/6 the Council has had 6 years of missed targets followed by 4 years during which its targets were comfortably exceeded, and that on this basis he concluded that there has been no persistent under-delivery. Similar information was put before me, but just covering a 9 year period from 2006/7. I accept that this evidence shows 5 years of shortfall followed by 4 years of exceeded targets, but the actual

numbers involved are significantly different, with a large, total shortfall over the period 2006-2011 of 4,339 dwellings, and a lesser excess over the 2011-2015 period of 1,255 dwellings.

The Council maintains that as the former housing provision figures of 1,330 dpa for 2007-2011 and 700 dpa for 2011-2021 contained in the Regional Strategy (RS) for the West Midlands, were only ever meant to be maximum requirements, the provision of a lesser figure than these maxima cannot be considered to represent under-delivery. However, despite its adherence to this stance at the inquiry, the submitted evidence indicates that the Council had been quite content to acknowledge a persistent under-delivery against the RS figures as recently as 2013. At that time its 5 year Housing Land Statement acknowledged that a 20% buffer was appropriate, having regard to its housing delivery performance against what it was happy to refer to as a target, arising from the RS figures.

In light of these points I do not consider it unreasonable to apply a 20% buffer to the 5 year housing figure."

- 1.1.11 Applying the OAN prepared by Barton Willmore (for the period 2011-2016), the mid-point of which is 855 dwellings per annum, the Council have under delivered against any of their housing targets since the start of the Core Strategy plan period in 2006.
- 1.1.12 The following three tables demonstrate Telford and Wrekin's delivery against their own Plan requirements and Barton Willmore's OAN:

Table 1: Delivery against the Council's Core Strategy (2006-2016)

Monitoring Year	Plan Targets	Actual Completions	Shortfall/Surplus
2006/07	1300	452	-848
2007/08	1300	363	-937
2008/09	1300	462	-838
2009/10	1300	483	-817
2010/11	1300	551	-749
2011/12	700	720	+20
2012/13	700	607	-93
2013/14	700	842	+142
2014/15	700	1074	+374
2015/16	700	1255	+555
Totals	10,000	6809	-3,191

Table 2: Delivery against the Council's Emerging Requirement

Monitoring Year	Plan Targets	Actual Completions	Shortfall/Surplus
2011/12	778	720	-58
2012/13	778	607	-171
2013/14	778	842	+64
2014/15	778	1074	+296
2015/16	778	1255	+477
Totals	3,890	4,498	+608

Table 3: Delivery against Barton Willmore's OAN (Midpoint)

Monitoring Year	OAN	Actual Completions	Shortfall/Surplus
2011/12	855	720	-135
2012/13	855	607	-248
2013/14	855	842	-13
2014/15	855	1074	+219
2015/16	855	1255	+400
Totals	4,275	4,498	+223

- 1.1.13 Table 1 demonstrates a significant shortfall of 3,191 dwellings against the Council's Core Strategy housing requirement, with under delivery experienced in 6 of the 10 monitoring years. If the emerging Plan requirement (778 dpa) is applied from 2011, there is under delivery in 7 of the past 10 monitoring years. Applying Barton Willmore's OAN midpoint from 2011 shows under delivery in 8 of the previous 10 years.
- 1.1.14 Against any of the targets it is clear that the Council have persistently under delivered against their requirements over the past 10 years. The PPG considers how Local Planning Authorities should deal with past under-supply at paragraph 035 (Reference ID: 3-035-20140306):

"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."

- 1.1.15 This therefore accords with the view of Inspector Wildsmith in the decision for Haygate Road, Wellington.
- 1.1.16 It is therefore considered that the application of a 20% buffer is appropriate in the case of Telford and Wrekin. This is in line with the guidance provided in §47 of the NPPF.

Gladman Housing Land Supply Calculations

1.1.17 Gladman have conducted their own review of Telford and Wrekin's claimed housing land supply. The critical analysis has found that Telford and Wrekin's housing land supply is actually 4,572, rather than the 6,727 dwellings cited in the Five Year Housing Land Supply Update of October 2016. Gladman present the following scenarios to assist the Inspector:

Council's Housing Requirement and Gladman Supply

Council's Requirement 778 x 5	3890
Council's Requirement + 5%	4085
Council's Requirement + 20%	4668
Gladman Supply	4572
Gladman Supply (Years) (5%)	5.6
Gladman Supply (Years) 20%	4.9

Gladman's OAN (midpoint) and Gladman Supply

4275
4489
5130
4572
5.1
4.5

1.1.18 Gladman's Sites Schedule can be found at Appendix 1. Gladman, on the basis of their OAN and the Council's requirement, consider that the appropriate buffer to be applied is 20%, based on the Council's persistent under delivery against all targets as outlined above. Against both the OAN and the Council's own housing requirement, it is clear from the above that the Council cannot demonstrate a Framework compliant five year housing land supply.

1.2 Q1.5 - Are adequate safeguards in place to address any unanticipated shortfalls in housing supply during the Plan period?

- 1.2.1 Table 10 of the Telford and Wrekin Local Plan outlines the Council's claimed existing supply, and the provision that is to be made for the period 2011-2031. The Council claim that their existing supply (from net completions, dwellings with planning permission which are under construction, dwellings with planning permission which haven't started (less a 20% allowance for non-implementation) stands at 10,882 dwellings.
- 1.2.2 Gladman object to Policy SP4 on the Presumption in Favour of Sustainable Development in that it is considered to be too restrictive and contrary to the guidance in the Framework to boost significantly the supply of housing. The presumption in favour of sustainable development is designed to ensure that developments that are sustainable can be approved without delay. Policy SP4 is so heavily caveated by the 13 detailed criteria that it will be ineffective in delivering the Government's aim of boosting significantly the supply of housing.
- 1.2.3 Criterion 1 states that the development must be in accordance with the scale of development planned for across the borough. This is contrary to the framework as housing requirements should not be seen as ceilings and should be seen as the minimum level of housing required to meet the needs of the community. This criterion is unsound.
- 1.2.4 Criterion 2 states that the development should be in an area where the need arises. This is again contrary to the Framework as the 5-year housing land supply situation should be monitored on a borough wide basis and similarly any shortfall in supply should be addressed on a borough wide basis. Criterion 2 is therefore unsound.
- 1.2.5 Criterion 3 relates to the priority given to urban areas of Telford and Newport and the use of previously-developed land. Both of these are contrary to the Framework as, similar to Criterion 2, any shortfall in housing land supply should be addressed on a borough wide basis and para 111 of the Framework only seeks to encourage the use of brownfield land not prioritise it. Criterion 3 is therefore unsound.
- 1.2.6 Criterion 5 relates to the priority given to maintaining the character and appearance of the countryside. This criterion is also contrary to the Framework as this is a matter that should be weighed in the planning balance against the need to significantly boost the supply of housing and the other benefits of a particular scheme. Criterion 5 is therefore unsound.
- 1.2.7 Policy SP4 as it is currently drafted is therefore unsound and needs significant revision to reflect the guidance set out in the Framework to significantly boost the supply of housing and to take into account other benefits of a particular scheme in the planning balance.
- 1.2.8 Policy SP4 should not have additional qualifying criteria and should directly reflect the model policy contained in the Framework.

- 1.2.9 Gladman's sites in the borough are as follows (more detail is provided in the hearing statement for Matter 8):
 - Land at Humber Lane, Telford
 - Land at Haygate Road, Wellington
 - Land at Muxton Lane, Muxton
 - Land at Shrewsbury Road, Edgmond
- 1.2.10 Should the Inspector consider that the Council cannot demonstrate a Framework compliant five year housing land supply, or that the housing requirement and the Council's OAN do not reflect the full, objectively assessed market and affordable housing needs of the Borough, these sites are available now, offer suitable locations for development now, and are achievable, all with a real prospect of delivering a significant amount of housing within the five year period and should all be allocated within the Telford and Wrekin Local Plan.

Gladman Site Schedule - Appendix 1

3	Major Sites with Outline Planning n/s at 1st April 2016				
PlanAppRef	Site Address	Total left	5 year delivery	GDL 5 Year Delivery	GDL Comments
W2002/0392	Land at Lightmoor Village, Telford	320	100	0	The Council assumes 2 full years of delivery at 50 dwellings per annum. However, there is no housebuilder yet in place to substantiate these assumptions. The site is still awaiting preparation of reserved matters, determination of reserved matters and discharge of conditions. The site has significant infrastructure required in advance of the first dwellings to be delivered. GDL therefore consider this site will not deliver in the 5 year period.
W2004/0980	Land at Lawley Village, Telford	1620	280	266	There is a reserved matters application in the system for 266 dwellings by the Lawley Village Developer Group. The Application was submitted in July 2016. This application is for fewer homes than the Council's 5YLS figure, so 266 should be reflected in the supply.
W2009/0914	Southwater, Telford Town Centre	330	53	0	The Outline planning application originated in 2009. As yet, a reserved matters application has not come forward. There is a significant amount of provision to be made on site, aside from residential and Gladman would question whether 53 dwellings could come forward in the five year peirod, given the need for offices, retail, leisure etc.
W2010/0152	Redhill Clay Pit, Redhill Way, St Georges	120	120	0	Outline planning consent was granted under W2003/1316 with a later time extension granted under TWC/2010/0722 on 08/04/2011. Reserved Matters were submitted by Land Improvement c/o Savills for 337 dwellings and approved on 13 May 2011 (TWC/2010/152). The Planning Permission is extant because the Reserved Matters were started and partly developed. It appears that the company will be trying to sell with an approved reserved matters. It is therefore considered likely that a new developer will want to submit a new full application for their own house types. The site remains for sale on the Land Improvement Holdings website. There is no developer at the moment and on that basis it can only be assumed that no dwellings will be delivered in the 5 year period.
W2011/0002	Alexandra Road, Wellington	18	18	0	No reserved matters application has been prepared and the site is still on the market. There appears to be a lack of developer interest and therefore the site should be discounted from the supply.
W2011/0541	Land off, Peregrine Way, Apley	100	100	70	The site had an application submitted in outline in 2006, renewed in 2012. There is a current reserved matters application 2015/0843 of 21st September 2015 which remains undertermined due to the requirement for additional ecology surveys which are still being undertaken. On this basis, Gladman consider 30 units should be discounted from the supply.
W2011/0821	Land north, east and south of Aston Grove, off Wellington Road, Newport	145	136	136	Gladman have no comments on this site.
W2011/0949	Gladstone House, Hadley Local Centre, Hadley	24	24	24	Gladman have no comments on this site.
W2011/1102	Beech Road, Ironbridge	90	90	0	There are no reserved matters submitted and the property is not currently being advertised for sale.
W2012/0056	39 Stafford Road, Oakengates	14	14	0	There are no reserved matters submitted and the site is not being offered for sale. There is no developer involvement and there is no contact detail for the occupier or site owner. The previous applicant was not a development company and therefore the site has been discounted from the supply.
W2012/0069	Ercall Wood Technology College, Wellington	80	80	80	Gladman have no comments on this site.
W2012/0240	Land at, Arleston, Telford	153	95	20	The Reserved Matters for the extra care containing 50 self-contained flats and 95 dwellings was approved on the 2nd June 2016 RM 2015/0836. This permission requires the delivery of the extra care after 20 market dwellings, There is now a new full application under TWC/2016/0840 by Redrow Homes for the erection of 132 dwellings with no extra care. Redrow have a deal with Helical that they will buy subject to satisfactory planning, but it is unlikely that the planners will approve a scheme that does not include the delivery of the extra care and this is the advice that Redrow have received in September 2016. On that basis the implementation of the existing Reserved Matters can result only in the delivery of 20 units prior to the delivery of the extra care facility. Redrow have indicated that they cannot find a provider for the extra care units and have indicated that on the basis of their knowledge that the scheme will only deliver the first 20 units in the 5 year period. This therefore is reflected in a delivery

	Priorslee East, Priorslee				There is currently only a reserved matters application ref TWC/2016/0804 on plot D submitted by Central and Country Development Limited for 18 units.
					There are no applications on parcels J1 and J2, parcel F or 1,2,3
W2012/0530		395	160	18	These sites do not appear on the HCA land disposal schedule of July 2016 and there is therefore no agreed disposal route or timing for marketing.
					Given the delay in marketing the site the unknown method of disposal of the land the biding process, partner selection, submission of Reserved Matters there is clearly a delay to the delivery of the site and it is not considered the site will deliver as the council indicate within the 5 year period other than the 18 units on plot D.
W2012/0650	Doseley Works, Doseley, Telford	268	100	35	The application forms the final phase of the site with phases 1 complete and 2 under construction. This phase required the current site occupiers who make pipes to vacate the site and the demolotion and remediation of this area of the site. Gladman have therefore assumed a delivery of 35 dwellings in year 5 of the supply.
W2013/0567	Caravan and Camping Centre, Stadium Way, Hadley	14	14	0	The site expires on the 14th january 2017 and has been marketed by local agents since the consent was granted in 2014. There is no developer interest and therefore on this basis it is not considered that reserved matters will be submitted prior to the expiry of the outline on this basis the consent is removed from the supply.
					At this time no reserved matters application has been submitted. The consent required the submission of RM no later than three years after the 3 October 2014, the consent therefore expires on 3rd October 2017.
W2013/0592	Hinkshay Road, Dawley	165	80	0	There is considerable ground remediation to be undertaken due to the former battery production on site. The remediation work might jeopardise the residential development on this site. Gladman have therefore discounted the site from the supply.
W2013/0769	Castle Farm Way, Priorslee	600	80	0	The site is on a former employment site of Celestia Ltd who were a ceramics manufacture. This Outline application for up to 600 dwellings was permitted on the 26/03/2014 under application ref: TWC/2013/0769, the consent therefore expires in March 2017. The applicants were not Housebuilders and there is no house building developer involvement currently in the site.
					The site is not currently being marketed and no reserved Matters have been submitted. On this basis and the extensive work required in order to address the conditions on the outline consent it is discounted from the supply as it is not considered that the site will be able to deliver in the five year period.
W2013/0777	Moorfield Lane, Church Aston	9	9	4	Agent has confirmed that do not intend to submit the reserved matters and that they will be submitting an application for 4 dwellings, hence the reduction.
W2013/0806	Wrockwardine Wood Arts College, New Road	53	53	53	Gladman have no comments on this site.
W2013/0808	Grange Park Primary School, Stirchley, Telford	37	37	0	The applicant is Telford and Wrekin Council. There are no reserved matters submitted and there is no evidence of the site being for sale on the Council's website. Remove from the supply.
W2013/0901	Gower Street, Oakengates	20	10	0	This site received outline consent for 20 Dwellings in 12/05/2014 (application ref: TWC/2013/0901) with the outline consent expiring in May 2017. The site has been actively marketed by the agents but no developer has come forward to progress the site on this basis it is discounted from the supply
W2013/0902	Wellington Road, Horsehay	23	23	0	This Outline application was permitted 04/04/2014 – and therefore expires in April 2017 the site is currently the Hugh's Transport Ltd although still being marketed there is no developer or Reserved Matters Submitted or vacant site with the intention to be developed. On this basis it is removed from the supply.
W2014/0230	Back Lane/Plantation Drive, Tibberton	26	26	25	Planning permission is for a maximum of 25 dwellings - 1 dwelling removed.
W2014/0415	The Knoll, Church Aston	17	17	17	Gladman have no comments on this site.
W2014/0484	The Cedars, Rodington	14	14	14	Gladman have no comments on this site.
W2014/0671	Doseley Road, Doseley	13	13	0	The site could not be progressed because there is a piece of land within the application site has no evidence of title and this has but off potential purchases due to the risk. Currently there is no prospect of the land being sold until there is resolution to the matter with this not being in site. Mr eaker agreed that it was unlikely of be delivered given the circumstances It is therefore discounted form the supply.

PlanAppRef	Site Address	Total left	5 year delivery	GDL 5 Year Delivery	Gladman Comments
5	Major Sites with Housing Allocations at 1st April 2016	1003	433	104	
	Sub-total	1863	493	154	Gladman also have concerns over the site's viability, with over £10 million in contributions required and the site's inability to provide policy compliant affordable housing on site.
W2014/0980	Priorslee East, Priorslee (H2 in Local Plan)	1100	150	52	This site was taken to committee and a resolution to grant was made in 2015 subject to a S106, with the Developer Miller's. There remains to be signed and therefore no consent is yet issued. Millers do not yet own the site as is clear in the committee report. It is noted that there will be 10 years for the submission of the Reserved Matters.
W2014/0113	Former British Sugar site, Allscott	470	50	0	The permission is complex with 37 planning conditions to be dealt with. Although the site is being marketed on the basis of the type of permission and the complexity of delivery and no known developer interest at the current time then there is not considered to be any housing delivery in the 5 year period
W2013/0855	Station Road, Newport	50	50	50	Gladman have no comments on this site
W2013/0809	Former Swan Centre, Grange Avenue, Stirchley	28	28	0	The outline consent is for 21 dwellings and time expires on 21st Feb 2017. There is also a highway constraint that would prevent the development coming forward. No reserved matters submitted and no known developer interest. Site has been discounted from the supply.
W2011/0827	Audley Avenue, Newport	215	215	52	This site is part under the control of St Modwen's The site has been to planning committee on three occasions the 14th November 2012, 23 July 2014 and 24th June 2015. Planning Permission was due to be issued in June 2016 but this has still to be issued as the S106 remains to be agreed and signed. However there is no decision notice and hence no reserved matters. Given the time that has passed to date there is no guarantee that there will be agreement on the S106. The site does not appear on the St Modwens website as coming soon and does not appear as sold on the TWC website as they are part landowners. {see S 66 of the application forms}. It is also noted that site is not a proposed allocation in the emerging plan. In view of the above and that there is a developer involved the site is included with the delivery timetable and final contribution to the 5YLS based on the DBA delivery timetables and rates resulting in 52 units being added to the supply.
PlanAppRef	Site Address	Total left	5 year delivery	GDL 5 Year Delivery	Gladman Comments
4	Major Sites with Resolution to Grant at 1st April 2016				
	Sub-total Sub-total	5341	2084	819	second submission of outline application. Site is therefore discounted.
W2015/0369	Garfield Road, Ketley Bank	45	45	0	Site discounted to 35 dwellings delivery Site is currently in use as a builders yard. No reserved matters submitted. Agent has confirmed it to be likely to require a
W2015/0157	Former Dairy Crest site, Crudington	111	111	35	Former Dairy Crest Ltd, Crudgington, Telford, Shropshire. The former dairy buildings have been demolished and the site is currently being marketed. Although marketing is underway no developer is yet involved and no Reserved Matters are submitted. Given the complexity of the development, the requirements of the planning permission including site contamination remediation and the need for the land to be sold and reserved matters submitted, it is considered that the site will only deliver at the end of the 5 years period.
W2014/1080	Mill Lane, Tibberton	22	22	22	Gladman have no comments on this site.
W2014/0746	Maxell site, Shawbirch	495	160	0	The Planning Permission allows for 7 years for the submission of Reserved Matters. These therefore do not require submission until 30th September 2022. The Group Solicitor J Ross currenlty occupy some of the buildings and confirmed that the site is not currently being marketed. Given the need for demolition, marketing and given that there is no time imperative for submission of reserved matters it is not considered that the site will deliver over the whole 5 years, therefore delivery has been limited to 52 dwellings.

W2013/0861	Former Sutherland School, Trench (H3 in Local Plan)	123	123	50	The site is not currently being offered for sale on the Councils website and there is no developer interest as at October 2016. There is no reserved matters submission. The site is not therefore considered to be built out within the 5 year period The delivery timetable and final contribution to the 5YLS is 50 units being added to the supply.
W2015/0057	Station Road, Newport (H13 in Local Plan)	120	120	50	No consent has yet been issued and application is yet to go to committee. 50 units towards the supply.
W/2016/0096	New Trench Road, Donnington (H1 in Local Plan)	650	200	84	The application is yet to go to committee and is reliant on major infrastructure requirements to come forward. Given the considerable scale of objection to the site too, it is considered only 84 dwellings will come forward in the 5 year period.
W2016/0165	Former Madeley Court School (H6 in Local Plan)	53	53	53	Gladman have no comments on this site
TBC	Former Beeches Hospital, Ironbridge (H5 in Local Plan)	89	89	89	Gladman have no comments on this site
TBC	Former Phoenix School, Manor Road, Dawley (H7 in Local Plan)	200	50	44	This site was subject to an EIA screening opinion in October 2015 for 200 new homes This confirmed that the former school buildings have been demolished but sports buildings and other pitches remain in use. There is no live application submitted although there is understood to be developer interest.
TBC	Holyhead Road, St.Georges (H11 in Local Plan)	40	40	40	Gladman have no comments on this site
ТВС	North of Priorslee Roundabout, St.Georges (H12 in Local Plan)	70	70	40	Another HCA site. Given the delay in marketing the site the unknown method of disposal of the land the biding process, partner selection, submission of Reserved Matters there is clearly a potential delay to the delivery of the site although and due to the scale it is it is not considered that the site will be unable to deliver within the 5 year period.
	Sub-total	1345	745	450	
6	Other deliverable sites at April 2016				
PlanAppRef	Site Address	Total left	5 year delivery	GDL 5 Year Delivery	Gladman Comments
W2008/0108	Orleton Lane, Wellington, Telford	165	144	52	This is the site of the former Oreton Park school, a new full application TWC2016/0860 submitted September 2016. Lovells are the applicants, the Council own the land and Cerda Planning are the planning consultants.
W2009/1015	Church Farm, Preston upon the Weald Moors, Telford	20	20	20	Gladman have no comments on this site
W/2015/0146	Wesley House, 4 Station Road, St Georges, Telford	10	10	10	Gladman have no comments on this site
	Sub-total	195	174	82	

Small Sites under construction	153	153
Small Sites Not Yet Started	348	244

GDL	4570
GDL SUPPLY	45/2