

TELFORD & WREKIN COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Section 78

REBUTTAL PROOF OF EVIDENCE ON HOUSING LAND SUPPLY

REBUTTAL PROOF OF EVIDENCE OF Mr Darren Richard Oakley BA(Hons) MA

ON BEHALF OF THE LOCAL PLANNING AUTHORITY

APPEAL BY JVH Town Planning Consultants Ltd/Redrow Homes Ltd

AGAINST Telford & Wrekin Council

LAND EAST OF KESTREL CLOSE and BEECHFIELDS WAY, NEWPORT

PLANNING INSPECTORATE REFERENCE: APP/C3240/W/16/3144445

LOCAL PLANNING AUTHORITY REFERENCE: TWC/2016/0704

1. Introduction

- 1.1 I have prepared this rebuttal proof of evidence in order to respond to certain points raised by Ms Hodson and Mr Timbrell.
- 1.2 I respond to various points made by Ms Hodson and by Mr Timbrell in their respective proofs of evidence. The fact my rebuttal does not deal with a point in the proof of Ms Hodson and Mr Timbrell does not indicate I accept the points being made.

2. Ms Hodson: Shortfall

- 2.1 The measure of shortfall is a relatively straight forward aspect of the assessment of housing land supply, involving a calculation of delivery against the housing requirement. Ms Hodson seeks to present two alternative methods of calculating shortfall. The first of these is to apply the contested OAN argued in Mr Bolton's evidence (either 888 dpa or 933 dpa) and measure this against actual completions achieved since 2011 (the base date for the OAN). Whilst the Council disagrees with the appellant's OAN (as argued by Ms Howick in her proof) Ms Hodson is correct to apply the 2011-16 timescale to this calculation (Table 1 and 2 of Ms Hodson's proof). This is consistent with the Framework, which requires LPAs to measure delivery against the housing requirement, whatever this may be at the time.
- 2.2 In the alternative, Ms Hodson presents the same calculation but includes the period 2006-11. This period relates to the housing figures derived from the now revoked Regional Strategy for the West Midlands rather than being based on an up to date OAN. Ms Hodson is wrong to apply this time period to the measure of shortfall because this period does not relate to the period used to determine an up to date housing requirement based on an OAN. For the purposes of this inquiry, both parties are agreed that the housing requirement to be applied should be based on the OAN. Both parties also agree that the base date for the OAN is 2011. Furthermore, Ms Hodson states in her own evidence that the amount of shortfall is determined against the annual housing requirement as expressed in the emerging local plan (which has base date of 2011) or, alternatively, against the figures proposed by Mr Bolton (at para 6.7.5).
- 2.3 It is therefore clear that the relevant period for the calculation of shortfall must relate to the same period that applies to the up to date housing requirement based on a new assessment of need (OAN). Both parties agree that this covers the period 2011-2031. In effect, Ms Hodson is attempting to import a shortfall, or backlog, from a previous period. This is not credible. A case in point is the *Zurich Assurance v Winchester City Council* High Court Judgement (2014) EWHC 758 (Admin) passed down on 18th March 2014. I

accept that this case did not relate to a s78 appeal dealing with HLS, instead it concerned a challenge to a local plan and the proper basis for a housing requirement. Nonetheless, the judgment is clear on the matter of how different figures covering different periods derived from different methodologies should be applied, and stated that it would be 'highly contrived' to add on backlog from an earlier period and would, 'mix apples and pears in an unjustified way'. The judgment is relevant to this case given that the sets of numbers (covering 2006-11, and 2011-31) are derived from different data sources and methodologies, published at different times. Consequently, Ms Hodson's methodology does not represent a credible assessment of shortfall as presented in Table 3, Table 9 and Table 10 of her evidence.

3. Ms Hodson: Establishing and applying the correct buffer

- 3.1 The establishment of an appropriate buffer (be it 5% or 20%) is a judgmental exercise that relates to the occurrence, or otherwise, of persistent under-delivery. Ms Hodson argues that persistent under-delivery has occurred and that a 20% buffer should be applied to the calculation of the requirement. Reliance (at para 6.7.7-6.7.8) is placed on statements made by the Council in planning documents and previous cabinet reports published at an earlier time relating to five year supply as evidence to support the justification for the 20%. However, such statements cannot be considered credible because they do not reflect the latest evidence of assessed need for the period 2011-31 (which only became apparent in 2015 following publication of the PBA Report in March of that year), nor do they reflect on the scale of housing delivery achieved since 2011. Furthermore, the fact that the adopted housing figures set out in the Core Strategy are considered, by both parties, to no longer provide a suitable basis for the assessment of housing land supply also suggests that limited weight, if any, should be attached to them in the overall assessment, given that those statements relied heavily on those figures.
- 3.2 Ms Hodson then goes on to compare delivery against the housing figures in the Core Strategy since 2006 (Table 4 and 5, para 6.79) as the basis for her evidence of persistent under-delivery. In doing so, Ms Hodson makes an assumption, wrongly, that the housing figures somehow represent targets or requirements that must be achieved and, if not, then this would result in under-delivery. Reference is made to the RS Phase 2 Review Panel Report published in 2009 (para 6.7.10), some 7 years old now, as evidence suggesting that the housing figures set out in Policy CF3 of the RS (and, hence, Core Strategy Policy CS1) should be treated as '*targets to be aimed for*', and that the, '*minima-maxima is no longer useful*'. I do not consider that any significant weight can be given to the Panel's view in the light of the comprehensive information now available at this inquiry, including the fact that the RS was formally revoked on 20th May 2013 before any revised RS could be adopted. Furthermore, regardless of what the Phase 2 Review Panel

Report said subsequent to adoption of the 2004 RS, the housing figures set out in Policy CF3 were adopted on the basis of maxima for all local authority areas outside the metropolitan urban area (MUA) and these were carried forward into the Core Strategy in 2007, following examination, in support of the wider regional objective of redirecting growth into MUA post-2011.

- 3.3 Ms Hodson then goes on to argue (in para 6.7.11) that, whilst accepting the housing figures set out in the Core Strategy to be unsuitable as a basis for housing land supply purposes, these same figures should be used to assist in establishing a record of persistent under-delivery. The result is a 'conjoining' of figures from very different and separate sources into a single timeframe (2006-16). Ms Hodson does this, firstly, (para 6.7.12) by linking together the Core Strategy figures for the period 2006-11 with the emerging local plan figure for 2011-16. Ms Hodson then presents (para 6.7.13) a second analysis which uses the alternative based on Mr Bolton's OAN for the 2011-16 period. Furthermore, in doing so, Ms Hodson seeks to apply the figures as 'requirements' (para 6.7.12).
- 3.4 I do not consider that any weight should be given to this 'mix and match' approach as a credible basis for establishing persistent under-delivery. This is for two reasons. Firstly, as explained in my evidence¹ and reiterated in paragraph 4.4 above, the figures were adopted as maxima and so cannot represent a requirement, by definition. And secondly, as demonstrated in my evidence on shortfall, a buffer can only be applied to the up to date housing requirement and any calculated shortfall emanating from a comparison of delivery against that requirement. The up to date requirement as part of this inquiry relates to the [agreed] starting point of 2011 consistent with an up to date OAN. It is irrational to add a buffer to a shortfall that does not relate to the requirement.
- 3.5 Furthermore, the Core Strategy figures were split into two discrete time periods (2006-11; 2011-16) with a significant reduction in the scale of delivery envisaged for the latter period (from 1,330dpa down to 700dpa). This reduction was consistent with the RS objective to redirect growth back into the conurbation post-2011, whilst recognising that this process of 'market redistribution' would need time to adjust. On the basis of Ms Hodson's methodology, a comparison of delivery against the Core Strategy figures would suggest that delivery underscored the maximum figures on 6 out of the 10 years, with only one in the last 5 years. On this basis, even if the housing figures were defined in the way suggested by Ms Hodson, it is questionable whether this provides sufficient evidence of persistence.

¹ Paragraph 5.10 of my proof of evidence

- 3.6 Ms Hodson places some weight on the Growth Point Initiative set up by central government in 2006. The project was to invite local authorities to bid for GP status and to share central government funding for infrastructure projects. However, no formal plans were ever published by the Council and, in Ms Hodson's words, remained a 'concept'. Consequently, very limited weight should be given to this part of Ms Hodson's evidence.
- 3.7 Consequently, based on the foregoing analysis, I do not accept Ms Hodson's opinion that a 20% buffer should be applied to the housing requirement.

4. Ms Hodson: Determining the housing requirement

- 4.1 Ms Hodson has determined a selection of housing requirements, ranging from 4,668 to 11,041 depending on which assumptions are applied (Table 6 to 10). All the requirements include a 20% buffer. Two of the requirements include the calculated 'shortfall' based on the period 2006-16 (Table 9 and 10).
- 4.2 Based on my evidence relating to the base requirement, shortfall and buffer, I do not consider any of the requirements put forward by Ms Hodson represent a suitable basis for the calculation of HLS.

5. Timbrell: Evidence on lead-in times and builds out rates

Delivery rates

- 5.1 Mr Timbrell goes to great lengths in an attempt to undermine the delivery rates applied to those sites considered to be deliverable, suggesting that the rates are too ambitious (para 2.2 of his proof). Mr Timbrell suggests that the market is 'cautious' and that there is 'genuine concern' regarding delivery rates in Telford and Wrekin. I do not accord with this view. This is based on the fact that since the economic downturn of 2008, annual monitoring indicates that overall delivery of new homes has increased year on year up to April 2016, with the exception of 2012/13. In fact, last year (2015/16) saw one of the highest annual net completions seen in recent times. Such a scale of delivery does not, in my opinion, substantiate Mr Timbrell's claim for greater caution in terms of the future state of the local housing market over the next five years.
- 5.2 Mr Timbrell also argues (para 2.5) that there is concern that Homes and Communities Agency (HCA) exerts too much control over housing delivery in the borough. However, HCA will no longer provide the lead on public sector land disposal in Telford and Wrekin following the initiation of a tripartite deal signed between the Council, HCA and DCLG, known as the Telford Land Deal, which will see the Council take over responsibility for the timing of release of land onto the open market.

- 5.3 Mr Timbrell argues that delivery rates on sites brought forward by national house builders should be 35 dpa. This view appears to be based on conversations with house builders. I do not accord with this view. An analysis of a sample of national house builder sites (see Appendix 1 of this rebuttal) would suggest that recent delivery rates in any given year are broadly consistent with at least a 40dpa delivery rate, and such rates are being achieved across the borough, contrary to Mr Timbrell's view (para 2.17). There is no reason to suspect that this will change on the basis of current information. The Council will, of course, keep this matter under review and, if necessary, make appropriate amendments as part of future HLS assessments.
- 5.4 Mr Timbrell also argues that there is a 'general' reliance on 'small developers'. In fact, at present, reliance on small or local builders is relatively limited compared to sites being brought forward by national builders. I can provide evidence (see Appendix 2 of this rebuttal) that demonstrates this point. For example, the numbers of dwellings considered deliverable on major sites (over 10 dwellings) either under construction or with full planning permission that are being progressed by smaller developers are estimated to be 190 dwellings. If the figures for small sites (less than 10 dwellings) are added on, assuming these are being brought forward by small developers, the estimated total is 691,² or 10.2% of total deliverable supply. It is also worth noting that the vast majority of those major sites being progressed by smaller builders are already on site and under construction at April 2016.
- 5.5 Mr Timbrell also argues that the Council's assumption of 36 dpa for regional sites is also too ambitious, and should be 25 dpa instead. Again, I do not share Mr Timbrell's concern, given the sustained upturn in delivery since the mid-2000s, long before initiatives such as Help to Buy were introduced.

Lead-in times

- 5.6 Mr Timbrell argues that the Council is 'overly optimistic' in its application of lead-in times (para 3.1). I do not share his view. I consider that the importance of lead-in times is being overplayed. A significant proportion of the deliverable supply has already breached the hurdle of planning consent, either in outline, full, or through reserved matters, or developers are already on site at April 2016. This equates to about 71% of the total supply (4,754/6727)³, excluding small sites. This figure increases to about 78% (5,247/6727) if sites with a

² Comprising 190 dwellings from small builders as indicated in Appendix 2 of this rebuttal, plus 153 dwellings and 348 dwellings from row C and D of the Council's Housing Land Supply Statement (October update) 2016 (CD 4.13) respectively.

³ Comprising row A and B of Table 4 in CD 4.13 (2,185 plus 2569)

resolution to grant subject to s106 being signed are included⁴. Furthermore, it is estimated that the supply from major sites (919 dwellings) without an extant planning permission only comprise 13.7% of the total deliverable supply⁵. Less than 1% is planned to come forward on future windfall sites.

- 5.7 Consequently, the analysis presented by Mr Timbrell (para 3.19) would only apply to a small proportion of the overall supply that didn't benefit from an extant permission at April 2016, and so should be given limited weight in the overall assessment of deliverability.
- 5.8 Mr Timbrell, as part of his argument on the Council's apparent over-optimism with respect to lead-in time, makes reference to a sample of six sites that have been through the planning application process in Telford and Wrekin (para 3.19). All the sites referred to were under construction at April 2016. The timescales covered in these examples include the period from validation to approval and, in some instances, when the first plot was completed (though I have not verified the completion dates at time of writing). The examples used by Mr Timbrell clearly focus on a small number of sites that have, in the past, experienced some delay in progress. I accept that some sites will experience some delay, but the issues will more than likely be site-specific and should therefore not be applied to the deliverable supply in general. Each site is unique and so a delay on one site doesn't mean a delay will occur on all sites. I consider it would be irrational to conclude otherwise.
- 5.9 Furthermore, the examples presented by Mr Timbrell indicate that the timeline between a reserved matters application (a situation that would apply to all the sites with an extant outline consent that form part of the deliverable supply) being registered and a first plot completion can vary quite significantly, from 18 months (Doseley Works) down to 6 months (i.e. Phase 3 Wellington Road). This would suggest that, even taking account of any delays, sites could still deliver a substantial amount of development within any five year period.
- 5.10 Given the recent sustained upturn in delivery experienced in the borough, it is useful to highlight some examples of sites that have been progressed relatively quickly in comparison to those examples quoted by Mr Timbrell (see Appendix 3 of this rebuttal). They also represent sites that have been progressed very recently. This shows that the time period from registration to permission is between 3½ to 8 months, significantly shorter than the 15.7 months/1.27 years quoted by Mr Timbrell (para 3.21).

⁴ Comprises 4,754 plus 493 taken from row E of Table 4 (CD 413)

⁵ Comprising rows F and G from Table 4 (CD 4.13)

5.11 Mr Timbrell (at para 3.22) also questions the Council's approach to defining what lead-in time actually represents and lack of detail in the HLS statement. The use of 'lead in from start' is to reflect the purpose of this aspect of the assessment, namely estimating future potential delivery. In order to assess the scale of potential delivery from those sites considered to be deliverable, and thus assess supply against the requirement, it is necessary to consider when dwellings could be completed (as opposed to predicting when they will be completed, which is not necessary or, indeed, possible). The measure is from April 2016 to end of March 2021. Part of this assessment includes consideration of 'commencement' and, though this is not explicitly stated in the schedule, site totals have been discounted to reflect that fact that the sites approved in outline, or which have no extant planning permission, at April 2016 may not be built out in full by 2021 due to the need for further planning approvals prior to commencement of development. Consequently, I consider the assumptions relating to lead-in to be reasonable as a basis for estimating future delivery. Furthermore, many of the dwellings in the deliverable supply are on sites that have already commenced at April 2016 (totalling 2,185 dwellings, or 84% of the OAN-based housing requirement) and so future commencement is clearly not a relevant factor on these sites.

6. Ms Hodson: Assessment of deliverable sites

6.1 The aspect of Ms Hodson's evidence (p56-81 of her proof) that I wish to rebut covers her assessment of deliverability of a number of sites in the Council's deliverable supply set out in my evidence. My rebuttal is set out in the table below.

JH site ref.	DO response	Outcome
1	Application relates to a strategic site (Lightmoor Village), which is already under construction. Site is considered deliverable, given willing landowner intends to bring forward the site for development. Insufficient evidence submitted by appellant to demonstrate the site undeliverable.	No change
2	Agreed	Reduce deliverable supply to 266

4	<p>There is no requirement for a developer to be identified now for the site to be considered deliverable up to 2021. The site is deliverable given the 'in principle' acceptance of development. Ms Hodson is speculating that a new application is likely without any confirmation from a prospective developer. Insufficient evidence submitted by appellant to demonstrate the site is undeliverable.</p>	No change
5	<p>Insufficient evidence submitted to demonstrate that the site is undeliverable, given the 'in principle' acceptance of development. Still time for a planning application to be submitted for relatively modest development up to April 2021.</p>	No change
6	<p>This site had the benefit of an outline consent issued in 2012. I am aware that a bat survey has been undertaken as part of the reserved matters application, with a draft report submitted on 10th November, with a revised layout expected shortly. Insufficient evidence submitted to demonstrate that the site is not deliverable as envisaged. Ms Hodson is being overly cautious in stating that the site won't start to deliver homes until year 2018/19, given the site is at reserved matters stage with progress being made to secure consent.</p> <p>Conversation with Kier (18th November 2016), who intend to purchase the site from HCA, confirmed intention to start on site during summer 2017, subject to RM approval, with a two-year build out period.</p>	No change
7	<p>Application relates to a larger site in Newport, which was already under construction at April 2016. The appellant acknowledges that the site subsequently achieved reserved matters consent in April 2016. No reason to suggest the site is not deliverable in full by April 2021.</p>	No change
9	<p>This site had outline permission at April 2016, so there is an 'in principle' support for residential established. Current outline expires in March 2018. No evidence to confirm that no development is to take place by end of March 2021.</p>	No change
10	<p>Whilst activity may be slow at this time, still sufficient time for the site to be acquired and brought forward given permission in outline (all matters reserved) has</p>	No change

	<p>already been issued, confirming 'in principle' support for development. The outline will expire in more than a years time (13th December 2017). No indication that no development will happen on this site by 2021. Whether or not the previous applicant was a 'development company' is not considered to be a major factor in assessing 'deliverability'. Landowner seeking to progress the site.</p>	
12	<p>I accept the summary of events presented by Ms Hodson in her evidence. However, I am aware that a subsequent full application has now been submitted by Redrow Homes in November 2016 (not validated at time of writing) which includes a mix of homes and extra care provision. This would appear to contradict the previous application (TWC/2015/0840) which did not include any extra care housing (ECH). Clearly, the applicant wishes to progress the site. There now appears to be some of the uncertainty regarding the triggers relating to construction of the extra care facility. Consequently, the 20 dwellings planned to be built out by April 2021 under TWC/2015/0836 prior to construction of the ECH element may not now be implemented.</p>	No change
13	<p>I am aware that HCA is close to appointing a preferred developer for plots E and F (c.8 hectares). The plots are being progressed through the Telford Land Deal. It is anticipated that the plots will be built out at a total of 220 dwellings (c.27.5 dph). Given that some site preparation has already taken place, including the provision for access between and onto the various plots, it is also anticipated that a reserved matters planning application will be submitted by April 2017. A target date of September 2017 has been set for consent to be secured. The total housing to be delivered on plots D3, E and F will be 245 dwellings. This includes provision for 25 dwellings on plot D3, confirmed by TWC Property Service on 22nd November 2016. The remaining plots (J1 and J2) will be brought forward via 'Direct Commissioning', a central government initiative established to accelerate housing delivery. Therefore, no reason to suspect the site could not come forward by 2021 as envisaged.</p>	No change

14	I accept that a sitting tenant may influence the timing of any start on this phase of the larger site. However, not aware that any arrangements have been agreed and confirmed between the relevant parties. The view expressed by the appellant is therefore speculative and cannot be relied upon until such details are known.	No change
15	Following a conversation with the agent for the current outline application (Mr M Cheadle) on 14 th November 2016, it was confirmed that the applicant will be pursuing a resubmission that will supersede the original outline consent. This provides clear evidence of a firm intention to progress the site for development.	No change
16	Following a conversation with new site owners (Countrywide Properties) on 16 th November 2016 it is their intention to submit a reserved matters application before Christmas of this year. Countrywide Properties expect to accelerate delivery to c.70 dpa. Even if an allowance of up to 12 months is made for registration and approval of the application before a start on site, there is clearly sufficient time to deliver 80 units by 2021.	No change
17	The agent (Harris Lamb) confirmed on 14 th November 2016 that the client has instructed them to progress a reserved matters application, to be submitted prior to the expiry of the outline in March 2017. Even if an allowance of up to 12 months is made to allow for registration and approval of the application before a start on site, there is sufficient time to deliver 80 units by 2021.	No change
18	Agreed	Reduce deliverable supply to 4 dwellings
20	For information, I am aware that the site has been sold subject to contract (SSC). The fact that no developer exists does not automatically mean the site is not deliverable. Insufficient evidence submitted by appellant to demonstrate the site undeliverable by 2021.	No change
21	The application is still extant, and will expire in April 2017. Insufficient evidence submitted by appellant to	No change

	demonstrate the site undeliverable by 2021.	
22	The application is still extant, and will expire in April 2017. Insufficient evidence submitted by appellant to demonstrate the site undeliverable by 2021.	No change
26	I am aware that there are legal measures that can be taken to resolve matters as 'Title defects' such as described in Ms Hodson's evidence. This is known as 'Title Indemnity Insurance'.	No change
27	Maxell Site, Shawbirch – I have been informed that there has been strong interest in bringing forward this site for development. There are no constraints that prevent the site from being progressed should a developer come forward. Planning permission remains extant.	No change
29	TWC aware that there is currently interest from a national house builder in taking forward the site. Even if an allowance of 6 months is made for the sale of the site and a further 12 months between registration of a reserved matters application and start on site, there would still be approx. 3 years to allow for full build out at 36 dpa. No evidence that only 58 dwellings could be delivered by 2021.	No change
30	No evidence that 45 dwellings could not be delivered by 2021, even if a new planning application was submitted, given the existing 'in principle' support for residential development	No change
31	TWC expectation is that s106 will be signed before end of November 2016. No other impediments preventing development within next five years. Once the site is sold the new owner (most likely to be a national builder) can progress the site to reserved matters stage. Nearly three years (Aug 2019) before commencement on site is considered to be pessimistic and doesn't reflect the upturn in delivery in Newport. Assumed that site will start in 2018 and deliver at 40 dpa.	Reduce deliverable supply to 120
32	Landowner (TWC) anticipates site will be released onto the market in summer of 2017 following rebuilding of Grange Park School on adjacent land. Insufficient evidence submitted by appellant to demonstrate the site	No change

	undeliverable by 2021.	
34	The appellant argues that no RM or developer means the site is not deliverable by April 2021. Appellant has not presented any evidence that the site is not deliverable up to 2021. Landowner is actively seeking to market the site for the intended use.	No change
35	<p>The appellant assumes a lower build out rate (35dpa) than TWC and suggests dwellings would be delivered at the start of May 2018. For information, the s106 has now been signed and consent issued (26th October 2016) and a house builder is progressing the site. TWC assumption is 50 dpa with completions coming forward over three of the five year period.</p> <p>Conversation with Julie Morgan (23rd November 2016) from the developer (Miller Homes) confirmed they would be assuming a build out rate of 50dpa based on 'national standards' from one outlet. However, MH also confirmed that they were considering having two outlets on site. This could result in overall delivery being in the range of 75 to 100 dpa. Ms Morgan also stated that MH were assuming that RM application would be submitted within 12 months. Assuming 3-6 months to secure the RM consent, this would suggest delivery would begin in 2018, and potentially on site within the 2017/18 period.</p>	No change
36	This site is owned by TWC, who secured outline consent in June 2016. The appellant argues that no RM or developer means the site is not deliverable by April 2021. However, the landowner will be actively seeking to market the site for the intended use. Sufficient time exists to allow for a reserved matters application to be submitted and determined and for start on site in 2018. Appellant has not presented any credible evidence that the site is not deliverable up to 2021.	No change
37	Insufficient evidence submitted by the appellant to demonstrate the site is undeliverable by 2021, given landowners intention to sell the site for the intended use.	No change
38	I accept that the timescale necessary to put in place the necessary consents mean that start on site may turn out to be slower than envisaged. I have assumed a start on	Reduce deliverable supply to

	site in 2018 given the landowners intention to pursue residential development, subject to outline consent being granted.	120 dwellings
40	The appellant assumes completions will only come forward in the year 2019 onwards and then only 23 units. I consider this to be pessimistic given the site is owned by the developer who will build out the site (Shropshire Homes) and a full planning application has been submitted (TWC/2016/0562).	No change
42	The appellant presents no evidence that the site is not deliverable by April 2021. TWC is promoting the site through the local plan and consider that it can come forward in the next five years. Site previously allocated in the Central Telford Area Action Plan following adoption in March 2011. Site will be progressed as part of Telford Land Deal.	No change
43	The appellant presents no evidence that the site is not deliverable by April 2021. TWC is promoting the site through the local plan and consider that it can come forward in the next five years. Site previously allocated in the Central Telford Area Action Plan following adoption in March 2011. Site will be progressed as part of Telford Land Deal.	No change
44	The appellant presents no evidence that the site is likely to start in 2019 given the landowner's (Lovell) firm intention to bring the site forward subject to securing full planning consent, which is likely to be in 2017.	No change

6.2 Consequently, based on the foregoing analysis, I do not accept Ms Hodson's calculation of 4,565 dwellings as being deliverable up to April 2021.