

## Telford & Wrekin Local Plan: Examination in Public

### Initial Statement by Council

#### Matters 1 – Housing Supply (Q1.4 and 1.5)

The Council would like to make the following brief statement with regards to matter's 1.4 and 1.5:

##### On Matter 1.4 – Housing Land Supply

- In terms of overall supply, the Council has made good progress towards achieving the planned level of housing growth. At April 2016, 4,498 net completions had been delivered – some 29% of the housing requirement – in the first quarter of the plan period.
- In addition to completed dwellings, the additional supply will come from a range of 'supply components';
  - 'existing commitments',
  - 'sites with resolution to grant, subject to s106',
  - 'an allowance for small windfall sites not yet identified', and
  - 'Site allocations'.
- The plan therefore identifies all the necessary supply of land needed to deliver the remainder of the housing requirement, the vast majority of which is located in, or adjacent to, the main built-up areas of the borough. This is set out in Table 8 of the Housing Land Supply Statement (update Jan 2017), in response to the Inspector's MIQs on this matter.
- An allowance for windfalls for small sites has also been included, representing less than 4% of the housing requirement.
- In terms of under-delivery, a number of objectors argue that the Council has persistently under-delivered housing to the extent that a 20% buffer should be added to the five year requirement. The Council does not accept that it has under-delivered housing against the previous (Core Strategy) nor the proposed housing figures.
- Consequently, a 5% buffer should be applied when determining the five-year requirement.
- The updated housing land supply statement (like the previous statements before it) is based predominantly on sites with planning permission, with a relatively small number of sites yet to be granted consent at April 2016.
- The Council also consider it's assumptions on lead-in times and build out rates to be realistic.
- Consequently, in terms of 'deliverable' supply, the Council has presented evidence in the January 2017 update, that demonstrates sufficient supply exists to deliver the next five years of the plan period.

### **On Matter 1.5 – safeguards against unanticipated shortfalls**

- A number of representations argue that further contingency must be made in the Plan should delivery fall short of the requirement, including specific identification of reserve sites.
- The Council considers that sufficient flexibility already exists within the plan to address any potential shortfall that might occur during the remainder of the plan period.
- Unlike many other local authorities, T&W is able to build into the Plan a number of allowances of 20% for non-implementation. Such an approach has received support during consultation.
- Assuming a plan requirement of 778 per year, the borough is unlikely to see any shortfall in the first ten years of the plan period, up to 2021 at least. This is because delivery has exceeded the proposed figure by 608 dwellings at April 2016, and supply up to 2021 is considered to exceed 5 years.
- The Council also undertook, in 2016, a review of the SHLAA, which identifies a considerable number of suitable sites, when assessed against emerging local plan policy, that might otherwise be deliverable or developable.
- Consequently, the Council does not consider there to be any need to specifically identify reserve sites, given the scale of recent delivery and the substantial land supply that currently exists in the borough.

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