

1 TELFORD AND WREKIN LOCAL PLAN – EXAMINATION IN PUBLIC – MATTER 8 SITE ALLOCATIONS (K24/40A)

1.1 Introduction

1.1.1 The Inspector requested that the Council would confirm the methodology it adopted that informed its final schedule of housing allocations. The Council have provided Document K24/40a in response to the Inspector's questions on Day 6 of the Examination (Friday 10th February). The Inspector raised the following concerns:

- The Council needs to show its working with regard to the 4th sieve of sites considered for allocation, with particular interest in the planning judgements applied to reach their final decision (and how 315 sites were reduced to just 17 which were allocated);
- Also, the output of Sieve 3, which shows why some sites were taken forward for consideration within Sieve 4, and some were not. The Inspector stated that any information as to how the Council conducted the Sieve 3 assessment (such as any further criteria/sub criteria that were used to form the Council's assessment) would also be particularly helpful.

1.1.2 Gladman would like to make a number of comments on the Council's methodology, and the inconsistency of the decision making applied to the selection of their Site Allocations.

1.2 The Council's Methodology

1.2.1 Taking the points raised by the Inspector in chronological order (i.e. the order by which the Council undertook the assessments), Gladman raise the following comments:

Sieve 3 – Strategic Fit Stage

Additional Criteria

1.2.2 The parties were directed towards document A3a (Integrated Appraisal Appendices), and the conclusions at Appendix IX (page 759 of the electronic PDF). 315 sites were carried forward to the strategic fit stage. The comments from parties around the table at the Examination Hearings related to the lack of information provided by the Council as to how sites were progressed to allocation stage, following the scoring against the strategic fit criteria (i.e. the fourth sieve). This has now been provided by the Council and is considered in more detail below.

1.2.3 Gladman have provided a table (appended to this statement), which considers the additional criteria the Council have shown at Appendix 1 of their K24/40a statement. Gladman are still unsure how the Council went about scoring respective sites i.e. how to meet the criteria and when a site does not.

- 1.2.4 Given this, Gladman are no further forward in their understanding of the strategic fit criteria. The “Planning Assessment” column provided by the Council still does not explain how decisions have been reached for a number of the strategic fit criteria. For example, no further information is provided for Criteria 1 (*“Focussing growth on the urban areas of Telford and Newport”*) and Criteria 7 (*“Maximises opportunity for infrastructure investment”*).
- 1.2.5 In addition, the further information provided for other criteria is unhelpful. For example, for Criteria 3, whilst the suitable walking distance has been clarified at 800 metres, there is no information provided as to whether this distance is measured from the centre or the boundary of the proposed site, or whether the distance is measured as the crow flies or whether it is measured using the shortest walking route. This same principle applies for Criteria 5.
- 1.2.6 Gladman also have difficulty understanding how the Council’s preferred sites 144, 482 and 508 can pass Criteria 5, given that the sites are not within 400m of a strategic employment area (whether measured from the centre of the site or from the boundary).
- 1.2.7 Criteria 10 is also confusing, and the Planning Assessment provided (*“Is the site within 20m buffer of a strategic highway network”*), does not provide any further clarification on how this has been applied to the Council’s allocated and rejected sites.

Inconsistency

- 1.2.8 The criteria provided and discussed above unfortunately leads to further concerns on inconsistency. To illustrate this, Gladman has produced a table showing the Councils assessment. There is then a final column where Gladman have reviewed the Humber Lane site using the scoring for H1 and H2 for consistency.
- 1.2.9 Applying this approach, Gladman consider that Humber Lane meets six of the strategic fit criteria. The site would:
- Focus growth on the urban area of Telford;
 - It would promote sustainable urban extensions;
 - It would support strategic employment areas;
 - It would also maximise opportunity for infrastructure investment;
 - It would provide a balanced provision which is complimentary with existing commitments; and
 - It harnesses connections to main highways, footpaths and cycleways.
- 1.2.10 Finally, it is also concerning that there appears to be a number of sites where the Council have miscounted the SF scores outlined in the table within Appendix 2, for example sites 144 and 482, which have each been given inflated scores. Not for the first time in this examination the Council

have provided incorrect information, when it is crucial that all evidence is up to date, correct and supports the Local Plan.

Sieve 4 – Planning Assessment

- 1.2.11 Considering the Council’s methodology for the Planning Assessment stage, it is clear that, following receipt of Sieve 4 there is a little more transparency from the Council as to how it has reached its decision on the allocated sites. However, this does not mean that the assessment is robust, and it is particularly clear that the Planning Assessments for each of the Strategy Fit Criteria have not be applied robustly. The Council, in their assessment of the sites they have chosen to allocate, seem to have employed a copy and paste approach to their scoring system, given that the conclusions are remarkably similar and does little more than record the sites that are allocated and those that are not. This is at odds with the process of planning judgement that the Council suggested they undertook at the Examination.
- 1.2.12 Perhaps more concerning still, is that the Council, in their planning judgement, appear to reintroduce criteria that previously meant sites would be rejected from the site selection process. For example, for the sites 144, 482 and 508 (which form the Council’s H1 allocation), the conclusions state *“portion of the site covered by higher risk flood zones”*. However, sites in flood zone 3 should not have been taken past the preliminary elimination stage, if the Council’s own selection methodology as set out in the Housing Delivery Technical Paper (B2b) is followed.
- 1.2.13 The Council’s own evidence base, including the Strategic Flood Risk Assessment of 2008 states for site 482, which forms part of allocation H1:

“Given the degree of flood risk posed to this site, alternative sites in lower risk Flood Zones, preferably Zone 1, should be developed in preference to this site.”

- 1.2.14 The Council’s own evidence base, at Appendix E of the SFRA 2015 Addendum, demonstrates that over 50% of the site is within the flood risk zone 3. It is therefore difficult for Gladman to understand how the site has reached this sieve 4 of the site selection process.

1.3 Conclusions

- 1.3.1 Gladman do not consider that the Sieve 4 assessment represents a “planning judgement”. Gladman were led to believe that the planning judgement would weigh up the constraints and/or benefits of each of the sites taken forward for assessment (i.e. the 315 sites taken to sieve 4) and provide a detailed conclusion as to why a site had been allocated or otherwise. In reality, what the Council have actually provided represents nothing more than a confirmation of the sites that the Council have chosen to allocate.
- 1.3.2 To be robust, the Council’s assessment of sites, and the sieves that have been used to whittle down the number of potential allocation, should be capable of being easily understood. At this stage, Gladman are no clearer as to how the Council have reached the 17 sites it deems suitable of allocation.

1.3.3 The PPG (S022, Ref ID: 11-022-20140306) states:

“The sustainability appraisal report should help to integrate different areas of evidence and to demonstrate why the proposals in the Local Plan are the most appropriate.”

1.3.4 Lots of sites were identified by the Council as being suitable, and there are a number of sites which appear to have been incorrectly scored (including Gladman’s site at Humber Lane, Site 810). It is important to do a proper site by site assessment to establish the sites that are the most suitable for allocation. However, the Council haven’t done this and this is a significant failing of the sustainability appraisal.

1.3.5 The evidence provided by the Council does not demonstrate why the allocations selected within the Local Plan are the most appropriate. The fourth sieve is a crucial piece of evidence. It doesn’t explain in any detail why the Council have rejected 298 sites as unsuitable for allocation. This only reinforces Gladman’s position that the methodology applied by the Council is not robust. This is a significant failing of the plan, and Gladman invite the Inspector to conclude accordingly, given the evidence set out above.

Strategic Fit Criterion	Definitions and Justifications	Planning Assessment	Site	Site	Site	Site	Site	Site
			144 (H1)	386 (H2)	482 (H1)	508 (H1)	810	810 (GDL)
1.Focussing growth on the urban areas of Telford and Newport	Growth is either within, immediately associated/contiguous with or clearly and sustainably connected to the urban areas of Telford or Newport	See definition and justification	<input checked="" type="checkbox"/>					
2.Protection of strategic green space and valuable landscapes	Protection of designated landscapes, the Green Network and high quality agricultural land (class 1, 2 or 3a).	Is the site within designated landscapes, the Green Network and high quality agricultural land (class 1, 2 or 3a)	<input checked="" type="checkbox"/>					
3.Sustaining and enhancing local urban centres	Development should be close proximity and well connected to a Local, District, or Town Centre or located in a Market Town.	Is the site within reasonable walking distance (within 800m) of a Local, District or Town Centre or Market Town	<input checked="" type="checkbox"/>					
4.Promote sustainable urban extensions	Be of sufficient scale and critical mass to deliver comprehensive social, economic and environmental infrastructure being well connected to existing development	Can the site contribute to creating SUE's, including access to a range of facilities and when developed at appropriate densities.	<input checked="" type="checkbox"/>					
5.Supports the strategic employment areas/eastern arc	Adopting an approach which locates homes closer to jobs and facilities greater opportunity for the promotion of sustainable transport patterns	Is the site within reasonable walking distance (within 400m) of a strategic employment area	<input checked="" type="checkbox"/>					
6.Supports areas of social deprivation	Supporting development that contributes to the regeneration of Target Intervention Areas	Is the site in or immediately adjacent to a TIA?	<input checked="" type="checkbox"/>					
7.Maximises opportunity for infrastructure investment	Locating development in areas which can harness existing commitments to invest in infrastructure from the LEP, HCA and other investors in the borough	See definition and justification	<input checked="" type="checkbox"/>					
8.Responds to the availability of public land	Development that assists in the provision of social and education infrastructure helps protect public services and can demonstrate good stewardship of public assets and resources	Is the site owned by Telford & Wrekin Council or the Homes and Communities Agency	<input checked="" type="checkbox"/>					
9.A balanced provision which is complimentary with existing commitments	To produce a balanced distribution of development in the borough. Areas with sufficient commitment such as the Rural Area are therefore excluded.	Is the site in an urban area or on the urban fringe	<input checked="" type="checkbox"/>					
10.Harnesses connections especially main highways, cycleways, footways and public transports corridors.	Locating development where it is well connected to existing infrastructure and exploits proximity to sustainable transport modes.	Is the site within 20m buffer of a strategic highway network?	<input checked="" type="checkbox"/>					
Total (Appendix A3a)			7	7	6	7	0	6
SF Score recorded in recent council App 2			8	7	7	7		