

Telford & Wrekin Local Plan: Examination in Public

Matter 8: Housing Sites Allocations

Response to paragraph 3 of the Inspector's note of 13 March 2017

EiP Reference: K24/40g

This note provides clarification regarding the Council approach in arriving at its final schedule of housing sites allocations and addresses all the issues raised in paragraph 3 of the Inspectors note of 13th March 2017.

Explanation of the Council's process leading to the final schedule of housing allocations.

1. The Council's site selection process is summarised in the Housing Delivery Technical Paper (B2b) which explains that a three stage process was initially adopted to select sites.
2. The Preliminary Elimination Stage is described at paragraph 2.5 of B2b which reduced the number from 720 down to 400 sites which were then carried forward to the second Site Assessment stage.
3. The Site Assessment Stage is described in paragraphs 2.7 to 2.13 of B2b which reduced the number from approximately 400 to 315 sites. These 315 sites were then carried forward to the third Strategic Fit Stage.
4. The Strategic Fit Stage is described in paragraphs 2.15 to 3.3 of B2b. It involved a scoring exercise against ten criteria as set out in Section 3 Table 1 of B2b. As a scoring exercise the Strategic Fit Stage did not reduce the number of sites. The scoring for the 315 sites was summarised in a table in the Integrated (Sustainability) Appraisal Report 2015. This is Table 4.55 of D4b and Appendix IX of D5b.
5. This Scoring Exercise was taken forward for the final site allocations to be made i.e. the 4th stage. In this respect the Council, refers to section 5 in B2b which explains that site selection was ultimately determined in accordance with priorities set out in paragraphs 5.3 to 5.5.
6. The Council then produced its final schedule of 17 housing site allocations. (Appendix D, Table 21 of the submitted Local Plan).
7. Two points need to be made regarding the production of this final schedule:
 - i) The Council acknowledges that it has not been able to produce a contemporaneous document to demonstrate the application of section 5 of Document B2b. Unfortunately, the Council has encountered

significant staff turnover since 2015 which has resulted in the Council being unable to find potentially relevant documentation which may have been created at the time.

- ii) At paragraph 5.2 of B2b the Council states that “All of the sites selected respond positively to at least 5 of the Strategic Fit Criteria”. This is incorrect as SHLAA ref sites 445 and 613 scored 4 and 3 respectively and were combined as site reference H17 in the final schedule, Table 21. These sites were included for allocation for three exceptional reasons: first, they benefit from section 7(1)New Towns Act consent for housing, a consent that does not time expire; secondly, they are currently located within the Wrekin Local Plan urban area of Telford; and, thirdly, if developed, they will help consolidate the new community at Lawley.

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- 8. The Council produced document K24/40a in response to the Inspector’s question (K24). This was not a contemporaneous document. It was prepared and submitted by the Council to help the Inspector by applying planning considerations to each site that scored 5 or above (apart from 2 sites previously mentioned). This explains why over 200 sites are not included in Appendix 2 to K24/40a. This does not mean that the full 315 sites were not considered when the Council produced the final schedule of 17 housing site allocations. The Council now recognises that Appendix 2 to K24/40a was not what the Inspector had requested.

Response to objectors comments and criticisms

- 9. The Council has provided the explanation above which clarifies the methodology it has applied in finalising the 17 Housing Site Allocations.
- 10. The Council now believes it has clarified a previous misunderstanding regarding K24/40a, and hopefully the position is now clear. The Council will submit a table of detailed responses to the representors’ recent written questions and criticisms over the Housing Sites Allocation process.

Context for Site Allocations

- 11. The Council took a “policy on” approach to plan for a housing number considerably in excess of its OAN of 9,940¹ As of April 2015 and before the issue of the draft Regulation 18 version of the Local Plan, it had issued

¹ Based on the 2012 ONS SNPP. Later raised to 10,040 using the 2014 ONS SNPP

planning permissions for 12,550 homes². The Council were also aware, at the time of producing the final schedule of housing allocations, of substantial developer interest at pre application stage and of applications going through the planning process

12. Thus, it can be noted that housing allocations were not in April 2015, or now, absolutely critical to ensure the delivery of the Local Plan housing requirement.
13. In addition to the large number of planning permissions and dwellings delivered since April 2011, the borough, as a New Town, also has a legacy of sites within the existing urban area of Telford (as defined in the Wrekin Local Plan) with Section 7(1) New Towns Act consents which could come forward for development at any time.
14. These section 7(1) sites are all within the existing urban area and are in sustainable locations with good access to services that would be supported for housing when assessed against Policies SP1 and HO1. The suitability of this land for development has already been assessed and established through their 7(1) status but also their identification on the Wrekin Local Plan proposals map as housing commitments.

Conclusion

The Council remains of the view that the methodology it has applied, leading up to the final allocations, can be understood with reference to the evidence base submitted to the examination of the Local Plan and referred to again in this submission. The outcomes and other matters relevant to the final allocations have been presented to the Examination. The Council considers that the Inspector can now confirm that its approach to site allocation in these circumstances was appropriate.

² Refer to Table 10 of the Local Plan – unchanged since Regulation 18 (Consultation Version of the Local Plan)