The Planning Inspectorate

Report to Telford & Wrekin Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Telford & Wrekin Local Plan 2011-2031

The Plan was submitted for examination on 30 June 2016

The examination hearings were held between 30 January and 10 February 2017

File ref: PINS/C3240/429/10

Abbreviations used in this report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
CS	Telford & Wrekin Core Strategy
DCLG	Department for Communities and Local Government
dpa	Dwellings per annum
DtC	Duty to Co-operate
EA	Environment Agency
ELRIR	Employment Land Review: Interim Report
GBBC HMA	Greater Birmingham and Black Country Housing Market Area
GTTSANA	Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment
HE	Historic England
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IA	Integrated Appraisal
IDP	Infrastructure Development Plan
LAA	Local Aggregates Assessment
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
MSA	Minerals Safeguarding Area
OAN	Objectively assessed housing needs
OBR	Office for Budget Responsibility
ONS	Office for National Statistics
PBA	Peter Brett Associates (consultants for the Council)
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PSED	Public Sector Equality Duty
RLCSHC	Retail & Leisure Capacity Study and Health Check
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SL	Strategic Landscape
SNCT	Shrewsbury & Newport Canal Trust
WHS	World Heritage Site
WLP	Wrekin Local Plan
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Telford & Wrekin Local Plan 2011-2031 provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Telford & Wrekin Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs were proposed by the Council, and were subject to public consultation over a six-week period. Updated sustainability appraisal has been undertaken. In some cases I have amended their detailed wording and added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Increase in the housing requirement from 15,555 to approximately 17,280 dwellings following an increase in the objective assessment of the Borough's housing needs.
- Recognition of the potential for an element of the Local Plan's housing requirement to meet some of the needs of the Greater Birmingham and Black Country Housing Market Area, subject to suitable justification.
- Deletion of four housing sites in response to concerns about the site selection methodology and introduction of a requirement for the preparation of a Site Allocations Local Plan.
- Addition of detailed development requirements for the Priorslee Sustainable Urban Extension.
- Clarification of the approach to Gypsies and Travellers in accordance with national policy.
- Clarification that the Local Plan's housing requirement is not a maximum limit.
- Clarification of the approach to main town centre uses in accordance with national policy.
- Deletion of the support for major hotel development in the Ironbridge Gorge World Heritage Site.
- Addition of safeguarding for the line of the Shrewsbury & Newport Canal.
- Strengthening of protection for the Shropshire Hills Area of Outstanding Natural Beauty.
- Deletion of the Lilleshall Village Strategic Landscape.
- Updating of built heritage policies to accord with national policy.
- Clarification of mineral policies, including the introduction of buffer zones to mineral safeguarding areas and the addition of updated information on the supply of aggregates and sand and gravel.

Introduction

1. This report contains my assessment of the Telford & Wrekin Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Telford & Wrekin Local Plan 2011-2031, published for consultation in February 2016, is the basis for my examination. The submission version (dated June 2016) contained a number of tracked changes, several of which seem to me to amount to amendments of more than a minor nature. I have considered these in association with other changes that have been suggested by the Council and other parties.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council has requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and/or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were either discussed at the examination hearings or raised in written submissions, are necessary. The MMs are referenced in bold in the report [MM] and are set out in full in the Appendix.

4. Following the examination hearings, the Council prepared a schedule of proposed MMs, accompanied by an updated Sustainability Appraisal (SA)[1] to reflect the increased housing requirement, among other matters, and a refresh of a number of the supporting evidence documents[2]. The MM schedule was subject to public consultation for a six week period, ending in September 2017. I have taken account of the consultation responses in coming to my conclusions in this report. In this light of these comments I have made some amendments to the detailed wording of the MM (including the deletion of one MM) and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this

[1] Document G20.
[2] Listed in document K29.

case, the submission policies map comprises the set of plans identified as the Telford & Wrekin Local Plan 2011-2031 Submission Version Policies Map as set out in document A2.

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.

7. These further changes to the policies map were published for consultation alongside the MMs. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include the changes published alongside the MMs.

Assessment of Duty to Co-operate

8. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council has complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The Council sets out the actions that it has undertaken in this regard in a Duty to Co-operate Statement[3]. This describes the activities that it has undertaken with other bodies in order to maximise the effectiveness of the Plan's preparation. This has occurred to a particularly high degree with its immediate neighbours – notably with Shropshire Council, in respect of a wide range of matters, and Stafford Borough Council, especially in respect of the Local Plan's strategy for Newport. Engagement has also taken place more widely within the West Midlands region – the Council is a non-constituent member of the West Midlands Combined Authority – and with other Duty to Co-operate bodies in respect of specific topic matters.

9. As described in the remainder of this report, the Council has worked in partnership with other relevant bodies in order to address specific strategic matters. Examples include joint working in respect of the Ironbridge Gorge World Heritage Site (WHS) and the Shropshire Hills Area of Outstanding Natural Beauty (AONB), as well as co-operation with bodies such as Natural England and the Environment Agency in respect of specific Local Plan issues such as biodiversity, waste and water planning and flood risk assessment.

10. No objections have been raised in respect of any failure to meet the Duty to Co-operate by any of the bodies prescribed in relevant legislation for the purposes of section 33A(1)(c) of the Act. While concerns of detail remain, notably in respect of the Local Plan's approach towards meeting housing needs arising from the West Midlands conurbation, the representors concerned have made it clear that these relate to matters of soundness rather than any failure under the Duty to Co-operate. I return to these matters later in this report.

11. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the Duty to Co-operate has therefore been met.

[3] Document A6.

Assessment of Soundness

Main Issues

12. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified the following main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Main Issue 1 – **Are the Local Plan's housing policies based on adequate** and up-to-date evidence and a clear understanding of housing needs? **Does an adequate supply of housing land exist to meet the Local Plan's** requirements?

Objectively Assessed Housing Needs (OAN)

13. Among other matters, paragraph 47 of the National Planning Policy Framework (the Framework) states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the Framework's policies. Guidance on undertaking an objective assessment is set out in the PPG. This states that need for housing refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand. It should address both the total number of homes needed based on quantitative assessments, but also on an understanding of the qualitative requirements of the market segment. The PPG adds that assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur[4] .

14. The PPG explains that this exercise is an objective assessment of need based on facts and unbiased evidence and that constraints should not be applied to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. Such considerations should be addressed at a later stage when developing specific policies[5]. As such, a clear distinction must be drawn between the objective assessment of housing needs and the eventual determination of a Local Plan housing requirement.

15. The housing needs assessment that underpins the Local Plan has emerged through a succession of documents. A Strategic Housing Market Assessment (SMHA) was published in 2014. This was followed by a report for the Council by Peter Brett Associates considering the objective assessment of housing needs dated March 2015 (the PBA Report 2015[6]). An updated Strategic Housing Market Assessment (SHMA) was published in March 2016[7], towards

[4] PPG paragraph ID 2a-003-20140306.
[5] PPG paragraph ID 2a-004-20140306.
[6] Document C2a-i.
[7] Document C2b-i.

the end of the Regulation 19 consultation period on the Local Plan. During the examination period, an updated statement on objectively assessed housing needs was published in November 2016 (the PBA Report 2016[8]) that takes into account the 2014-based population and household projections which were released in 2016.

16. Concerns have been raised about the timing of the publication of the 2016 SHMA. However, in terms of OAN, the conclusions of the 2016 SHMA carry forward the approach in the earlier PBA 2015 report – which itself incorporated more up-to-date data sources than the 2014 SHMA. In that regard, the 2016 SHMA does not materially alter the Council's position at the time of the Plan's Publication Version. While changes were made to the assessment of affordable housing needs – a matter that I address further below – this reflects changes in the underlying methodology in the main data source that underpinned the 2014 SHMA – namely the cessation of the choice-based letting system and housing register. The Council's decision to issue an update therefore appears broadly justified. Although the timing of its publication was less than ideal, I am satisfied that the process of this examination has enabled relevant parties to make further comments on its contents. I do not feel that the timing of the 2016 SHMA's publication represents a fundamental weakness in the evidence base that supports the Local Plan.

17. The PBA Report 2015 and the 2016 SHMA adopt a consistent approach to the definition of the relevant housing market area (HMA) – namely the Borough of Telford & Wrekin. In part, this represents a pragmatic response to the amalgamation of several former neighbouring authorities into the single-tier Shropshire Council. In the geography defined by a study published for the Department of Communities and Local Government (DCLG), Telford & Wrekin was grouped with the former Bridgnorth District Council. However, it is clear that other parts of the Shropshire Council area are much less well related to Telford & Wrekin in HMA terms. In any event, an analysis of migration and commuting patterns shows that Telford & Wrekin Borough shows a relatively high level of self-containment. Taken together, these factors justify the chosen approach towards HMA definition. However, this does not preclude the need to consider the potential for the Borough to assist in meeting housing needs from outside the HMA, a matter that is considered later in this report.

18. The Council confirmed at the relevant hearing that its position on OANs is as set out in the PBA Report 2016 – namely an OAN of 10,040 dwellings over the plan period (2011-2031), an average of 502 dwellings per annum (dpa). This represents a small increase over the 9,940 dwelling figure (equivalent to 487 dpa) set out in the PBA Report 2015 and the 2016 SHMA. Bearing in mind that the Framework encourages the use of up-to-date evidence, I understand the Council's wish to refresh its evidence in this manner. Indeed, a number of the representors seeking to challenge this figure also incorporate 2014-based figures in their evidence.

19. Notwithstanding this change, the Council's OAN figure remains significantly lower than the housing requirement that the Local Plan seeks to make provision for. Policy HO1 sets a target of 15,555 dwellings (equivalent to some 778 dpa), which represents an approximate 55% uplift over the

[8] Document G14.

Council's OAN figure. However, a number of representors seek to challenge the Council's assessment of housing needs. In summary, they consider that the OAN figure should be markedly higher than the Council's assessment. To that end, a variety of figures ranging from some 826-933 dpa, all of which would exceed the Plan's housing requirement, have been suggested. It is therefore necessary to consider the Council's OAN methodology in more detail.

20. Taking the above into account, it is the 2014-based DCLG household projections that provide the starting point for OAN assessment. It is common ground that these translate to an annual figure of 502 dpa. However, while this is the same as the eventual OAN figure that is now adopted by the Council, the latter figure has been achieved using a different methodology.

21. It is generally accepted by all parties that the 2014-based DCLG projections for Telford & Wrekin incorporate an element of recessionary trends, particularly with respect to migration assumptions. Specifically, a sharp upturn in net migration into the Borough in 2014-15, as shown in the ONS mid-year estimates represents a clear difference from the pattern between 2002 and 2013, when the Borough experienced relatively low levels of either net in- or net out-migration.

22. The Council's response to this concern is to adopt a different population projection – 'PBA Trends 2005-2015' projection, as set out in the PBA 2016 report. This projection suggests a population increase of 827 persons per annum, which represents an increase over the figure of 702 persons per annum envisaged by the DCLG 2014-based projection. The Council has then applied the DCLG 2014-based household formation rates to the PBA Trends 2005-2015 projection. This results in the higher level of population increase giving rise to the substantially same number of households (and hence dwellings) as envisaged in the 2014-based projections. This apparently anomalous result is explained by the differing population structure, notably in terms of age, than is projected by the PBA Trends 2005-2015 projection. In summary, the PBA assessment envisages higher population numbers for younger age groups than the ONS 2014-based population projection and lower population numbers for older age groups.

23. As noted above, there is broad agreement that an adjustment needs to be made to the 2014-based projections in order to ensure that recessionary trends are not perpetuated. In principle, it seems to me that the adoption of a trends-based population projection by the Council is therefore justified. As noted above, recent migration data show a marked departure from previous years. While some objections have been raised to using a 10 year period upon which to base trends[9], I consider that adopting a shorter 5 year time period would be likely to give undue prominence to what has been a marked change. There is no certainty that such a dramatic rise will continue: it may indeed represent a post-recessionary 'bounce-back', as suggested by the Council.

24. To my mind, there is merit is taking a longer term view. It is noted that the population growth suggested by another representor (Barton Willmore for Gladman Developments)[10] (835 persons per annum), does not depart

[9] See for example the arguments advanced by SPRU for Redrow Homes – document H1.
[10] Document J1/16/1.

markedly from the figure suggested by the PBA Trends 2005-2015 projection (of 827 persons per annum).

25. However, the Barton Willmore assessment – which has been undertaken using a different methodology (the POPGROUP and Derived Forecast demographic forecasting model) – results in a markedly different (and higher) output in terms of households. In part, this is because the Barton Willmore assessment does not envisage the changes to the Borough's demographic profile that are shown in the PBA Trends 2005-2015 projection. Nevertheless, I have no reason to doubt the view of PBA, expressed at the relevant hearing session that these changes merely represent the output from the model that they have used.

26. The other main difference between the Barton Willmore projections and the PBA Trends 2005-2015 projection relates to the treatment of household formation rates. The PBA approach to this matter is criticised by other representors along similar lines, with several alternative methodologies being suggested. It is common ground that the household formation rates that underpin the DCLG 2014-based household projections do not differ significantly from those contained in the 2012-based projections. Concern has been raised that these continue to embody recessionary effects compared to the 2008-based household formation rates. A particular concern relates to the possible suppression of household formation for age groups 25-34 and 35-44. Several representors state that this is as a result of worsening affordability.

27. The PPG recognises that the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. It adds that, for example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing[11].

28. It is common ground that the 2012-based and 2014-based household formation rates are below those underpinning the 2008-based projections. Representors contend, in summary, that adoption of these rates would act to embody recessionary trends. Particular concern is voiced about the 2014-based household formation rates for the 25-34 year age group, which remain lower than the 2008-based figures.

29. However, the Council contends that this difference may be due to a variety of factors, specifically demand-led effects such as wage levels and different life style choices. It sees no justification in incorporating any return to earlier headship rates in the case of Telford & Wrekin. It points to data showing that household representative rates for Telford and Wrekin are slightly above (or equal to) national benchmarks for England[12]. It also comments that a large supply of land was maintained during the recessionary period[13]. While actual completions were clearly at a relatively low rate during that period (for example, between 2006/7 and 2009/10 no year exceeded 500 dwellings), the picture has now changed markedly – with totals of 842, 1074 and 1255 dwellings for 2013/14, 2014/15 and 2015/16 respectively[14]. Furthermore,

[11] PPG ref ID: 2a-015-20140306.
[12] Figure 2.1 of document G14.
[13] See table 6 of document B2(a).
[14] See table 3 of document G17.

data from 2015 show that affordability in the Borough has remained better than in England as a whole and in adjoining areas[15].

30. Drawing these matters together, I agree with the Council that there is insufficient evidence of local factors indicating historical suppression of household formation rates, in terms of demographic information, affordability or supply, to justify making adjustments to the recent DCLG projections. I see no evidence that these projections have failed to take into account more recent changes in factors that affect the demand for housing – such as changes in working patterns and life styles. To my mind, even a partial return to 2008-based household formation rates – which in any event are based on old evidence – is not therefore justified. I therefore reject the alternative calculations and methodologies to that effect that have been presented by representors. I am therefore satisfied that the Council's figure of 502 dpa represents an appropriate demographic-based assessment of housing need.

31. National policy in the Framework requires that the assessment of housing should take full account of relevant market and economic signals. As the PPG makes clear, employment trends should be taken into account. Specifically, plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area. The PPG adds that where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, the PPG states that plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.

32. The Council has used the Experian forecasting model to test the labour market implications of its demographic projections. The most recent output from this model, taking into account a forecast dated September 2016, shows 710 net new jobs per annum[16], a figure that has been reduced from previous forecasts. In the Council's opinion, the forecast population increase (based on its figure of 502 dpa) would be more than enough to support this level of jobs growth. As such, the likely growth in jobs would not be constrained by labour supply.

33. The Council's analysis is disputed by a number of representors. On the one hand, there is broad agreement about the likely level of job growth in the Borough. While the three projections cited by both Barton Willmore and SPRU (Cambridge Econometrics, Oxford Economics and Experian Economics) suggest markedly different output figures, their average (693 jobs per annum) is similar to the Council's figure. However, there is significant disagreement as to how to assess the size of population needed to support this level of growth and avoid undue constraints.

34. Barton Willmore suggests that national projections of economic activity rates produced by the Office for Budget Responsibility (OBR) should be applied.

[15] See figure 2.4 of document G14.
[16] Document G14, page 30.

However, I accept the Council's argument that these are not locally-based and, moreover, that their use in this context would represent an inconsistent range of inputs. This is because application of the OBR activity rates to a calculation of labour demand would be likely to produce a different (lower) initial job growth figure.

35. Concern is also raised about the use of the Experian model for this purpose, saying, in effect, that population is an input to this economic model rather than an output. In general terms, I accept the Council's response that the Experian model represents an integrated approach that, moreover, has been 're-run' to take account of its more recent population projection.

36. Nevertheless, a number of detailed objections have been raised to the assumptions that the Council has adopted, particularly by SPRU, specifically in relation to commuting rates, 'double jobbing' and future economic activity rates. I address each in turn.

37. The Experian model predicts that commuting rates will change in the future. This is disputed by SPRU which takes the view that such a ratio should remain the same. To my mind, the former view appears more realistic. While the detailed parameters of future changes are factors contained within the model, it seems to me a reasonable assumption that commuting patterns are likely to be influenced by the interactions between where new jobs arise and where the workforce lives. Past commuting patterns have indeed been subject to change: it is a matter for the Council to consider how these may be affected in the future. I do not feel that this represents a flaw in PBA's approach.

38. Turning to 'double jobbing' – where one person has more than one job – the Council's assessment that this will rise from 3% in 2011 to 7% in 2031[17] is challenged on the basis that it is over-optimistic. SPRU quotes an alternative figure of 4%, based upon a figure reported in the Financial Times from 2015.

39. To my mind the evidence underpinning either of these assessments is limited. However, the Financial Times' figures – which relate to the UK as a whole rather than Telford & Wrekin in particular – suggest that 'double-jobbing' is an increasing phenomenon. Clearly, part time working is also on the increase, suggesting that the potential for double-jobbing may rise. Bearing in mind that the Plan period extends to 2031, it is possible that this trend will continue. However, the 7% figure that the Council suggests represents a considerable increase: such a high figure is not justified by the balance of the evidence before me. The 4% figure has been endorsed by an Inspector considering a recent appeal at Kestrel Close, Newport as a 'conservative' approach[18]: I share that view.

40. A further criticism is that an over-reliance has been placed upon an increase in activity rates for those aged 65 and above in PBA's assessment. Higher activity rates mean in summary that a smaller population is needed to supply a given number of jobs. It is accepted that there are uncertainties inherent in any such assessment. It is very likely that, for the reasons set out by the Council which relate particularly to the rising state pension age, that the rate

[17] Document G14, paragraph 2.86.
[18] Land east of Kestrel Close/Beechfields Way, Newport: ref. APP/C3240/W/16/3144445 – document K24/31a.

of economic activity of this age group will increase. However, the rate of increase in such activity rates that is suggested by the PBA approach is striking. I share the view of my colleague in the Kestrel Close appeal decision referred to above that there is a need for caution in placing an increased reliance on an older age structure to fill jobs. Past fluctuations in local economic activity rates support this view.

41. For the above reasons, I consider that there is a need for an upwards adjustment to the demographic-based assessment of housing need discussed above. My colleague in the Kestrel Close appeal adopted an output figure from SPRU's calculations (albeit not the final figure recommended by that representor to either that inquiry or this examination) of 864 dwellings per annum as a 'generous maximum' for the purposes of that appeal.

42. I presented my interim findings on this and other matters to the Council at the end of March 2017[19]. In that document I requested the Council to revisit the PBA conclusions in respect of the above-noted labour market implications. Failing that, I sought the Council's view on whether the above-noted figure of 864 dpa should be adopted for the purposes of the present examination.

43. In responding to this request[20] the Council explored the potential for reviewing the above-noted concerns with its consultants (PBA). However, it was concluded that the relevant reviews would be impractical within the timescale of the examination. I have no reason to take a different view. Given the circumstances, the Council stated that it therefore accepts the Kestrel Close Inspector's conclusion about the objectively assessed need for housing (of 864 dpa) for the purposes of the examination. It therefore proposes to amend the Plan's housing requirement to approximately 17,280 dwellings.

44. While it would have been preferable to reconsider the Council's evidence, and re-run relevant models, in the light of the concerns stated above, it seems to me that the Council has made a pragmatic decision in the light of the evidence that has been presented about the Borough's housing needs. The 864 dpa figure lies well within the range suggested by the alternative assessments that have been put forward by representors, as discussed above. It represents a significant increase above the demographic-based assessment. Delaying the examination further to seek to achieve a more accurate figure – as has been suggested by some representors – would, to my mind, be counter-productive. Given the evidence before me, I consider this figure to be sufficiently robust to enable the Plan to be adopted – subject, as set out below, to the inclusion of references to the preparation of a housing site allocation plan to ensure that adequate sites are identified. I therefore adopt this figure as a realistic and objective assessment of the Borough's housing needs over the Plan period. The changes that this implies are considered in more detail below.

45. In their submissions on OAN, representors have generally not suggested that an additional allowance should be made in respect of market signals. Bearing in mind that the figure stated above represents a very considerable increase over the base demographic requirement (an increase of some 72%) I agree that no further uplift is justified.

[19] Document F10.
[20] Document F10b.

46. Housing supply is considered in more detail later in this report. However, it should be noted that a housing delivery figure of 864 dpa appears well within the scope of recent rates of housing completions, as already discussed. An average rate completions of some 1057 dpa has been achieved in the three years 2013/14-2015/16[21]. This suggests that the increased housing requirement figure is not unrealistic in terms of delivery.

47. During the consultation period on the proposed Main Modifications, the Government published a follow-on consultation on proposals to set a standard method for calculating housing need[22]. Some representors have sought the adoption of this approach in the present examination. However, the proposals that have been put forward are consultative only and, moreover, are not intended to apply to plans submitted on or before 31 March 2018. As such, they do not cause me to alter my above assessment.

Affordable Housing – Needs and Delivery

48. An assessment of affordable housing needs was undertaken in the 2016 Strategic Housing Market Assessment (SHMA)[23]. This represents an update of the evidence set out in the earlier (2014) SHMA, and results in a lower needs figure that had previously been assessed. Although concerns have been raised by representors about this change, I have no reason to doubt the Council's explanation that this derives from updated ways of registering local housing need as already mentioned. As such, the figures in the 2014 and 2016 SHMAs cannot be directly compared. Changes to the Plan are needed to reflect the updated position [MM50-52] in order for the Plan to be justified.

49. The 2016 SHMA seeks to evaluate demand against supply. Assuming that the existing backlog in affordable housing needs is met within 5 years, the SHMA calculates a 'net annual imbalance' of 665 dwellings. In effect, this equates to the annual net affordable housing need for the Borough. Clearly, this represents a substantial figure – in excess of the Council's initial OAN figure. Even given the increase in the Plan's housing requirement, it would still represent a significant proportion of the intended level of overall housing delivery. This suggests that there is limited scope to address the backlog within the timescale envisaged by the 2016 SHMA calculation.

50. Accordingly, the Council has carried out an additional affordable housing needs analysis in an addendum to the SHMA, with a more detailed explanation of the calculation in its PBA 2016 report[24]. Table A1 of the latter document presents a summary of the Council's assessment of affordable housing needs spread over the full Local Plan period. In summary, this shows an overall affordable housing need of 816 dwellings per annum against which is set an annual capacity of affordable housing of 552 dwellings per annum, giving a net annual imbalance of 264 dwellings. Among the factors incorporated in the overall need figure are the backlog at the start of the period (3,373 dwellings), an estimate of newly arising need during the Plan period (8,840 dwellings) and an

[21] Document G17 – table 3.
[22] Planning for the right homes in the right places: consultation proposals (14 September 2017)
[23] Document C2b-I, appendix D.
[24] Documents C2b-ii and G14 (appendix F) respectively.

estimate that some 4,800 affordable homes will be taken out of management during that period.

51. Representors have queried the apparently high level of the annual capacity figure. On the Council's evidence this mostly derives from a net annual supply of social housing re-lets, along with a small number of intermediate housing re-lets or re-sales. The PPG advises that past trends in re-lets should be investigated in order to calculate likely future affordable housing supply. Although there is indeed a significant amount of 'churn' in this regard, I have seen no substantive alternative evidence of social housing turnover that causes me to call the Council's figures into question. During the examination, the Council produced additional evidence in support of its earlier assessment[25]. Taking this into account I am satisfied that its net annual affordable housing need figure is appropriately justified.

52. Policies HO5 and HO6 set out the Local Plan's approach to the delivery of affordable housing. Policy HO5 applies a 25% rate to residential development schemes in Telford, and a 35% rate to Newport and any other location. In both cases the policy applies only to schemes of 11 dwellings or more, in line with the WMS dated 28 November 2014.

53. At the hearings, the Council confirmed that its key viability evidence in respect of affordable housing delivery, and indeed other development costs, is set out in the Local Plan Viability Study (January 2016) (LPVS)[26]. It considers the earlier Affordable Housing Viability Study (2009)[27] to now be out of date. Bearing in mind the changes that have occurred to the housing market since that date, this view is not unreasonable. I therefore disagree with those representors that feel that greater weight should be placed on the findings of the 2009 document.

54. The scope of the LPVS has also been subject to some criticism. However, it follows a standard methodology and is based upon a broadly appropriate set of assumptions which have not been substantively challenged. The above-noted affordable housing requirements are incorporated. The LPVS considers a sample of housing sites, including the sole allocation proposed in Newport, as well as assessing minor residential sites in urban and rural areas. This appears to represent a realistic and proportionate assessment. A surplus after costs is shown for all development site types with the exception of a brownfield redevelopment site in urban Telford. In general terms, this supports the Council's view that the affordable housing requirements set by the Local Plan are not likely to materially restrict housing delivery.

55. While the LPVS shows that there may be specific cases where viability is a problem, I am satisfied that there is sufficient flexibility within policy HO6 and its supporting text (notably at paragraph 5.2.3.4) to enable such proposals to be assessed on a case by case basis. Nevertheless, a number of the Plan's specific development requirements are proposed to be amended to give greater flexibility both for viability reasons and to ensure that any such requirements are appropriate to the development concerned. These changes

[25] Document K13h.
[26] Document E2.
[27] Document K15.

[MM58, MM59, MM61, MM66, MM74, MM84] are needed to ensure that the Plan is effective, justified and consistent with national policy.

56. Updated evidence submitted by the Council[28] indicates that there has been varying success in achieving the above-noted affordable housing thresholds in schemes that have been completed since 2010 (or are under construction). It is argued by representors that this suggests that these thresholds are unrealistic. However, I see no reason to doubt the Council's view that where the threshold was not achieved this was down to specific site-based factors. This reinforces the pragmatic approach to such cases that is referred to above. Nevertheless, it is also clear that the relevant percentage was achieved in a significant number of developments – and indeed was exceeded in a number of cases, as is allowed for in policy HO5. This evidence does not cause me to depart from my comments above.

57. The Council's updated assessment of affordable housing supply[29] totals some 3,334 homes – equivalent to some 63% of the total affordable housing need over the Local Plan period (based upon the above-noted 264 dpa figure). This is derived from a variety of sources[30], with appropriate 'discounts' added to account for possible non-implementation. To my mind, this presents an appropriately cautious approach. However, although the Council points to the potential contribution of 'non-section 106 sources' towards future affordable housing delivery, it is clear that it is unlikely that the need discussed above will be fully met by the Local Plan as submitted. I consider this matter below in the context of the Local Plan's housing requirement.

Local Plan Housing Requirement

58. For the reasons set out above, the Council has accepted that the Plan's housing requirement should be increased from 15,555 to approximately 17,280 dwellings. Its population target for 2031 increases from 198,000 to 202,500 people. Various changes to the Local Plan are required as a consequence [MM4-6, MM8, MM37-38, MM55, MM90, MM94]: these are necessary for the Plan to be positively prepared, justified, effective and consistent with national policy. The recommended changes to the wording of policies SP1 and HO1 also clarify that the 17,280 dwelling figure is 'approximate' rather than a target: this is necessary in order to provide flexibility and to reflect the Council's view, stated at the examination hearings, that the figure is not intended to represent a ceiling or limit on housing development. Such a stance is consistent with the Framework's aim of boosting significantly the supply of housing. I have made a further change to the wording of policy SP1 to recognise that, as discussed elsewhere in this report, provision for the full 17,280 figure has not yet been made.

59. The amended housing requirement figure has been the subject of an updated SA[31] which considers four growth options ranging from 11,250 to 20,000 dwellings. It should be noted that the revised requirement is well within the range of options that were initially considered by the Council in its 2013

[28] Document K13c.
[29] Document K13.
[30] Itemised in table 2 of that document.
[31] Document G20.

Strategy & Options document[32], and indeed remains markedly lower than the Council's preferred option at that time of 26,500 dwellings. Development at the scale now recommended, and indeed at a higher level, has therefore already been the subject to an integrated appraisal – including SA and Habitat Regulations Assessment (HRA). The 2017 SA update reaffirms the view of its 2016 predecessor[33] that as the level of growth increases, so does the likelihood and potential significance of positive effects in respect of the provision of housing, the economy and the health/well-being of the population. In particular, the delivery of affordable housing is likely to be improved.

60. The Council confirms that key stakeholders in respect of water supply and waste water infrastructure (Severn Trent Water and the Environment Agency) have no objections to the amended housing target given planned improvements in capacity over the Local Plan period. Sufficient mitigation in respect of landscape, biodiversity and the historic environment is provided for in relevant plan policies (some of which will be strengthened by the changes recommended in this report). As is discussed in more detail below, the allocation of any additional housing sites will be a matter for a separate Local Plan, given my concerns about the site selection exercise that underpins the present document.

61. As already noted, the Council has produced a number of other updated evidence documents to reflect the increased housing requirement figure. In summary these demonstrate that the change would not materially affect the recommendations of the existing evidence base. No material change is required in respect of retail and town centre policies[34], while a housing mix analysis[35] shows that the increase would not fundamentally change the conclusions of the existing SHMA. Highways England is satisfied that the existing strategic transport modelling is sufficiently robust to incorporate the changes that are now proposed[36].

62. As is set out below, there is a surplus of employment land over and above the figure provided for in the Local Plan: the Council confirmed at the examination hearings that it is, in any event, pursuing an employment growth strategy. Existing arrangements for waste planning would not be materially affected[37]. The intended pattern of distribution of new housing development within the Borough would be unaffected, although the actual numbers would increase: I address this in the second main issue below.

Unmet Housing Demand from West Midlands Conurbation

63. As already noted, the Local Plan as submitted set a housing requirement in excess of the Council's preferred figure for the Borough's objectively assessed needs. Authorities within the Greater Birmingham and Black Country Housing

[32] Shaping Places Local Plan: Strategy & Options – document D2a.
[33] Documents A3 and A3a.
[34] Document G23.
[35] Document G22.
[36] Document K29, appendix A.
[37] Document G21.

Market Area (GBBC HMA)[38] made representations that the resulting 'surplus' would assist in meeting the identified shortfall within the GBBC HMA.

64. Following the examination hearings, the authorities concerned put forward suggested text for inclusion within the Local Plan stating that, among other matters, the Plan's stated excess provision over its objective assessment of housing needs would make a contribution towards meeting the shortfall from the GBBC HMA and that in the event of it being established that the remaining GBBC HMA shortfall cannot be met within its boundaries then the Local Plan should be reviewed to test whether any additional growth can be accommodated and delivered. The GBBC HMA authorities also feel that any increase to OAN that requires additional in-migration should reflect that the most likely source of such in-migration is the GBBC HMA. As such, they consider that any increase in the Plan's housing requirement should therefore be deducted from the GBBC HMA shortfall[39].

65. As already discussed, the revised Local Plan housing requirement is equivalent to the amended OAN figure that has been accepted by the Council. A surplus would not therefore exist: as such, the entire Local Plan housing target would be aimed at meeting the Borough's OAN. However, as also discussed, there would be a sizeable excess over and above the assessed demographic needs.

66. In response, the Council accepts that its strategy would have the result of increasing in-migration to the Borough – an outcome that would be greater as a result of the increased housing requirement. However, it considers that there is not an adequate justification for any specific number to be assigned to the GBBC HMA. I share that view. Migration data suggest that, historically, the main source of internal migration into Telford & Wrekin is Shropshire, with a somewhat lower figure from the Greater Birmingham area[40]. There is therefore no evidence before me that supports the view of the GBBC HMA authorities either that they are the most likely source of in-migration into the Borough or that the recommended increase in the Plan's housing requirement should necessarily be deducted from that HMA's shortfall. Irrespective of my comments below, such a course of action would be likely to over-estimate any contribution that Telford & Wrekin could make to the GBBC HMA's shortfall.

67. Furthermore, while the scale of shortfall for the City of Birmingham is now known, the figures that have been presented by the Black Country authorities to this examination do not fully quantify the scale of shortfall that is likely to arise from their emerging Joint Core Strategy. Moreover, even if an additional shortfall from the Black Country authorities is demonstrated, it does not necessarily follow that this should (or could) be addressed in part through the Telford & Wrekin Local Plan. As already discussed, the Borough occupies a separate HMA outside the GBBC HMA. National policy in the Framework is clear that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing *in the housing market area*, as far as is consistent with the

[38] The Association of Black Country Authorities, Birmingham City Council & South Staffordshire District Council.
[39] Document K24/2b. The Greater Birmingham authorities are defined for that purpose as Birmingham, Dudley, Wolverhampton, Walsall, Sandwell and South Staffordshire.
[40] For example, table 1 of document B2a.

policies set out in the Framework (my italics)[41]. It seems to me that the duty for the GBBC HMA authorities is therefore, first, to assess whether the relevant need can be met within that HMA and only then to consider the potential for such a need to be met within other HMAs.

68. In fact, the evidence before me suggests that there is as yet no agreement between authorities within the GBBC HMA as to how the shortfall arising from the City of Birmingham is to be met by authorities within that HMA. The Strategic Housing Needs Study Stage 3 Report prepared for the Greater Birmingham and Solihull LEP and the Black Country Authorities[42] did not consider the 'export option' (i.e. meeting the need outside the HMA) in detail, as it was not part of the study's brief. While Telford & Wrekin is mentioned in that document, this was in the context of a Local Plan that sought to set a housing requirement in excess of the Borough's OAN. Other potential alternatives are also mentioned, including East Staffordshire and Wyre Forest Districts, as well as the South Worcestershire authorities.

69. The Study also acknowledges that there would be economic implications arising from taking unmet need from outside the GBBC HMA. It notes that of the people who make long-distance moves out of that HMA, many will be workers whose jobs are in the HMA or close to it. Some may commute back into the HMA but many will not wish to do so or may be unable to do so sustainably. The Study adds that depending on the locations concerned, policy intervention beyond land-use planning is likely to be required to encourage job creation in the destination areas as well as infrastructure investment.

70. Taking these matters together, I consider that neither the principle of meeting some of the GBBC HMA's shortfall in the Telford & Wrekin Local Plan, nor the scale of any such contribution, have been fully justified. Having said that, the evidence suggests that, in practice, at least some of the in-migration that the Local Plan is making provision for is likely to originate from the GBBC HMA. It can be anticipated that further work will be undertaken to apportion the shortfall arising from the GBBC HMA and that, if this is done, a stronger evidence base may become available to determine the potential contribution from 'out of HMA authorities' such as Telford & Wrekin. As such, it would be wrong for the Plan to exclude this possibility at the present stage: I therefore also reject the Council's suggested deletion of text from Chapter 1 of the Plan in that context. Instead, I propose a rewording of the relevant section to reflect my considerations above [MM1]. This is necessary for the Plan to be positively prepared, justified, effective and consistent with national policy.

Housing Land Supply

71. The Council's housing land supply evidence has been updated during the examination. Following my initial queries, the relevant data were reformulated in January 2017[43] to take account of more recent information and sets out the position at 31 March 2016 (despite a number of references in the relevant document to January 2017). It also acknowledges that in the

[41] Paragraph 47 of the Framework.
[42] Document G4.
[43] Document G17.

context of this examination the five year land supply should be based upon the Local Plan housing requirement rather than the Council's OAN figure.

72. Housing supply information was subsequently revisited again[44] to reflect the changes to both the Local Plan's overall housing requirement (discussed above) and the revised approach to site allocation (discussed later in this report). My comments take this into account.

73. In terms of meeting the overall Local Plan housing target, the components of supply are generally not in dispute. The Council makes appropriate allowances for the non-implementation of sites where appropriate. While the assessment discussed at the hearing included a technical problem in that a windfall allowance was included for the first three years (which risked double counting with extant small site permissions), this has been remedied in the more recent statement (a reduction in supply of 90 dwellings). Clearly, the removal of a number of site allocations (or the reasons set out later in this report) means that at present there is insufficient supply in order to meet the overall housing requirement. However, as is also discussed, this will be remedied by the preparation of a separate Site Allocations Local Plan. In order to be justified and effective, it is necessary to insert an updated version of the housing land supply information into the Plan [MM40-44, MM46-48].

74. Turning to the five year land supply position, it is noted that several representors feel that there has been a record of persistent under delivery of housing in the Borough sufficient to justify applying the 20% buffer as set out in the Framework. I do not agree. While there is evidence of lower delivery levels prior to 2013/14 (although this in part reflected the previous Core Strategy's approach of setting a *maximum* level of provision to reflect the then regional focus on development in the major urban areas) the recent position is one of considerable improvement – as has already been mentioned. Indeed, in the last two years delivery has markedly exceeded the increased Local Plan housing requirement that is recommended in this report. Over the first five years of the present Plan period taken together (starting in 2011/12) there has been an over-provision of some 178 dwellings. This does not amount to persistent under delivery. A 5% buffer is therefore appropriate.

75. The Council has reassessed the five year land supply position in the light of the amended housing requirement[45]. In terms of the five year land requirement, the Council's figure of 4,536 dwellings (including a 5% buffer) – equivalent to 907 dpa – is justified. I share the view of representors that it would be inappropriate to seek to delete the above-noted over-provision from the first five years of the Plan period from that total, as was suggested in an earlier paper.

76. The Council's position is that it has a deliverable supply of 5,484 dwellings to set against this requirement – an approximate six year supply. While there is no significant dispute about the figures for dwellings under construction and the contribution from major sites with full planning permission, detailed concerns were raised at an examination hearing about over 20 sites – notably

[44] Document G24 – 1st table.
[45] Document G24 – 2nd table.

those with outline planning permission and those at the 'resolution to grant planning permission' stage.

77. The Framework clarifies that sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

78. There is clearly a difference in approach between the Council and those representors that seek to challenge its five year land supply assessment – notably Redrow Homes Limited which participated in the Kestrel Close appeal. The former is optimistic, the latter pessimistic. When considering evidence on this matter at Kestrel Close, the Inspector took, for reasons of prudence, the worst case picture presented by the appellant (a five year supply of 4,565 dwellings). This gave an outcome of a marginal 5.03 years supply.

79. In the present case a broadly similar approach can be taken. In fact, the Council's own supply estimate has reduced markedly from its position at the Kestrel Close appeal. The effect of the reductions sought by Redrow Homes Ltd at the examination hearings amount to a difference of some 840 dwellings between the Council's position and that of the representor – a supply figure of some 4,644 dwellings. This would equate to an approximate 5.1 years supply. Given that this assessment represents a worst case analysis of the development potential of the sites in dispute, I am satisfied that a five year housing supply can be demonstrated in the context of this examination. In this context I note that two more recent appeal decisions have both accepted that a five year housing land supply can be demonstrated in the Borough[46].

80. In terms of safeguarding against unexpected shortfalls (over and above the allowances that have been made for non-implementation of existing permissions), I am satisfied that the policy context that is set out in the Local Plan, subject to the changes recommended in this report, will allow for a positive approach to development on non-allocated sites that may allow other acceptable schemes to come forward. This is discussed further below. As has already been stated, recent completion rates are well in excess of the amended Plan housing requirement. This provides some confidence that a sufficient level of delivery will be achieved. However, in the event of shortfalls being demonstrated then the preparation of the Site Allocations Local Plan will provide an opportunity to review the scale of additional land requirements.

Gypsies and Travellers

81. The Local Plan's approach to accommodation for gypsies and travellers is set out in policy HO9. The underlying justification is set out in a Technical Paper and a Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2014) (GTTSANA)[47].

82. The methodology and finding s of the GTTSANA are not in significant dispute. This shows an additional requirement (2014-2031) for 32 residential pitches

[46] Refs. APP/C3240/W/16/3149398 (May 2017) & APP/C3240/W/16/3162166 (August 2017) - attachments to document M45.
[47] Documents B2e and C2f respectively.

and a minimum of 11 transit pitches for gypsies and travellers. No additional accommodation is needed for travelling showpeople given the presence of two existing sites. In terms of the supply of sites for gypsies and travellers, the Council can demonstrate a provision of some 29 residential and 11 transit pitches[48]. In particular, planning permissions have been granted in 2015 and 2016 for an extension to an existing Council-run site at Lodge Road, Donnington and for a site at the former Ketley Community Recycling Centre. The Council can therefore demonstrate in excess of a five year supply of sites. Its stance that there is no present need to allocate land for the remaining three pitches is therefore justified: such a low level of additional provision can be expected to come forward as 'windfalls' during the Local Plan period.

83. Such 'windfall' developments would be considered in the light of Local Plan policy HO9. In correspondence with the Council after the examination hearings[49], I raised concerns about criteria (i) and (iii) of this policy. The first of these requires that a need be demonstrated for the relevant provision. This is not a requirement set by the national Planning Policy for Traveller Sites (PPTS). Indeed the relevant criteria in the PPTS are intended to apply in cases where no need can be demonstrated[50].

84. Criterion (iii) of policy HO9 requires that such proposals should not 'dominate' local settled communities by way of size, population density or impact on local infrastructure. To my mind, the term 'dominate' is imprecise. Furthermore, concerns about the impact of such proposals in respect of matters including living conditions, access, landscape and infrastructure are covered by other criteria of the policy. In order to be effective and consistent with national policy, and mindful of the Public Sector Equality Duty (PSED), it is therefore necessary to delete criteria (i) and (iii). It is also necessary to strengthen the policy's approach to flood risk for the same reasons [MM54].

Other Housing Issues

85. The Council's approach to securing a mix of housing types, sizes and tenures is set out in policy HO4. In order to achieve a more consistent approach to the way in which the Plan sets out development requirements, the Council proposes to replace 'expect' with 'require' in this policy. It is also necessary to delete the reference to Lifetime Homes in order to accord with the Written Ministerial Statement (WMS) dated 25 March 2015. These changes [MM49] are needed in order to be effective and consistent with national policy.

86. Policy HO7 of the Local Plan seeks to support proposals to address specialist housing needs – notably housing for the elderly and vulnerable, including people with a disability. While the need for such support is accepted – with reference to evidence set out in the Housing Mix and Tenure Technical Paper[51] as well as the PSED – it seems to me that the policy could be clearer in explaining what kind of specialist needs are being referred to. Furthermore, the policy's concern about 'overconcentration' is neither well evidenced nor

[48] Document J5/TWC.
[49] Documents K16 and K16a.
[50] PPTS paragraph 11.
[51] Document B2d.

clearly explained. The Council proposes changes accordingly [MM53] which are needed for reasons of justification and effectiveness.

Conclusion – Main Issue 1

87. For these reasons, and subject to the changes listed above, I conclude that the Local Plan's housing policies are based on adequate and up-to-date evidence and a clear understanding of housing needs and that an adequate supply of housing land exists to meet the Local Plan's requirements.

Main Issue 2 **–Is the Local Plan's settlement hierarchy and proposed** distribution of development sufficiently justified? Does the Local Plan plan positively for the development and infrastructure required in the area?

Settlement Hierarchy & Distribution of Development

88. The Local Plan's spatial strategy for Telford & Wrekin identifies three distinct sub-areas of the Borough – Telford, Newport and the Rural Area. This is reflected by three spatial policies (policies SP1, SP2 and SP3), along with a policy for housing in rural areas (policy HO10) that identifies five settlements in which a limited amount of infill housing is supported.

89. There is little dispute that this settlement hierarchy follows the logic of the existing pattern of development within the Borough. The spatial approach of focussing development primarily on Telford, supported by development in Newport and a more limited scale of growth in rural areas broadly reflects the option selected at the Strategy & Options stage (2013)[52] of Plan preparation. However, as noted above, the intended delivery of new housing has been markedly reduced – from 26,500 to approximately 17,820 dwellings (as amended).

90. I comment on the Plan's overall housing requirement above. However, I agree with the assessment of the Integrated Appraisal (IA)[53] that in broad terms the general principles for the distribution of development have not changed. Policies SP1, SP2 and SP3 set out housing numbers for Telford, Newport and the Rural Area respectively. Policy SP1 states that the Local Plan identifies land to provide for the delivery of approximately 13,400 net new homes in Telford. Policies SP2 and SP3 support the delivery of approximately 1,200 net new homes and 900 net new homes in Newport and the Rural Area respectively. In line with the amended housing requirement discussed above, the Council proposes to change these figures to 14,950, 1,330 and 1,000 net new homes respectively. This would retain the existing proportions of the intended distribution.

91. The proportional distribution of new housing within the Borough has been the subject of debate. However, in general terms I consider the overall balance between Telford, Newport and the Rural Area to be broadly justified. It is clearly right to seek to locate most new building in the more sustainable locations, whilst retaining the scope for some development to meet the needs of rural communities. The identification of the five rural settlements

[52] Document D2a.
[53] Document A3.

specifically mentioned in policy HO10 is supported by a technical paper[54] that takes account of existing services and facilities.

92. Nevertheless, the numbers themselves, which originally derived from a breakdown of the distribution of households in the Borough in 2011 applied to the Plan's housing requirement of 15,555[55] and have now been increased pro-rata to reflect the increased housing requirement, can only be approximations. Concern has been raised by the development sector that the figures should not be seen as a limit on housebuilding in the areas concerned. I agree. Such an approach would be at odds with the Framework's aim of boosting significantly the supply of housing.

93. The Council accepts this point, clarifying at the relevant hearing session that figures such as the 900 homes originally proposed in policy SP3 do not represent a cap on development. Indeed, if this were to be the case then the scope for additional development in Newport and the Rural Area during the Plan period would be very limited given the number of dwellings with extant planning permissions in those respective areas. It is clear that there is no intention to impose a 'moratorium' on development.

94. As such, and in addition to the above-noted revisions to the numbers themselves, the Council suggests a number of changes in order to clarify its approach. Central to these is the removal (amongst other changes to that policy) of criterion (i) of policy SP4 which requires developments to accord with 'the overall scale of development planned for across the Borough'. (See also other changes to policy SP4 discussed below.) Other changes to supporting text are also proposed. These changes [MM8-12, MM14-16] are necessary for the Local Plan to be effective and consistent with national policy.

Planning Positively for Development & Infrastructure

95. Policy SP4 of the Local Plan aims to establish the presumption in favour of sustainable development in line with national policy. While I understand the reasons behind the Council's approach, it seems to me that the inclusion of additional criteria (in section B) that seek to define the Council's view of what constitutes a 'sustainable' development risks confusion when read alongside national policy in the Framework. Furthermore, particular concerns apply to a number of detailed criteria. As already discussed, criterion (i) has the potential to act as an unintended limit on development in some areas of the Borough. Criterion (iii) appears to introduce a sequential approach to the use of previously-developed land (by using the word 'priority') that does not appear in national policy. Other criteria, although non-controversial in themselves, duplicate policies elsewhere in the Plan.

96. The Council accepts these concerns and proposes to delete the list of Section B criteria from policy SP4. It also proposes that the text in paragraph 3.3.4, which is in essence a statement of policy, is included within the main body of the policy itself. Changes are also proposed to policies SP1, SP2 and SP3 (with consequent changes elsewhere in the Plan) to ensure that they are consistent with national policy in respect of the approach to previously-developed and best and the most versatile agricultural land. These changes

[54] Document B2f.
[55] Document J3/TWC, para 3.2.5.

[MM8-9, MM12, MM15, MM89, MM91] are needed for the Local Plan to be effective and consistent with national policy. However, I share the view of some representors that there is no soundness reason to change the title of policy SP4, and I have therefore retained the original.

97. During the examination, the Waters Upton Neighbourhood Plan was made. Along with the Madeley Neighbourhood Development Plan, this will accompany the Local Plan as part of the development plan. Changes are needed to reflect the updated position [MM2-3] for reasons of effectiveness.

98. The Local Plan is supported by the Telford & Wrekin Infrastructure Delivery Plan 2016-2031 (the IDP)[56], which contains a prioritised list of strategic off-site infrastructure projects under three headings: transport and utilities infrastructure; social infrastructure; and environmental infrastructure. Costs arising from the IDP have been taken into account in the LPVS. The IDP identifies likely sources of funding in cases of a funding gap. I have seen no evidence to dispute the Council's conclusion that there are no unfunded critical projects that would prevent the delivery of the Local Plan. The Council expects to prepare a Community Infrastructure Levy Charging Schedule following the Local Plan's adoption.

99. The scale of growth proposed in the Local Plan has been subject to traffic modelling and a Transport Growth Strategy has been prepared in support of the Local Plan[57]. The latter document summarises the transport evidence base that underpins the Plan. Highways England has raised no soundness concerns about the Plan, confirming that an earlier suggestion that the M54 should be widened between junctions 3 and 4 is not justified in the Plan period. Highways England recommends that this scheme is removed from the IDP. It does not in any event form a Local Plan proposal. Highways England has also confirmed that it has no objections to the intended increase in housing numbers recommended by this report.

100. Land for the highway improvements proposed in policy C2(i) of the Local Plan is not specifically identified on the policies map. However, the Council confirms that at this stage in the design process, it is likely that the land required for the identified transport schemes will be within existing highway land and public ownership and as such under Council control. There is no evidence that this matter would prevent any of the Plan's proposals from coming forward.

101. Policy C1 of the Local Plan, which seeks to promote alternatives to the private car, places a number of transport requirements on new developments. The Council clarified at the examination hearings that these costs have not been fully tested for viability, and proposes amended wording accordingly. I agree that it is necessary to amend the policy for reasons of effectiveness. However, I have amended the Council's suggestion to refer specifically to the need to ensure that development viability is not adversely affected [MM66].

102. Parking standards, including specific requirements for cycle parking and parking for disabled vehicle users, are set out in Appendix F of the Local Plan. The relevant justification is set out in an evidence paper[58]. The standards

[56] Document E3.
[57] Documents C4a-ii and C4a-i respectively.
[58] Document C4b.

have been the subject of limited comment. While it was suggested that a specific requirement be imposed in respect of electric car charging points, rather than the encouragement set out in the present wording, there is no substantive evidence to dispute the Council's view that there is insufficient local demand to justify such a change.

103. Appendix A of the Local Plan contains a schedule of indicators for monitoring purposes. These are linked to the Local Plan's overarching objectives. Monitoring will be carried out through preparation of the Authority Monitoring Report on at least an annual basis.

Conclusion – Main Issue 2

104. For these reasons, and subject to the changes listed above, I conclude that the Local Plan's settlement hierarchy and proposed distribution of development is sufficiently justified and that the Local Plan plans positively for the development and infrastructure required in the area.

Main Issue 3 **– Are the Local Plan's proposals for employment, retail** and main town centre uses sufficiently justified and consistent with the evidence base and national policy? Should the Local Plan contain an explicit safeguard in respect of the Shrewsbury & Newport Canal?

Employment

105. The Local Plan's strategy for employment development is set in the context of Telford & Wrekin's long and important history as a major focus for economic activity. One legacy of Telford New Town is that the Telford Development Corporation made substantial provision for new employment: many sites proposed for allocation within urban Telford benefit from extant consents under section 7(1) of the New Towns Act 1981 and section 6(1) of the New Towns Act 1965. These are effectively commitments. Many are in the ownership of the Homes and Communities Agency.

106. The Council has not prepared a full Employment Land Review to inform the Local Plan. Instead, it relies on the Employment Land Review Interim Report (2012) (ELRIR)[59] which provides an update of the previous exercise – which was undertaken in 2006. Sites totalling some 378 ha were considered: this has been reduced to the approximately 149 ha of allocations that are identified in the Local Plan. The identification of these sites has not proved to be controversial, and I am satisfied that they are soundly based. While there is a surplus over and above the 76 ha figure set out in policy EC1, it is noted that this is a minimum target and, moreover, that the 149 ha figure referred to above is a gross area that includes some land that is not proposed for such development[60]. An updated schedule setting out the delivery position of the 28 employment site allocations was submitted by the Council during the examination[61]. This confirms that the net site area of these allocations is some 101 ha.

[59] Document C1b, amended during the examination to include missing tables.
[60] For example at site E19 (T54, Nedge Hill) – document J4/TWC, paragraph 4.2.2.
[61] Document K14.

107. It is recognised that maintaining a varied site portfolio creates flexibility for potential investors. Furthermore, I agree with the Council that the particular history and nature of these allocations – notably the segregated nature of many sites which limits their potential for development for alternative uses such as residential – supports this strategy. In practice the Council has demonstrated an appropriately flexible approach to the redevelopment of employment sites, notably in the rural area at Allscott and Crudgington, granting permission for a mix of uses including housing and employment.

108. In respect of Newport, a separate assessment was undertaken in 2013[62]. In summary, this concludes that there is a requirement for some 8-9 ha of employment land in the town over the Local Plan period. It suggests that the absence of a suitable supply of land is constraining the town's potential economic growth: there is no substantive evidence before me to justify taking a different view. A site allocation is proposed to meet this need on land south of the A518 (site E27). Although located on the opposite side of the A518, this allocation is well located in respect of existing employment areas on the south side of the town. I am satisfied that its allocation is appropriately justified. National funding through the Marches Local Enterprise Partnership has been agreed to help deliver an Enterprise and Science Park on this site[63].

109. Some concern was raised about the Council's ability to deliver the 76 ha minimum figure proposed for the Borough by policy EC1. The delivery schedule referred to above suggests that some 33-34 ha of this is likely to be delivered in the next five years, followed by some 10 ha in the following five year period 'assuming no further deals are done'. On balance, I am therefore satisfied that the 76 ha is broadly achievable for the Plan period as a whole. However, it is recommended that the Council monitor site delivery carefully, and consider reassessing its policy approach in the event of a likely shortfall.

110. A number of representors seek greater flexibility in order to enable a range of employment uses to be located in Strategic Employment Areas (policy EC1) and in the Rural Area generally (policy EC3).

111. In respect of Strategic Employment Areas, the Council accepts that there is a need for greater clarity about the type of uses that would be acceptable. It proposes changes accordingly. It also suggests a change to enable main town centre uses (other than retail uses) to locate in that part of the Central Area Strategic Employment Area that lies within the Town Centre boundary. I agree that all of these changes [MM17, MM19-20, MM95] are needed for reasons of effectiveness and consistency with national policy. I consider retail development in more detail below.

112. In respect of the rural areas, the Council's position remains that the substantial amount of employment land that is available within the urban areas (notably Telford) means that there is little justification for significant employment development in the countryside. An exception to this is Harper Adams University, which is recognised as a major contributor to the rural economy: additional text is proposed to clarify that point [MM23] which is necessary in order to be justified and effective. Bearing that in mind, I share the Council's view that it is not necessary for soundness reasons to materially

[62] Document C1a.
[63] Document K28.

increase the amount of flexibility provided by policy EC3 of the Local Plan, which already supports new development subject to certain criteria. However the Council proposes to amend that policy to clarify that it does not solely apply to the conversion/re-use of existing buildings and that new buildings will be supported in appropriate circumstances. A change is also proposed to align its text more closely with the Framework. These changes [MM13, MM21-22] are needed for reasons of effectiveness and consistency with national policy.

113. Having reviewed planning permissions and a current planning application in the vicinity of Audley Avenue, Newport, the Council proposes to delete a part of the identified Strategic Employment Area in south Newport, including land likely to be developed for retail purposes. A change is proposed to Map 2 of the Local Plan [MM18] which is needed to meet the test of being justified. A similar amendment will also be required to the Policies Map to ensure that policy EC1 is sound.

Retailing and Main Town Centre Uses

114. The Local Plan's retail strategy is supported by a Retail & Leisure Capacity Study and Health Check (2014) (RLCSHC)[64]. This updates previous evidence and concludes that the need that had previously been forecast for Telford has significantly reduced. In particular, there is no need to plan for significant convenience goods floorspace in the short to medium term. While the Local Plan seeks to improve the comparison goods offer in Town and District Centres, it does not propose specific allocations in that regard. Given the evidence, this approach appears justified.

115. A change to the supporting text to the Plan's shopping policies to provide for a more flexible approach to policy should circumstances change is proposed by the Council [MM24]: this is needed for reasons of effectiveness. In order to introduce more flexibility within the Primary Shopping Area, the Council proposes to designate a Secondary Shopping Frontage in which changes of use from class A1 to other uses that are complementary to the town centre location will be supported. These changes [MM26-27, MM32] are necessary for reasons of effectiveness. The Council also proposes to amend the Policies Map accordingly.

116. Local Plan policy EC4 identifies a hierarchy of centres, comprising four tiers namely: the Principal Town Centre (Telford Shopping Centre); two Market Towns (Newport and Wellington); District Centres; and Local Centres. The hierarchy reflects the actual distribution of centres within the Borough, and is not subject to significant objection. Retail parks are excluded from the hierarchy: however the Council proposes an amendment to the supporting text to clarify that development in such locations is not ruled out in principle, subject to satisfying the sequential approach. This change [MM25] is needed in order to be consistent with national policy. For the same reason, a clarification to the scope of policy EC6 is required [MM28].

117. Concern has however been raised about the impact assessment thresholds that are set out in policy EC8. It is recognised that these are below the default figure set out in the Framework. Nevertheless, I am satisfied that they are appropriately based upon local circumstances as set out in the RLCSHC,

[64] Documents C1f-i, ii and iii.

amplified by the comments in the Council's hearing statement[65] - including in respect of the existing size distribution of units within Telford Town Centre and the District Centres. The Council proposes changes to clarify the application of these thresholds [MM29-30] which are needed for reasons of effectiveness.

118. As already noted, the area identified in the Local Plan as Telford Town Centre includes land that is not included within the Primary Shopping Area, including part of a larger Strategic Employment Area. This distinction is not apparent within policy EC8 as presently worded. The Council proposes a change to recognise this concern, along with a change to supporting text [MM29, MM31] which are necessary in order to be consistent with national policy. Bearing in mind these merely establish the sequential preference for the Primary Shopping Area as a location for new retail development, I do not accept that the resulting effect would be overly restrictive. In the event of sites not being available in the Primary Shopping Area, then less sequentially preferable sites would be considered in line with national policy.

119. It has been argued that the above-noted changes to policy EC8 would conflict with the provisions of the Framework. However, it is clear from the Framework's glossary that there is a distinction between the term 'edge of centre' as applied to retail compared with other main town centre uses. For retail purposes, the definition relates to the boundary of the primary shopping area, while for other main town centre uses it is the boundary of the town centre. The Council's approach of identifying a primary shopping area, which is the main focus of retail activity, within the larger town centre area within which other main town centre uses can be accommodated appears consistent with this national policy approach. The sequential test set out in paragraph 24 of the Framework clearly relates to the above-noted definition of 'edge of centre'. It is also noted that the evidence of need, as already discussed, does not support a redefinition of the extent of the primary shopping area.

120. Policy EC12 of the Local Plan, relating to leisure, cultural and tourism development supports major hotel development in various town centre locations and the Ironbridge Gorge World Heritage Site (WHS). I share the concern raised by Historic England (HE) in respect of the implications of this policy for the significance of the WHS. In addition, although Ironbridge is identified as a District Centre in the Local Plan, the extent of that centre is markedly less than the WHS as a whole.

121. It is accepted that Ironbridge Gorge is a major tourist destination with a limited hotel offer. However, the Council accepts that the market for new hotels in this location is itself limited[66]. It proposes amendments to remove the reference to 'major' hotel development and to add in references to the need to take account of the significance of the WHS. However, these do not resolve the conflict between policy EC12 and the sequential approach to main town centre uses (including hotels) set out in the Framework. In my view the case for making an exception to national policy in this instance has not been made. In order to be consistent with national policy it is necessary to delete

[65] Document J4/TWC, paragraphs 4.4.10 to 4.4.15.
[66] Document K25a.

the references to Ironbridge Gorge from this policy and supporting text [MM33, MM35].

Shrewsbury & Newport Canal

122. The line of the Shrewsbury & Newport Canal, which linked Shrewsbury to the Shropshire Union Canal at Norbury Junction passes through the Borough. The route was officially abandoned in 1944. Some sections within the Borough are still in water or are represented by a dry channel. Others have been filled in. However, the route remains free of substantive built development.

123. Restoration of the canal is proposed by the Shrewsbury & Newport Canal Trust (SNCT). With the Council's support, the SNCT has leased Wappenshall Wharf with the aim of restoring and maintaining the historic buildings there, including some listed structures. The adopted WLP provides explicit support for the canal's restoration, and seeks to safeguard existing water features including canals[67]. The principle of the canal's restoration is also supported in the adopted Telford & Wrekin Core Strategy (2007) (CS)[68]. However, no such explicit support is provided by the present Local Plan. While the potential visitor benefits of such restoration are mentioned, it merely provides that schemes which relate to restoration will be 'considered'.

124. I share the Council's view that enabling development, such as housing, to support the canal's restoration in countryside locations to the north of Telford's main urban area could conflict with the Local Plan's development strategy set out above. A similar comment was made by the previous CS Inspector. However, in the present case this is not what is being sought by the majority of representors, although it is being proposed by some. What is principally at issue is whether or not an explicit safeguard should be applied to the canal's route.

125. The Council has clarified that it remains in support of restoration in principle. However, it points to a number of technical constraints that it feels are likely to prove potentially insurmountable barriers to the project. These include the identification of the section through Newport as a Site of Special Scientific Interest, the need to secure road and river crossings and complex issues arising from the need to address the existing drainage function of the canal line in the Strine Levels and Weald Moors. While the SNCT points to a feasibility study undertaken by W S Atkins in 2003, it is likely that the detailed costings are now somewhat out of date.

126. In my view, major constraints clearly exist. However, the evidence before me indicates that none of these amount to 'showstoppers' that would preclude the restoration project in principle. It is common ground that tourism benefits would be likely to flow from the restoration project. The route of the canal contains a number of designated heritage assets. Subject to any detailed assessment that might take place at the time of a planning application, it has the potential to be considered as a non-designated heritage asset. The canal is listed in the Shropshire Historic Environment Record. These factors all argue for the route to be safeguarded. Indeed, some protection is already afforded to those sections of the route that lie within plans adopted by

[67] Document G7, paragraph 8.3.31.
[68] Document G8, paragraph 9.49.

Shropshire Council and Stafford Borough Council. The approach adopted in the submitted Local Plan therefore appears inconsistent.

127. Although it maintains its original position on this matter, the Council has helpfully suggested possible modifications in response to my queries. Their inclusion in the Local Plan [MM34, MM36] are needed for reasons of effectiveness. A change will be needed to the Policies Map. For the avoidance of doubt, I agree with the Council that those sections of the Humber and Trench Arms extending into the already developed urban area of Telford should not be subject to this policy.

Conclusion – Main Issue 3

128. For these reasons, and subject to the changes listed above, I conclude that the Local Plan's proposals for employment, retail and main town centre uses are sufficiently justified and consistent with the evidence base and national policy and that the Local Plan should contain an explicit safeguard in respect of the Shrewsbury & Newport Canal.

Main Issue 4 - Does the Local Plan take adequate account of the effects of development on the natural and built environment?

Landscape Designations

129. The Borough includes part of the Shropshire Hills Area of Outstanding Natural Beauty (AONB). National policy states that great weight should be given to conserving landscape and scenic beauty in AONBs, which along with National Parks and the Broads, have the highest status of protection in relation to landscape and scenic beauty. Although this is recognised in the supporting text of the Local Plan, its policy on landscape protection (policy NE7) makes no reference to the AONB, referring only to Strategic Landscapes (see below).

130. This approach fails to accurately reflect the importance that national policy gives to AONBs. It also does not appropriately distinguish between the relative level of weight that should be attached to national and local landscape designations. The Council accepts these concerns and proposes amendments to policy NE7 and supporting text accordingly. These changes [MM64-65] are needed in order to be consistent with national policy.

131. At the local level, the Plan identifies three areas as Strategic Landscapes (SL), namely Wrekin Forest, Weald Moors and Lilleshall Village. It confirmed at the hearings that it considers these to be valued landscapes in the terms of the Framework[69]. While this is, in the first instance, a matter of judgement for the local planning authority, it seems to me that such a conclusion underlines the need to ensure that the areas concerned are robustly justified. In the present case, particular concerns have been raised about the justification underpinning the Lilleshall Village SL. I share these concerns.

132. As was clear at the relevant hearing session, no substantive evidence has been presented by the Council to explain the grounds upon which the Lilleshall Village area was initially selected for identification as an SL. Two particular evidence documents have been referred to by the Council in this context.

[69] Paragraph 109 of the Framework.

However, the first of these – the Telford & Wrekin Landscape Sensitivity and Capacity Study 2009[70] – does not seek to provide such justification, focussing on specific defined areas around settlements, while the other – the Telford & Wrekin Strategic Landscapes Study (2015)[71] – represents a study of the three areas *after* their selection, so does not explain why they had been selected in comparison to other parts of the Borough. Neither does it explain why other areas were not selected.

133. At the relevant hearing session, the Council's consultant (the author of the 2015 study) stated that the landscape of the Lilleshall Village area has some intrinsic merit. I do not dispute that assessment, and I agree in particular that the Lilleshall Monument (sited on a geological outcrop) is a distinctive feature that moreover offers extensive views. However, it is clear that the landscape types that make up the majority of the defined SL area – which predominantly fall into a single category ('estate farmlands') – also occur widely elsewhere within the Borough. While the Lilleshall Village area amounts to a 'good representational example' of an estate farmland landscape type, as stated by the Council's consultant at the hearing session, it is not clear why this in itself is of sufficient significance to justify a specific – and a strategic – Local Plan designation. What was, and what remains, lacking is any comparative assessment of why this particular area merits identification rather than other areas in the Borough of a similar landscape type and/or quality.

134. It is accepted that there is strong local support for this designation. However, that does not compensate for the absence of compelling landscape evidence. Although I note the concerns that deletion of this SL would encourage further residential development in the locality, I would comment that the justification for a landscape designation should derive from intrinsic landscape quality rather than an intention to prevent development. While I am aware of the two recent appeal decisions that have been presented by representors[72], I note that in neither case did the Inspector consider that the land concerned amounted to a valued landscape in the terms of the Framework. For the above reasons, it is necessary to delete the Lilleshall Village SL in order that the Local Plan is justified [MM7, MM62-63].

135. In view of the above, I have considered whether the other two SLs identified in the Plan are sufficiently justified. Neither has proved to be particularly controversial in this examination. In the case of the Weald Moors SL, this designation takes forward the Strine Levels Area of Special Landscape Character identified in the WLP. There is no doubt that this low-lying area with its distinctive landform and drainage pattern comprises a valued landscape within the context of the Borough. The Wrekin Forest SL includes the AONB, the value of which is not in dispute, adding further land that is itself of a distinctive landscape character and that forms part of the setting of the Wrekin and the Ercall. To my mind, these designations are adequately justified.

136. It is noted in this context that the WLP also identified the Severn Gorge as an Area of Special Landscape Character. Clearly, the importance of the Gorge

[70] Document C3e-i.
[71] Document C3f.
[72] Refs. APP/C3240/W/16/3149398 (May 2017) & APP/C3240/W/16/3162166 (August 2017) - attachments to document M45.

landscape has not diminished since that time. Although it is not now proposed to designate the Severn Gorge as an SL, I accept on balance the Council's view that its landscape significance is adequately recognised and protected by the Plan's provisions in respect of the Ironbridge Gorge WHS.

Green Network

137. The Green Network represents a pattern of open spaces within the Borough's main urban areas. It derives from the original landscape master-planning of Telford New Town: within Telford itself, the Green Network is at present designated through the WLP. Although the concept is therefore well-established, it has been revised and updated in the context of the present Local Plan. I am satisfied that the rationale and methodology of this update, as described in the relevant technical paper[73], are adequately justified. In particular, I see no reason why the Green Network concept cannot also be applied to Newport, where open spaces – including a linear open space along the line of the former Shrewsbury and Newport Canal – clearly contribute to the town's distinctive character.

138. A number of objections have been raised to the inclusion of land within, or indeed the exclusion of land from, the Green Network. The Council's responses to these concerns have been set out in a separate paper[74]. I agree with the Council that, for the reasons stated, no changes are needed in this matter in order to make the Plan sound. I note that the Council intends to progress some limited changes as minor modifications to the policies map.

139. Further comment is however needed in respect of two sites. Representors seeking to include land at Station Road, Newport within the Green Network are also objecting to the principle of the land's identification as a housing site (H13). I address the matter of the Plan's housing site allocations elsewhere in this report: as will be seen below, this is one of the sites that I recommend should be deleted from the Plan due to my general concerns about the Council's approach to its site selection methodology. However, as is explained below, this does not represent a view on the site's particular merits: that is a matter to be determined elsewhere.

140. In respect of the open space value of site H13, it is accepted that it is valued by local people. It is crossed by a right of way. However, while local residents say that access to the whole site was previously possible, there is no evidence that a formal right of access now applies over and above the right of way. The site's wildlife interest is not sufficient to merit identification as a Local Wildlife Site[75]. Although the site is presently seen as part of the open countryside adjoining the town, the land to the south (between the site and the bypass) is subject to a planning application for which the Council is minded to grant planning permission subject to a legal agreement. This scheme would isolate site H13 from the countryside to the south. Taken together, these matters support the Council's view that the site's existing – and indeed potential – open space value is not sufficient to merit inclusion within the Green Network.

[73] Document B3c.
[74] Document G13.
[75] Reference is made to the Ecological Appraisal – document K23b.

141. Arguments about the landscape value of land at Kestrel Close, Newport were considered in the above-noted appeal. I have no reason to disagree with my colleague's conclusions. I accept that the land has a countryside character. However, its presence within the wedge of open space that extends alongside the line of the canal, along with its relationship to footpaths such as the canal towpath, appear to me to justify its inclusion within the Green Network for Newport. While I am aware that land in this location was identified as having development potential in the Council's Proposed Housing and Employment Sites document (2014)[76], it is clear that this was a consultation document that formed part of the Local Plan preparation process. It identified land for more housing than was envisaged at the time in order to 'help maintain some flexibility over the choice of sites taken forward to the draft plan stage'. It is clear that it does not represent the Council's final position on the matter of this site – or indeed other sites.

Biodiversity

142. Policies NE1 and NE2 of the Local Plan set out a comprehensive approach to the protection of biodiversity and geodiversity assets. This approach is supported by Natural England, which also supports the Habitat Regulations Assessment that the Council has undertaken[77]. However, concern has been raised that the list of requirements set out in these policies are unlikely to be applicable to many, indeed most, development proposals that the Council will consider. This has been accepted by the Council, which proposes changes to clarify that such measures will only be required in appropriate circumstances. These modifications [MM58-59] are necessary for reasons of effectiveness. Given the importance of ancient woodlands and veteran trees, I agree with the Council that stronger protection for these habitats is justified for the same reasons [MM60].

Water and Flood Risk

143. The Local Plan is supported by the Telford & Wrekin Water Cycle Study[78], Water Quality Modelling[79] and the Telford & Wrekin Strategic Flood Risk Assessment[80]. The evidence is summarised in a Technical Paper[81], which explains the links between the Local Plan and the relevant local context for the management and delivery of water – including the Severn River Basin Management Plan. The key issues driving investment in water supply infrastructure are sustainable management of ground water, addressing issues of low river flows and improving the resilience of local water supplies. Severn Trent Water does not anticipate any significant capacity problems within the areas of its network over the life of the Local Plan and states that any requirements for additional capacity can be addressed by reinforcing its network through the Asset Management Plan process.

144. In terms of waste water treatment, no significant barriers have been identified to prevent the delivery of growth over the Local Plan period. Constraints at

[76] Document D3a.
[77] Document A4.
[78] Document C6c(i)-(iii).
[79] Document C6d
[80] Document C6f(i)-(iii).
[81] Document B6b.

Newport sewage works are being addressed through a project to switch flows to Rushmoor Waste Water Treatment Works which has additional capacity available. Capacity at Coalport works will also be addressed to cover the expected levels of development.

145. The EA confirms that the Plan provides a robust and comprehensive evidence base with regard to flood risk management, adding that the latest Climate Change guidance has been factored in to ensure that the allocated sites are suitable for development[82]. This latter point requires a change to be made to policy ER12 [MM88] which is needed to be consistent with national policy. A further change is required to policy ER12 to ensure that, first, the criteria set out are requirements, rather than expectations, and to, second, clarify that not all of these requirements will necessarily apply to all developments. This change [MM87] is needed for reasons of effectiveness.

146. Policy ER10 sets out requirements for major developments in respect of water conservation and efficiency. The Council accepts that this needs to be reworded to ensure that it is consistent with the Written Ministerial Statement (WMS) dated 25 March 2015. It has confirmed that it does not intend to apply the optional Building Regulations water efficiency standard. It proposes to reword the policy to clarify that it will 'expect' design features to support the recycling and re-use of water to be incorporated in major developments. To my mind, this phrasing still has the potential to be applied in practice as an additional requirement, contrary to the provisions of the WMS. It is therefore necessary to amend 'expect' to 'encourage'. Subject to that, this change [MM86] is needed to be consistent with national policy.

147. The EA also comments that a flood risk sequential approach has informed the Plan's allocations. Where sites do have an element of flood risk associated with them (such as site H1), the EA has confirmed that a sequential approach can be applied to ensure that all built development is located within Flood Zone 1. However, as set out later in this report, I have raised other concerns about the Plan's site selection methodology that has led to my recommending the deletion of those sites (including H1) that do not have planning permission or other consent.

148. The Council proposes to amend policy HO2 to set out an explicit presumption against development within Flood Zones 2 or 3 within the remaining housing allocations. However, I agree with a representor that this does not fully accord with the Framework, and I have amended the Council's suggested text to refer instead to the sequential approach set out in national policy. This change [included in MM39] is necessary to ensure that flood risk has been adequately addressed within these allocations. Clearly, it will be also necessary to apply a sequential approach consistent with national policy to any future site selection process.

Renewable Energy

149. Policy ER1 provides general support for renewable energy, with the exception of wind farms in the light of the further WMS dated 18 June 2015. At the hearing, the Council confirmed that this policy has not been subject to viability testing. However, it added that none of the policy's provisions were intended

[82] Document J7/TWC – appendix 2.

to be read as requirements on development – merely as encouragements. It proposes a change to clarify this position [MM74] which is needed for effectiveness and consistency with national policy.

150. Some concern has been raised that the Plan does not make specific provision for wind energy development. However, this matter has not been the subject of a significant level of comment in this examination. Indeed, it is clear that there is very limited demand for such proposals in the Borough. The evidence base to support such provision is not in place. As such, the Council's position appears both justified and proportionate.

Built Heritage and Environment

151. Historic England (HE) raises a number of detailed concerns about the Plan. I have addressed the matter of policy EC12's support for major hotel development in regard of the Ironbridge Gorge WHS above. I deal with HE's concerns about the Plan's site selection methodology later in this report. In both cases changes to the Plan ae recommended.

152. Policies BE3 to BE8 of the Local Plan set out the approach to various heritage assets, ranging from the WHS to archaeological remains. Although clearly distinguishing between different types of heritage asset, these policies do not incorporate the requirements set by the Framework[83] in respect of balancing harm to heritage assets against public benefits. The Council accepts this and proposes changes accordingly [MM67-72]. These are needed in order to be consistent with national policy. A further change to policy BE8 [MM73] to clarify the procedures for recording archaeological information is needed in order to be effective. Changes to other supporting text to emphasise the importance of taking account of the historic environment [MM56-57, MM93] are also necessary for the same reason.

153. Design criteria are set out in policy BE1, including the need to demonstrate an integrated design approach, promote a secure environment and promote links for all users. I am satisfied that these criteria are consistent with the Framework's requirement to secure high quality and inclusive design.

Conclusion – Main Issue 4

154. For these reasons, and subject to the changes listed above, I conclude that the Local Plan takes adequate account of the effects of development on the natural and built environment.

Main Issue 5 – Is t**he Local Plan's approach to planning for minerals and** waste clearly expressed, adequately justified and consistent with national policy?

Minerals

155. To date, minerals planning within Telford & Wrekin has been guided by a range of policy documents – notably saved policies within the Shropshire and

[83] Notably at paragraphs 123 to 135 of the Framework.

Telford & Wrekin Minerals Local Plan (adopted 2000). The Council now seeks to incorporate minerals policies within the present Local Plan.

156. The Borough's varied geology has resulted in a range of mineral deposits. The Framework explains that minerals are a finite resource that can only be worked where they are found: as such, it is important to make the best use of them to secure their long term conservation. Local Plan policy ER2 seeks to protect Minerals Safeguarding Areas (MSAs) as is required by the Framework. The boundaries of these areas are supported by evidence from the British Geological Survey and, subject to my comments below concerning the urban area, are broadly justified.

157. At submission, the Council accepted (following consultation with the minerals industry[84]) that the text of policy ER2 required significant modification. Changes put forward at that time included the inclusion of buffer zones, in recognition that incompatible development next to an MSA may act to sterilise development, and a more explicit statement that mineral resources within MSAs and buffer zones will be protected from unnecessary sterilisation (subject to various criteria). These changes [MM75-76] are needed in order to be justified, effective and consistent with national policy.

158. The approach set out in the Local Plan does not identify MSAs within the urban areas. Planning Practice Guidance states that safeguarding mineral resources should be defined in designated areas and urban areas where necessary to do so. For example, safeguarding of minerals beneath large regeneration projects in brownfield land areas can enable suitable use of the mineral and stabilisation of any potentially unstable land before any non-minerals development takes place[85].

159. In the present case, the Council argues that it is not necessary to extend MSAs into the urban areas. In response to my questions at the relevant examination hearing and in subsequent written exchanges the Council maintains (in summary) that land within the urban areas is either already sterilised by the presence or proximity of existing sensitive uses (notably housing), or the existence of particular environmental constraints, so that in practice any remaining mineral resources within the urban areas would be likely to be unworkable. Evidence has been submitted to that effect. In the circumstances, I accept this argument.

160. Nevertheless, one implication of this policy approach is that it is necessary to ensure that the relevant policy allows, as a matter of principle, for the prior extraction of minerals from mineral resources that lie outside MSAs. This is addressed by text within policy ER2. A further implication is that policy guidance is required in order to address the possibility of development coming forward within the urban area but adjacent to an MSA in a rural area. The Council has put forward additional text for policy ER2 to address this matter. These changes (included in MM75) are needed in order to be justified, effective and consistent with national policy.

161. Concern has also been raised that the Local Plan fails to set out an appropriately strategic approach in respect of its approach to maintaining

[84] See Statement of Common Ground – document G3.
[85] PPG ref ID: 27-004-20140306

supplies of aggregates and sand and gravel. This is broadly accepted by the Council, which (in consultation with Shropshire Council with which it plans jointly for such resources) has put forward a number of amendments. These include data from the most recent Local Aggregates Assessment[86] (LAA) that shows that in 2015 the permitted land banks for crushed rock working and sand and gravel working amounted to some 44 and 15 years' production respectively.

162. The LAA's assessment of the scale of the sand and gravel land bank is the subject of some dispute. However, I am satisfied that the LAA has been properly prepared in consultation with Shropshire Council and the relevant Aggregates Working Party. While concern is raised about the nature of the land bank, notably that a large proportion is bound up in a single site, I have seen no substantive evidence that this, in itself, is sufficient to preclude an adequate supply from coming forward. Importantly, the scale of the land bank identified in the LAA is in excess of that required by paragraph 145 of the Framework. Although an objection is made to the principle of joint planning between the Council and Shropshire Council, and the effective 'sharing' of sites between the two Council areas, it seems to me that this represents an appropriate and pragmatic approach given the distribution of relevant minerals, as well as the Framework's encouragement for joint working.

163. The above-noted changes [MM77-MM79] are therefore necessary in order that the Plan is justified, effective and consistent with national policy. However, I have made a small further change to the Council's suggested wording to accord more closely with the Framework's references to LAAs.

164. The Council has also proposed changes to the wording of policy ER4, which sets out the policy requirements for assessing proposals for new sand and gravel sites. These have been the subject of objection, notably to the inclusion of a reference to 'exceptional circumstances' on the grounds that this introduces a policy requirement that does not appear in the Framework. On reflection, I accept that argument and consider that the suggested changes are not therefore necessary for soundness reasons. As such, this draft main modification[87] has been deleted and is not now recommended.

165. Although the Local Plan makes no specific mineral site allocations, it refers to a site at Pave Lane as having been considered potentially suitable as a future allocation. However, it then raises concerns about the site's deliverability, including environmental constraints. It adds that the site could come forward if 'one or more' of three unworked commitments in Shropshire (Sleap, Barnsley and Woodcote Wood) fail to come forward.

166. During the examination, I sought to clarify this position. At the same time, the site's owner and potential operator have promoted the site as a formal allocation in the Local Plan. In their view, the site at Woodcote Wood is uncertain, while that at Barnsley will not come forward. The Pave Lane site is the subject of a planning application that (at the time of writing) has yet to be determined.

[86] Document K24/35a.
[87] Formerly MM80.

167. The Council states that the owners and operators of the sites at Sleap and Woodcote Wood have confirmed a clear intention to develop the sites concerned during the Plan period. It considers that the above-noted LAA demonstrates that there is sufficient supply from existing operations, commitments and resources within Shropshire, along with a strong likelihood of further sites coming forward through Shropshire's Local Plan review process. It therefore considers that such resources will be more than adequate to meet the identified need for sand and gravel in the sub-region. On balance, I accept this argument. However, I also agree with the Council's intention to retain a reference (with caveats) to the Pave Lane site as a potential resource in the event of a need for additional sand and gravel reserves being identified. The Council suggests rewording of the relevant text along these lines [MM81]: subject to the further change described below, I agree that this is needed in order to be justified.

168. The promoters of the Pave Lane site consider that the Local Plan is unfairly prejudicial to them and that it has not been prepared objectively. However, it seems to me that there is a clear difference of view about the local need for sand and gravel. For the reasons set out above, I agree with the position of the Council as set out through the LAA. I also accept the Council's view about the likely delivery of alternative sites. However, the above-noted modification does not rule out the principle of the Pave Lane site coming forward if a need for additional sand and gravel extraction can be demonstrated. In order to make this clearer I have amended the Council's suggested wording to state that in such circumstances consideration 'will' (rather than 'could') be given to Pave Lane for sand and gravel purposes. I have also shortened the Council's suggested text to refer more directly to policies ER4 and ER6. Nevertheless, I do not accept that there is a need to allocate this site in order for the Local Plan to be sound.

Waste

169. The Local Plan's approach to waste planning is informed by a Waste Evidence Base Report (2015) and is summarised in the Waste Technical Paper[88]. Using a 'high scenario', an estimate was made of whether there was a capacity gap in terms of different waste categories. Such a gap was found in respect of Anaerobic Digestion, Material Recovery Facility (i.e. recycling), Residual Recovery Capacity and Transfer Capacity. However, the Council is satisfied that its existing contract with Veolia, along with the approach set out in Local Plan policies ER7 to ER9, is sufficient to meet anticipated waste arisings to 2031. Specific measures include the safeguarding of existing facilities (in policy ER7), the development of new facilities at Hortonwood household recycling centre in Telford and the ability of Veolia to make use of headroom capacity at sites in neighbouring authorities for Local Authority Collected Waste (namely Battlefield in Shropshire and Four Ashes in Staffordshire). No specific waste allocations are therefore proposed.

170. The Environment Agency (EA) confirms that the evidence base is robust and the Local Plan's broad waste strategy has not been the subject of significant objection. I have no reason to take a different view. However, for reasons of

[88] Documents C6b and B6a respectively.

effectiveness it is necessary to amend the supporting text to policy ER7 to clarify the approach set out above [MM83].

171. Some concern has been raised that the approach towards the location of new waste sites in rural areas is unduly restrictive. However, it seems to me that given general countryside protection policy aims, the intended direction of such developments towards strategic employment areas within policy ER7 appears justified. Furthermore, that policy contains appropriate flexibility to cater for exceptional cases where other solutions may be acceptable. The Council proposes that the wording of this policy is amended to clarify that its design requirements – in criterion (iii) – apply to existing as well as new waste facilities. Subject to a change to the Council's suggested wording (to reflect the likelihood that changes to existing facilities would only come forward if alterations such as extensions are being proposed), this change [MM82] is needed in order to be effective. For the same reason I agree with the Council that it is necessary to amend policy ER8 and its supporting text [MM84-85] to clarify the waste planning requirements for residential developments.

Conclusion – Main Issue 5

172. For these reasons, and subject to the changes listed above, I conclude that the Local Plan's approach to planning for minerals and waste is clearly expressed, adequately justified and consistent with national policy.

Main Issue 6 **– Is the Local Plan's** housing site selection methodology robust and transparent?

173. The methodology underpinning the selection of the 17 housing sites proposed in the Local Plan[89] has been the subject of considerable debate during the examination. The Council has sought to explain the process in its Housing Delivery Technical Paper amplified by comments in its examination hearing statement[90]. A three stage process is described, commencing with a 'call for sites' in May 2012. A total of some 720 sites were processed through a preliminary elimination stage (removing approximately 300 sites), a site assessment stage (resulting in a total of 315 sites) and a strategic fit stage. The end of the process was the identification of 17 sites.

174. It is accepted that a Local Plan's evidence base needs to be proportionate. However, it is also the case that all parties need to understand why certain sites were allocated and why other sites were not allocated. While there is relatively little disagreement about the early stages of this process, it is the final reduction from 315 to 17 sites that has attracted the most criticism.

175. I have sought to examine the methodology that the Council has employed in selecting these allocated sites. Unfortunately, the commentary set out in the Council's hearing statement and in section 5 of the Housing Delivery Technical Paper contain only a brief summary of that process. Indeed, the latter document states (para 5.6) that 'the site selection or rejection reasons for each individual site can be found in the Integrated (Sustainability) Appraisal Report (2015)' (the IA).

[89] Excluding the allocation on land west of Woodside Avenue, which is a proposal in the Madeley Neighbourhood Development Plan.
[90] Documents B2b and J8/TWC respectively.

176. However, Appendix X of the Integrated (Sustainability) Appraisal Report[91] comments that 'the IA findings are not the sole basis for a decision; other factors including planning and deliverability, play a key role in the decision-making process'. Bearing in mind the position set out in Housing Technical Paper as described above, this suggests to me an element of circular reasoning.

177. Clearly, the detailed selection of sites for allocation involves an element of planning judgement. However, that judgment needs to be both explicit and transparent. In short, there needs to be a clear 'audit trail' that shows how the final decisions were arrived at, and what factors were taken into account in making such decisions.

178. In response to my questions along those lines at the relevant hearing session, the Council offered to table working spreadsheets that would provide more information about these decisions had been reached. I accepted that suggestion and allowed other parties the opportunity to make representations accordingly. However, the document that was subsequently produced[92] was not the working spreadsheets that had been offered. Instead it represents a commentary, apparently prepared after the event, that seeks to apply planning considerations to some (but not all) of the sites that were considered at the strategic fit stage of the site assessment process. I was subsequently advised that the Council is unable to produce the spreadsheets that were referred to at the hearing session[93].

179. The evidence that has been submitted since the hearing session is inadequate for several reasons. First, it does not represent the actual selection exercise, as it was prepared after the event. Second, comments are given on only a number of some 315 sites considered at the strategic fit stage of the assessment. Over 200 sites are missing. This represents a substantial gap in the evidence base. While the Council comments that the sites listed are only those that scored 5 or above in that exercise, it is clear that some sites with a lower score were also assessed – and indeed subsequently allocated in the Local Plan. Clearly, an additional sieving exercise had taken place prior to the one that is presented in the new evidence. Third, it is clear from the comments made in this document that a number of sites that scored highly against the strategic fit criteria were then discounted on the basis of their existing use. It is unclear why these were not screened out at the earlier site assessment stage, at which the site's development potential was considered in terms of various factors – including use.

180. For the avoidance of doubt, I do not seek to comment on the detailed scores that have been assigned to specific sites in the IA. However, I share a general concern raised by some parties in respect of strategic fit criterion 2 (promoting sustainable urban extensions) that it is not immediately clear why some large sites (notably those that have been allocated) were given a positive score in respect of that criterion while other large sites – also adjoining the urban area – were deemed to not comprise a sustainable urban extension.

[91] Document A3a – page 53/71 of that appendix.
[92] Document K24/40a.
[93] Document K24/40g, paragraph 7(i).

181. A further concern is that the inclusion of one specific criterion (criterion 8) appears to favour the allocation of land in public ownership over that in private ownership. Given that the IA scoring, as described above, was intended to have some influence on site selection it seems possible that the inclusion of this criterion may have disadvantaged otherwise acceptable sites in private ownership. It is accepted that the best use should be made of public land. The particular history of Telford as a New Town and the activities that the Council is now progressing with its public sector partners in this regard are acknowledged. However, I see no basis in national planning policy to explicitly favour land in public ownership over that in private ownership when selecting sites for allocation in a Local Plan.

182. In addition, Historic England (HE) maintains an objection to the treatment of the historic environment, heritage assets and their setting in respect of the site selection methodology. Notwithstanding the Council's responses[94] to my further written questions in that regard, I share HE's concern that the use of a 200m radius in order to assess potential heritage impacts (other than inclusion in a Conservation Area and World Heritage Site) is poorly justified. In my experience, the setting of a listed building can, for example, extend over a markedly larger distance. HE's Advice Note 3 on The Historic Environment and Site Allocations in Local Plans[95] suggests a more holistic process that seeks to understand the significance and value of the assets concerned. I see little evidence that this has been undertaken in the present case. For example, while the Council's response to HE acknowledges that eight of the Plan's housing allocations have one or more listed buildings within 200m of the site, its comment that 'suburban style housing would not affect the setting of any of these heritage assets' lacks an appropriate level of detail and analysis of the particular circumstances of the heritage assets concerned.

183. Drawing these matters together, I consider that the housing site selection exercise underpinning the Local Plan is flawed. I should however emphasise that this finding does not represent any view on the merits of those sites that have been selected for allocation – or, indeed, those that have been rejected.

184. I raised the implications of this finding in a Note to the Council in March 2017[96]. In that Note I stated that I felt that the preparation of a revised site selection exercise would, at this stage in the examination, take up an undue amount of time – thereby delaying the Plan's eventual adoption. Withdrawal of the Plan would be wasteful of the considerable amount of time and effort that has gone into its preparation to date.

185. My suggestion to the Council was therefore that a third alternative should be pursued – namely the deletion of those housing site allocations that have been identified through the above-noted site selection process but do not have planning permission or other consent. There would be little merit in deleting sites that already have such permissions or consents, as those would remain in force. The site already allocated in the Madeley Neighbourhood Development Plan (Land West of Woodside Avenue) would also be unaffected.

[94] Document K25a.
[95] Quoted in J8/24/1, paragraph 3.1.3.
[96] Dated 30.3.17 – document F10.

186. The Council has suggested modifications along these lines, which are needed in order for the Plan to be justified [MM39, MM45, MM92]. They have the effect of deleting four of the 17 housing sites set out in Appendix D – sites H1, H7, H8 and H13. For the avoidance of doubt, I take no view about the acceptability or otherwise of these allocations on an individual basis. My concerns, as set out above, relate to the site selection process as a whole.

187. The housing land supply implications of this change are discussed above. In summary, a five year land supply can be maintained, but the achievement of the Plan's overall housing target will require the preparation of a Housing Site Allocations Local Plan in order to address the shortfall discussed above. I have added additional text to policy HO1 [included in MM39] to clarify this matter and I have amended the Council's proposed rewording of paragraph 5.1.3.2 to remove the suggestion that the preparation of such a Plan should be conditional upon the outcome of ongoing monitoring. I have seen no substantive evidence that the shortfall arising from the increased housing target together with the deletion of these housing sites can be addressed other than through the site allocation process. Nevertheless, I consider that suggestions from some parties that a specific timeframe is enforced would be unduly inflexible.

188. I am aware that there are several representations that specific sites that have not been allocated in the Plan should now be brought forward. However, in view of my comments above I feel that this would be incompatible with the consideration of all potential sites in a robust and transparent manner. The forthcoming Site Allocations Local Plan will provide a mechanism for the relative merits of these sites to be assessed.

189. The Planning Practice Guidance states that where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)[97]. Such detail is lacking from the two sustainable urban extensions proposed in the Plan – at Donnington & Muxton (H1) and Priorslee (H2). Site H1 is one of those recommended for deletion. However, the Council proposes the insertion of new text to guide the detailed development of site H2 at Priorslee. This change [included in MM39] is needed in order to be effective and consistent with national policy.

Conclusion – Main Issue 6

190. For the above reasons, I conclude that the Local Plan's housing site selection methodology is neither robust nor transparent. However, subject to the changes listed above, I am satisfied that the approach towards site allocations now recommended is adequately justified and consistent with national policy.

Assessment of Legal Compliance

191. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

[97] PPG ref ID. 12-010-20140306.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan has been prepared generally in accordance with the Council's LDS July 2015, although submission for examination was somewhat later than initially anticipated.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2012. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	As described in this report, SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations Assessment Report (June 2016) sets out why Appropriate Assessment is not necessary. Natural England supports this.
National Policy	The Local Plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

192. The Plan has a number of deficiencies in respect of soundness and/or legal compliance for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

193. The Council has requested that I recommend Main Modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended Main Modifications set out in the Appendix the Telford & Wrekin Local Plan 2011-2031 satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

M J Hetherington

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.

Appendix – Main Modifications

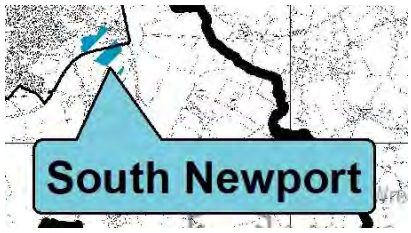
The modifications below are expressed either in the form of ~~strikethrough~~ for deletions and **bold underlined** for additions of text, or by specifying the modification in words in *[italic text in square brackets].*

The page numbers and paragraph numbering below refer to the publication local plan (examination document D5), and do not take account of the deletion or addition of text. Further renumbering of pages and paragraphs will be required as a consequence of these modifications.

Ref	Page	Policy/ para	Main Modification
MM1	12	1.3.2.3	The Council has considered the representations made to the local plan received from these local authorities. It is acknowledged by all parties that Telford & Wrekin functions as a separate housing market area, based on an analysis of the relevant indicators presented in supporting evidence to the Local Plan. This is consistent with the decision of the Greater Birmingham and Solihull Local Enterprise Partnership (GB&S LEP) to exclude Telford & Wrekin from their assessment of housing needs within the GB&S LEP area. Given this relationship, and based on current evidence available at this time, **the potential contribution of in-migration arising from the Local Plan's housing requirement towards meeting the needs of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA) has not been quantified. The Council will continue to consider this matter in the light of emerging evidence. It does not at present rule out the potential apportionment of some of the Local Plan's housing requirement towards meeting the needs of the GBBC HMA.** ~~the Council has not been convinced that it should be a participant in any redistribution of future housing growth outwards from the conurbation. The Council has sought further clarification in order to understand fully the implication of any shortfall in housing within the West Midlands and what this might mean for Telford & Wrekin. Any specific actions taken by the Council in response to this matter will need to be based on credible and compelling evidence that demonstrates that the housing needs of the conurbation cannot be met within its own housing market area.~~ Discussions will therefore continue to progress on this basis.
MM2	14	1.3.5.2	The Local Plan will, in combination with the Madeley Neighbourhood Development Plan **and Waters Upton Neighbourhood Plan** and any neighbourhood development plans completed up to 2031, form the development plan for Telford & Wrekin.
MM3	14	1.3.6.1	This allows local communities to produce neighbourhood development plans, neighbourhood development orders and community right to build or buy orders. Madeley Town Council **and Waters Upton Parish Council** made the first **two** neighbourhood development plan**s** in the borough.

Ref	Page	Policy/ para	Main Modification
MM4	26	2.2.2	The Local Plan vision for the year 2031 can be summarised as follows: • By 2031, Telford & Wrekin will be a healthier, more prosperous and better connected place. • It will have a population of approximately ~~198,000~~ **202,500** people
MM5	27	Table 3 objective 8	Support the delivery of **approximately 17,280** ~~15,555~~ new dwellings across the whole borough by 2031.
MM6	30	3.0.2	The Local Plan ~~contains a housing growth target over the plan period of~~ **sets a housing requirement of approximately 17,280** ~~15,555~~ new homes...
MM7	30	Figure 5	*[Update Key Diagram to reflect other modifications in this this schedule]*
MM8	34	SP1	The Local Plan **supports** ~~identifies sufficient land to provide~~ the delivery of approximately ~~13,400~~ **14,950** net new homes in Telford up to 2031. This includes one sustainable urban extension to the town considered appropriate for development, identified in Policy HO2 . ~~Additional housing development over and above that already committed or identified in the Local Plan will be prioritised on previously developed sites within the town which does not affect the best and most versatile agricultural land.~~
MM9	35	SP2	Development in Newport will be expected to support its role as a Market Town, as set out in Policy EC4. The Plan supports the delivery of approximately ~~1,200~~ **1,330** net new homes in Newport up to 2031. ~~Additional housing development over and above that already committed or identified in the Local Plan will be prioritised on previously developed sites within the town which does not affect the best and most versatile agricultural land.~~
MM10	36	3.2.2.5	~~The identification of a specific housing requirement for~~ **The level of provision** for Newport is based on the breakdown of the overall requirement set out in Policy HO1, which has been apportioned in line with the corresponding breakdown of households across the borough, based on the Census 2011.
MM11	36	3.2.3.1	Over 60 percent of the borough is rural, most of which is in the west and north of the borough. For the purposes of the Local Plan the rural area is defined as the area which lies outside the ~~urban~~ **built up** areas of Telford and Newport.
MM12	37	SP3	~~The best and most versatile agricultural land will be protected by using areas of poorer quality and in preference to higher quality land for new development.~~ **Where development is proposed on best and most versatile agricultural land (Grade 1, 2 and 3a) the economic and other benefits of the land will be taken into account.** The Council will support the delivery of approximately ~~900~~ **1,000** net new homes in the rural area up to 2031.
MM13	37	3.2.3.5	It will support increased rural employment through agricultural businesses, the provision of renewable energy schemes, low impact industries in agricultural buildings, suitable uses based around leisure and tourism such as farm shops, bed and breakfast accommodation, conversion of agricultural

Ref	Page	Policy/ para	Main Modification
			buildings to holiday cottages and/or small scale offices **and well-designed new buildings.**
MM14	38	3.2.3.6	~~The identification of a specific housing requirement~~ **The level of provision** for the rural area is based on the breakdown of the overall requirement set out in Policy HO1, which has been apportioned in line with the corresponding breakdown of households distributed across the borough, based on the Census 2011.
MM15	39	SP4	Presumption in favour of sustainable development The Council will support development proposals that are considered to be sustainable. Development is considered sustainable where it is in accordance with~~:~~ ~~A. N~~**n**ational and Local Plan policies, taking into account other material considerations. ~~B. The following criteria:~~ ~~i. The overall scale of development planned for across the borough;~~ ~~ii. The requirement to make provision for development needs where these arise;~~ ~~iii. The priority given to focusing development on the urban areas of Telford and Newport through the use of previously developed land;~~ ~~iv. The significance of sustaining and promoting the vitality and viability of Telford Town Centre and the other designated centres within the borough;~~ ~~v. The priority given to maintaining the character and appearance of the countryside;~~ ~~vi. The need to maintain and enhance the vitality of rural communities;~~ ~~vii. The protection and enhancement of the borough's green infrastructure assets;~~ ~~viii. The need for appropriately located development that is accessible by public transport, walking and cycling;~~ ~~ix. The need to properly manage the impacts of development on existing infrastructure, and ensure additional infrastructure is provided where required;~~ ~~x. The contribution that development can make to increasing energy efficiency, reducing greenhouse gas emissions and increasing the resilience of development to the effects of climate change;~~ ~~xi. The need to protect and enhance the borough's biodiversity, geodiversity and heritage assets, in particular the Ironbridge Gorge World Heritage Site;~~ ~~xii. The need to safeguard environmental standards, public safety, and residential amenity; and~~ ~~xiii. The need to achieve high standards of design in development that have regard to local context, both visually and functionally.~~ **The Council will work in a proactive way to make sure proposals which accord with the development plan are approved without delay.**

Ref	Page	Policy/ para	Main Modification
			Where there are no Local Plan policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless: • **any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or** • **specific policies in the NPPF indicate that development should be restricted.**
MM16	39/40	3.3.3 & 3.3.4	*[Delete paragraphs]*
MM17	43	4.1.1.1	To deliver improvements to the employment in the area **predominantly within B use classes** and support local growth, the Council needs to set out how proposals for employment development will be assessed. Within this section a strategy is set out for the allocation of land for employment development **chiefly within the B Use Classes** and criteria for assessing **such** employment development away from these allocated areas. Policy EC1 sets out the Council's approach to promoting new inward investment on strategic employment areas which are the largest parcels of serviceable employment land.
MM18	44	Map 2 (extract)	*[Amend the boundaries of South Newport Strategic Employment Area to exclude land east of Audley Avenue.]* 
MM19	43	EC1	The Council recognises the importance of the strategic employment areas throughout the borough. The areas, as shown on Map 2 and the Policies Map, are expected to deliver B Use Classes along **with sui generis uses associated with B Use Class activity such as waste management** ~~with similar industrial uses~~ and ancillary uses **that support the Strategic Employment Area**. **Within the Central Area Strategic Employment Area, main town centre uses (except retail development) will also be encouraged on sites within the Telford Town Centre as shown in Policy EC5.**
MM20	45	4.1.1.6	Some of the employment areas require supporting ancillary services **to meet the needs of on-site**~~, such as catering for~~ employees **and businesses.**

Ref	Page	Policy/ para	Main Modification
MM21	47	EC3	Development relates to agriculture, forestry or assists in the diversification of the rural economy ~~(such as education and research, leisure, culture and tourism activities)~~;
MM22	47	EC3	Where it can be demonstrated that no suitable building capable of conversion/re-use is available or the re-use of previously developed land is not available or is unsuitable, new development will be supported **in well-designed new buildings** provided that development complies with the above criteria and the **scale, use and** design is responsive to the local context.
MM23	p.47	4.1.3.2	*[Insert the following as a new paragraph 4.1.3.2]* **It is also recognised that the Harper Adams University campus is a major employer in the rural area, and a major contributor to the rural economy. Appropriate development, as defined in Policy EC3, within the campus will be supported.**
MM24	48	4.2.2	...the borough's future need for additional space or additional large stores in the food grocery sector is likely to be met by existing commitments. **However, in the event of further demand emerging for additional convenience floorspace the Council will support such proposals within the Primary Shopping Area (PSA) of Telford Town Centre in the first instance.**
MM25	50	4.2.1.8	There are a number of out of centre retail parks located in Telford and Wellington that sit outside the borough's hierarchy of centres. The Council acknowledges these retail parks contribute to local shopping needs but does not seek to direct new development to these areas **in the first instance** so as to protect the vitality and viability of Telford Town Centre.
MM26	51	Policy EC5	In the Primary Shopping Area Primary Shopping Frontage the Council will only support changes of use from Use Class A1 to other uses ~~within the A Use Classes~~ where the proposal: i. Would not harm the retail character of the frontage; and ii. Would complement the other shopping uses within the centre. **In the Primary Shopping Area Secondary Shopping Frontage the Council will support changes of use from Use Class A1 to other uses which are complementary to the town centre location.**
MM27	53	Map 3	*[Modify Map 3 as shown.]*

Ref	Page	Policy/ para	Main Modification
			
MM28	54	Policy EC6	ix. Any retail **and non-retail** use subject to the provisions of Policy EC10
MM29	57	EC8	Development that attracts large numbers of people and has a main town centre function should be consistent with the scale and the function of the centre defined in Policy EC4. The Council will only support proposals for development outside or on the edge of Telford Town Centre, a Market Town, District or Local Centre where suitable sites within these centres cannot be identified through a sequential test. **As provided for in Policies EC1 and EC5, the Council will only support proposals for retail development (Use Class A1) in Telford town centre located outside or on the edge of the Primary Shopping Area, where suitable sites cannot be identified through a sequential test.** Where a site cannot be identified proposals will require the submission of an impact assessment **in accordance with national policy.** **For retail uses, an impact assessment will be required** where:
MM30	57	Policy EC8	i. The proposal provides a retail floorspace greater than 500 square metres gross; or ii. The proposal **provides a retail floorspace and** is located within 500 metres of the boundary of a District Centre and is greater than 300 square metres; or iii. The proposal **provides a retail floorspace and** is located within 500 metres of a Local Centre and has a floorspace greater than 200 square metres gross.

Ref	Page	Policy/ para	Main Modification
			If planning permission is granted for retail development in an out of centre or edge of centre location, the range of goods sold may be restricted either through planning conditions or legal agreement.
MM31	57	4.2.5.2	The NPPF promotes competitive town centre environments and recognises that the borough's centres are integral to communities and therefore their viability and vitality should be supported. One way of positively contributing to the vitality of the borough's centres is by directing major new development into these centres **in the first instance** and restricting it away from locations outside centres which would divert visitors and trade.
MM32	58	4.2.6.3	The Council's preferred location**s** for evening and night time economy uses will be within Southwater **and Central Square** in Telford Town Centre ..."
MM33	62	Policy EC12	The Council will support major hotel accommodation within or immediately adjacent to Telford Town Centre, Newport and Wellington Market Towns ~~and the Ironbridge Gorge World Heritage Site~~.
MM34	62	Policy EC12	The Council expects application for tourist accommodation to demonstrate how they will broaden the range and quality of provision in the borough. **The Council will safeguard the alignment of the Shrewsbury and Newport Canal (as shown on the Policies Plan) with a view to its long-term re-establishment as navigable waterways by:** **i. Not supporting development likely to destroy the canal alignment or its associated structures** **ii. Ensuring that when the canal is affected by development the alignment is protected or an alternative alignment provided.** This policy contributes towards achieving objective 5.
MM35	63	4.3.2.6	… with nearby destinations. ~~Both the 2012 *Marches Hotel Study* and the *Telford & Wrekin Destination Management Plan 2014/17* recognise that the borough has a growing tourism market around Ironbridge and this policy therefore supports hotel development in this area.~~ Newport and Wellington's appeal as Market Towns would be reinforced by the promotion of more visitor accommodation.
MM36	63	4.3.2.9	*[Insert the following new paragraph after paragraph 4.3.2.8:]* **Proposals for the restoration of the Shrewsbury and Newport Canal will only be supported where they can demonstrate that there will be no adverse impacts upon the natural and historic environment including designated sites, heritage assets, habitats and species in accordance with Policies NE1, NE2, BE4, BE6 and BE8.**
MM37	66	HO1	The Council **is planning for approximately** ~~identifies a borough wide plan target of 15,555~~ **17,280** net new dwellings up to 2031.
MM38	66	5.1.1.4	The housing requirement set out in Policy HO1 **has been informed in part by** ~~is higher than~~ the objectively assessed needs identified in the *Telford &*

Ref	Page	Policy/ para	Main Modification
			Wrekin Objectively Assessed Housing Need report by Peter Brett Associates (March 2015) ~~which identified an overall housing need of 9,940 dwellings up to 2031~~. The housing requirement ~~is therefore not solely based on the overall housing need. It also~~ allows for ~~additional~~ development of an appropriate scale, nature and location which will support delivery of the overall plan vision and growth strategy, including supporting the delivery of affordable housing.
MM39	67	HO2	Policy HO2 Housing site allocations The Council has identified the housing supply, including additional site allocations, that will contribute towards the delivery of the Council's housing requirement set out in Policy HO1. **The Council will identify further housing sites to achieve the Local Plan's housing requirement through the preparation of a Housing Site Allocations Local Plan.** ~~Two~~ **One** of the site allocations ~~are~~ **is** identified ~~also~~ as **a** Sustainable Urban Extension~~s~~ (~~Donnington and Muxton Sustainable Urban Extension - Site H1; and~~ Priorslee Sustainable Urban Extension - Site H**1**~~2~~) which will be required to deliver a range of uses, including housing, open space, employment, local services and facilities, and other supporting infrastructure necessary to ensure the delivery of sustainable places~~, in line with Policy SP4~~. **Land at Site H1 will deliver a Sustainable Urban Extension to Telford. It will have a mix of uses including housing, employment, retail, recreational and community uses to serve existing and future residents of Priorslee and the wider area. It will be sensitively integrated into the existing urban fabric of Priorslee and the wider landscape, through high quality design and measures to achieve sustainable development.** **The development will be assessed against the following principles:** • **a housing-led, mixed use development;** • **an indicative yield of around 1100 homes at a mix of densities comprising a range of market and affordable housing consistent with Policy HO5 and HO6;** • **a broad range of house types as well as other forms of residential accommodation (sheltered housing or extra care) consistent with Policies HO4 and HO7;** • **the provision of other built uses to support and consolidate the growing neighbourhood of Priorslee and reduce off site car movements from this site consistent with Policy C1. These are likely to include (but not be limited to): retail facilities to serve the daily needs of the population; employment uses within the B1 Use Class; a primary school; recreational facilities including playing pitches, orchards and spaces for passive recreation; a community centre and space for other community facilities (such as a crèche);**

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			• **a site layout that respects its undulating topography and its sensitive interfaces (such as the southern boundary's proximity to the M54 and a motocross operator off site);** • **a site layout that respects its interfaces with housing to west including at Lichfield Close, Ely Close, Waterlow Close and Eltham Drive and with the open countryside to the east;** • **primary vehicular accesses will be off the A4640 (Castle Farm Way) with one access from the A5. Access to the site from Salisbury Avenue will be restricted to cyclists, pedestrians and local bus services;** • **the provision of a bus service to connect the site with Telford town centre and other measures to promote alternative modes of transport to the car, including improved connectivity to and use of the Sustrans National Route 81 which crosses the site; extensive green infrastructure to address the site's sensitive interface with the open countryside;** • **the protection, maintenance and enhancement of known ecological assets;** • **the protection, conservation and, where possible, enhancement of known heritage assets including the listed building at Woodhouse and the Watling Way Scheduled Ancient Monument. This will require an evaluation of the archaeological importance of the area; and** • **a commitment to sustainable urban drainage systems, with built development avoiding areas in Flood Zones 2 and 3.** The sites and **indicative yields for all the housing allocations** are defined on the Policies Map and listed within the list of housing site allocations in Appendix D. **The Council will apply a sequential approach to the assessment of flood risk in line with national policy within these allocations.**
MM40	67	5.1.2.3	**Existing supply figures are set out in Table 10.** The latest set of monitoring figures from **1** April 201~~5~~**6** indicate that a total of ~~3,243~~ **4,498** dwellings had been built for the period 2011-1~~5~~**6**. These completions need to be taken into account as part of the overall supply. The number of dwellings under construction at **1** April 201~~5~~**6** was ~~968~~ **1,068**. In addition, ~~8,339~~ **7,719** dwellings had the benefit of planning permission but where construction work had not yet started. The Council has made an assumption that some of those dwellings not yet built are unlikely to be delivered due to site specific problems or the expiry of permission. Consequently, as shown in Table 10, a discount of 20% for 'non-implementation' has been deducted from this figure. This leaves a net supply of ~~6,671~~ **6,175** from permissions that have not yet started.
MM41	67	Table 10	*[Delete Table 10, and replace with updated table set out in Annex A at the end of this schedule.]*

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MM42	68	5.1.2.4	The total assumed supply at April 201~~5~~**6**, after making such deductions, is therefore ~~10,882~~ **11,741** dwellings. This represents a substantial amount of existing supply already identified to meet the housing requirement.
MM43	68	5.1.2.6	In Telford & Wrekin, a number of sites have already been approved subject to the signing of a legal agreement (otherwise described as 'resolution to grant' sites). Due to the legal obstacles surrounding these sites, they cannot be included as commitments within the total assumed supply at this time. The sites, currently totalling ~~1,680~~ **2,341** dwellings, have also not been allocated in the Local Plan as they are likely to form part of the existing commitments once the legal issues have been resolved. Consequently, they have been included in Table 10 as part of the balance necessary to meet the housing requirement. After applying a similar allowance (20%) for non-implementation, this reduces the likely supply from the 'resolution to grant' sites to ~~1,344~~ **1,873** dwellings. By including these sites in the supply, this reduces the number of additional dwellings that will be required as site allocations.
MM44	69	5.1.2.7	Table 10 also sets out the number of dwellings that are likely to come forward from site allocations**, comprising sites with planning permission and sites approved under section 7(1) of the New Towns Act 1981 and section 6(1) of the New Towns Act 1965.** ~~. in the plan period is 2,799. This is because it cannot be assumed that all the site allocations will come forward for development and be completed during the plan period. Therefore, the capacity of 3,499 from sites identified in Appendix D assumes an uplift of around 20% to reflect the potential for non-implementation towards the end of the plan period.~~ **Total supply from site allocations is estimated to be 2,264 dwellings as set out in Appendix D of the Plan. This differs from the figure of 1,020 dwellings set out in Table 10. This is because 1,244 dwellings (comprising sites H2, H3 and H9) are already accounted in the resolution to grant component, so as to accurately reflect the planning status of those sites at end of March 2016. However, at this point in time (April 2017), sites H2, H3 and H9 should be considered as if they were site allocations that are now, in effect, commitments because they now benefit from planning permission. After an allowance of 20% is applied to 1,020, this reduces the allocations figure to 816.**
MM45	69	5.1.2.9	Policy HO2 identifies ~~two~~ **one** Sustainable Urban Extension~~s~~ that ~~are~~ **is** critical to the delivery of the housing requirement, due to the amount of new homes planned for and the extended timescales involved in delivering ~~them~~ **the site**. ~~These are~~**This is**: ~~land at Muxton off the A518 approximately 750 dwellings); and~~ land at Woodhouse, Priorslee (approximately 1,100 dwellings). ~~Whilst the delivery of these sites will most likely progress over the~~

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			~~medium to long term, an application has been submitted for the extension in Priorslee. If approved, the relatively early starting point for the progression of the site will support the housing trajectory by delivering completions in the early part of the plan period.~~ The progression of **the** site~~s~~ in the early phases of the plan period will be helpful to maintaining a positive five year land supply position throughout the lifetime of the Local Plan.
MM46	70	5.1.2.10	A small allowance of ~~480~~ **360** dwellings has also been included in the supply to take into account small windfall sites. This is **a conservative estimate** based on past trends in delivery of sites less than 0.1 hectare, and does not assume any dwellings built on residential garden land. **Nor does it take account of the extensive new permitted development rights in the Town and Country Planning (General Permitted Development) (England) Order 2015 that allow conversions to housing through the prior approval process**. **It also addresses the potential problem of double-counting in the early years of future supply from small sites.**
MM47	70	5.1.2.12	Table 10 demonstrates the total future supply from 'resolution to grant' sites, site allocations and windfall sites, and existing site allocated in adopted neighbourhood plans is therefore estimated to be ~~4,673~~ **3,089**.
MM48	70-71	5.1.3.2, 5.1.3.3 and Figure 7	*[Delete paragraphs 5.1.3.2 and 5.1.3.3 and insert the following text after Policy HO3 as a replacement:]* (new 5.1.3.2) **Table 10 indicates that the Council can deliver around 14,830 dwellings up to 2031 from identified sources. This equates to around 17 years worth (or 86%) supply against the figure of 17,280 proposed in Policy HO1. This position assumes no additional supply from any other sources and also an allowance of 20% to account for potential future non-implementation during that period. However, the current identified shortfall in site allocations does raise some uncertainty regarding delivery towards the end of the plan period. Consequently, the Council will continue to monitor and keep up to date its assessment of housing delivery against its housing trajectory. The Council will prepare a Housing Site Allocations Local Plan which will enable a further range of sites to be identified to achieve the Local Plan's housing requirement.**
MM49	73	HO4	The Council will ~~expect~~ **require** major developments to deliver a mix of housing types, sizes and tenures to meet a range of household needs. The Council will ~~expect~~ **require** major development to deliver housing that will meet the changing needs of households over time including the needs of an ageing population, with properties built to ~~lifetime homes standards and~~ the Government's nationally ~~prescribed~~ **described** space standard~~s~~**, provided**

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			this meets a specific need and does not threaten viability of development overall.
MM50	75	5.2.2.5	*Delete ~~2015~~ and replace with* **2016** *twice.*
MM51	75	5.2.2.6	*Delete the first five sentences of this paragraph:* **"**~~Taking future household growth...during the plan period~~**."**
MM52	78	5.2.4.1	*Delete ~~2015~~ and replace with* **2016**
MM53	79	HO7	The Council will support proposals **within Use Class C2 and other forms of residential accommodation including retirement homes** to address specialist housing needs, provided that: i. The proposed development is designed to meet the specific needs of residents, including requirements for disabled people, where appropriate; ii. The location of the development (including where such provision is part of a larger scheme) is in close proximity to community and support facilities, shops and services, and public transport connections; and iii. The proposed development **relates well to the local context in design, scale and form** ~~does not create an over concentration of similar accommodation in any one street or neighbourhood.~~
MM54	81	HO9	The Council will support planning applications for Gypsy and Traveller accommodation if they perform positively against the following criteria: ~~i. The applicant can demonstrate there is a need for such provision;~~ **i** ~~ii~~. The proposal can be supported by local shops, community facilities, public transport connections, local and employment opportunities; ~~iii. The proposal does not dominate local settled communities by way of its size, population density and impact on local infrastructure;~~ *[renumber other criteria]* ~~x~~. **ix.** The site would be located **away from areas at high risk of flooding and** in safe and secure locations with **suitable** access ~~to~~ **for** the emergency services.
MM55	82	5.3.1.1	The Council has assessed its housing need across the borough and has identified a requirement for ~~15,555~~ **approximately 17,280** new homes, consistent with government advice that requires local authorities to boost significantly the supply of housing.
MM56	88	6.0.2	Green infrastructure is an important component of sustainable communities; it provides a range of functions including climate change mitigation, recreation, biodiversity, flood water storage**, an appreciation of the historic environment** and benefits for health and wellbeing.
MM57	88	6.0.3	Green infrastructure is 'a network of multi-functional green space, urban and rural, which is capable of delivering a wider range of environmental and quality of life benefits for local communities.' It includes public and private green spaces including parks, sports pitches, children's play areas and private gardens as well as urban and rural features such as highway verges and street trees, **heritage assets,** rivers, **canals** and ponds, meadows and grasslands, hedges, woods and fields.

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MM58	90	NE1	The Council will**, <u>where applicable</u>,** expect development to: i. Maintain, protect and, where appropriate, enhance designated sites and habitats and species of ~~principle~~ **<u>principal</u>** importance for nature conservation …
MM59	93	NE2	The Council will**, <u>where applicable</u>,** expect development to: …
MM60	93	NE2	Loss or damage to irreplaceable habitats, including ancient woodlands and veteran trees, cannot be practically compensated and will not be ~~normally~~ acceptable.
MM61	96	NE5	The Council will**, <u>where applicable</u>,** require **<u>major</u>** development to provide: …
MM62	98	6.5.2	The Local Plan has identified **<u>two</u>** ~~three~~ areas as Strategic Landscapes. These are: • Wrekin Forest; **<u>and</u>** • Weald Moors**<u>.</u>**~~; and~~ • ~~Lilleshall Village.~~
MM63	98	6.5.3	*[Delete paragraph.]*
MM64	98	NE7	**<u>Shropshire Hills Area of Outstanding Natural Beauty and</u>** Strategic Landscapes **<u>The Shropshire Hills Area of Outstanding Natural Beauty (AONB) will be given the highest level of protection.</u>** The Council will protect the borough's Strategic Landscapes from development which would cause detrimental change to the quality of the landscape.
MM65	98	6.5.4	*Add the following text to the end of the paragraph:* **The Wrekin Forest Strategic Landscape includes part of the Shropshire Hills Area of Outstanding Natural Beauty (AONB), a small part of which falls within the borough. Any proposals affecting the Shropshire Hills AONB will also be required to be consistent with the current AONB Management Plan and any subsequent update**.
MM66	107	C1	The Council will require**, <u>where applicable and viable,</u>** major development in urban areas and, on a case by case basis, in rural areas to: … ii) ~~Fund~~ **<u>E</u>**~~e~~nhance~~ment of~~ and / or provide local and strategic walking and cycling routes, **<u>that enable residents or employees to access wider walking and cycling networks</u>**; iii)~~ Fund~~ **<u>E</u>**~~e~~nhance~~ments to~~ existing public transport services or provide new services and demonstrate their financial viability; …
MM67	124	BE3	*[Insert the following text after the first paragraph:]* **<u>Any harm or loss to the World Heritage Site must be clearly justified.</u>**

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			The Council will only support proposals likely to cause substantial harm to the World Heritage Site where it has been clearly demonstrated that there would be substantial public benefits associated with the proposal, or in all the following circumstances: • **The asset cannot be sustained in its current use;** • **The asset prevents all reasonable use of the site; and** • **The harm or loss is outweighed by the benefit of bringing the site back into use.** **In these wholly exceptional circumstances where harm can be clearly and convincingly justified and the development would result in the partial or total loss of a heritage asset and/or its setting within the World Heritage Site, the Council will require the developer to record and analyse the asset, including an archaeological excavation where relevant, in accordance with a scheme to be agreed beforehand and to be deposited on the Council's Historic Environment Record.**
MM68	127	BE4	*[Insert the following text after the first paragraph:]* **Any harm or loss to the significance of or setting to a listed building must be clearly justified.** **The Council will only support proposals likely to cause substantial harm to or total loss of a listed building where it has been clearly demonstrated that there would be substantial public benefits associated with the proposal that would outweigh any harm or loss to the listed building, or all the following circumstances:** • **The asset cannot be sustained in its current use;** • **The asset prevents all reasonable use of the site; and** • **The harm or loss is outweighed by the benefit of bringing the site back into use.** **Harm to a Grade II listed building is unacceptable other than in exceptional circumstances. Harm to a Grade I or II* listed building is unacceptable other than in wholly exceptional circumstances.** **In these exceptional circumstances where harm can be clearly and convincingly justified and the development would result in the partial or total loss of the asset and/or its setting, the Council will require the developer to record and analyse the asset, including an archaeological excavation where relevant, in accordance with a scheme to be agreed beforehand and to be deposited on the Council's Historic Environment Record.**

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MM69	127	BE5	*[Insert the following text after the first paragraph:]* **Any harm or loss to a conservation area must be justified.** **The Council will only support proposals likely to cause substantial harm to a Conservation Area where it has been clearly demonstrated that there would be substantial public benefits associated with the proposal, or all the following circumstances:** • **The asset cannot be sustained in its current use;** • **The asset prevents all reasonable use of the site; and** • **The harm or loss is outweighed by the benefit of bringing the site back into use.** **In these exceptional circumstances where harm can be fully justified and the development would result in the partial or total loss of the asset and/or its setting, the Council will require the developer to record and analyse the asset, including an archaeological excavation where relevant, in accordance with a scheme to be agreed beforehand and to be deposited on the Council's Historic Environment Record.**
MM70	131	BE6	*[Insert the following text after the first paragraph:]* **Any harm or loss to a building of local interest must be justified. The Council will have regard to the scale of the harm or loss likely, balanced against the significance of the building.** **Where harm to a building of local interest can be justified, and development would result in the partial or total loss of the building, the Council will require the developer to record and analyse the building in accordance with a scheme to be agreed beforehand to be deposited on the Council's Historic Environment Record.**
MM71	128	BE7	*[Insert the following text after the first paragraph:]* **Any harm or loss to a registered park and garden must be justified.** **The Council will only support proposals likely to cause substantial harm to a Conservation Area where it has been clearly demonstrated that there would be substantial public benefits associated with the proposal, or all the following circumstances:** • **The asset cannot be sustained in it's current use;** • **The asset prevents all reasonable use of the site; and** • **The harm or loss is outweighed by the benefit of bringing the site back into use.**

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			Harm to a park or garden of historic interest is unacceptable except in exceptional circumstances. **In these exceptional circumstances where harm can be fully justified and the development would result in the partial or total loss of the asset and/or its setting, the Council will require the developer to record and analyse the asset, including an archaeological excavation where relevant, in accordance with a scheme to be agreed beforehand and to be deposited on the Council's Historic Environment Record.**
MM72	131	BE8	*[Insert the following text after the first paragraph:]* **Any harm to a schedule ancient monument must be justified.** **The Council will only support proposals likely to cause substantial harm to a Conservation Area where it has been clearly demonstrated that there would be substantial public benefits associated with the proposal, or all the following circumstances:** • **The asset cannot be sustained in its current use;** • **The asset prevents all reasonable use of the site; and** • **The harm or loss is outweighed by the benefit of bringing the site back into use.** **Harm to a scheduled ancient monument is unacceptable except in wholly exceptional circumstances.** **In these exceptional circumstances where harm can be fully justified and the development would result in the partial or total loss of the asset and/or its setting, the Council will require the developer to record and analyse the asset, including an archaeological excavation where relevant, in accordance with a scheme to be agreed beforehand and to be deposited on the Council's Historic Environment Record.**
MM73	131	BE8	ii. Where in situ preservation is not justified or proves impractical or inappropriate, provision will be made for its recording and/ or excavation by a competent archaeological organisation before development starts on site **and any information which requires recording shall be recorded in a suitable format and deposited on the Council's Historic Environment Record.**
MM74	137	ER1	*[Amend second paragraph as follows:]* **The Council supports** ~~Wherever feasible,~~ development ~~should~~ **which** include decentralised energy production **or** ~~of~~ connection to an existing Combined Heat and Power **or** ~~of~~ Community Heating System such as in Telford Town Centre.

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MM75	140	Policy ER2	~~The Council will support non-mineral development~~ **Mineral resources** within the Mineral Safeguarded Area**s and buffer zone areas** (displayed on the Policies Map ~~and Map 4~~) **will be protected from unnecessary sterilisation by other development unless** ~~provided that one of the following criteria are met~~: i. The development ~~can~~ **cannot** be sited or relocated to avoid mineral areas; ii. Mineral resources are either not present or are of no economic value; iii. The **mineral can be extracted without** ~~prior extraction of minerals would have~~ unacceptable impacts on neighbouring uses, local amenity or other environmental assets **prior to the development taking place** ~~such as land stability~~; iv. The overriding need for the development outweighs the need to safeguard the mineral resources present; or v. The incompatible development is of a temporary nature and can be completed with the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed. **Major development proposals within the urban areas abutting a Mineral Safeguarding Area should demonstrate:** **i) That the mineral resource is not economic to work or is not present; or** **ii) That the proposed development will not permanently sterilise the mineral; or** **iii) That the mineral resource will be prior extracted to prevent it being sterilised.** Where prior extraction **is established as feasible** ~~is proposed~~, conditions will be imposed requiring **extraction of viable mineral resources present in advance of construction.**~~, a~~ **A**pplicants **will be required** to provide details of the tonnages of minerals extracted, once the scheme has been completed. The Council will apply the following exemptions to this policy: i. Applications for householder development (except for new dwellings); ii. Applications for alterations and extensions to existing buildings and for change of use of existing development, unless intensifying activity on site; iii. Applications for advertisement consent; iv. Applications for reserved matters including subsequent applications after outline consent has been granted; v. Prior notifications (**for example,** telecommunications, forestry, agriculture, demolition);

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			vi. Certificates of Lawfulness of Existing Use or Development (Section 191) and Certificates of Lawfulness of Proposed Use or Development (Section 192); vii. Applications for works to trees and other miscellaneous minor works/applications (e.g. Fences, gates, access etc); viii. Applications for temporary planning permission.~~;~~ ix. ~~Applications where there are overriding factors which in the national, regional or local interest must be satisfied; and~~ x. ~~Applications where further evidence is presented to the council which confirms that the area of resource affected would not be economic to work.~~ All non-mineral development proposals outside the Mineral Safeguarding Areas where the potential for prior extraction to take place has been identified should seek to extract any viable mineral resources present in advance of construction. Proposals for prior extraction will be permitted provided the proposal is in accordance with policy ER6 Mineral development. Proposals for non-mineral development outside the Mineral Safeguarding Areas that do not allow for the prior extraction of minerals will only be permitted where they accord with points (i) to (v) above. In the urban and rural areas the Council will support non-mineral development providing it does not threaten, lead to the loss of or damage to, the functioning of established planned or potential minerals related infrastructure unless: i. An alternative site within an acceptable distance can be provided, which is at least as appropriate for the use as the safeguarded site; and ii. It can be demonstrated that the infrastructure no longer meets the current or anticipated future needs of the minerals, building and construction industry. Applications for non-mineral and non-waste related development adjacent to existing, planned or potential mineral related infrastructure will be supported provided it can be demonstrated that it will not prevent or prejudice the current or future use of the mineral related infrastructure. This policy contributes towards achieving objective 29.
MM76	142	Map 4	*[Update map in relation to BGS data and to apply BGS buffers in the rural area.]*
MM77	143	10.2.2.1 to 10.2.2.2	**10.2.2 Maintaining Aggregate Supplies ~~supplies of crushed rock~~** **10.2.2.1** Mineral Planning Authorities (MPAs) such as Telford & Wrekin Council are required to plan and make provision for a steady and adequate supply of aggregates **(both crushed rock and sand and gravel)** . The

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			NPPF requires **councils to prepare Local Aggregates Assessments (LAAs)** ~~LAAs~~ to gauge provision based on average annual sales over the previous ten years **and other relevant local information and an assessment of all supply options**, rolling forward seven years supply for sand and gravel and ten years supply for crushed rock. **It is accepted practice for authorities to plan jointly for aggregates supply and** Telford & Wrekin Council and Shropshire Council have co-operated as a single sub-region for ~~the~~ **this** purpose **for a considerable period,** ~~of aggregates supply~~ **an approach approved by the West Midlands Regional Aggregates Working Party.** **10.2.2.2 The latest available LAA data indicates that the land bank of permissions for crushed rock working has remained consistently above the minimum target levels for 10 years. In 2015 the permitted land bank of permissions was equivalent to about 44 years production.** **10.2.2.3 For sand and gravel working the latest LAA data for the sub-region shows that in 2015 there were 10 permitted sites for sand and gravel working in Shropshire, 5 of which were operational. The LAA data indicates that, at 0.73mt, sand and gravel production in Shropshire and Telford & Wrekin in 2015 has significantly recovered from recent years and is now above both the 10 year rolling average for sand gravel sales (0.69mt) and the 3 year average (0.67mt). The LAA data also demonstrates that the landbank of permissions for sand and gravel working has remained consistently above the minimum level required by NPPF of seven years. The permitted landbank of permissions was equivalent to about 15 years' production in 2015.** **Crushed Rock resources** **10.2.2.4** ~~10.2.2.2~~ Leaton Quarry contributes to the sub-regional supply of crushed rock requirements. The market area for crushed rock is predominantly local and it is used in ready mix and precast concrete and road construction and surfacing, rail track ballast ~~sea~~, and water and effluent filtration pipe bedding.
MM78	143	ER3	**Maintaining supplies of crushed rock** The supply of crushed rock will be provided from existing permitted reserves at Leaton Quarry. The Council will only support proposals for further crushed rock working if **the need for the mineral outweighs the material planning objections (Policy ER6) and** one or more of the following exceptional circumstances apply: ~~i. The need for the mineral outweighs the material planning objections (Policy ER6);~~ ~~ii~~. **i.** Working would prevent the sterilisation of the resource; and/or ~~iii.~~ **ii.** Significant environmental benefits would be obtained.

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			Proposals for new crushed rock extraction should demonstrate they are environmentally acceptable to work and be consistent with Policy ER6 and other relevant plan polices. **This policy contributes towards achieving objective ~~objectives~~ 29**
MM79	143/144	10.2.2.3 to 10.2.2.5	~~10.2.2.3 The latest available data indicates that the land bank of permissions for crushed rock working has remained consistently above the minimum target levels for 10 years. In 2014 the permitted land bank of permissions was equivalent to about 46 years production therefore no new sites for extraction will be allocated.~~ ~~10.2.2.4~~ **10.2.2.5 As a result of the extensive landbank for crushed rock no new sites for extraction will be allocated.** In the event that increased production results in the site's permitted reserves becoming exhausted earlier, subject to environmental constraints, an extension to Leaton quarry would be considered to replenish reserves. ~~10.2.2.5~~ **10.2.2.6** The only other alternative crushed rock supplies within the borough that are not sterilised or exhausted are at the Ercall, near the Wrekin, the Wrekin itself and Lilleshall Hill. The Ercall is within the Shropshire Area of Outstanding Natural Beauty (AONB) and there is housing on and adjacent to Lilleshall Hill. The disused Ercall Hill and nearby Maddox Hill crushed rock quarries, both geological SSSI sites, were last worked for crushed rock in the mid-1980s, when they were permanently closed down to concentrate production at Leaton Quarry. It is therefore a sustainable continuation of planning policy for any future allocation of crushed rock resources to be an extension of Leaton Quarry, subject to it being environmentally acceptable.
MM80	144	ER4	*This draft main modification has been deleted.*
MM81	144/145	10.2.3.2 to 10.2.3.4	10.2.3.2 ~~In 2014 there were 11 permitted sites for sand and gravel working in Shropshire, 6 of which were operational. Recent data suggests that the land bank of permissions for sand and gravel working has remained consistently above the minimum target of 7 years, and~~ **It is acknowledged that the NPPF promotes a growth and development agenda to which the Local Plan has responded accordingly. However, due to the ready availability of an adequate and steady supply of sand and gravel resources from existing proximate sites in other parts of the Shropshire sub-region it is considered** there is no need for the plan to identify additional sites**.** ~~since Shropshire Council has indicated that supply can be met up to 2031. In recognition of a rising population and new inward investment for employment, and the NPPF's agenda for growth, should~~ **Should** exceptional circumstances occur **where the need for** additional ~~reserves~~ **extraction** of sand and gravel **reserves can be demonstrated** ~~are required~~, new sites will

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			be considered provided ~~the sites~~ **they** are environmentally acceptable to work. 10.2.3.3 The ENTEC report *Assessing Sand and Gravel Sites for Allocation in the Shropshire sub region: Site Assessment Report* (including Telford & Wrekin) jointly commissioned by Shropshire Council and Telford & Wrekin Council (March 2010) and later addendum (February 2011) considered appropriate sites for the sub region for sand and gravel resources. The only other site in Telford & Wrekin considered ~~potentially suitable~~ as a future allocation ~~is~~ **was** Pave Lane **in the east of the borough close to an existing commitment for sand and gravel extraction at Woodcote Wood in Shropshire. However, Pave Lane** ~~However this site~~ was classed as 'least preferred' **in the report** meaning that it should only be considered if one or more of the unworked site commitments (Sleap/Barnsley/Woodcote Wood) in Shropshire fail to come forward. **In the case of two of these sites (Sleap and Woodcote Wood), the mineral operators and landowners concerned have confirmed that there is a clear intention to work these sites during the Plan Period; furthermore the latest LAA data demonstrates there is sufficient supply from existing operations, commitments and additional resources allocated at three sites in Shropshire Council's Local Plan, together with a very strong likelihood of additional allocations and windfall sites being identified in Shropshire as part of its current Local Plan review process. These resources will be more than adequate to satisfy the identified need for sand and gravel in the sub-region**. ~~There are serious issues with the deliverability of the Pave Lane site within the Local Plan period. Significant serious environmental constraints include Woodcote Hall, a retirement and nursing home, which lies between the site and the nearby Woodcote Wood site (in Shropshire), landscape issues when viewing the site from nearby Staffordshire, and access onto the A41(T) is constrained.~~ 10.2.3.4 ~~In the event of a site in Shropshire being undeliverable then Pave Lane could be considered to come forward. If the site were to come forward as an extension to the Woodcote Wood site issues of cumulative impact would need to be considered. However, the Woodctoe Wood site has not yet been developed.~~ **Where the need for additional extraction of sand and gravel reserves can be demonstrated then consideration will be given to Pave Lane for sand and gravel extraction in line with policies ER4 and ER6, with reference to cumulative impact concerns if the site was to come forward in close proximity to the Woodcote Wood site.**
MM82	148	ER7	iii.New **and altered** facilities should be designed…
MM83	148	10.3.1.2	As a result of the new household waste contract the borough will be treating **suitable residual** household waste at Energy from Waste facilities in

Ref	Page	Policy/ para	Main Modification
			Shropshire and Staffordshire which have capacity **to accommodate Telford and Wrekin's household waste needs throughout the plan period**. This negates the need for expensive, large scale treatment plants within the borough for the duration of the plan period. For this reason consideration should be given to safeguarding existing waste infrastructure so as to maintain continued operation and provide opportunities for expansion of infrastructure, where appropriate, to meet local needs
MM84	150	ER8	*[Delete policy ER8 and replace with the following:]* **Policy ER8** **Waste planning for residential developments** **The Council will support residential development that helps drive waste management up the Waste Hierarchy by:** **i. Providing, with regard to local design standards and waste collection regime at the point of application, the following:** **a) Sufficient space for the storage of recycling and refuse containers that is designed to a high standard; and** **b) A storage area that is accessible, conveniently located with a step free route to the collection point and where practical, sited to the rear of the property, avoiding the need to convey containers through a property. Where this is not possible storage at the front of the property should be secure and minimise its visual impact.** **ii. In the case of shared housing, flatted development or residential homes:** **a) Where appropriate and related to the size and nature of development, provide shared recycling and refuse facilities of a capacity agreed with the Council;** **b) Where storage is not fully enclosed and secured it should be at least five metres away from the building and be separate from cycle storage, car parking and key circulation areas in order to reduce risk of fire from flammable materials;** **c) Communal storage areas need to be accessible to collection crews with a hard surfaced, step free route between the storage area and collection point, which should be kept clear of parked vehicles.** **iii. Collection points for all developments should be accessible for standard sized waste collection vehicles, details of which can be obtained from the Council;** **iv. Demonstrate how construction and excavation waste from development sites will be recycled, treated and/or disposed. This should demonstrate either recycling of waste on-site or, where this is not possible, the destination and end use of waste taken off-site.**

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			This policy contributes towards achieving objectives 25 and 30.
MM85	150	10.3.2.5	Poorly sited or designed refuse storage can also be harmful to the health and amenity of the occupiers of the development by reason of odours or loss of privacy or outlook. This can be avoided by ensuring that refuse and recycling storage is separate from all habitable and ci**r**culation areas, and is independently ventilated. **More information on waste management will be set out in the Design Supplementary Planning Document.**
MM86	153	ER10	~~The Council will require major development to demonstrate that it:~~ ~~i. Incorporates design features that will reduce water consumption; and/or~~ ~~ii. Incorporates design features that will support recycling/re-use of water through measures such as rainwater harvesting and grey water recycling, especially where a large demand for water is predicted such as industrial processes; and/or~~ ~~iii. Provides features for the collection of rainwater for use in irrigation/watering to offset potable water demand.~~ ~~This policy is linked to the phasing of development as set out in Policy HO3.~~ **The Council will encourage major development to incorporate design features, commensurate with the scale and type of development, that will support recycling / re-use of water to help offset demand for potable water supplies.**
MM87	157	ER12	The Council will **require** ~~expect~~**, where applicable,** development to:
MM88	157	ER12	*[Insert new bullet point to policy ER12:]* **x. Refer to Table 1 and 2 of the Government's Climate Change Allowances guidance and contact the Environment Agency for any detailed river catchment climate change data"**
MM89	160	Appendix A, para 5	Policies within the Local Plan that support requests for developer contributions for strategic infrastructure include: ~~Policy SP 4 - Presumption in favour of sustainable development;~~ Policy NE4 - Provision of public open space; Policy COM1 - Community facilities; Policy C3 - Impact of development on highways.
MM90	164	Table 13 Aim 2	Support **the** delivery of **approximately** ~~15,555~~ **17,280** new dwellings across the borough by 2031
MM91	165	Table 15 Aim 4	Delivery of **approximately** ~~900~~ **1,000** dwellings in the rural area
MM92	171	Appendix D Table 21	<table><tr><td>Site Ref</td><td>Site Size (Ha)</td></tr><tr><td>~~H1~~</td><td>~~41.886~~</td></tr></table>

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<tr><th>Ref</th><th>Page</th><th>Policy/ para</th><th>Main Modification</th></tr>
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<tr><td>H1~~2~~</td><td>~~61.424~~ <u>57.016</u></td></tr>
<tr><td>H2~~3~~</td><td>5.290</td></tr>
<tr><td>H3~~4~~</td><td>~~2.249~~ <u>3.135</u></td></tr>
<tr><td>H4~~5~~</td><td>~~2.085~~ <u>3.445</u></td></tr>
<tr><td>H5~~6~~</td><td>3.385</td></tr>
<tr><td>~~H7~~</td><td>~~8.284~~</td></tr>
<tr><td>~~H8~~</td><td>~~6.310~~</td></tr>
<tr><td>H6~~9~~</td><td>0.708</td></tr>
<tr><td>H7~~10~~</td><td>~~34.895~~ <u>42.367</u></td></tr>
<tr><td>H8~~11~~</td><td>1.202</td></tr>
<tr><td>H9~~12~~</td><td>3.255</td></tr>
<tr><td>~~H13~~</td><td>~~4.544~~</td></tr>
<tr><td>H10~~14~~</td><td>2.26 <u>2.261</u></td></tr>
<tr><td>H11~~15~~</td><td>~~2.55~~ <u>2.553</u></td></tr>
<tr><td>H12~~16~~</td><td>~~6.57~~ <u>6.571</u></td></tr>
<tr><td>H13~~17~~</td><td>13.82</td></tr>
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<tr><td>MM93</td><td>191</td><td>Appendix I Glossary</td><td>Add <u>Heritage statement – A statement that: identifies the special character and significance of any heritage asset; whether there is a demonstrable need for the works to it; assesses the likely impact of the development on that asset; and how this has been addressed through design considerations.</u></td></tr>
<tr><td>MM94</td><td>189</td><td>Appendix I: Glossary</td><td>Add <u>Housing trajectory: A graphical tool used to show past and future housing delivery performance by identifying the predicted provision of housing over the lifetime of the Local Plan.</u></td></tr>
<tr><td>MM95</td><td>189</td><td>Appendix I: Glossary</td><td>Add <u>Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure; entertainment facilities; the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</u></td></tr>
</table>

Annex A
Replacement Table 10 (p67) – see **MM41**

Table 10 Housing Land Provision for the borough 2011-31 (at 1 April 2016)

		Gross	Net
A	Net completions (2011-16)		4498
B	Dwellings with Planning Permission (under construction)		1068
C	Dwellings with Planning Permission (not started)	7,719	
D	Less 20% allowance for non-implementation	(1,544)	6,175
E	Total existing supply (A+B+D)		11,741
F	Supply from resolution to grant sites	2,341	
	Less 20% allowance for non-implementation	(468)	1,873
G	Site allocations post-examination stage	1,020	
	Less 20% allowance for non-implementation	(204)	816
H	Windfall allowance (sites 0.1 ha or less)	360	360
I	Madeley Neighbourhood Development Plan site – Rough House Park	50	
	Less 20% for non-implementation	(10)	40
J	Total Future Supply (F+G+H+I)		3,089
K	Total housing land provision (2011-31) (E+J)		14,830
L	Overall housing target for the period 2011-31		17,280
M	Residual supply from anyother sources, inc. additional site allocations (L-K)		2,450