



The countryside charity
Shropshire

**Regulation 18 Consultation on Telford & Wrekin Local
Plan Review – Draft Plan 2020 – 2040**

**Response from CPRE, the countryside charity
(Shropshire Branch)**

January 2024

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1. Introduction

- 1.1 We welcome this opportunity to take part in the Regulation 18 “informal” consultation on the Draft Plan, prior to the eventual final formal Regulation 19 stage consultation on the publication version, scheduled for later this year¹.
- 1.2 CPRE Shropshire supports a beautiful and thriving countryside that enriches all our lives. We support development in the right place which is sympathetic to the landscape and to the needs of local communities and those who work within them. We support building the right types of housing in the right places, in numbers that are clearly needed, to ensure that the County’s special qualities are protected and that the genuine needs of its residents are met.
- 1.3 However, we do not believe that the continued aspirational growth preferred by Telford & Wrekin Council will protect the special qualities of the Local Authority area, or serve its resident population to best effect.
- 1.4 Our response is partly restricted in its scope because of our limited resources. There are many excellent aspects to the Draft Plan, but we naturally concentrate on the elements of it with which we have reservations, although this response is necessarily selective in what we comment upon.
- 1.5 Since the publication of the Draft Plan, a new version of the National Planning Policy Framework (NPPF) was published on 19 December 2023. We imagine that the Council may need to make changes to the Draft Plan to reflect this. When publishing the final Plan for submission it would be helpful if any such necessary changes could be clearly identified.
- 1.6 This response from CPRE Shropshire, which concentrates in a large degree on housing and economy aspects, indicates that the Draft Plan:
 - i) has a site allocation process that is questionable and internally inconsistent;
 - ii) has targets for both housing and employment land that are too high, based on figures that are questionable, which are well in excess of demographic need, and which are therefore not truly sustainable, being at odds with both the climate emergency and the ecological emergency;
 - iii) incorporates double counting of housing need with the Black Country authorities, and which appears to cater for demand from the West Midlands conurbation rather than the need of Telford & Wrekin residents;
 - iv) pays lip service to the brownfield first principle; and
 - v) has no overall land use policy (around 80% of the Local Authority area can be thought of as “green”) and uses too much Best and Most Valuable farm land in its allocations.

¹ In Summer - Autumn 2024, according to the latest June 2022 version of the Local Development Scheme 2022 – 2025

- 1.7 We acknowledge that the Council steers respondents towards its online consultation process including the form as below:

Q1: Which part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number or a map/diagram title.

Click or tap here to enter text.

Q2: Do you support or object?

- Support
 Object

Q3: Please state your reasons or comments in this box here?

Click or tap here to enter text.

Q4: Are you suggesting a change?

- Yes No

Q5: If yes, what changes would you suggest?

Click or tap here to enter text.

- 1.8 The nature of this narrative response does not sit easily within this rigid system, and we are therefore submitting it as a single document directly to the Council's planning policy team. We believe that we have given enough information within it for that team to see how our responses tally with the questions within the above form. This approach also retains a single coherent document, that can be seen and referred to by others, rather than having our comments scattered in multiple parts within the online system, with no coherent record of what has been submitted.
- 1.9 Also, in some cases, the online system is too restrictive in its demands. For instance, in respect of Question 2, it is not necessarily a binary matter whether one simply supports or disagrees. The support or disagreement can be qualified or partial, which the form does not cater for.

Consultation

- 1.10 It is noted and welcomed that the consultation process was extended from its original shorter timescale in recognition that it straddled the Christmas and New Year period. This should, of course, have been recognised from the outset.
- 1.11 The consultation is almost entirely reliant on online access. Those without such access, or with limited broadband capability or online skills, are thereby disenfranchised from taking part. The limited geographical range and number of the five drop-in consultation events in the pre-Christmas period may not have reached many such people.
- 1.12 As is inevitable with Local Plans there is a huge amount of documentation to be assessed in order to understand the whole process. It would be helpful if some overall document could be produced, akin to a Non-Technical Summary in an EIA, to guide members of the public through the process, and to help in the paper chase that results from trying to track down

relevant background information. Otherwise, the exercise is something of a sham, or a tick-box exercise, through being too opaque for the general public to follow.

- 1.13 One simple measure that would help would be to have included a contents page at the front of the Draft Plan.
- 1.14 We recognise that comments made at this Regulation 18 stage will not be seen by the Inspector who eventually examines the submission version of the plan. We therefore trust that, under the Gunning Principles of consultation, the Council will take pains to take 'conscientious consideration' of our consultation responses before moving to the Regulation 19 stage, and will include details of that conscientious consideration in a consultation response report on this Regulation 18 consultation.
- 1.15 We reserve the right to make additional comments, if necessary or appropriate, at that Regulation 19 stage of consultation.
- 1.16 We now move to more detailed comments on the Draft Plan.

2. Site Allocations and Integrated Impact Assessment: Interim SA

- 2.1 There are inconsistencies and errors in the information as presented, namely:
 - a) the tables could be presented in a more user-friendly way;
 - b) the colour coding used is inconsistent and not properly explained;
 - c) there are errors in the tables listing the allocated sites;
 - d) there appears to be a lack of objectivity in assessing the sites for suitability for allocation; and
 - e) the exclusion of small sites is likely to mean that windfalls are under accounted for.

Presentation

- 2.2 The Integrated Impact Assessment (IIA), with appendices, is 313 numbered pages long. It would have been helpful if the separate Appendices document, as well as the main document, had had its own separate contents page. It would also have been helpful if Appendix E: Site Assessment Methodology and Appraisal Matrix had retained the titles (maybe in abbreviated form) at the top of each separate page.

Colour coding

- 2.3 The detailed site assessments at Stage 2 and Stage 3 of the Site Assessment process appear to have been set out in three separate places:
 - i) the Site Assessment Technical Paper, pages 16 to 17;
 - ii) pages 266 to 271 of the IIA Appendix E: Site Assessment Methodology and Appraisal, setting out the criteria used in:

iii) pages 272 to 279 of that Appendix, setting out the detailed matrices.

2.4 There seem to be differences in the colours set out in each of these documents.

- At i) three colours have been indicated, namely green, amber and red i.e. a simple traffic light system.
- At ii) at least six colours are to be found, namely grey, dark green, light green, amber, mauve and red.
- At iii) there are again six colours, but slightly different ones, namely grey, dark green, light green, yellow, amber, mauve and red.

2.5 Stage 2 (Initial assessment of hard constraints) of the IIA process lists 29 possible criteria under 14 numbered *SA Criteria and Objectives*. Stage 3 (Integrated Assessment Site Appraisal) of the IIA process then includes 26 of these criteria, which it assesses using colour coding.

2.6 It is difficult to match the Stage 2 key as shown on page 16 of the Site Assessment Technical Paper to the colour coding as laid out on pages 266 to 271 of Appendix E of the IIA. For instance, the Stage 2 coloured categories on page 16 are stated as:

Stage 2 – Initial assessment of hard constraints		
No hard constraint	Less than 75% within hard constraint or on boundary	Site entirely or 75% or greater within hard constraint, does not require further assessment

However, it is hard to see how those translate, for instance, to the Score Thresholds used for Criteria 1, Biodiversity in the IIA Appendix E: Site Assessment Methodology and Appraisal, as below:

Appendix E : Site Assessment Methodology and Appraisal Matrix

SA Criteria and Objectives			Score Thresholds (note, for non-applicable scorings, a white colour has been used)	Data (national/local data)	Methodology	Notes
1. Biodiversity	1.1	Direct loss or disturbance of biodiversity assets	Greater than 50m from biodiversity asset Adjacent to/within 50m of biodiversity asset Less than 10% of the site overlaps with a biodiversity asset Greater than 10% of the site overlaps with biodiversity asset	SSSI, SAC, SPA, Ramsar, NNR LWS, LNR	Euclidean distance from site to nearest biodiversity asset.	

Errors in listing

2.7 It appears that a total of 198 sites were received as a result of the two separate Calls for Sites². On Appendix E of the IIA, pages 272 to 279, 199 sites appear to have been assessed.

2.8 Including the multiple sites within the three SUEs, it appears that a total of 82³ of these 199 sites have then been allocated. At 42%, this does seem a high percentage, compared with

² Site Assessment Technical Paper, paragraphs 3.5 and 3.6

³ As listed at Table 5, pages 14 and 15, of the Site Assessment Technical Paper

the approximately 6% in Shropshire Council's current Draft Plan, where only just over 120 sites were allocated out of well over 2,000 that went through the assessment process.

- 2.9 On the 14 Appendix to the Draft Plan (pages 170 to 175), there are listed 53 Proposed Housing Sites (representing 68 sites with the 18 sites included in the three SUEs) with housing yields of 7,900 dwellings; and 13 employment sites totalling 91.6 Ha. That is a total of 66 allocated sites.
- 2.10 These sites are also listed, grouped in a different way, on the Proposed Allocations Webpage⁴. On those lists there are a total of 67 sites.
- 2.11 It is the 14 Appendix to the Draft Plan that should be the definitive list of allocated sites but, when compared to the other sources, it is wrong, in two respects, namely;
- i) it omits to list site 350; and
 - ii) it includes site numbered 472 in the employment allocations, whereas it appears that it should be site 473.
- 2.12 These discrepancies should be corrected for in the final plan.

Lack of objectivity

- 2.13 The colour coding system has the appearance of objectivity but nowhere is any weighting applied to any of the factors. It is apparent that subjective judgement has been used at later stages of the site assessment process to override the apparent results from Stages 3 of the process.
- 2.14 For instance, site 210 has been scored red in no less than 11 out of the 26 categories, yet has still at later stages been deemed suitable to be allocated to one of the SUEs.
- 2.15 It might also be thought essential that any site allocations should give preference to the efficient use of land. Yet only 48 out of the 199 sites have been scored green in that "efficient use of land" category, and out of that 48 only 27 have actually been allocated. That fact is returned to in the "Brownfield Land" section below.

Small sites/windfalls

- 2.16 Paragraph 3.4a of the Site Assessment Technical Paper states that *"site submissions below 0.25 ha or capable of accommodating only 5 or fewer dwellings are unlikely to be considered for inclusion in the local plan, unless there is potential for allocation as part of a larger site. Such small sites can still be considered through the planning application process as 'windfall development' "*.
- 2.17 The extent of such sites should be openly stated, to give some measure of possible windfall sites. For instance, the Brownfield Register indicates that there are 15 such sites on that Register, totalling 1.98 hectares, with housing yield estimated at 110 dwellings.

⁴ At www.telfordandwrekinlocalplan.co.uk/info/16/proposed-site-allocations

3. Housing and Employment land

3.1 The very high housing requirement of 20,200 houses is set out in more detail at page 29 in Policy Strategic S4 Housing delivery strategy.

Table 4 Housing supply and requirement

Type	Number of dwellings (net)	Comments
Overall housing target 2020-2040	20,200	1,010 dwellings per year for 2020-2040
Existing housing supply ⁽⁹⁾	11,378	Commitments (sites with permission not expired), sites with resolution to grant planning approval and remaining Local Plan housing allocations
Net supply from new allocations	8,822	New housing allocations to meet the requirement
Net new dwellings per annum from new allocations	441	

3.2 The 20,200 figure comes from the Housing Requirement Technical Paper (H RTP), as summarised on its page 7:

Housing Requirement Component	Annual Net Dwellings	Total Net Dwellings (2020-2040)
Dwelling-led LHN (step 1)	412	8,240
Dwelling-led LHN (step 2 - uplift)	63	1,260
Market signals adjustment	253	5,060
Improved household formation	189	3,780
Non-household population adjustment	13	260
Total housing need³	930	18,600
Contribution towards Black Country's unmet needs ⁴	80	1,600
Total housing requirement	1,010	20,200

3.3 To determine housing need, NPPF paragraph 61 requires the use of the Government Standard Method, based on Office for National Statistics figures (including the controversial affordability uplift). The above table puts that housing need at 9,500 dwellings over the plan period, i.e. only 47% of the stated requirement of 20,200 dwellings.

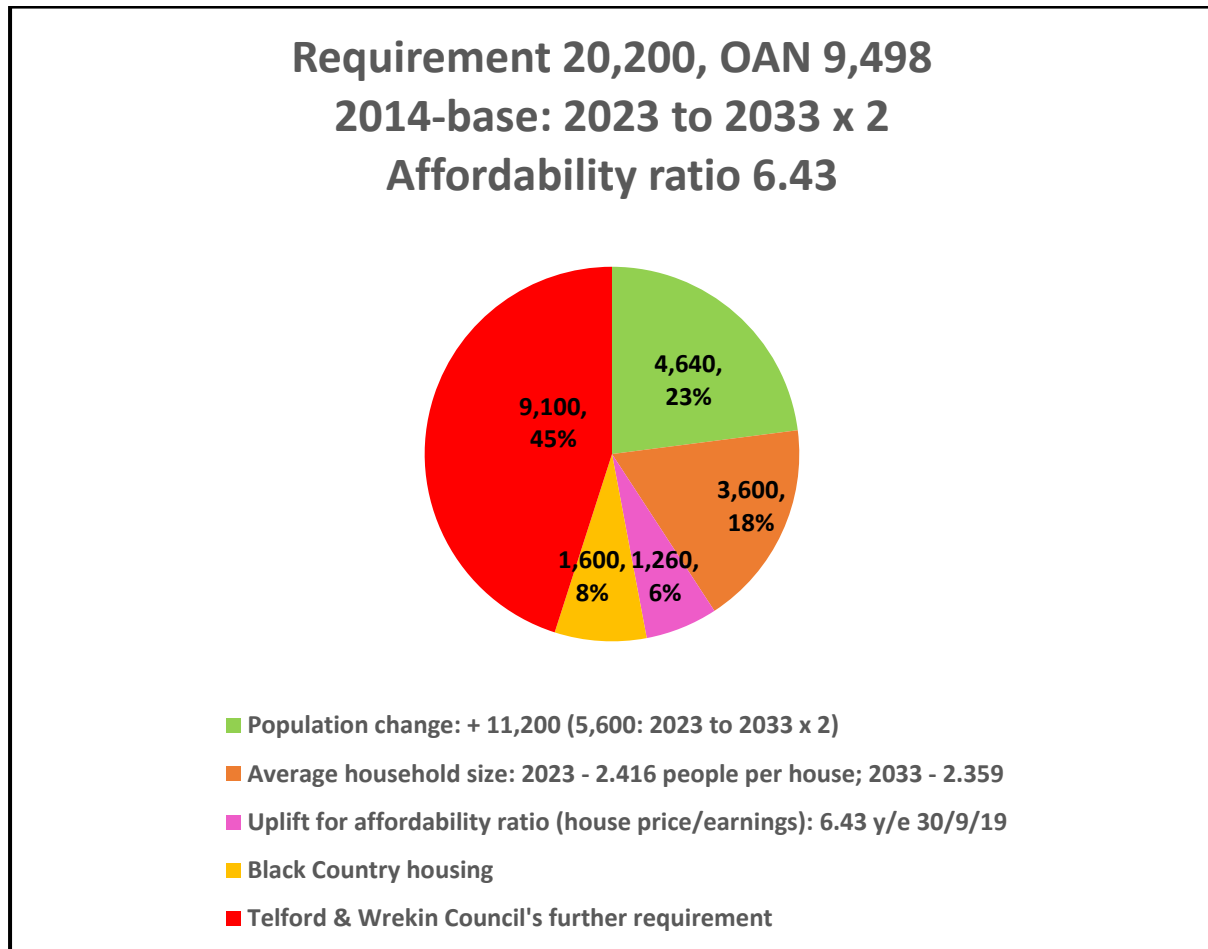
3.4 NPPF 61 goes on to state that the standard method is an advisory starting-point and that there may be exceptional circumstances which justify an alternative approach to assessing

housing need. The HRTP takes full advantage of this rider to inflate the requirement figure to 213% of the standard method figure.

- 3.5 Paragraphs 7.13 to 7.15 of the HRTP purport to explain where each of the above annual net dwellings figures comes from but, frankly, it is not apparent within the HRTP how each of these figures is calculated. That is partly because the HRTP feeds off the previous *Economic and Housing Development Needs Assessment - Part One* (EHDNA), so a reader has to follow a further paper trail to try to see how figures were derived. But it is also because the HRTP can hardly be said to have been written in plain English; it is opaque, repetitious and tortuous. It is the work of a firm in Bedford, and appears to have been prepared and authorised by the same person. It appears to be a form of “playing with numbers”.
- 3.6 The Standard Method figure of 9,500 is easy to replicate, being based on the ONS 2014-based projections, as is still required by the Government. The other figures remain opaque. For instance, nowhere in the HRTP is there any explanation whatsoever of how both the 253dpa and 5,060 overall market signals adjustment has been calculated. Nor can any such calculation be found in the EHDNA. So where is the evidence for how it has been calculated?
- 3.7 Without such clear explanation, the housing requirement figures in the HRTP are fundamentally unsound.
- 3.8 Paragraph 1.13 and note 4 of the HRTP imply that both the 80dpa and 1,600 overall housing figures from the Black Country are simply based on the difference between current population trends projection (SNPP-2018-Rebased 2021 scenario detailed in section 5) (1,010 dpa) and total housing need (930 dpa). This seems a particularly odd way of arriving at the figure for the contribution to the Black Country’s unmet need; normally one would expect that such a contribution would at least have been discussed with the relevant Black Country authorities, and better still agreed with them, but there is no evidence given of any such liaison.
- 3.9 In England as a whole the 2021 Census figures showed slightly lower household numbers than the ONS predictions. In the Shropshire Council area they were indeed lower, but for Telford & Wrekin they were much higher (at 76,500 compared to the highest of 72,881 in 2021 with 2018-based figures). Telford & Wrekin is definitely an outlier in this respect as far as the 2021 Census figures are concerned. Paragraph 5.22 of the HRTP suggests this may be “*a function of high recent rates of housing delivery*”. In other words, the previously high housing targets have resulted in more houses and more people than predicted. So why compound that growth again now?
- 3.10 If this phenomenon is indeed “*a function of high recent rates of housing delivery*” it would be instructive to know where the people in all these new houses have come from. Is it from the Black Country/Birmingham?
- 3.11 Table 2.1 on page 7 of the Annual Monitoring Report 2022 (AMR) shows that, in the 11 years from 2011/12 to 2021/22 there were a total of 11,339 completions, which is an average of 1,031 per year. This compares with a requirement of only 864 dwellings per year in the current Local Plan. The AMR is silent on whether these extra dwellings are lived in by

people from within the Borough, or by people who have moved into the Borough from elsewhere.

3.12 The Standard Method (SM) incorporated into the H RTP figures assumes that the population of Telford & Wrekin is projected to increase by only 11,200 in the plan period. We have summarised these SM need figures, and the overall housing requirement of 20,200, in the following chart:



3.13 This chart clearly demonstrates the scale of the excess requirement over and above the Standard Method figure.

3.14 It is clearly preposterous that Telford & Wrekin should be contemplating providing 20,200 houses for an extra population of only 11,200. Looked at this way, the stated objective on page 15 of the draft plan that delivery of these 20,200 houses is to “*meet the housing needs of the borough*” can surely not be true. The requirement of 20,200 must also be meeting the needs of other Local Authorities.

3.15 It should therefore be openly stated within the Draft Plan how much of the difference between the Standard Method housing requirement (9,500 overall or 475 dpa) and the figure of 20,200 is really down to Black Country/Birmingham pressure.

3.16 In order to gain further insight into the housing and employment land figures, we commissioned a report from the consultant Gerald Kells, which is included in full here as Appendix 1. Points arising from his conclusions are:

For Housing

- i) The large-scale increase in housing above the SM calculation can only be justified if one assumes very large scale in-migration into Telford from surrounding areas, notably the Black Country.
- ii) The CENSUS confirms that Telford population is higher than projected but this most likely reflects the current over-supply of housing and a reliance on in-migration. It is counter-balanced by population and housing shortfalls elsewhere in the region.
- iii) Telford also cries in aid the ONS2018 figures, but other authorities continue to rely on the ONS2014 figures, leading to a risk of double-counting, which is supported by Telford's migration assumptions.
- iv) Moreover, the Telford housing supply-side figures suggest there is a potential for significant over-supply, even above the high requirement for Telford.
- v) This has also to be seen in the light of the over-supply in neighbouring Shropshire (particularly the M54 corridor) which would be exacerbated if, under pressure, they identified the land at Jn3 of the M54 for development.
- vi) There is a strong case for arguing that the ONS2016 figures represent a reasonable need for Telford but that any additional housing should be specifically identified to meet need arising in other local authority areas.
- vii) Bearing in mind the above, some sites should be specifically identified as meeting need elsewhere.
- viii) The H RTP specifically shows figures of 80dpa or 1,600 overall as meeting Black Country needs (albeit by way of a balancing figure). However, neither these specific figures, nor any contribution to Black Country need, appears to be mentioned in the Draft Plan itself. Shropshire Council has got itself into all sorts of trouble over the issue of dealing with Black Country need, so it behoves Telford & Wrekin Council to deal with the matter much more openly.
- ix) The lack of any windfall inclusion in the plan figures or policies is a significant omission. The quantification of the small sites that have been excluded during the site assessment/allocation process may give a measure of likely windfalls.
- x) Most fundamentally one has to ask if in-migration to Telford is desirable, and also if it is more desirable than elsewhere, in particular rural parts of Shropshire and/or the M54 corridor.

For Employment Land

- xi) The employment evidence seems bullish, based on aspirational LEP targets, with the completions data skewed by the large one-off MOD Donnington site.

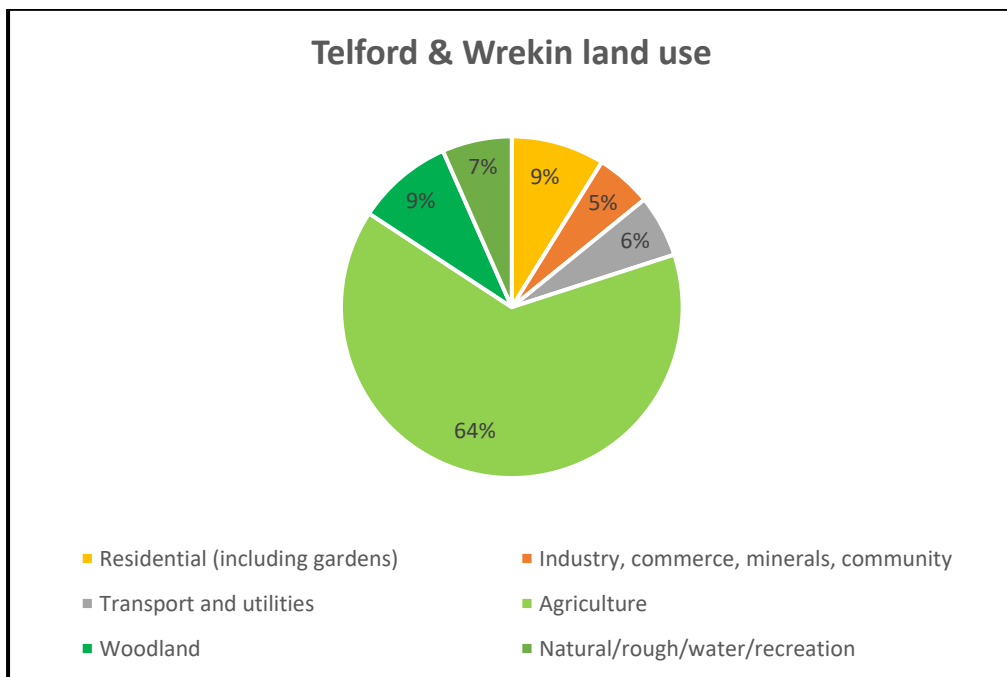
- xii) There is a case for a lower requirement, and any regionally significant site to be considered as part of a wider study. There is also a case for a proportion of the employment land being identified as meeting adjacent needs.

3.17 **Conclusion: Overall, the view of CPRE Shropshire is that the level of housing and employment need is not justified and that there is large scope for reducing the amount of countryside lost, particularly to housing. There is, furthermore, considerable additional over-supply above what is acknowledged in the plan, particularly from housing windfalls. Finally, the amount of housing identified to meet Black Country needs is only a fraction of the housing which is being double-counted with the Black Country.**

4. Best and Most Versatile Land (BMV land)

4.1 The first of the Borough’s stated six strategic priorities is Protecting Green Space. That chimes well with CPRE’s aim of standing up for the countryside. It is increasingly recognised that green space has considerable benefits for climate change and for health and wellbeing, as is acknowledged within the objectives on page 14 of the Draft Plan.

4.2 Telford & Wrekin’s land use can be summarised as in the chart below⁵:



4.3 This shows that a large part of the Borough consists of agricultural land. Agricultural land is a finite resource, which as well as its primary function of food production is also the largest land use resource for providing those vital climate change and health benefits.

4.4 The national CPRE report 'Building on our food security' (22 July 2022)⁶ states that:
“Our research reveals that almost 14,500 hectares of the country’s best agricultural land,

⁵ Based on Land Use Statistics England 2018

⁶ www.cpre.org.uk/resources/building-on-our-food-security

which could grow at least 250,000 tonnes of vegetables a year based on typical yields, has been permanently lost to development since 2010. This means that:

- *Two million fewer people can be fed their five a day from vegetables home-grown in England as prime farmland is lost to development.*
- *Food security concerns increase, with 60% of England's finest agricultural land at the highest risk of flooding from climate change.*
- *Nearly 300,000 homes have been built on prime farmland, with an extra 1,400 hectares used for renewable energy projects – despite more than enough previously developed brownfield land waiting for regeneration.”*

4.5 This further reinforces the fact that BMV land is a finite resource which is vital for food production, which thereby provides food security in uncertain times, and which should therefore be protected. To that extent, the Draft Plan should at least take pains to make sure that BMV land is indeed given protection.

4.6 This is not the case, however. The only mention within the Draft Plan of protecting BMV land is in the context of minerals, at 1.d. of Policy ML3, on page 164.

4.7 The value of BMV land is however recognised in some supporting documents, for instance:

- i) Paragraph 5.3.1. of the IIA Scoping Report September 2020 states: *Local soil resources are valuable to ensure a supply of nutritious food.*
- ii) Paragraph 5.4.2. states: *The subdivision of Grade 3 into 3a and 3b has not been undertaken on a national scale, including within much of Telford. In line with the precautionary principle, Grade 3 land is therefore presumed to be best and most versatile unless evidence can be provided to demonstrate it is 3b, not 3a.*
- iii) Paragraph 2.6.1 of the IIA states: *There is clear direction from national, regional and adopted local policy that significant new growth should be directed to areas of poorer quality land and away from areas of best and most versatile agricultural land.*
- iv) IIA objective at paragraph 2.6.2 of the IIA states: *Promote the effective use of land and soil, ensuring that the best and most versatile agricultural land resources are protected and used effectively, whilst also preserving minerals resources.*

4.8 However, despite the clear policy direction in iii) and iv) above, the proposed Site Allocations in this Draft Plan would clearly mean the loss of a significant amount of BMV land. We have quantified this effect in Appendix 2, which is based on the lists of Proposed Site allocations, divided into the four categories of Rural, Newport, Proposed Sustainable Urban Extensions, and Telford⁷.

⁷ As at www.telfordandwrekinlocalplan.co.uk/info/16/proposed-site-allocations

- 4.9 To this has been added (1) the area of each allocation, and the resulting totals, which are not overtly shown within the Draft Plan itself; and (2) the Agricultural Land Classification of each site, derived from the Agricultural Land Classification map⁸.
- 4.10 This shows that of the total allocations of 835.47 hectares, 33% (276.12 hectares) is Grade 2 land and 57% (477.2 hectares) is Grade 3 land. The remaining 82.15 hectares is brownfield or non-agricultural land. In total, therefore, 90% of the site allocations are potentially on BMV land.
- 4.11 Paragraph 5.4.3 (and 6.2.3 similarly) of the IIA states: *All of the sites involved for each option contain agricultural land to some extent, with much of this being best and most versatile. Therefore, whichever combination of sites is involved, moderate negative effects are predicted.*
- 4.12 On the basis of the policy direction and the fact that 90% of site allocations are potentially on BMV land we object that not enough protection has been afforded to BMV land in making the site allocations.

5. Brownfield Land

- 5.1 Paragraph 123 of the new NPPF states that: *Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.* This makes it clearer than the previous paragraph 123 that brownfield land should be prioritised. Paragraphs 124 and 125 of the new NPPF further reinforce this policy direction.
- 5.2 This is reflected in the Draft Plan at paragraph 3.38 in the Development strategy and strategic policies section when it states: *The council will take a proactive approach to ensuring the delivery of its housing supply and new permissions. This will include maximising brownfield land opportunities.*
- 5.3 On the Telford & Wrekin Local Plan Review webpage⁹ it states: *Telford & Wrekin Council are going to build new homes and places for employment that will try to use brownfield sites first.*
- 5.4 The clear intention is that brownfield sites should be prioritised and maximised. However, the actual proposed allocations have not borne this out in practice.
- 5.5 Telford & Wrekin's Brownfield Register¹⁰ lists a range of brownfield sites totalling 136.342 hectares, with an estimated housing yield of 3,114 dwellings, although the notes to each site indicate that the housing yield has not been updated in some cases. Of this total, 105.181 hectares is now 'permissioned' and 31.161 hectares 'not permissioned'.

⁸ Provided at www.telfordandwrekinlocalplan.co.uk/download/downloads/id/27/telford-and-wrekin---landscape-character-assessment.pdf

⁹ At www.telfordandwrekinlocalplan.co.uk/info/7/spatial-strategy

¹⁰ Accessible via www.telford.gov.uk/info/20456/local_registers/3270/brownfield_register

- 5.6 In contrast, as shown at the foot of Appendix 2, the total brownfield area included in the Proposed Site Allocations is only 23.9 hectares.
- 5.7 Also, as referred to at paragraph 2.15 above, out of the 48 sites scored green for “efficient use of land” in the Site Assessment process (which equated to brownfield sites), only 27 have actually been allocated.
- 5.8 We therefore object that not enough brownfield land has been included in the site allocations.
- 5.9 We also point out that it is extremely difficult to trace allocated sites, or other sites assessed in the IIA process, to the Council’s Brownfield Register, which casts doubt on the accuracy of that Register.

6. Rooftop solar

- 6.1 Proposed Policy CC1 states that all new buildings should “*incorporate or be designed to enable the installation of low/zero carbon technologies in the future*”. The council declared a 'climate emergency' in 2019, yet this policy reads as though the council has no present commitment to ensure any homes are constructed with low carbon technologies, e.g. solar, now rather than in the future. We therefore object to this policy wording, which should be amended to require all new buildings to incorporate low/zero carbon technology at the construction phase.
- 6.2 Proposed Policy CC2 requires only major development¹¹ to incorporate renewable energy production and storage on site. On the same principle as above, this policy wording should be amended to include all developments; smaller developments could comply with the requirement by, for instance, installing roof-mounted solar panels.
- 6.3 The draft plan promises a further 8,822 new homes in the Borough yet includes no meaningful targets for rooftop solar on this great opportunity. Targets should be incorporated as to how many new homes will be built with rooftop solar and how this will be achieved.
- 6.4 Similarly, there should be targets and incentives to increase rooftop solar on commercial roofspace, including a requirement for its installation on all new such roofspace. At present the plan seems to be silent on the matter.
- 6.5 Paragraph 160.b) of the NPPF states that: *plans should consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development.*
- 6.6 The draft plan includes no such identified areas, although Telford & Wrekin Council requested submission of land that could potentially be allocated for renewable energy

¹¹ Defined, for housing, as development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more; and for non-residential development as additional floorspace of 1,000m² or more, or a site of 1 hectare or more

schemes¹². Without such identified areas, the move towards industrial solar farms will continue to be a free-for-all, with inappropriate and controversial sites being approved, be they in protected landscapes or on BMV land. The Council itself recognised this in the case of the New Works and Steeraway solar farms, where it failed to be able to pursue its objections to the grants of permission at appeal, through legal technicalities over timings of serving papers.

- 6.7 National CPRE are pushing a rooftop first approach with its national rooftop renewables campaign¹³. This mirrors the research of the UK Warehouse Association¹⁴. This sensible approach to solar should be adopted within the Draft Plan.

7. Infrastructure

- 7.1 The strategic priority, at paragraph 2.7 of the Draft Plan, of *Maximising inward investment and employment opportunities*, and the bullish housing targets, will inevitably place pressure on existing infrastructure.
- 7.2 There is already strain on drainage, on road capacity, on schools, on transport and on medical facilities. A development on the edge of Eyton Moors is reported to be using, for surface water drainage, a canal that floods regularly.
- 7.3 Any development will overburden this infrastructure further. It would be more prudent to “optimise” investment and housing targets instead of “maximising” them.

¹² Site Assessment Technical Paper, paragraph 2.11

¹³ www.cpre.org.uk/news/rooftops-can-provide-over-half-our-solar-energy-targets-report-shows

¹⁴ www.ukwa.org.uk/wp-content/uploads/2022/09/Investment-Case-for-Rooftop-Solar-Power-in-Warehousing-August-2022.pdf

Appendix 1 – Housing and Employment Need and Supply

Telford Plan (Regulation 18)

Housing and Employment Need and Supply (Draft)

Report to CPRE Shropshire by *Gerald Kells*

January 2024

1. Introduction

1.1 My name is Gerald Kells. I work as an Independent Policy and Campaigns advisor, having been the West Midlands Policy Officer for CPRE up to 2012. I have since advised both organisations and local residents on housing, transport and employment issues, and in particular presented evidence at a number of Local Plan Inquiries, including Shropshire.

1.2 I was asked by CPRE Shropshire to review the housing and employment need and supply underpinning the Regulation 18 Telford Plan.

1.3 I have considered the Plan itself as well as Part One of the Economic and Housing Development Needs Assessment (EHDNA Oct 2020) which considers employment needs. Part two relates to housing need but appears to have been superseded by the Housing Requirement Technical Paper (H RTP October 2023) and the Strategic Housing and Employment Land Availability Assessment (SHELAA October 2023).

1.4 One particular aspect of the Plan is a housing requirement far in excess of the Standard Methodology. This is justified by reference both to employment needs and to the very much higher 2018 housing projections from the Office for National Statistics (ONS2018), as well as the 2021 CENSUS results for Telford.

1.5 A key concern I have is that, even if that increase were justified, much of it would offset housing needs from other areas of the Midlands, notably the Black Country, for which the Telford Plan is currently only proposing to making a small contribution of 1,600 homes.

1.6 Including so much more in the requirement, rather than as a separate contribution to meet neighbouring authorities' needs, risks serious double counting.

1.7 CPRE Shropshire will be aware from the debate currently on-going at the Shropshire Plan Examination that, an uplift in housing numbers to meet 'additional' needs within a local authority is likely to include housing which relies on in-migration from neighbouring areas. But even so, the Inspectorate may

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conclude that this is only the ‘local requirement’ and seek further allocations to meet the needs elsewhere.

1.8 In other words, even though Telford’s higher requirement is essentially based on in-migration it may only count marginally towards shortfalls in other districts, (such as those in the Black Country, notably Sandwell¹⁵).

1.9 The new NPPF (Para 61) has changed the Duty to Cooperate requirement and now says:

In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

1.10 This suggests the underlying problem identified above will persist since the ‘local housing need figure’ will be assumed not to include housing from neighbouring areas, even when, as in this case it clearly does.

1.11 The HRTP in Para 4.21 asserts that:

The continuation of any given trends in population and formation for Telford & Wrekin as a standalone local planning authority may - when considered alongside elements relevant to establishing full objectively assessed housing needs as an alternative to the standard method - be relevant to identifying the scope to contribute towards part of the unmet needs of neighbouring authorities. This does not, however, reflect the extent of unmet needs declared by neighbouring authorities or the strength of their relationship with Telford & Wrekin.

1.12 However, this will only be possible if the local housing need does not mask those relationships.

1.13 I also note that that EHDNA is now out of date and some of its evidence, for example, relating to COVID and BREXIT, may now be better understood. However, its economic analysis plays a key role in both the employment land assumptions and also the justification for that very significant uplift in the housing requirement beyond the Standard Methodology.

1.14 I do also have questions as to the scale of employment land need, relying as it does on the highly ambitious LEP strategy. It is certainly necessary to consider its assumptions as well as looking at housing need.

1.15 A further issue is that some of the housing supply data is difficult to interpret. With that in mind, it appears to me that the plan takes no account of windfall supply in its calculations (although this would need to be confirmed). There also appears to be considerable over-supply. This includes a reliance on slower delivery of housing, particularly on Urban Extensions, than might be considered desirable.

¹⁵ See my December 2023 reports for WM CPRE on the Dudley and Sandwell Plans.

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2. Housing and Employment Need

2.1 Standard Methodology

2.1.1 The calculation of housing need using the Standard Methodology for Telford is set out below.

Table 1: Need Calculations for Telford/ONS Figures (2022 affordability)

Telford Need 2022-2041 (including 2022 affordability uplift)	Annual rate (2021 affordability in brackets)	Demographic Increase	Plan Period (19 Years)
SM ONS 2018	909 (930)	790	17,271
SM ONS 2016	580 (597)	503	11,020
SM ONS 2014	475 (492)	412	9,025

2.1.2 The SM result, based on the ONS2014 figures, would be 475 dwellings per annum (9,025 over the Plan Period).

2.1.3 This would rise using the ONS2016 figures, although looking more widely the ONS2016 figures reduce housing need across both the Black Country, and the wider West Midlands, because the ONS2016 figures make arguably more realistic assumptions about future household growth.

2.1.4 The most recent ONS household projections for the UK (2018) show the population reaches 72.4 million by mid-2043, an even slower growth rate than in the 2016-based projections, that is to say a reduction of 0.9 million in mid-2043. However, those projections also substantially alter the distribution of houses.

2.1.5 A key reason for that is changes in the underlying NHS registration data which means the 2018 figures rely on only two-year trends.

2.1.6 Telford's need rises more dramatically in the ONS2018 figures, in line with that redistribution of housing from the ONS2016 calculations.

2.1.7 Since then, the interim 2021 CENSUS results have been published and Table 2 compares the baseline CENSUS results with the three ONS projections.

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Table 2: Comparison of CENSUS and ONS Projections for Telford

Population				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	185,600	174,800	179,100	183,627
Difference to Census		-10,800	-6,500	-1,973
Household				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	76,500	72,014	71,255	72,881
Difference to Census		-4,396	-5,245	-3,619
Household Size				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	2.43	2.43	2.51	2.52
Difference to Census		0	0.08	0.08

2.1.8 Pending new ONS figures (expected in 2024), the 2021 CENSUS could be argued to support the use of the ONS2018 figure for Telford as its population and household figures exceed all the existing ONS figures but are closest to the ONS2018 figures. However, it is worth noting that the household size in Telford corresponds best to the ONS2014 figures.

2.1.9 It is also worth noting that across the West Midlands the best household match with the CENSUS is the ONS2016 figures.

2.1.10 A good reason for suggesting the higher CENSUS figures in Telford reflect migration into the Borough is to consider the housing target in the existing Telford Local Plan.

2.1.11 That target is set at 864 dpa (17,280 from 2011-2031). Peter Brett Associates (PBA) undertook the Housing Needs work at the time¹⁶ and their report suggested an annual need of 483-497 dpa (para 3.25) and then considered a scenario of 750 dpa. The higher figure was predicated on a deliberate attempt to boost the population of Telford to support economic growth and specifically to reach Telford’s planned size of 225,000 population, as opposed to 167,000 at the 2011 CENSUS.

2.1.12 The 864 dwellings per annum in the Plan clearly exceeds even PBA’s suggestion. It has also been exceeded in delivery terms, especially since 2015 (perhaps when the impact of the 2008 financial crash began to wear off). As a result, by 2021, the Council had delivered 1,244 more houses than the Plan

¹⁶ Telford & Wrekin Objectively Assessed Housing Need Final Report, Peter Brett Associates, March 2015

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required (according to the 2022 Housing Land Supply Statement in Table 1.1). That is even allowing for a dip in 2020-2021, possibly reflecting the impact of the Coronavirus pandemic.

2.1.13 I have not considered in detail all the evidence supporting the previous plan, but taking the Peter Brett figure as a proxy for a demographic base, would suggest a planned over-supply of some 360 dpa, or 3,600 up to 2021, and 4,800 when one includes the additional actual supply. This would be consistent with the difference in the CENSUS.

2.1.14 I have used a simplistic calculation but it does illustrate how the deliberate over supply of housing in Telford is likely to have contributed to its comparative high growth and why projecting that forward is likely to exacerbate the trend. If that is a policy decision then it should be reflected in the housing which is considered to meet needs outside the Borough.

2.2 Housing Requirement Technical Paper

2.2.1 The Housing Requirement Technical Paper (H RTP) starts from the figures given in the previous EHDNA and supports the EHDNA's view that Telford should be considered a single and separate Housing Market Area.

2.2.2. Table 1 shows the outputs from 2020.

Table 1. Summary of Part 1 EHDNA Consultation Options

Scenario (2014-Return)	Dwelling Change (Annual)
	2020-2040
Employment-led Experian Growth	848
SNPP-2018	964
Dwelling-Led 1150dpa	1,150

Source: *Telford & Wrekin Part 1 EHDNA (2020) (DLP for T&W Council)*

2.2.3 Their SNPP2018 figure is out of date as it would be 909 using the current SM calculation. The higher dwelling-led figure relies on the same basic ONS2018 figures but returns the household size (measured by headship rates) to the 2014 figure.

2.2.4 The employment-led Experian growth rate is also the most buoyant of the employment calculations (as I consider later.)

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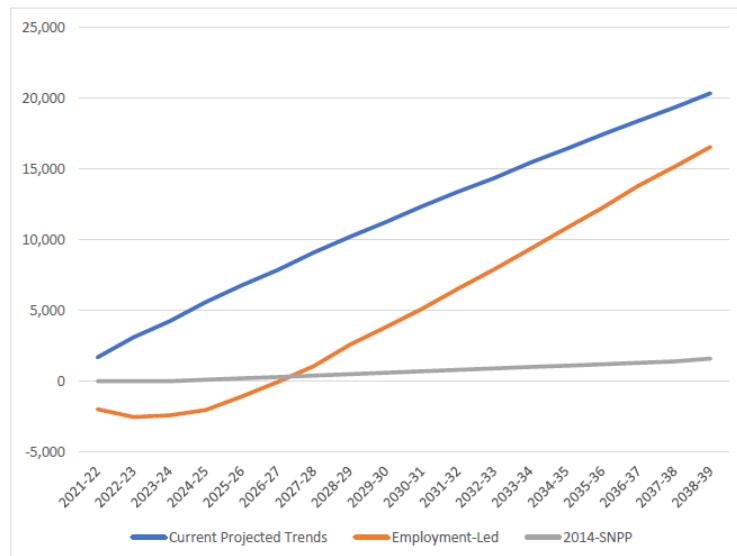
2.2.5 The Technical Paper seeks to ‘rebase’ the figures based on the CENSUS and this leads to an increase to 1,010 dpa (including a small adjustment for non-household-based housing need).

Table 4. Summary of SNPP-2018 Current Trends Projection Scenarios

Scenario	Equivalent Dwelling Change (Annual)			
	2020-2040		2021-2040	
	Household Population	Non-Household Adjustment (+13)	Household Population	Non-Household Adjustment (+13)
SNPP-2018	964	977	953	966
SNPP-2018-Rebased2021	1,063	1,076	997	1,010

2.2.6 More details are set out in Table 6 of the H RTP. What is striking is the key role migration into the county plays in this scenario. Of the 26,427 population increase, 21,299 (81%) comes from net-migration, 5,128 from other sources as shown in Figure 4.

Figure 4. Total Net Migration – Projected Demographic Trends and Market Signals



2.2.7 In other words, this is a scenario which heavily relies on migration into the district (presumably facilitated by additional housing provision). Even their SM2014 approach would assume migration of between 7,467 and 10,165 in the same time-period.

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2.2.8 This adds weight to my concern that such a high adjustment in the SM result in Telford should be counteracted by lower housing need in adjacent authorities. However, as it stands, many of those are relying on the higher ONS2014 figures.

Table 6. Outputs of Updated EHDNA Scenarios

Scenario	Change 2021 - 2040			Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP-2018-Rebased2021 (HH-14 RR)	26,427	14.2%	18,366	24.0%	1,121	997
SNPP-2018-Rebased2021 (HH-14 R)	26,427	14.2%	14,880	19.5%	1,121	808
Experian-led Employment Growth (HH-14-R) ('Market Signals')	23,068	12.4%	11,833	15.5%	958	642
+12,420 Population Growth Dwelling-Equivalent (HH-14-RR) (inclusive of LHN Step 2 Affordability Adjustment and Population Growth)	12,420	6.7%	11,654	15.2%	513	633
Dwelling-led LHN (HH-14-R) (LHN Step 2 comprising additional population growth)	12,418	6.7%	8,748	11.4%	535	475
Dwelling-led LHN (HH-14-RR) (LHN Step 2 comprising improved household formation)	4,732	2.5%	8,748	11.4%	179	475
Dwelling-led LHN no uplift (HH-14-R) (LHN Step1)	9,345	5.0%	7,588	9.9%	393	412

Figure 3. Updated EHDNA Scenarios - Total Population

2.2.9 The HRTP goes on to consider the council's alternative approach to housing need which it calculates as amounting to 930 dpa, and compares this with its own total of 1,010. The 80 dpa difference, it considers, could be accounted for as housing to meet Black Country need, that is to say 1,600 dwellings over the plan period.

2.2.10 However, as was shown from the net-migration trends in Figure 4, this is only a small fraction of the anticipated in-migration to the authority suggesting this is a somewhat arbitrary approach.

2.2.11 The components of the Housing requirement are set out in the Table on Page 7 of the HRTP. This shows, not only the reliance on an uplift in household formation (a return to the 2014 household formation assumptions), but also a massive 'market signals' adjustment. Since this cannot come from existing residents it must rely on in-migration from other authorities far in excess of the 1,600 contribution to the Black Country.

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Housing Requirement Component	Annual Net Dwellings	Total Net Dwellings (2020-2040)
Dwelling-led LHN (step 1)	412	8,240
Dwelling-led LHN (step 2 - uplift)	63	1,260
Market signals adjustment	253	5,060
Improved household formation	189	3,780
Non-household population adjustment	13	260
Total housing need³	930	18,600
Contribution towards Black Country's unmet needs ⁴	80	1,600
Total housing requirement	1,010	20,200

2.3 Employment Assumptions (EHDNA)

2.3.1 The EHDNA is now somewhat dated, having been completed in October 2020 during the pandemic. A more-up-to-date assessment, including a review of the outputs from the modelling work, should probably be undertaken before the next stage of the plan to confirm the evidence is still robust.

2.3.2 The EHDNA first seeks to identify the Functional Economic Market Area (FEMA) for Telford and concludes, based on the level of self-containment, that Telford can be considered a separate FEMA. The evidence, however, is mixed because Travel to Work (TTW) evidence suggest strong linkages with parts of Shropshire and there is a clear link to the M54 corridor, as well as TTW evidence from the Black Country which would suggest a significant relationship with Telford.

2.3.3 The EHDNA then considers completions data and other background data from which it projects forward to get an estimate of future employment needs, as set out in Table 22. One particular element of note is the very large one-off development at MOD Donnington, which increases the need dramatically if included.

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Table 22. Employment Land Needs Based on Past Completions Trends, 2020-40

MOD Donnington Assumption	Open Storage Assumption	B1a/b	B1c/B2	B8	Total
Excluded	No	19.1	81.3	24.8	125.2
Excluded	Included	19.1	81.3	35.5	135.9
Included	No	20.9	81.3	75.6	177.8
Included	Included	20.9	81.3	86.3	188.5

2.3.4 The report goes on to examine three different models for future economic growth, Cambridge, Oxford Econometrics (OE) and Experian.

2.3.5 It is worth noting the different demographic assumptions behind these models (Paras 7.5-7.23) which may explain their very different outputs.

2.3.6 Cambridge Econometrics (CE) is an unrestrained model which assumes labour supply will meet demand and does not restrict it demographically. OE bases its assumptions on the ONS2016 figures, which are, as we noted above, considerably lower for Telford than the ONS2018 figures.

2.3.7 Experian relies on the ONS2014 figures, and so one might expect it to result in lower projections of employment. However, it is to be noted that it uses regionally based figures and the ONS2014 regional figure is higher (some 44,000 higher across all West Midlands authorities in 2021 between ONS2014 and ONS2018).

2.3.8 The result is that CE shows a job growth for the period 2020-40 of 12,130 jobs, Experian shows a growth of 13,900 jobs, and OE shows a net loss of 770 jobs over this period. While CE and Experian are broadly similar overall the demographic basis is different, but it is probably fair to say that both rely on more unrestrained growth and on either in-migration or commuting.

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Table 24. Jobs Growth by Broad Sector, 2020-40

	CE	Experian	OE
Agriculture, Forestry & Fishing	-20	-500	-70
Extraction & Mining	-40	0	-40
Manufacturing	-700	-1,300	-5,000
Utilities	-30	100	-200
Construction	400	500	200
Wholesale & Retail	20	1,700	-500
Transport & storage	800	1,300	-60
Accommodation, Food Services & Recreation	2,700	800	300
Information & communication	1,800	1,200	500
Financial, Professional & Business Services	3,600	6,000	3,700
Public Services	3,600	4,100	400
Total	12,130	13,900	-770

2.3.9 Moreover, it can be seen in Table 24 that the Experian and CE projections have very different sectoral profiles. Para 7.41 suggests this is explained by different assumptions on a post-COVID boost.

2.3.10 The EHDNA goes on to examine potential growth sectors based on the Marches Local Economic Partnership's (LEP's) Local Investment Strategy. Para 7.91 suggests this approach is in line with the PPG. However, there has been criticism in the past of reliance in Plan Making on LEP aspirations which are, just that, aspirations and tend, understandably, to set high goals.

2.3.11 The result for Telford is shown in Table 34, and includes growth forecast beyond any of the projections. It relies on an additional 3,200 jobs above the highest figures given by the three projections, and so would require even greater commuting or in-migration and could impact further on the work force in neighbouring areas.

Table 34. Comparison of Forecasts for Telford & Wrekin

	Jobs Growth 2020-40	Annual Growth Rate 2020-40
CE	12,063	0.61%
OE	-923	-0.05%
Experian	13,900	0.70%
Growth Forecast	17,100	0.80%

2.3.12 When one looks further on at Table 36 one sees these totals broken down by sector. It is clear that the Telford growth strategy most clearly matches the

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Experian output with lower growth in accommodation and much higher growth in financial services.

2.3.13 What is also noticeable is the assumption of growth in manufacturing where the LEP is aiming in its LIS for growth which exceeds the most optimistic projection by 2,200 (with all the three projections showing a decrease). Given the risks relating to BREXIT (and perhaps to a lesser extent to COVID) the LIS growth for manufacturing seems highly aspirational.

Table 36. Sectoral Brexit Risk Rating, Telford & Wrekin

Sector	Total Jobs 2020	Forecast Jobs Growth 2020-40				Brexit Risk
		CE	OE	Experian	Growth	
Agriculture and mining	800	-200	-200	-500	0	Med
Manufacturing	14,200	-700	-5,000	-1,100	1,500	Med
Electricity, gas & water	1,200	0	-200	100	100	Low
Construction	5,200	400	300	400	400	Med
Wholesale and retail trade	15,300	0	-500	1,700	1,700	High
Transport & storage	4,300	700	0	1,300	1,300	High
Accommodation & food services	2,900	2,700	300	700	700	High
Information & communications	3,900	1,800	500	1,100	1,100	Med
Financial & business services	19,700	3,600	3,400	5,600	5,600	Med
Government services	22,400	3,600	400	4,200	4,200	Low
Other services	3,800	0	300	300	300	Low
Total	93,700	11,900	-700	13,800	16,900	

2.3.14 These job figures are then converted into Net Employment Land Needs.

2.3.15 Two additional requirements for land are then added. The first is for replacement need. This is based on past employment land losses to other uses. The extent of those is set out in Table 54. A notable fact is the very high B2 losses in 2015/16, over 25,000 sq. m, nearly 30% of the ten-year total.

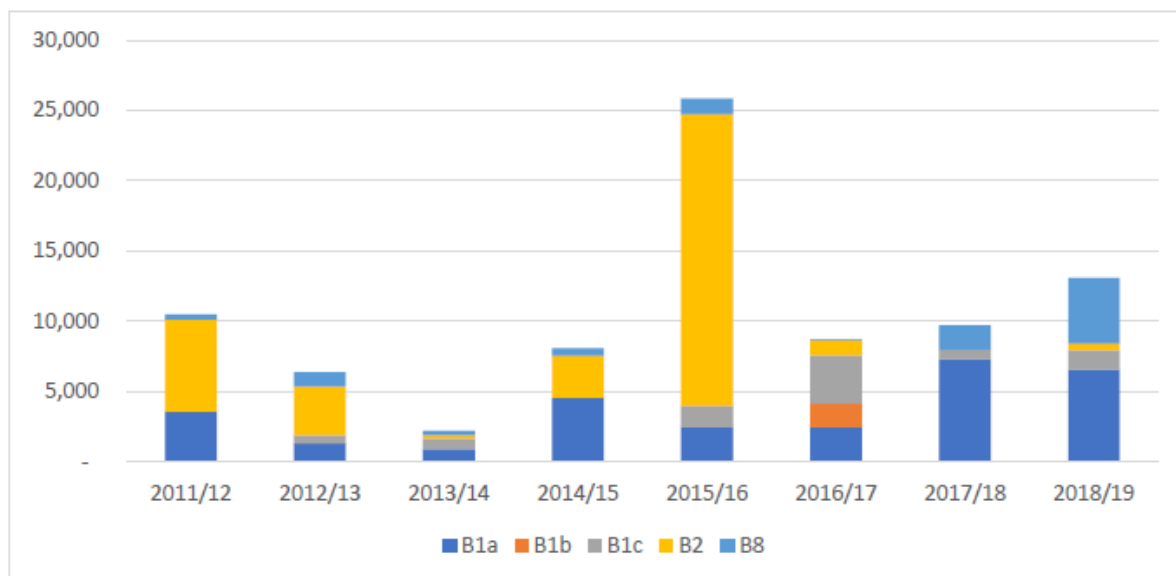
2.3.16 The average is given as 10,561 sq. m per annum, but if that outlier year were excluded, would be closer to 7,000 sq. m (it is impossible to calculate exactly without the figures behind the graph). The replacement demand, set at 52.8 hectares in Table 55, might then be closer to 35 hectares.

2.3.17 The report does not examine whether there are exceptional reasons for this loss although it may relate to changes in legislation.

2.3.18 A further 10.7 hectares is identified in Table 56 for Open Storage. Again, this is based on past completions since it does not relate specifically to employment growth. While this seems justified it is not explained whether the expected sectoral growth justifies a continuation of past trends.

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Figure 54. Employment Floorspace Losses – 2011-19



Source: SPRU analysis of local authority data

2.3.19 Lastly a margin of 5 years completions is added. It should be noted that the 5-year margin is not only the top of the required range, but is also based on completions including MOD Donnington which is acknowledged to be a one-off development.

Table 60. Total Employment Land Needs (ha) – Comparison of Labour Demand Scenarios, 2020-40

Stage	Description	CE	OE	Experian	Growth Scenario
i-iv	Net Growth Needs	29.3	-48.2	46.2	72.8
v	Net to Gross	52.8			
vi	Demand for Open Storage	10.7			
vii	Changing Trends in Working from Home	-14.6	-9.7	-13.2	-14.1
viii	Margin of Flexibility	44.5			
ix	Total Employment Land Needs	122.7	50.1	141.0	166.7

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Table 61. Total Employment Land Needs (ha) – Comparison of Labour Demand Scenarios, 2020-40

	B1a/b	B1c/B2	B8	Total
CE	38.0	38.3	46.4	122.7
OE	24.9	-5.2	30.4	50.1
Experian	32.3	36.4	72.2	140.9
Growth Scenario	32.3	62.2	72.2	166.7

2.3.20 Not surprisingly, given the bullish view of manufacturing, the Growth Scenario includes a large amount more B1c/B2 development and both the Experian projection and the Growth Scenario include much more B8.

Table 64. Total Employment Land Needs (ha) 2020-40 – Comparison of Scenarios

	B1a/b	B1c/B2	B8	Total
Labour Demand – Experian	32.3	36.4	72.2	140.9
Labour Demand – Growth Scenario	32.3	62.2	72.2	166.7
Completions Trend – Excluding MOD Donnington	19.1	81.3	35.5	135.9
Completions Trend – Including MOD Donnington	20.9	81.3	86.3	188.5

2.3.21 The EHDNA goes on to compare these scenarios together (but eliminates the CE and OE projections). The results are set out in Table 64. The EHDNA considers that the completions trend acts as a ‘useful comparison’ and concludes that the employment land provision should be somewhere between 167 and 189 hectares (Para 10.32).

2.3.22 The EHDNA suggests the difference in the Growth scenario and the higher Completions Trend (10.31) can be at least partly explained by the 14 hectares discounted in the Growth Scenario due to a forecast uptake in home working. This does not make immediate sense given the B1a/b completions are much lower than the labour demand trends.

2.3.23 The role of MOD Donnington also raises some questions. Its inclusion is discussed in Paras 6.55 to 6.22. The reason for it is cited as being so as not to:

‘risk restricting the supply of available land such that future opportunities for inward investment or expansion of existing employers might be constrained.’

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2.3.24 However, investment in such a large site for a single use is clearly unusual and may reflect specific circumstances relating to the MOD. Future investment in such a large distribution unit would be of regional significance and would need to be considered in a wider context, notably taking account of the West Midlands Rail Freight Interchange and other proposals across the West and even East Midlands.

2.3.25 Lastly, it is not clear to me that the level of replacement need is justified. If 2015/16 is considered an outlier year for employment land losses, that projection might actually be 15-20 hectares lower.

2.3.26 This would suggest a lower provision for employment land should be adopted and land should only be identified, if needed for a Regionally/Nationally significant site following a wider study of large-scale logistics need.

3. Supply

3.1 Housing Supply

3.1.1 The housing supply evidence is not entirely clear. According to Table 4 there are 11,378 homes currently in the system. These come from commitments (sites with permission not expired), sites with resolution to grant existing housing, planning approval and remaining Local Plan housing allocations.

3.1.2 A further 8,822 homes, it says, will be provided to meet the 20,200 requirement, (although that figure is not exactly broken down anywhere, and appears to be derived to match the 20,200 requirement).

3.1.3 Para 3.37 refers to a windfall supply of 60 dpa, which would amount to a further supply of 1,020 (based on 17 years, discounting the first three years). The plan reads as if this is additional to the 20,200 but that is not explicit.

3.1.4 That windfall figure, I note, is also at odds with the SHELAA which identifies an average small site completion rate of 72 dpa since 2012 which would normally have been the figure adopted in the Plan, giving 1,224 over the Plan Period.

3.1.5 Nor is there any assessment of the potential for larger windfalls (also included in the NPPF definition of windfalls) although this can provide significant new development in many authorities.

3.1.6 In particular, as discussed in Paras 2.3.18-2.3.20 above the Employment Need evidence assumes some 52.8 hectares of Employment Land will be lost over the Plan Period. While this may be an exaggeration, it is also likely that this will be partly due to change of use and usually on sites of more than 10 dwellings. If half that figure were released for housing it would result in a further 26.4 hectares of

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land, at least 792 additional homes at only 30 dph from that source alone. More may, of course, come from retail closures and new mixed use new developments.

3.1.7 The tables in the Plan Appendix include a list of Proposed Housing Sites (3,554), Mixed Use Sites (1,110) and Sustainable Urban Extension (SUE) Sites (7,900). This totals a supply of 12,564. It is not explicit, but I assume these are all new allocations which would create an excess of 3,742.

3.1.8 I suspect the potential high level of over-provision results from low assumptions on delivery rates. Para 5.27 of the SHELAA sets out its assumed delivery rates, which amount to 50 dpa for large sites with some higher where there are multiple outlets.

3.1.9 Assuming the difference between the plan figure and the total supply was entirely accounted for on the larger SUE sites, those three sites would only be assumed to deliver together 53% of their capacity within the plan period. There is, of course, nothing to stop delivery being increased on those sites if it suits the developer.

3.1.10 There is only vague reference to this being the case in Policy HO2 where Part 2 includes the aim that each SUE is to provide 1,000 homes. Using this figure for each SUE reduces the overall new supply to 7,656, giving a shortfall of 1,166 on the Table 4 assumptions for the Plan Period.

3.1.11 There are no detailed policies which explicitly outline the intention for each SUE so it also isn't made clear why the figure of 1,000 homes is applicable.

3.1.12 Taking a modest amount of windfalls into account, along with the over-supply, there is likely to be at least a further 5,758 (3,742 + 1,224 + 792) homes in the supply, depending on how quickly large sites are built out and without taking any account of large windfalls.

3.1.13 The other relevant supply-side issue is density. The plan has no density policy. In reference to Town Centres Para 6.42 says:

Well designed, higher density major mixed use development schemes that include residential development will be supported.

3.1.14 The SHELAA has a table (Table 3) of assumed densities but these are not transferred into a policy. Moreover, the densities in Telford seem lower than many authorities are seeking to achieve in urban areas. Notably central locations often aim for 100 dph. Of course, there may be limiting factors in Telford but these are not made explicit. It is unclear to me if the potential to increase densities has been considered and what impact that might have on supply.

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Table 3: Housing site density assumptions

Site location	Density assumption range
Newport	45 - 55 dwellings per hectare (dph)
Telford less than four hectares	35 - 45 dph
Telford four hectares and above	30 - 40 dph
Central Telford (in and around Telford Town Centre)	45 - 75 dph

3.1.15 It may be that a forensic examination of housing sites in the supply information could confirm some of these issues but the plan and the background information should, in my view, be clearer so that the reader can understand precisely what assumptions have been made, and what elements are included in each calculation.

3.2 Employment Supply

3.2.1 The plan adopts an employment figure of 167 hectares in Policy Strategy S3 split in line with the Growth Scenario Table 3.3. The appendix B gives a list of sites.

3.2.2 According to Para 3.1:

To date the Council has an existing supply of 76.5ha and the Plan allocates land to deliver a minimum of 90.5ha of new employment land.

3.2.3 A list of new sites is given in Table 11 of the Appendix to the Plan which amounts to 91.6 hectares, marginally above the figure in Policy S3.

3.2.4 It is not clear from the Plan, however, how much of the land is suitable for the desired employment split, in particular, how much would meet the 32 hectares for offices and whether some of that could be supplied at new mixed use (some identified around Telford centre) or other town centres redevelopments.

3.2.5 The other obvious fact about the supply table is that most of the sites are relatively small mostly under 12 hectares with only two at 18.8 and 17.5 hectares respectively.

3.2.6 This suggests the Council is not seeking a large regionally significant site (of the MOD Donnington size) which again brings into question the size of the overall

Appendix 1 – Housing and Employment Need and Supply

requirement and whether it is skewed by the inclusion of MOD Donnington in the completions evidence.

4. Conclusion

4.1 Housing

4.1.1 Having considered all the evidence it seems to me that the large-scale increase in housing above the SM calculation can only be justified if one assumes very large scale in-migration into Telford from surrounding areas, notably the Black Country.

4.1.2 The CENSUS confirms that Telford population is higher than projected but this most likely reflects the current over-supply of housing and a reliance on in-migration. It is counter-balanced by population and housing shortfalls elsewhere in the region.

4.1.3 Telford also cries in aid the ONS2018 figures, but other authorities continue to rely on the ONS2014 figures, leading to a risk of double-counting, which is supported by Telford's migration assumptions.

4.1.4 Moreover, the Telford housing supply-side figures suggest there is a potential for significant over-supply, even above the high requirement for Telford.

4.1.5 This has also to be seen in the light of the over-supply in neighbouring Shropshire (particularly the M54 corridor) which would be exacerbated if, under pressure, they identified the land at Jn3 of the M54 for development.

4.1.6 It seems to me there is a strong case for arguing that the ONS2016 figures represent a reasonable need for Telford but that any additional housing (particularly the SUEs identified in the Plan) should be specifically identified to meet need arising in other local authority areas.

4.1.7 In this regard, I note that the plan currently does not include a figure for how much housing is meeting need elsewhere. Even the 1,600 referred to in the H RTP as meeting Black Country needs is not separately identified in the plan.

4.1.8 I also cannot see the justification for the lack of windfall inclusion in the plan figures or policy. A specific density policy with robust justification for density targets should be considered. Further detailed policies for each of the SUEs, including targets for development within the plan period, should also be included.

Appendix 1 – Housing and Employment Need and Supply

4.1.9 Most fundamentally one has to ask if in-migration to Telford is desirable, and also if it is more desirable than elsewhere, in particular rural parts of Shropshire and/or the M54 corridor.

4.2 Employment Land

4.2.1 The employment evidence seems bullish, based on aspirational LEP targets, with the completions data skewed by the large one-off MOD Donnington site.

4.2.2 I think there is a case for a lower requirement, and any regionally significant site to be considered as part of a wider study. It may be that there is a case for a proportion of the employment land being identified as meeting adjacent needs.

Appendix 2 – Proposed Site Allocations and Agricultural Land Classification

Appendix 2 – Proposed Site Allocations and Agricultural Land Classification

Rural

Site	Area (hectares)	Agricultural Land Classification
130 Village Farm, Preston on the Weald Moors	2.6	Grade 2
171 Roden Nurseries	1.6	Grade 2
197 Land west of Rodington	13.4	Grade 2
200 Land adjoining cemetery, Rodington	3.2	Grade 2
202 Land south of Sunningdale, Rodington Heath	5.9	Grade 3
220 Land adjacent Yew Tree Farm, Tibberton	3.1	Grade 2
245 Land adjacent Roden Hall	0.2	Grade 3
274 Land off Church Road, Honnington	3.7	Grade 3
324 Land west of Pipers Lane, Edgmond	4.3	Grade 3
326 Land west of Kilvert Close, Edgmond	5.3	Grade 3
327 Land west of Flatt Pitt Farm, Edgmond	4.0	Grade 3
328 Land adjacent to Shrewsbury Road, Edgmond	6.9	Grade 3
356 site 1 – Land north of Junction 7, M54	3.5	Grade 3
362 site 2i – Land west of Cluddley Lane, Northern side	1.4	Grade 3
364 site 2ii – Land west of Cluddley Lane, Southern side	0.5	Grade 3
411 Land off Hay Street, Tibberton	1.1	Grade 2
450a Land North and West of Allscott Meads	14.4	Grade 3
450b Land North and West of Allscott Meads	3.3	Grade 3
647 Long Barn Stables Equestrian Centre, Field Aston, Newport	1.4	Brownfield
665 Land on the East side of Rose Cottage, Allscott	5.9	Grade 3
689 Land Southern side of Waters Upton	1.7	Grade 2
695 Former Dairy Crest Foods	1.2	Grade 3
Totals	88.6	Grade 2 = 26.7 (30.1%) Grade 3 = 60.5 (68.3%)

Appendix 2 – Proposed Site Allocations and Agricultural Land Classification

Newport

Site	Area (hectares)	Agricultural Land Classification
398 Land North of A518, Newport	4.5	Grade 2
399 Land East of A518, Newport	17.5	Grade 2
462 Land Southeast of Newport Town Centre	2.9	Grade 2
463 Land off Audley Avenue (former Combat Stress facility)	1.4	Brownfield
472 Land South of the Dale, Church Aston	8.5	Grade 2
Totals	34.8	Grade 2 = 33.4 (95.98%) Grade 3 = 0

Proposed Sustainable Urban Extensions

Site	Area (hectares)	Agricultural Land Classification
Land North of A442 Wheat Leasows (Wappenshall)	249.3	Grade 3
Land North East of Muxton	182.0	Grade 2
Land at Bratton	113.0	Grade 2/3
Totals	544.3	Grade 2 = 182.0 (33.4%) Grade 3 = 362.3 (66.6%)

Telford

Site	Area (hectares)	Agricultural Land Classification
187 Land West of Wellington Road	3.5	Non-agricultural
251 Land South of Holyhead Road	7.3	Grade 2
263 Wheat Leasows, Western and Eastern site	10.22	Grade 2
269 Land at Park Road	0.8	Non-agricultural
287 Shropshire Star, Waterloo Road	2.1	Brownfield
301 Land off Ironmasters Way	5.7	Brownfield
302 Meadowdale Nurseries and Garden Centre	3.0	Brownfield
303 Land at Southwater Phase 2	0.2	Brownfield
320 Ridgeways, Hem Lane off Halesfield 1	3.6	Grade 3
334 Former Bush Hotel, Hadley	0.3	Brownfield
337 Land opposite the Shawbirch P.H., Trench	0.2	Non-agricultural

Appendix 2 – Proposed Site Allocations and Agricultural Land Classification

339 Land between Hartbridge Road and Beverley Roundabout	0.9	Non-agricultural
349 Land West of Stainburn Road, Lawley	5.9	Grade 3
350 Land at Madeley Court Way	0.25	Non-agricultural
352 Land South of Holyhead Road	10.6	Non-agricultural
378 Land East of Vasey and South of Barnfield Road	5.0	Grade 2
412 Land at Hilltop Farm, Waterloo Road	5.0	Non-agricultural
413 Land at Upper Coalmoor Farm	8.5	Grade 3
422 Former Phoenix School, Manor Road	7.3	Non-agricultural
424 Brandon Avenue, Shawbirch	1.2	Non-agricultural
445 Land at Arleston Manor Drive	0.4	Non-agricultural
449 Land East of Dawley Road	5.1	Grade 3
459 Malinslee, Telford	2.1	Non-agricultural
473 Land East of Dawley Road	20.2	Grade 3
483 Car park adjacent to police station, Legges Way	0.5	Brownfield
498 Land at Aga Rangemaster, Waterloo Road	1.7	Brownfield
499 Ash Grey Car Park North	1.1	Brownfield
513 Ash Grey Car Park South	0.6	Brownfield
514 Land adjacent to Frasers site	0.5	Brownfield
515 Blue Willow car park	1.0	Brownfield
516 Lime Green car park	0.9	Brownfield
525 Land at Hortonwood / Wheat Leasowes north A442	11.5	Grade 2
601 Land surrounding Sunkyst Towers, to south of Vesey Court	2.6	Grade 3
630 Agriculture House, Southwater Way	0.3	Brownfield
685 Land South and West of Sommerfield Road	26.0	Non-agricultural
696 Land south of Coalmoor Road	8.5	Grade 3
699 TAFS Salop Ltd, Gower Street	3.2	Brownfield
Totals	167.77	Grade 2 = 34.02 (20.0%) Grade 3 = 54.4 (32.0%)
Overall Totals for Telford & Wrekin	835.47	Grade 2 = 276.12 (33.0%) Grade 3 = 477.2 (57.0%) Brownfield = 23.9