

TELFORD & WREKIN COUNCIL

CABINET – 02/01/20

TITLE: REVIEW OF THE TELFORD & WREKIN LOCAL PLAN – PROTECT, CARE AND INVEST TO CREATE A BETTER BOROUGH

REPORT OF: ASSISTANT DIRECTOR BUSINESS, DEVELOPMENT & EMPLOYMENT

LEAD CABINET MEMBER – CLLR DAVID WRIGHT, CABINET MEMBER FOR HOUSING, TRANSPORT & INFRASTRUCTURE

PART A) – SUMMARY REPORT

1. SUMMARY OF MAIN PROPOSALS

The Telford & Wrekin Local Plan (TWLP) is the Development Plan for the Borough, it is central to delivering plan led growth and is the starting point for assessing planning applications. The TWLP was adopted in January 2018.

The Town and Country Planning (Local Planning) (England) Regulations 2012 places an obligation on Councils to review Local Plans within a five year period from the date of adoption. The purpose of a review is to take account of “*changing circumstances affecting the area, or any relevant changes in national policy*”¹. A review, therefore, needs to be completed by January 2023.

The Borough needs to comply with the Regulations and ensure its Local Plan is up-to-date and in conformity with the revisions to the National Planning Policy Framework. A review also enables authorities to address local opportunities and/or challenges.

The Review is also a key opportunity to tackle policy and infrastructure challenges including transport, health and wellbeing, provision of affordable and specialist accommodation and to review policy to address Climate Change in the light of the Climate Emergency Declaration.

Given these circumstances and opportunities it is recommended that a review of the Local Plan be launched. This would not be housing numbers driven but seeks to embed key priorities for the Council and Borough. Four core objectives are proposed to underpin the review:

- Employment led growth through **inward investment and job creation**

¹ Paragraph 33, National Planning Policy Framework (NPPF)

- A ‘**Forest Community**’ approach which affords the **protection, enhancement and accessibility of the natural environment and green spaces that characterise the Borough**
- Support for **regeneration of our Borough Towns, new town estates and infrastructure**
- Meet local housing needs including providing more **affordable and specialist accommodation** to support people to live longer and healthier at home

This report is accompanied by two further documents which support the Review process including:

- **Local Development Scheme (LDS)** - The Council (as the Local Planning Authority or LPA) is required to publish an LDS, a project plan for preparing Development Plan Documents and make this available to the public. The attached version is being recommended to Cabinet for approval.
- **Statement of Community Involvement (SCI)** - sets out the way the LPA will involve the local community, stakeholders and statutory bodies in the Review of its Local Plan. Cabinet is being recommended to approve the attached version for publication.

The formal Review starts with a formal Call for Sites, an open process whereby the LPA invite willing land owners to submit their sites for consideration in identifying future land for development. Cabinet is requested to approve the commencement of a Call for Sites as part of the first stage of the Review.

The Local Plan will be brought forward in tandem with a review of the Economic Strategy, a new Housing Strategy and a refreshed Local Transport Plan ensuring a Local Plan Review that sets the context for growth in the short and medium term with a horizon of 2041.

2. RECOMMENDATIONS

- 1. To commence a review of the Telford & Wrekin Local Plan based on the information set out in this report;**
- 2. To approve and publish the Local Development Scheme attached to this report with effect from 1 January 2020;**
- 3. To approve and publish the revised Statement of Community Involvement attached to this report;**
- 4. To commence the Call for Sites process; and**
- 5. That authority be delegated to the Assistant Director Business, Development & Employment (or any Officer authorised by this post-holder) to exercise all the Council’s powers (besides those which are non-executive powers) under the relevant provisions of the Planning and Compulsory Purchase Act 2004 and the Town and Country**

Planning (Local Planning) (England) Regulations 2012 and all other enabling legislation relating to, preparation, publication, consultation and processing to secure the delivery of the Local Plan Review, the Call for Sites, the Local Development Scheme and the Statement of Community Involvement.

3. SUMMARY IMPACT ASSESSMENT

COMMUNITY IMPACT	Do these proposals contribute to specific Co-operative Council priorities?	
	Yes	<p>TWLP contributes towards all priorities.</p> <ul style="list-style-type: none"> • TWLP protects and enhances the environment and green spaces, secures, new play facilities and investment in school places. • TWLP Allocates and protects employment land for inward investment and job creation. • Investment in school places secured as a result of new development. Opportunities for job creation and training from new employment development. • TWLP supports connected communities and investment in sustainable travel such as walking, cycling and public transport. • TWLP secures affordable housing, specialist housing and an appropriate mix of housing on new developments. • TWLP improves health and wellbeing of residents through the design of developments as well as the protection and enhancement of; community facilities, the natural environment and green spaces. • TWLP designates areas of the Borough that are of environmental, cultural and historical significance.
	Will the proposals impact on specific groups of people?	
	No	The impact will be Borough wide
TARGET COMPLETION / DELIVERY DATE	<ul style="list-style-type: none"> • Publication of LDS and SCI – January 2020 • Cabinet approval to consult on Issues & Options Document – Summer 2020 • Cabinet approve Preferred Options Document for consultation – Spring 2021 • Cabinet approve (Reviewed) Publication Plan and final stage of consultation – Autumn 2021 • Cabinet approve submission of (Reviewed) Publication Plan – Subject to Planning Inspectorate • Adoption at Full Council – Subject to Planning Inspectorate 	
FINANCIAL / VALUE FOR	Yes	<i>The review of the Local Plan will require additional resources on top of the existing ones available. One off</i>

MONEY IMPACT		<p>monies of £391k have been approved from the Capacity fund and this total available resource will support the Local Plan review and manage the Call for Sites process.</p> <p>The LDS and Statement of Community Involvement once approved will be incorporated into the Local Plan review process. (AEM 11/10/19)</p>
LEGAL ISSUES	Yes	<p>The requirement to review an adopted local plan and an adopted Statement of Community Involvement every 5 years is imposed by legislation. The Local Plan is a Development Plan Document and the stages involved in reviewing it and processing it through to adoption by Full Council are described in this report.</p> <p>The Statement of Community Involvement is a Local Development Document for approval and adoption by Cabinet.</p> <p>The requirement to prepare, maintain and publish a Local Development Scheme is also imposed by legislation and, if Cabinet resolve that it should come into effect, they must specify the date from which it is to do so. (IR 04/09/19)</p>
OTHER IMPACTS, RISKS & OPPORTUNITIES	Yes	<p><u>Impacts</u> – a review will have a positive impact on the wider regeneration and development agenda and enable the Council to refresh policies, secure inward investment and jobs, contribute positively to regeneration of town and district centres and protect and enhance the natural environment and green spaces.</p> <p><u>Risks</u> – A delay in the Review timetable will increase the risk of Local Plan policies being deemed out of date and the Council unable to maintain its Five Year Housing Land Supply exposing the Borough to speculative housing pressures.</p> <p><u>Opportunities</u> – the Review process is the most effective means of maintaining a relevant and up to date plan at the same time as addressing the land supply needs of the Borough. The Local Development Scheme will provide an early indication of timescales for residents and stakeholders interested in planning issues. The updated Statement of Community Involvement will set out how the Council intends to consult residents and stakeholders on planning issues in general (including the Review).</p>
IMPACT ON SPECIFIC WARDS	No	Borough-wide impact

PART B) – ADDITIONAL INFORMATION

4. INFORMATION

4.1. Introduction

The Telford & Wrekin Local Plan (TWLP) is the Development Plan for the Borough, it is central to delivering plan led growth and is the starting point for assessing planning applications. The TWLP forms the main part of the Borough's 'Development Plan'. The TWLP is formed of two parts; 1) a set of development management policies which all planning applications are assessed against and 2) a set of allocated housing and employment sites.

The Borough's Development Plan also consists of Neighbourhood Development Plans (NDPs) with additional policies set at a Parish or Town Council level which respond to more local circumstances. The following areas have NDPs; Waters Upton Parish, Madeley Town Council, Edgmond Parish Council, Newport Town Council and Lilleshall Parish Council.

The Town and Country Planning (Local Planning) (England) Regulations 2012 places an obligation on Councils to review Local Plans within a five year period from the date of adoption. The purpose of a review is to take account of "*changing circumstances affecting the area, or any relevant changes in national policy*"². The TWLP was adopted in January 2018 therefore a review would need to be completed by January 2023.

The Borough needs to comply with the Regulations and ensure its Local Plan is up-to-date and in conformity with the revisions to the National Planning Policy Framework but there are a range of local opportunities and challenges and commencing a Local Plan Review now provides an opportunity to:-

- address the changing face and role of local, district and town centres,
- ensure that we have the employment land supply to compete for investment and to create jobs and to diversify the local economy,
- secure investment in transformational infrastructure projects,
- address the continuing regeneration of our Borough Towns, new town estates and infrastructure, and
- enhance the Borough's wealth of greenspaces.
- Respond to the Council's commitment to address climate change

Commencing a Local Plan Review now provides an opportunity to embed the Council and Community priorities for the Borough and tackle changes in national policy and/or economic factors that have emerged since the last local plan was developed. It is proposed that any review of the Local Plan is not housing numbers driven but seeks to embed key priorities for the Council and Borough.

² Paragraph 33, National Planning Policy Framework (NPPF)

This report is accompanied by two further documents, the Local Development Scheme and Statement of Community Involvement, which support the Review process (further details for each are included in section 6.2.).

The Call for Sites is an open process whereby the LPA invite willing land owners to submit their sites for consideration in identifying future land for development. Cabinet are requested to approve the commencement of a Call for Sites as part of the first stage of the review.

The Local Plan will be brought forward in tandem with a review of the Economic Strategy, a new Housing Strategy and revised Local Transport Plan ensuring a Local Plan Review that sets the context for growth in the short and medium term.

Structure of this Report

The report is broken down into the following sections:

PART 1 – Drivers and Objectives supporting a Review of the Local Plan

PART 2 – Scope and Timetable for the Review

5. DRIVERS AND OBJECTIVES SUPPORTING A REVIEW

There are four high level objectives for the review of the Local Plan, these are driven by priorities of the administration and include:

- Employment led growth through **inward investment and job creation**
- A **‘Forest Community’** approach which affords the **protection, enhancement and accessibility of the natural environment and green spaces that characterise the Borough**
- Support for **regeneration of our Borough Towns, new town estates and infrastructure**
- Meet local housing needs including providing more **affordable and specialist accommodation** to support people to live longer and healthier at home

Furthermore, in order to ensure that the LPA meets the statutory 5 year timescale for undertaking a review, and taking into account the multiple stages of public consideration and examination of proposals by the Planning Inspectorate, it is important to commence the review as soon as possible.

The key themes for a review include:

5.1. Inward Investment and Job Creation

Inward investment and job creation are two of the highest priorities for the Council. The TWLP has a central role in an employment led strategy through the identification and allocation of employment land. The TWLP has a broad role in supporting this agenda including policies which direct industrial and

commercial development, support regeneration and growth of local, district and town centres as well as supporting the tourism offer of the Borough.

The Council has been successful in securing inward investment and jobs growth within the Borough. This has had an impact upon the supply of employment land which may pose a risk to future economic growth aspirations of the Council. The Review will consider the employment land position and plan positively for the future economic growth and inward investment helping to:

- Maintain economic competitiveness of the Borough including Telford Town Centre
- Create new jobs through inward investment tackling youth unemployment and providing higher skilled opportunities
- Future proof existing jobs through the growth and retention of existing businesses
- Provide opportunities for regeneration of Borough towns and new town areas
- Ensure a range of employment land which supports small and medium sized enterprise's (SME's) as well as larger investors and benefits district and town centres as well as Strategic Employment Areas.
- Increase diversification across the local economy
- Improving digital infrastructure

External factors will generate opportunities for economic growth in the Borough. These include major regional and national infrastructure projects which will open up opportunities for areas such as the Borough. These include; HS2 which will call at Stafford, the M54 / M6 northern link, plans for a Western Motorway bypassing the conurbation, I54 extension and the current proposals for RAF Cosford. Key opportunities locally include the electrification of the rail line to Wolverhampton bringing the opportunity of faster, higher frequency services. The Review is an opportunity for the Borough to address and benefit from these external influences through attracting inward investment and jobs.

The Council will shortly commence development of a new Economic Development Strategy. This will identify the target sectors for growth, opportunity projects, infrastructure requirements as well as skills and training needs for the Borough. Development of the strategy will help inform the need for, scale and location of future employment land supply through the review process.

TWLP allocated 148ha of employment land, which supports the growth of existing Strategic Employment Areas as well as supporting Borough towns. The majority of these sites are completed, under construction, been granted permission or reserved for expansion of existing businesses. The Council has worked, through the Telford Land Deal³, to 'de-risk' these sites and bring them

³ www.marcheslep.org.uk/growth-deal/telford-land-deal

to the market. This has led to significant levels of inward investment into areas such as Hortonwood, T54 and Donnington Wood.

5.2. Regeneration

The Borough faces challenging issues surrounding regeneration of Borough Towns, new town estates as well as local centres and the Telford Town Centre within the context of the changing retail environment. Successful regeneration. Another key issue for planning is the re-purposing of centres given the decline in the retail economy nationally. The review can consider matters such as:

- A balanced approach to new uses in centres such as public services, residential development and leisure uses
- Consolidation of retail centres so they are more robust, offer an appropriate range of shopping and are able to redefine their role in conjunction with programmes such as ‘Pride in Your High Street’⁴.
- Look at opportunities for smaller more targeted site allocations for residential and commercial uses in and around centres
- Respecting the historic character of the town and Borough centres.

In support of the Council’s efforts to secure national recognition and investment into the ageing New Town Estates the Review could consider how best to support regeneration and development in those areas. The Review could encourage this through appropriate allocations of residential and commercial development opportunities.

5.3. Protecting & Enhancing Green Spaces

The Council is clear that the green nature of Telford and the surrounding countryside is one of the key assets of the area and recognises the positive impacts that everyday contact with nature has to our physical health and mental wellbeing. The Local Plan Review provides an opportunity for the Council to continue to actively engage with local communities to enhance peoples’ contact with nature and to address inequalities in physical, social and cultural accessibility to local green space.

Telford was designed as a ‘Forest City’. This approach set out to create ‘a settlement in the landscape’, a town set within a network of amenity green space defined by a comprehensive tree and woodland structure. The Review provides an opportunity to re-imagine and further the concept for the 21st century establishing the Borough as a ‘Forest Community’ with a development strategy that protects, manages and enhances the Borough’s greenspaces supporting stronger communities and contributing to action to address climate change.

⁴ ‘Pride in your high street’ is a Council programme for investment in high streets across the borough

The Local Plan review will be accompanied by a new Borough Green Space Strategy that will outline how the Council working with local, regional and national stakeholders will deliver this commitment alongside promoting health and wellbeing through greenspace. This will embed nature based climate change mitigation within the wider strategic approach to green spaces in our Borough to help ensure that the Borough's network of green spaces, and the wildlife they support, are complex, connected and dynamic.

5.4. Climate Change

The Council has declared a Climate Emergency and has made a commitment for carbon neutrality from the Council's controlled operations and activities by 2030. A further commitment has been made to engage with residents, businesses, public sector organisations and partners to work together with the aspiration for the Borough to also be carbon neutral by 2030. The Review will enable the Local Plan to respond to climate change by including targets and policies based on the local potential to reduce emissions as well as developing climate resilience.

Alongside the chance to implement forest and greenspace based climate change mitigation this Review is an opportunity to support the transition to a low-carbon, resilient Borough through shaping policies which secure cuts in greenhouse gas emissions through:

- energy efficient development
- sustainable transport;
- renewable and low-carbon energy generation;
- creation of resilient habitats and biodiversity assets through green corridor connected sites;
- And to secure new developments and shape places that minimise vulnerability, and provide resilience to, climate change.

5.5. Housing for All

The starting point for addressing the Borough's housing needs will be to ensure that any additional housing allocations are balanced with the Council's economic growth strategy. The aim is to ensure that the Borough provides residents with the opportunity to live and work within the town. The delivery of new homes will play a key supporting role to an employment led strategy.

The Review is an opportunity to refresh wider housing policies based on emerging evidence around the need for specialist and supported accommodation within the Borough.

The Council will be producing a new Housing Strategy This will provide evidence and support the review of housing policies in the TWLP. Key themes that the document will address include:

- Creating sustainable, affordable and high quality communities

- Making the best use of our existing communities
- Homes to support and empower our most vulnerable people

The Council recognises that most people wish to live in their homes longer as they age and that this is better for their health and wellbeing as well as helping to reduce the costs of adult health and social care. Creating homes which enable people to live independently for longer is a means of doing this.

Reviewing the TWLP will explore opportunities to deliver more affordable housing in a greater range of locations. The NPPF states that LPAs should identify at least 10% of their housing requirement on sites of 1ha or less. This will create opportunities for use of previously developed land as well as supporting small / medium developers and local building companies.

In his report, the TWLP Inspector instructed the Council to prepare a 'Housing Site Allocations Local Plan'. The rationale was to help meet the shortfall in the Council housing requirement. However given the need to identify further employment land, the need to maintain a rolling Five Year Housing Land Supply (FYHLS) and the need to take into account the reasons set out above, the Council is taking the opportunity to review the plan as a whole.

As a Housing Market Area Telford & Wrekin continues to see strong levels of demand with completions running at around 1,000 homes per year. As existing housing allocations are granted permission and units are completed this will, over the course of the Review period, start to impact on the Council's ability to maintain a FYHLS. Delivering further supply to solely meet the current requirement of 17,280 homes will be a limited response to the area's needs given the need to identify further land for inward investment as part of an employment led strategy. Therefore it is prudent for the Council to take a measured approach to meeting its own housing needs supporting a level of housing growth that is balanced with the need for further employment land.

5.6. Local Transport Plan

The way people travel is also beginning to change and the Review presents a chance to assess how the TWLP can meaningfully support the switch to low emission vehicles, public transport, walking and cycling.

The review of the Local Plan will be undertaken at the same time as a review of the Local Transport Plan. This will provide an opportunity to align policies between documents and provide an integrated assessment of infrastructure needs. This is also an opportunity to take a forward-looking view regarding transport, highways and land use planning.

This is within the context of a fast moving technological environment and any proposed policy measures need to be balanced and flexible. The review could consider the following matters:

- How the Local Plan can future proof for the anticipated up take in low emission vehicles
- Regeneration opportunities around transport hubs such as rail and bus stations
- How best to secure infrastructure improvements for sustainable transport and highways enhancements

5.7. Health & Wellbeing

The health and wellbeing of the community is a high priority for the Council. This includes taking a community led approach to reducing pressures on local health services by enabling residents to live healthier, active lives.

Issues such as obesity and mental health are key issues identified in the Borough's emerging Public Health Report (2019). The Local Plan reflects the importance of health and wellbeing to the Borough. Development has a key role to play in improving the fabric of the local area in support of better health and wellbeing. This includes well designed developments that encourage active lifestyles, protection and enhancement of green spaces and opportunities for active travel.

The following health and wellbeing matters could be considered by the Review:

- Relationship and evidence relating to town centre uses and health and wellbeing
- A refresh of policies related to the design of developments to encourage active lifestyles
- Opportunities to create integrated health and wellbeing hubs in accessible locations

5.8. Reviewing Development Management Policies

The TWLP contains a set of development management policies which seek to direct and shape development in the Borough. It is appropriate that, as part of the Review, the Council considers whether its policies remain up to date and relevant or whether there is a need for new policies. This is an opportunity to refine policies that have been tested and strengthen the Council's approach to development management.

5.9. Changes in National Planning Policy Framework / National Planning Practice Guidance

In February 2019 the Government adopted a revised National Planning Policy Framework (NPPF) and as a consequence made changes to the National Planning Practice Guidance (NPPG). The Review will allow the Council to adjust policies, where required, to ensure the TWLP remains in line with Government Planning Policy. Although the TWLP is currently in general

conformity with the NPPF, failure to align the plan with the NPPF in the medium term will result in local policies becoming increasingly out of date.

6. SCOPE AND TIMETABLE FOR THE REVIEW

6.1. Scope of the Review

The Review will be informed by a number of consultation stages where members of the public, stakeholders and the development community can input into the process. The detail of how the LPA will consult will be set out in the revised 'Statement of Community Involvement'.

The Council as the LPA has a legal 'duty to cooperate' with neighbouring authorities and other bodies on strategic matters that cross administrative boundaries. This requires the LPA to engage constructively, actively and on an on-going basis in preparing or reviewing its Local Plan.

It is anticipated that the Review will cover, as a minimum, the following:

- A review of policies within the plan to ensure they are up to date and in line with the NPPF and other local and national factors.
- The opportunity to identify an appropriate supply of employment land in support of the Council's Economic Development Strategy
- The opportunity to identify an appropriate supply of housing land (addressing the request of the Local Plan Inspector for a Housing Site Allocations Document) which is balanced by the need for new employment land
- Roll the end date forward in line with the NPPFs requirement that strategic policies in a Local Plan should look forward by "at least 15 years".

6.2. TWLP Review Programme

The Review has been broken down into a number of phases. Each phase will be brought to Cabinet for approval to progress providing Cabinet with an overview of progress with each phase of the review. The four phases of the review are summarised below:

Phase 1 will comprise the following:

- Publishing an updated **Local Development Scheme (LDS)** (see Appendix A) – the LDS is the Council's 3 year programme for the production of documents that form part of the development plan as well as other planning documents such as the Authority Monitoring Report and Supplementary Planning Documents. It is not a policy document itself. It enables the local community and stakeholders to find out what planning documents are being prepared by the LPA and the timetable for their production. In particular, it sets out the timetable for the Review and update of the Local Plan, and outlines the dates when there will be formal

opportunities to get involved with the plan making process. The Council is required to make an up-to-date Local Development Scheme available to the public and the attached version is being recommended to Cabinet for approval.

- An updated **Statement of Community Involvement (SCI)** (see Appendix B) – This document sets out how and through what forms of communication the LPA will consult local residents, stakeholders and statutory bodies on planning issues such as the Review of the TWLP. The SCI also describes the LPA’s procedures and arrangements for involving the community when considering planning applications and major proposals for development. The SCI needs to be reviewed every 5 years, Cabinet is being recommended to approve the attached version for publication.
- Conducting a **‘Call for Sites’** – This is an open process whereby the LPA invites willing land owners to submit their sites for consideration in identifying future land for development. This process is open for an extended time period to ensure that all land owners have the opportunity to submit their sites, thereby reducing the risk of challenge later in the process.
- Producing a **Strategic Housing and Employment Land Availability Assessment** using information generated by the Call for Sites – This is an early action in the process of identifying further land for development and will assess whether sites are ‘achievable’, ‘deliverable’ and ‘available’ for development. Some sites that are clearly not achievable or deliverable will be discounted as part of this process.

Phase 2 – Consultation of the **‘Issues & Options’** to be considered as part of the Review. This will include strategic options for land supply and policy direction as well as options related to policies that need to be reviewed.

Phase 3 – This stage will see consultation on a **Draft Version** of (reviewed) TWLP and preferred options for site allocations. All representations have to be taken into account in preparing the Submission Version of the TWLP.

Phase 4 – A **Publication Version** of the TWLP and all documents prescribed by the Regulations will be made available for representations to be made. The **Submission Version** and associated documents and all representations received will then be submitted to the Secretary of State for **Examination**. Once the Examination process is complete the Council will proceed to adopt the TWLP (as reviewed).

6.3. Review Timetable

The timetable below sets out the anticipated dates for bringing reports forward to Cabinet as well as projected Examination dates. This timetable would be subject to review at each stage in the process.

Stage	Timescale
-------	-----------

Cabinet approval to consult on Issues & Options Document	Summer 2020
Cabinet consider representations received and approve a Draft Version of reviewed TWLP (including preferred site allocations)	Spring 2021
Cabinet consider representations received and approve a (Reviewed) Publication Version of the Plan for consultation	Autumn 2021
Cabinet consider representations received and approve a (Reviewed) Submission Version of the Plan to be made available for representations to be made and then submitted to the Secretary of State together with all other documents as prescribed	Subject to Planning Inspectorate
Adoption at Full Council	

6.4. Risk Management

In preparing the Local Plan review and other documents, the work outlined in this LDS may be subject to change over time. A risk management approach will therefore be implemented to evaluate and manage risks where possible whilst recognising that some risks may be outside the Council's control.

7. PREVIOUS MINUTES

Papers for Full Council, 11 January 2008 for adoption of Local Plan

8. BACKGROUND PAPERS -

Planning and Compulsory Act (2004)
National Planning Policy Framework (2019)
National Planning Practice Guidance (2019)

9. APPENDIX .

Appendix A – Local Development Scheme
Appendix B – Statement of Community Involvement

**Report prepared by Gavin Ashford, Strategic Planning Team Leader,
Telephone: 01952 384260**