

TELFORD & WREKIN COUNCIL

CABINET - 12 DECEMBER 2013

SHAPING PLACES: LOCAL PLAN UPDATE

REPORT OF ASSISTANT DIRECTOR: PLANNING SPECIALIST

LEAD CABINET MEMBER: COUNCILLOR CHARLES SMITH

PART A) – SUMMARY REPORT

1.0 SUMMARY OF MAIN PROPOSALS

- 1.1 Telford & Wrekin Council is preparing a new development plan, the Shaping Places: Local Plan. This report provides an update on the main areas of work and seeks approval of changes to the approach to the preparation of the Plan following recent consultation, emerging evidence and national planning policy considerations.
- 1.2 Consultation on the Strategy & Options document took place during June and July 2013 and the comments received are being used to help inform the development of planning policies. Appendix 1 of this report includes a summary of the comments received and their implications. This document will be made available on the Council's website subject to Cabinet approval.
- 1.3 To comply with the National Planning Policy Framework (NPPF) the Council must identify and update annually a 5 year supply of housing against its housing requirements set out in the adopted development plan. The Council has recently calculated its current 5 year housing supply. The implications of this for the Council's housing target and the consequent need to include specific site allocations within the Local Plan are set out in this report.
- 1.4 The final section explains the emerging policy approach in relation to a number of policy topic areas.

2.0 RECOMMENDATIONS

- That Cabinet approve the approach to the Local Plan set out in this report, taking into account the update to the Local Development Scheme (LDS) presented in a separate report.
- That Cabinet approve the summary of comments document at appendix 1 for publication on the Council's website.

3.0 SUMMARY IMPACT ASSESSMENT

COMMUNITY IMPACT	Do these proposals contribute to specific Priority Plan objective(s)?	
	Yes	Maintaining an on-going supply of housing responds to many of the Council's priorities, helping to regenerate neighbourhoods in need and ensuring local people have access to suitable housing.
	Will the proposals impact on specific groups of people?	
	Yes	The Local Plan relates to the whole borough and communities who live, work and visit the area. Including site allocations ensures that there is a supply of housing within the first 5 years of the plan as well as the remaining period up to 2031. The plan will also include a range of policies to ensure the needs of the community are met through development, such as the provision of affordable housing.

TARGET COMPLETION/ DELIVERY DATE	The timetable for the Local Plan is set out in the Local Development Scheme (LDS) which has been recommended to be updated to reflect the inclusion of site allocations in a separate report. Key dates to follow.	
FINANCIAL/VALUE FOR MONEY IMPACT	Yes	The policies covered by the Shaping Places Local Plan will be instrumental in supporting the sustainable growth of the Borough. It will be necessary to ensure that the targets and policies adopted through the approval of the final Shaping Places Local Plan are aligned with the growth assumptions within the budget strategy. Financial advice and support will be provided as necessary.
LEGAL ISSUES	Cabinet approval of the approach to the draft Local Plan set out in this report is not a formal part of the plan making process and there is no need to make any further reference to Full Council. Legal advice will continue to be provided when required, in particular regarding the 5 year housing supply and National Planning Policy Framework issues that are highly relevant to the outcomes of many recent appeals and court cases regarding planning applications for housing developments.	
OTHER IMPACTS, RISKS & OPPORTUNITIES	<p>The approach set out in this report will ensure conformity with the National Planning Policy Framework (NPPF), in particular, paragraph 47 which sets out a need to identify sites within the Local Plan for the first 5 years of the Plan and broad locations for years 6 onwards. Currently, using the formula set by the National Planning Policy Framework (NPPF) and in the light of recent planning appeals, the Authority has calculated that the Borough currently has a 2.5 year supply.</p> <p>Paragraph 49 states that “relevant policies for the <i>supply</i> of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites”, meaning there will be a ‘presumption in favour of sustainable development.’</p> <p>The combination of a revised housing target for the plan and the inclusion of site allocations will help the Authority demonstrate a 5-year supply and ensure its housing <i>supply</i> policies are up-to-date. This will allow the council to better manage the location of future development, ensuring it is led by the strategy set out in the Local Plan and phased in a manner that achieves key priorities and opportunities for the whole borough, including some of the more challenging urban areas in need of regeneration. In the meantime, the risk of not achieving this will be minimised by applying the definition of sustainable development and utilising existing policies which are non <i>supply</i> related such as affordable housing provision and urban design, ensuring good quality houses that meet a range of needs.</p>	
IMPACT ON SPECIFIC WARDS	Borough wide impact.	

PART B) – ADDITIONAL INFORMATION

4.0 STRATEGY & OPTIONS CONSULTATION

4.1 In accordance with the timetable set out in the Local Development Scheme (Feb 2013) and Statement of Community Involvement (Dec 2012) consultation on the Strategy & Options document took place during June and July 2013. As well as contacting statutory consultees and general bodies by post, hard copies of the Strategy & Options document and response questionnaire were made available in libraries and online. Officers also organised public open sessions, meetings with stakeholders and a variety of media events to advertise the consultation as widely as possible. Five open sessions were held with Members, Parish and Town Councils and the public. Town and Parish Councils were also provided with the opportunity to speak with officers at one-to-one meetings.

4.2 In total 1471 comments were received. In addition, through the programme of meetings that took place, particularly with Parish and Town Councils, a number of comments and concerns were addressed directly. The proposal to include an additional consultation phase on site allocations as part of taking the Plan forward is expected to attract more public engagement and comments.

4.3 Since the consultation, officers have been considering the comments received together with other evidence as part of preparing the draft policies for the Local Plan. Appendix 1 summarises the comments received. Subject to Cabinet approval these will be published on the Council's website along with the next steps in producing the Plan to ensure that people remain engaged in and informed about the process.

4.4 The responses were generally favourable and positive towards the options presented.

- In general, there was broad support for the growth set out in the vision and the aims for the plan. In response to residents' comments the Council will be considering options for a lower level of overall growth. Evidence for this will be strengthened in future stages of the plan and it will be clearly demonstrated that there will be no significant impact on green spaces as a result of new development within the urban areas of the Borough.

- The importance and value of green spaces is stated in the documents published so far, but this will be emphasised in future stages of the Plan. The new Plan will be positive about green spaces and will ensure that Telford continues to be one of the greenest towns in the country.

- There was broad support for the distribution of growth. In particular to complete the development of Telford as envisaged when the new town was designated. However the Council recognises the importance of providing certainty about where growth should be located and the phasing of development over the Plan period.

- There was general support for a more flexible criteria based approach to policies that emphasise the opportunities for development that supports existing centres and communities, encourages business growth and, where possible, utilises previously used land to meet the range of local needs.

5.0 REVISED HOUSING GROWTH TARGET

5.1 Since publishing a preferred housing requirement at the Strategy & Options stage of 26,500 for the period 2011-31, officers have continued to review the housing target taking into account comments received from residents during the Strategy & Options consultation, together with matters relating to the Duty to Co-operate with neighbouring authorities and the Council's position in respect of its 5 year housing supply.

5.2 Consultation

The Strategy & Options consultation attracted a range of comments on the scale of development and overall the consultation indicated broad support for the Council's preferred Option 3, which would see Telford become a strategic hub for Growth and Business. While the principle of growth was supported, the Council was asked to consider the approach to growth with the support of appropriate evidence, particularly relating to the assessment of housing need, as well as addressing deliverability. Similar comments have also been made during discussions with other Local Authorities, including Birmingham City Council, who have themselves set ambitious growth targets. Members will be aware that Local Planning Authorities that have not allocated sufficient land for new homes are having their plans questioned by planning inspectors at public examination. In a number of cases this has led to authorities having to withdraw their plans.

5.3 5 Year Land Supply

The National Planning Policy Framework (NPPF) sets out a requirement for all Local Planning Authorities to identify a 5 years' supply of deliverable¹ sites against its housing requirement and update this annually. The NPPF sets out a strict approach to determining 'deliverability' which is intended to maximise the number of sites available to the market in order to significantly boost the supply of new homes. In setting a 5 year target the Council should:

a) start with the housing provision target figure in the adopted development plan (adjusted to reflect the level of housing that has already been delivered). The Council's Core Strategy proposed a housing requirement of 10,850 for the Plan period. This translates into a 5 year target figure of 3,500 for the period 2013-2018².

b) add to this a percentage to account for any under-delivery of housing (in Telford & Wrekin's case this is 20% identified in table 1 below as a 'buffer') and

c) add any 'shortfall' or 'backlog' in completions to date i.e. number of houses which should have been delivered.

For Telford & Wrekin, this gives the Council a **5 year housing target as at April 2013 of 8,612 homes** which equates to **1,722 homes per year**. For clarity, a breakdown of this figure is provided in table 1.

Table 1. 5 Year Housing Target

Housing Target for the next 5 years (2013-2018)	
Adopted Core Strategy figure (<i>pro-rata</i> for 2013-2018)	3500
+ 20% buffer	700
+ shortfall	4412
FIVE YEAR HOUSING TARGET	8612

¹ To be considered deliverable sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or the sites have long term phasing plans.

² The 5 year target of 3500 dwellings is based on a trajectory set out in Core Strategy policy CS1 (2013-18 @ 700 dwellings/year)

- 5.4 While the Council continues to perform well and is able to demonstrate a supply of 4,387 deliverable homes for the 5 year period, when compared to the target of 8,612, this results in a supply of 2.5 years rather than 5 ($4387/1722 = 2.5$). It should be noted that this position is being replicated in Local Authorities across the country driven in part by the government's strict definition of deliverability and is providing the basis of decisions by the Planning Inspectorate when determining appeals against the refusal of planning permission. Officers have also sought counsel's opinion on this matter.
- 5.5 The government states that where a 5 year supply cannot be demonstrated, relevant policies for the *supply* of housing cannot be considered up-to-date and, in accordance with the NPPF, there is a 'presumption in favour of sustainable development'. This limits the weight the Council can apply to its housing supply policies when determining planning applications. In addition, any shortfall that arises as a result of the Council not meeting its annual housing target must be accommodated in future years of the Plan period. It is critical therefore that any future plan target is deliverable. Being overly ambitious runs the risk of year on year continuing to under-deliver against the set target, having to consistently accommodate a shortfall in its targets and remaining unable to attach weight to its housing supply policies. The Shaping Places Local Plan therefore must include a future housing target that balances deliverability with growth ambition and provides the framework and sites to help manage the shortfall.
- 5.6 As recognised in previous reports to Cabinet, the target of delivering 26,500 new homes by 2031 has been tested through the Regional Spatial Strategy process and found to be a sound basis for the borough's growth given its original planned size, good infrastructure provision and the opportunities available to help strengthen the local economy. A target of 26,500 however equates to 1,325 homes a year. This figure predates the recession and the impact this has had on housebuilding nationally. Locally, the delivery of new homes in the borough has bucked national trends, achieving the completion of up to 800 new homes a year. Initiatives such as 'help to buy' are also increasing demand but the market remains challenging. Taking into account the significant shortfall of 4,412, it is considered that an additional requirement of as many as 1,325 homes a year runs the risk of the Council being unable to deliver on its housing target which in turn would continue the associated implications for the Council's housing supply policies.
- 5.7 Work is therefore ongoing to establish a revised housing target for the borough that is deliverable but also reflects the Council's ambitions for growth and prosperity, taking advantage of the land and infrastructure potential that exists in the Borough. This target must be based on substantive evidence and need, Duty to Co-operate considerations (see below) and any shortfall from previous years. Officers are considering the projected growth in population and households across all forms of housing tenure and identifying how this translates into a housing target. As part of this work, consultants are completing a borough-wide Strategic Housing Market Assessment (SHMA) that will assess housing need and demand.

5.8 **Duty to Co-operate**

Under section 110 of the Localism Act 2011 local authorities are required to discuss, agree and provide evidence of cross-boundary issues of strategic significance (Duty to Co-operate). With regards to housing this can mean accommodating unmet housing need and discussing patterns of in and out migration. Telford & Wrekin shares some of its housing market with neighbouring authorities including Shropshire, South Staffordshire, Birmingham and the Black Country and therefore officers are discussing housing matters across these authority areas to reach joint agreements. The implications of this for the Council's housing target are being assessed; it could mean, for example, that Telford & Wrekin includes in its target figure an element of housing growth that cannot be met in neighbouring areas.

5.9 Delivering Growth

The government is encouraging local authorities to ‘significantly boost housing supply’ and promote positive growth, by approving sustainable development. Any revision to the housing target therefore will support this agenda as well as the Council’s ambitions to be a focal point for growth and destination of choice for business and investment. The revised housing target will also support the Local Plan’s vision to accommodate a population of over 200,000 by 2031 and therefore complete its early ambitions as a New Town. Accommodating the current shortfall of 4,412 new homes alone supports this growth ambition as it will require a step change in delivery within the first 5 years of the Plan period. The borough has a large number of sites for housing and steps are being taken to increase the deliverability of these sites. The Council will work with key partners including the Homes & Communities Agency, developers and with the Marches LEP Strategic Economic Plan to put the conditions in place to accelerate growth. The NPPF aims to increase land supply but even with the Council’s interventions, market conditions will ultimately drive delivery. If conditions do not favour delivery in any year, any shortfall against the housing target will be rolled forward to the subsequent year.

6.0 SITE ALLOCATIONS

6.1 The Local Development Scheme (2013) proposed allocating only broad locations for development within the Local Plan. In light of the Council’s 5 year housing supply position it is now proposed to make more locally specific site allocations. The allocation of sites will provide greater certainty and choice to the market and to new investors. More specifically, it will:

- Increase the deliverability of the Local Plan and provide greater certainty in achieving the growth ambitions advocated in national planning policy and the Council’s emerging Local Plan
- Help better manage supply and the phasing of development (eg prioritising urban sites that are key to regeneration)
- Provide the opportunity to allocate publicly owned land for development
- Help avoid land-banking
- Avoid the need to adopt a supplementary planning document on site allocations

6.2 This approach will not preclude other sites, referred to as ‘windfall’ sites, also being considered should they meet the relevant criteria, providing further flexibility and choice. A separate report to Cabinet ‘Timetable for Shaping Places Local Plan – ‘Local Development Scheme’ explains the site allocations stage in the context of the Local Plan process. This includes how the public, Parish and Town Councils, developers, landowners and other stakeholders will be actively involved in site allocations.

7.0 POLICY UPDATE

7.1 As well as a robust housing target and the allocation of sites, the Plan must have a clear set of planning policies which guide the determination of planning decisions.

7.2 Comments were received during the Strategy & Options consultation on a range of policy areas. These are being used, together with the findings of evidence studies to produce policies for the Local Plan.

7.3 This section of the report provides an update on a number of key policy areas. These will continue to be developed to support the delivery of the targets and site allocations referenced above.

7.4 Employment

Policies in the Plan will support the development of both business and educational facilities to address the existing and future need for economic growth, skills and increased job

opportunities. The Plan will include criteria based policies and identify key employment areas that will help to support business growth in locations including , town and local centres, rural settlements and employment areas taking into account the need to support Council priorities such as addressing levels of deprivation and unemployment in Targetted Intervention Areas. Officers are currently working closely with the Delivery and Planning, Inward Investment and Estates and Investment teams to ensure that the Local Plan supports the Council's Invest in Telford, business support and investment campaign. This includes maximising opportunities in key sectors e.g. advance manufacturing linked with the proximity to Jaguar Land Rover and delivering the Council's economic goals to increase growth and job creation within the current business base as well as attract new investment from target sectors both foreign and UK based.

7.5 **Housing**

The delivery of new homes is critical to achieving the Borough's priorities both for growth and regeneration. The findings of the consultation endorsed the need to provide a choice and mix of homes to meet everyone's needs. This section focuses on two key aspects; affordable housing and rural housing. Other matters, including providing additional sites for Gypsies & Travellers will also be addressed in the Plan.

Affordable housing

- 7.6 The Strategic Housing Market Assessment (SHMA) as well as other considerations such as financial viability will support the establishment of targets for affordable housing in different parts of the borough.
- 7.7 The need for affordable housing provision was clearly acknowledged during the Strategy & Options consultation with a general support for a flexible approach which could be applied on a site by site basis. This was seen to allow for locally arising need to be addressed while ensuring development is viable and deliverable.
- 7.8 The consultation had proposed an approach whereby some or all affordable provision could be provided via a financial contribution in lieu of on-site provision. A similar approach would be to allow delivery directly, but off-site. The NPPF emphasises that where local planning authorities have identified that affordable housing is required, policies should seek to meet this need on-site, unless off-site provision or a financial contribution of broadly equivalent value can be justified.
- 7.9 The Council wants to see market and affordable homes built and local need met. Viability, particularly in recent years has been a concern on a number of developments and it is important that future policy provides sufficient flexibility to maintain delivery but also ensures local affordable housing need is met. The Council is therefore exploring an approach which includes targets alongside a number of criteria based policies. These will allow the Council to consider differing levels of provision and the use of commuted sums, off-site provision, in lieu of on-site provision where justified using site-specific viability assessments offering flexibility to encourage the delivery of new housing.

Rural Housing

- 7.10 The existing Plan focuses development in the rural area on three villages. The Council had recognised that the evidence base for this approach had become out of date and the consultation showed strong support for introducing a more flexible approach that would consider development across the rural area.
- 7.11 It is proposed that the new Local Plan takes a criteria based approach to determining rural housing development which would consider factors including affordable housing need, the current provision of services and facilities, the characterisation of settlements and local priorities that development could help address. Officers are currently trialling the production of

a Parish Profile, with the intention of rolling out to all Town Councils and Parishes. Each Profile would contain information on matters such as population, number of services and facilities and local opportunities. This information would provide the Council with better and more comprehensive understanding of the borough's parishes which would in turn enable it to better plan for and make more informed decisions on planning applications.

Retail

- 7.12 The NPPF requires policies to define a hierarchy of centres where retail development should be focused in order to support their vitality and viability. Comments from the Strategy & Options consultation suggested that the existing hierarchy that defines six 'district' centres may no longer be appropriate and that a higher profile should be given to some of the centres outside Telford Town Centre. Consideration is currently being made to redefine these centres and their roles, perhaps as market towns or smaller town centres. At this stage it is not anticipated that any new land will need to be allocated for retail development but the Local Plan will need to refine the primary shopping areas in accordance with retail evidence.

Green infrastructure

- 7.13 The Green Network designation has been a key planning policy on open space in the last two Local Plans. Whilst it has served the borough well in protecting green space it is based on out of date information and only applies to Telford (not the whole borough). Experience shows that it is also now failing on occasion to meet the needs of local communities and the Borough, for example affording protection to sites which could deliver more positive outcomes to communities and conversely not providing for green space where there is a local need. The borough has a long association with green infrastructure, considered by many a key selling point and noted during the 2012 Shaping Places survey as one of the main reasons why people chose to live in the borough. Feedback from the Strategy & Options consultation highlighted the importance of prioritising the protection and enhancement of green space and the vision for the plan will better reflect this, adopting the principle of "pro growth, pro green". The Plan will seek to maintain the green qualities of Telford, protecting its green spaces and ensuring that it continues to be one of the country's greenest towns.
- 7.14 To help strengthen the approach to and recognise the value of green infrastructure in the borough as well as ensure that a balance is achieved between new development and the protection and enhancement of green space, it is proposed to adopt the following categories of protection, supported by evidence from the Green Infrastructure Local Needs Assessment:
- 7.15 Category 1: areas of green infrastructure which have international, national and local protection such as Sites of Special Scientific Interest, Local Nature Reserves and Wildlife Sites. There will be a general presumption against development in these areas
- 7.16 Category 2: areas of green infrastructure where special conditions apply such as an Area of Outstanding Natural Beauty. Any development proposed in these areas will be subject to strict criteria to ensure that the green infrastructure is protected and enhanced.
- 7.17 Category 3: all other forms of green infrastructure. While the green infrastructure in these areas is not protected to the same degree for categories one and two, spaces will be assessed for their value and function when deciding their future. While the Local Plan will include criteria based policies on the key aspects of Green Infrastructure such as biodiversity, recreation and leisure, these will be supported by a Supplementary Planning Document (SPD). This will enable the Council to keep an extensive and up-to-date database of green infrastructure.

Urban design

- 7.18 Comments from the Strategy & Options consultation broadly supported the importance of urban design within the borough and the suggested approach of including two overarching

policies within the Local plan covering general obligations and principles supported by a Supplementary Planning Document (SPD) that provides more detailed information and direction. Both the policy and the SPD will highlight the value of and the need for good quality development. They will explain what is meant by 'good design and quality' and how development must provide a positive contribution to an area, responding to local character and following best practice.

Climate change

- 7.19 In light of the Government's consultation on the review of housing standards and zero carbon homes (DCLG (August 2013) Housing Standards Review Consultation) together with recent discussions on Building Regulations and environmental standards, the Plan will not make reference to the Code for Sustainable Homes. Instead, new housing will be required to comply with Building Regulations.
- 7.20 Non-residential developments and their standards are not similarly affected by recent discussions. The BREEAM standard can be applied to non-residential developments provided that the development remains viable. The Local Plan, therefore, will suggest that all non-residential developments will achieve a set BREAAM standard unless a viability assessment suggests otherwise.

Central Telford Area Action Plan (CTAAP)

- 7.21 CTAAP covers the period 2011-2016 and provides an important development framework for Telford Town Centre, including the recent Southwater development. The policies within CTAAP need to be considered in light of the recent borough-wide evidence studies on retail and leisure provision and to align with the new Borough wide Local Plan. It is anticipated that the majority of the CTAAP will be incorporated into the Local Plan whilst removing any duplicated policies and ensuring the long term delivery of the 'heart of the town' envisaged in CTAAP is achieved, ensuring certainty to investors in the area.

8.0 CONCLUSION

- 8.1 This report provides an update on the main areas of work involved in producing draft Local Plan. Officers intend to report again on a revised housing target and site allocations early in 2014. In the meantime officers, subject to the approach being approved, will publish Appendix 1 on the Council's website.

9.0 PREVIOUS MINUTES

30 May 2013 'Shaping Places' Local Plan, Strategy & Options

10.0 BACKGROUND PAPERS

Telford & Wrekin Local Development Scheme (December 2013)

Report prepared by Rachel Walmsley, Principal Planning Officer. Telephone: 01952 384250

APPENDIX 1

Shaping Places

Local Plan

Summary of comments
received as part of the
Strategy & Options Consultation

10 June – 26 July 2013



Background

Telford & Wrekin Council is currently producing a new **Local Plan; Shaping Places**. As part of this process the Council consulted on its Strategy & Options document providing the community and other stakeholders with the opportunity to comment on and influence the proposed scale and location of development at an early stage of the plan-making process.

Consultation on the Strategy & Options document took place between 10th June and 26th July 2013 and formed part of the requirement by the Town and Country Planning (Local Planning) (England) Regulations 2012 to invite bodies or persons to make representations on what a Local Plan ought to contain. The consultation process was in line with the adopted Statement of Community Involvement (December 2012) (www.telford.gov.uk/planningpolicy) and in accordance with the timetable set out in the Local Development Scheme (February 2013) (www.telford.gov.uk/localdevelopmentscheme).

This document contains a summary of responses received during the period of consultation and explains how the comments will influence the Shaping Places Local Plan: Draft Plan stage.

Shaping Places Local Plan: Strategy & Options Document

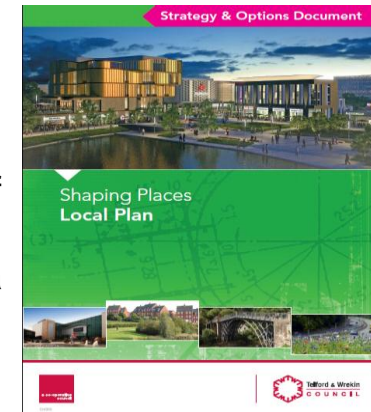
What did we consult on?

The Strategy & Options document set out options for the scale and location of development and different policy approaches to a range of topics including housing, employment, retail, green infrastructure and transport. For each subject area questions were asked about the content and options presented.

How did we consult?

In line with the Statement of Community Involvement, a range of methods were used to consult the community, ensuring events were well publicised and participation encouraged. 1652 consultees who had registered on the Local Plan database, including members of the public were consulted on the Strategy & Options document. Of these 1195 were sent letters (statutory consultees and general bodies such as voluntary organisations and business representatives). Hard copies of the Strategy & Options document and response questionnaire were made available in all 10 Telford & Wrekin libraries, including the mobile library, all of the 5 Telford & Wrekin Firstpoints and online. Officers also organised public open sessions, meetings with stakeholders and a variety of media events to advertise the consultation as widely as possible.

The Council has a Duty to Co-operate with neighbouring Local Authorities and statutory bodies under section 110 of the Localism Act 2011. These organisations were also written to during the consultation period.



Telford & Wrekin Council Planning Policy Portal Consultation

All comments were collated and viewable on a public on-line Consultation Portal. The Portal contains 1471 individual comments received through the Strategy & Options Consultation. These can be viewed at www.telford.gov.uk/shapingplaces

Open Sessions

During the consultation period five open sessions were held with Ward Members, Parish and Town Councils, and residents. A workshop event was held with the Telford & Wrekin Young People's Forum. All meetings provided an opportunity for people to consider exhibition material on the Strategy & Options document, listen to a presentation on the content of the document and talk directly to officers. The open sessions took place on the following dates:

- Telford & Wrekin Council Ward Members Open Session, Business Development Centre, Telford. 13 June 2013
- Telford & Wrekin Council Parish & Town Councils Open Session, Business Development Centre, Telford 20 June 2013
- Public Open Session, The Place, Oakengates Theatre, Telford. 26 June 2013 Daytime
- Public Open Session, The Place, Oakengates Theatre, Telford. 26 June 2013 Evening
- Young Peoples Forum, The Salvation Army, Telford. 10 July 2013

Targeted Engagement (Stakeholder Meetings)

A number of meetings with the following stakeholders provided an opportunity for people to listen to a presentation on the content of the Strategy & Options document and ask questions of senior management and officers:

- **Town & Parish Councils**

All Town & Parish Councils were offered a round the table discussion with officers on the Plan during the consultation. Ten out of the twenty-six Town & Parish Councils accepted this invitation with several involving more than one meeting to enable as many parish members to contribute as possible. Although not all, the Parish and Town Councils that did not accept the invitation commented via the Portal and at the Parish & Town Council Open Session.

- **Business Community**

As well as businesses being contacted directly via the Local Plan consultation database, the Local Strategic Partnership and Local, Regional and Intermediary Businesses were consulted. A presentation on the Strategy & Options document was given to the housebuilding industry in May 2013 and to representatives from Shropshire Fire & Rescue, Shropshire Chamber of Commerce, West Mercia Police, Clinical Commissioning Group and Job Centre Plus at a Local Strategic Partnership meeting on 4th July 2013. On 18th June 2013 the consultation was showcased at the Council's Invest in Telford launch event at The International Centre, Telford. The event focused on promoting the borough as an area of economic growth with over 100 local, regional and intermediary businesses attending.

BBC Radio Shropshire

An interview with BBC Radio Shropshire; Eric Smith and Clare Ashford on the Morning Show took place in Lawley Square, Lawley, Telford in advance of the public open sessions. The interview was aired on Tuesday 25th June around 8am to encourage attendance at the open session events. Radio Shropshire has a listenership of 26% of Shropshire's population per week, with an average of 104,000 listeners per week between June – September 2013³.

³ Shropshire Star Article 25 October 2013; <http://www.shropshirestar.com/news/2013/10/25/more-than-100000-radio-listeners-tuning-in-to-bbc-shropshire/>

Press Releases

Press releases went out in advance and during the formal consultation period in local newspapers; the Shropshire Star and the Telford Journal. Press and were also publicised on Telford & Wrekin Council's website and Shropshirelive.com.

Social Media

Regular updates on the Strategy & Options consultation were made on the Council's corporate Facebook and Twitter pages.

Facebook

Facebook messages were publicised on the dates below directing the social media users to the public on-line Consultation Portal via www.telford.gov.uk/shapingplaces, statistics on the number of views were as follows;

- 11 June 2013 reaching 3.1 thousand views with 314 clicks and 17 likes/shares/comments
- 2 July 2013 reaching 4.6 thousand views with 237 clicks and 24 likes/shares/comments
- July 2013 reaching 4.2 thousand views with 105 clicks and 7 likes/shares/comments

Twitter

Tweets were publicised during the consultation period on 7 separate dates. The message directed the social media users to the public on-line Consultation Portal via www.telford.gov.uk/shapingplaces.

Website

As well as the Shaping Places dedicated webpage www.telford.gov.uk/shapingplaces, a scrolling message was continuously displayed on the front page of Telford & Wrekin Council's webpages www.telford.gov.uk to encourage people to comment on the document.

Your Voice

Your Voice is Telford & Wrekin Council's quarterly newspaper which is distributed to around 72,000 households in the borough. An article on the Shaping Places Consultation was included in the Summer Edition distributed in June 2013.

Flyers/Poster

All Telford & Wrekin Council Community Centres were provided with posters and flyers to publicise the consultation period and to signpost users to the consultation portal, public open sessions. Hard copies of the document were also available in the centres.

What responses did we receive and how are they influencing the draft plan?

Each one of the 1471 comments received is being considered as part of preparing the Draft Local Plan, along with a range of evidence studies and the findings of a sustainability appraisal.

The following provides an overview of the comments received together with an explanation of how they are being used to inform the draft plan. Given the number of comments received, it has not been possible to respond to each comment individually. This does not mean it is not being considered in the development of the

Plan. If you would like a response to your comment, however, or would like to raise a concern please contact shapingplaces@telford.gov.uk.

Section of Strategy & Options	Summary of comments	How comments will inform the Draft Plan
Vision, aims and objectives	Support for vision but a need to better evidence 200,000 population projection, place more emphasis on green infrastructure (including ecological considerations), tourism & culture and 'local' as well as district centres	<p>The figure included in the Strategy & Options vision was based on population growth trends and intended to provide a broad indication rather than precise figure. The importance of evidence is acknowledged and population growth is taken into account as part of the housing target calculations referred to below.</p> <p>The vision for the draft plan will be amended to reflect the importance placed on the issues raised, most notably the emphasis on green infrastructure.</p>
Scale of growth	General support for growth but concerns raised over lack of evidence in support of this figure, how achievable/deliverable it is, potential impact on green spaces and lack of reference to the economic implications of growth.	<p>The role of development in supporting local communities and priorities for the borough will continue to be a strong message in the Draft Plan.. Since the consultation period, the Council has been considering further the scale of growth and associated housing target taking into account:</p> <ul style="list-style-type: none"> • conformity with the NPPF and associated guidance set out in the National Planning

		Practice Guidance (NPPG)
Section of Strategy & Options	Summary of comments	How comments will inform the Draft Plan
		<ul style="list-style-type: none"> • outcome of a review of the Council's 5-year housing supply • the need to include any shortfall in housing delivery from previous years • an allowance for 'economic' growth (e.g. increase in number of businesses and associated jobs and housing needs) • the findings of a Strategic Housing Market Assessment (SHMA)
		<ul style="list-style-type: none"> • housing needs associated with neighbouring authorities – a requirement under the statutory Duty to Cooperate placed on Councils • the findings of the sustainability appraisal which takes into account impacts associated with green infrastructure. <p>A revised housing target will be available for further comment during the consultation period commencing in April 2014.</p>

Section of Strategy & Options	Summary of comments	How comments will inform the Draft Plan
Distribution	<p>Broad support for Option 3 distribution (Low Rural/Medium Fringe/High Urban) followed by Option 2 (Low Rural/Low fringe/Very High Urban). Delivery of existing commitments has been challenged, highlighting the need to consider Strategic Housing Land Availability Assessment (SHLAA) sites to meet targets, including previous target shortfalls. Concern expressed from some communities potentially affected by development in the fringe, in particular, Eyton and Wappenshall. Careful consideration needed to phasing of development, ensuring that the Plan's objectives are achieved through development in urban/rural areas rather than too much development in the Fringe which is favoured by the market.</p>	<p>The Strategy & Options document recognised the need to balance development in the rural, urban and fringe areas in order to achieve the borough's priorities, provide a range and choice of sites and to meet the needs of local communities.</p> <p>Given the concerns raised regarding development in the fringe the Plan will need to continue to demonstrate an approach to growth that meets the Borough's priorities and ensures that housing is suitably located across the borough.</p> <p>Since producing the Strategy & Options document, it has been proposed to allocate specific sites in the Draft Plan. This will help determine more precisely where development will be located in the borough rather than broad locations. It is planned to consult on these site options in April-June 2014 before proceeding to preferred site allocations which will be subject to further consultation in early 2015 as part of the Draft Plan.</p>

Section of Strategy & Options	Summary of comments	How comments will inform the Draft Plan
Policy areas	<p>Specific comments were received on each of the policy areas. In general terms, support was given for a more flexible, criteria based policy approach with particular emphasis on strengthening business development opportunities in centres and villages, utilising brownfield land and providing a mix of housing which meet a range of local needs.</p>	<p>Comments on individual policy issues and options will be considered in the production of the Draft Plan policies. The Draft Plan will seek to ensure that policies provide market certainty while retaining a degree of flexibility ensuring development is deliverable throughout the Plan period. Policies will support the development of both business and educational facilities to address the existing and future need for economic growth, skills and increased job opportunities, including in the rural area.</p> <p>The Strategic Housing Market Assessment (SHMA) will provide supporting evidence on the type of housing required to meet housing need borough-wide and will inform housing and affordable housing policies in the Draft Plan.</p> <p>With regard to brownfield land, the NPPF supports the effective use of land that has been previously developed provided that it is not of high</p>

Section of Strategy & Options	Summary of comments	How comments will inform the Draft Plan
		environmental value. It also supports other opportunities such as new settlements or extensions to existing villages & towns where they are shown to be sustainable

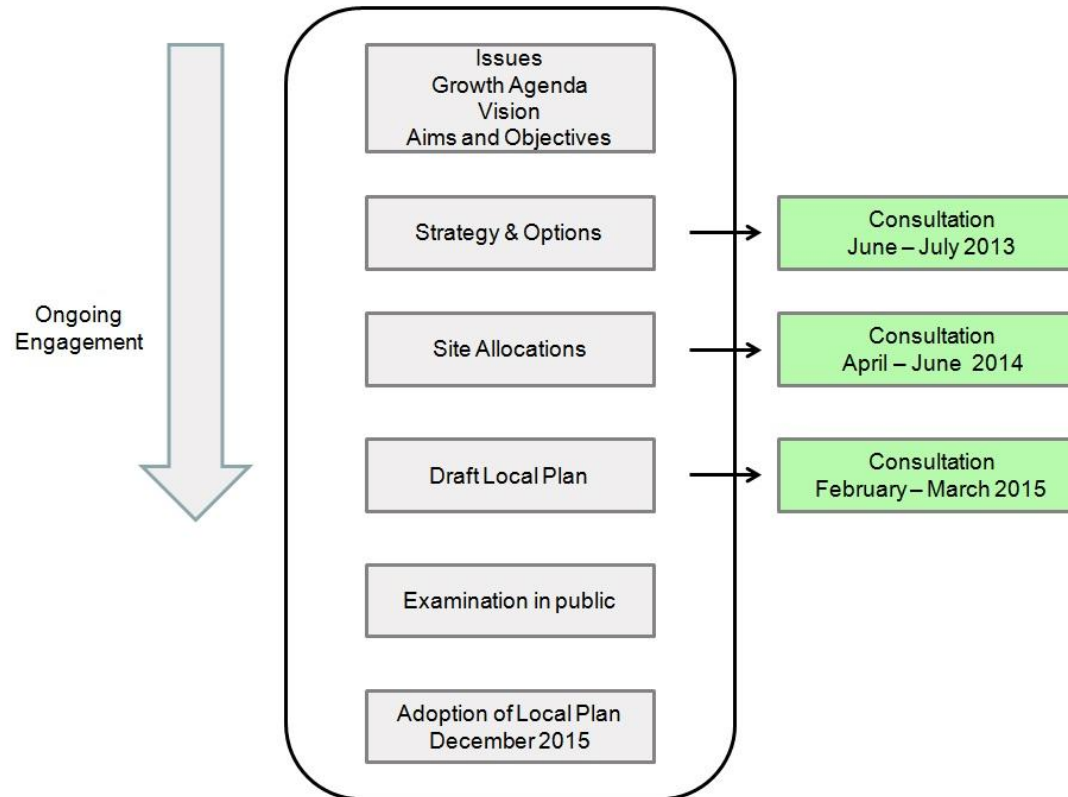
Equalities

The Council is committed to involving as many people as possible and ensuring this is representative of all the borough's communities. To help monitor this and assist with future engagement, a series of equalities questions were asked as part of the consultation. The responses submitted indicated that a broad range of people had contributed. While it was noted that the number of young people who responded was low, events such as the Young Persons Forum workshop provided some representation. Written comments were not submitted by attendees however and so while the feedback was recorded at the meeting and is being considered as part of developing the Plan, individual numbers of contributors details were not factored into the monitoring data.

Next stages of the Shaping Places Local Plan process

As detailed in the Local Development Scheme 2013 www.telford.gov.uk/localdevelopmentscheme, the following diagram sets out the next stages of the Local Plan making process:

Stages in the Shaping Places Local Plan process



Engagement in the Local Plan process is on-going and not limited to the formal consultation stages. If you want to find out more about Shaping Places, get involved or discuss a particular issue, then please contact shaping.places@telford.gov.uk Updates will also continue to be posted on the website at www.telford.gov.uk/shapingplaces