

Home Builders Federation
Respondent No.
Hearing Session : Matter 2

TELFORD & WREKIN LOCAL PLAN EXAMINATION

MATTER 2 – DUTY TO CO-OPERATE & RELATIONSHIP TO OTHER PLAN AREAS

Inspector's Key Issues and Questions in bold text.

The following Hearing Statement is made for and on behalf of the Home Builders Federation (HBF) in regard to the Telford & Wrekin Local Plan. This Statement responds to questions set out in the Inspectors Matters & Issues document. The following answers should be read in conjunction with our representations to the Local Plan pre submission consultation ended on 15th March 2016.

Questions

2.1 Has the Council satisfied the Duty to Co-operate set out in section 33A of the Planning and Compulsory Purchase Act 2004?

The Council has determined that Telford & Wrekin is its own HMA and the proposed housing requirement of 15,550 dwellings is necessary to meet only its own housing needs based on economic growth and delivering affordable housing. However the Council has also acknowledged that co-operation is necessary on the wider strategic matter of housing shortfalls and unmet housing needs arising in the West Midlands region from both Birmingham City Council and the Black Country authorities. This process is still on-going and the matter of unmet housing needs from Birmingham and the Black Country remains unresolved. At this time the satisfying of the Duty to Co-operate is a work in progress. Whilst the Council believes the matter of not meeting unmet needs from elsewhere in Telford & Wrekin is concluded (Council's Response to F2) it is not apparent that this view is shared by other Council's which have made representations on the Local Plan.

2.2 Given that the Plan seeks to set a housing requirement that exceeds its stated assessment of Telford & Wrekin's housing needs, is the Council's position of not seeking to meet any unmet housing demand from the West Midlands conurbation or South Staffordshire sufficiently justified?

The Council's latest evidence states that it has "solely assessed the needs of Telford & Wrekin" (para 1.7 Arc4 SHMA) in doing so the Council has determined that Telford & Wrekin is its own HMA and the proposed housing requirement of 15,550 dwellings is necessary to meet only its own housing needs based on economic growth and delivering affordable housing. Unfortunately the Council's terminology is somewhat confusing because the proposed housing requirement is not exceeding OAHN in fact it is meeting the economic led housing needs of the District (see answer to Q1.1 Matter 1).

However in a regional context where the Council has acknowledged that co-operation is necessary on the wider strategic matter of housing shortfalls and unmet housing needs arising in the West Midlands region from both Birmingham City Council and the Black Country authorities (para 7.24) there is an argument that the Council should be doing more. Telford is uniquely placed to do so given :-

- the historic role of Telford as a new town which has not yet reached its population target of 225,000 residents the population at the end of the plan period is only estimated as 198,500 residents ;
- the Council's pro-growth agenda "*to promote Telford's role as a major contributor to West Midlands economy*" and "*the drive to support growth and change in the Borough is therefore a key objective at the local level but also supports Telford's continued role within the wider region*" (paras 3.2.2.5 & 3.2.2.8 Housing Growth Technical Paper June 2016 (Document B2A)) ;
- the large supply of publicly owned land.

The HBF do not accept the Council's argument that the inter-relationship with the urban conurbations of the Black Country and Birmingham is weak. Telford is located only 45 minutes by road / 40 minutes by rail to the east of the Greater Birmingham conurbation. The Tables in the Telford & Wrekin OAHN Final Report by Peter Brett Associates published in March 2015 illustrate that Birmingham is ranked 3rd for migration patterns and ranked 5th for commuting patterns.

Therefore it is contended that the housing requirement should be higher than 15,550 dwellings.

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