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EXAMINATION OF THE TELFORD & WREKIN LOCAL PLAN 2011-2031

MATTER 1 – HOUSING NEEDS, REQUIREMENT AND SUPPLY

Introduction

This is a response to the specific questions raised by the Inspector in the Matters and Issues Document and it should be read in conjunction with our representations submitted on behalf of various clients (including some on behalf of Seabridge Developments Limited) on 15 March 2016 (not 2015 as stated on our letter!), in response to the Pre-submission Local Plan.

Question 1.1

Is the OAHN of 9940 homes sufficiently justified and in line with the NPPF and PPG?

Advance Land & Planning is a sole practitioner Consultancy which does not have the resources that are available to the Council, or the larger planning consultancies to provide a detailed review and response in relation to demographics and all of the associated statistical evidence that is associated with an OAHN. I do not, therefore have the detailed knowledge and understanding that others might purport to have on this subject matter.

Furthermore, whilst I fully appreciate that housing need and supply has to be calculated somehow and I certainly don't wish to denigrate those professionals who specialise in this subject matter, I am compelled to quote the phrase popularised by Mark Twain – "*lies, damned lies and statistics*". To my mind, slight adjustments to assumptions, parameters and inputs can deliver a wide range of differing results to suit a purpose. The outcomes cannot therefore be regarded as certain and I suggest that in the light of the objectives of the NPPF, if there is any doubt, it is better for the Plan to exceed any suggested 'minimum target'.

As a local practitioner, however, I have a good knowledge of the area and I possess a fairly good understanding of the local political and planning context, which I believe has influenced the development strategy that is now being promoted in this Plan.

It is my opinion that in the run-up to the last general election, following a difficult couple of years when the deliverable housing land supply stood at only 2.5 years, resulting in a spate of applications for residential development on sites that often proved unpopular elements of the local communities, the Council took a political decision to reduce the amount of new housing development within the Borough, especially on greenfield sites around the Town – effectively to ‘stem the bleeding’.

This meant dropping the growth strategy put forward as part of the Shaping Places consultations and moving to the present one, which I suggest is unambitious and not sufficiently pro-growth for a former ‘New Town’ such as Telford, which has a good standard of infrastructure and also fewer constraints to development than many other older settlements and the West Midlands conurbation.

It seems to me that the objectives of the NPPF to significantly boost the supply of housing and to promote general economic growth have started to be delivered in Telford – not to everyone’s liking of course and I just cannot reconcile the strategy now promoted by this Plan which seeks to reduce housing provision a level (circa 800/annum) which is about 33% lower than the level of actual housing completions (circa 1200) that are now being achieved.

Has appropriate account been taken of demographic and economic information as well as market signals?

The Council’s assessment is based upon 2012 Sub-National Household Projections (SNHP) but the NPPG states that the OAHN should be based upon the most up-to-date information and that would be the 2014 SNHP, which indicate a higher household growth than the 2012 based figures.

The cost of a typical house is 7 times mean income rising to 9 times in parts of the rural area and Newport and average house prices are significantly higher in the rural area. This market signal should have been given greater weight by the Council when formulating its development strategy, particularly for the rural area.

Has an assessment been made of affordable housing need as part of the process?

The proposed housing provision set out in the Plan will not meet the need within the Borough for affordable housing and so I suggest that this unmet objective represents justification for increasing the housing provision across the Borough. This is particularly so in the rural area, where the suggested policy of 'infill only' will deliver no affordable housing at all.

Can the Council explain and justify the timing of the release of the updated SHMA document? How does this relate to the previous SHMA document?

I am concerned that the evidence that the Council has published has, to a large extent, been retro-fitted to support the Council's new strategy and many of its proposals. One such pointer is the publication of a revised/updated SHMA that I fear may have been contrived, in order to better fit the political instruction for a lower housing provision.

I will leave others to postulate on how the SHMA can or cannot be justifiably modified from an initial net requirement of 18,691 additional dwellings in the Housing Vision document of 2014 (ES24), significantly lower in the ARC4 report of June 2016. I am just concerned that the 'updated' SHMA is not entirely 'objective' and its late arrival seems to me to point to a document that has been produced to substantiate rather than inform the Plan's proposals.

In any event, the Council must have been aware of the emerging revised SHMA (after all it commissioned the update and I further suggest that Officers must surely have seen a draft prior to its publication. So why then did the Council proceed to publish the Plan and why did it slip the new SHMA into the evidence base only two days before the end of the consultation period and delete the original one? I suggest that this is most irregular and served to prejudice the proper consideration of the Plan on publication.

Furthermore, I question the legality of publishing such a key element of the evidence base after the Plan had been prepared and so late in the day when importantly, those with an interest in the issues but not familiar with the process, will be left wondering why there is such a divergence from the previously publication?

I suspect that this issue is potentially a point of legal challenge and I respectfully suggest that in order to remedy this fundamental procedural flaw, the Council should re-consult on this and a whole range of new 'evidence' that it has procured since the Plan was first published.

Question 1.2

Is the Plan's proposed housing requirement (15,555 homes) sufficiently justified in line with the Framework and PPG and is it both deliverable and sustainable?

As I have stated earlier, I have concerns about the soundness of the SHMA and the conclusions of the OAHN and I cannot reconcile a strategy that proposes to deliver an average of only 778 dwellings each year throughout the Plan period, when even in economically and politically challenging times that current prevail, Telford has managed to deliver an increasing number of new homes in recent years including over 1200 in 2015/16 with well over 1400 predicted to be completed in 2016/17. The proposed reduction runs counter to the overarching objective of the NPPF to significantly increase the delivery of new homes and to boost economic growth. It also runs counter to the original purpose of Telford as a New Town and its more recent aspirations to be a regional Growth Point. Furthermore, the reduction in delivery is not justified by any overriding planning policy or infrastructure constraints.

In my duly made representation I suggested that in order to better fulfil its role in the sub-region, Telford could and should be required to deliver an average of 1000 new homes over the 20-year period of the Plan (20,000 dwellings in all) and I now further suggest that the trajectory should be weighted in favour of the next five years, in order to: help make up for past shortfalls; satisfy current demand; help reduce affordable housing need (including in the rural area) and to better achieve the overarching objectives of the NPPF referred to above.

Question 1.3 – Job Creation and Labour Force

The Council is rightly seeking to attract new commercial (office and industrial) development into Telford in order to expand its economic base, by extolling the virtues of its existing infrastructure and good connectivity with the West Midlands conurbation, the wider region and the national road and railway network. This is commendable and is to be endorsed.

I suggest, however, that the existing labour force in Telford is insufficient to supply the new commercial development and so without more new homes to match the economic growth, more commuting will occur from outside the Borough, which is not a sustainable approach.

Furthermore, it flies in the face of the Council's stance that it should not be required to meet any of the unmet housing needs from Birmingham and the Black Country etc. To my mind the Council is seeking to increase economic investment in the Borough, without providing the required increase in new homes in the right places, to accommodate the new workers from outside of the Borough.

Question 1.4**Can an adequate and flexible supply of housing land be demonstrated**

The Council has clearly under-performed against a previously adopted target and so a 20% buffer allowance is appropriate and should be applied.

I suggest that two of the main reasons for the historic under-delivery are the significant constraints to the development of many of the brownfield sites within the Telford urban area, which in many cases, do not represent particularly attractive locations and which more often than not are commercially unviable.

Whilst it is right that encouragement should be given to the re-use of previously developed land, it is a dangerous and unrealistic strategy to rely so heavily upon existing commitments within the existing urban area, especially once the new villages of Lawley and Lightmoor have been completed. I suggest that it would be prudent to identify additional housing land allocations, both within and around the edge of Telford to provide greater flexibility to the Plan and to mitigate the potential for an under-delivery of new homes.

Question 1.5**Are adequate safeguards in place to address any unexpected shortfall in housing supply during the Plan period?**

In the face of criticism, the Council may subsequently indicate that it will carefully monitor and quickly review the Plan should the need arise. Following criticisms by the Examiners of the Core Strategy, it was supposed to speedily prepare a Land Allocations DPD and then also to embark on an early review of the Plan, but that never happened and quite frankly, given the current political context and the fact that development is rarely welcomed and is not usually a 'vote winner', I have no confidence it would be any different on another occasion.

I suggest that additional sites (Omission Sites – Matter 8) should be allocated to provide a degree of flexibility. I have also previously suggested that it would be prudent for the Plan to identify Reserve Sites that could come forward should delivery not match expectations.

Finally, in my response to Policy HO3, I have previously referred to the need for a flexible policy mechanism similar to the Modification incorporated into the Shropshire SamDev Plan 2015 (Policy MD3), in order to allow for sustainable development outside settlement boundaries to be permitted where the housing trajectory indicates a potential under-delivery of housing against the required target.