



Acres Land & Planning Ltd

'Acres of space'

Hallam Land Management Ltd & Seabridge Developments
Respondent No.

Matter 1 (Part 1): Housing Needs and Requirements

TELFORD & WREKIN LOCAL PLAN 2011-2031: CORE STRATEGY EXAMINATION MATTERS, ISSUES AND QUESTIONS.

1.1 Is the Council's full objective assessment of housing needs (totalling 9,940 homes for the Plan period) sufficiently justified in line with the National Planning Policy Framework (the Framework) and Planning Practice Guidance (PPG)? Has appropriate account been taken of demographic and economic information, as well as market signals? Has an assessment been made of affordable housing needs as part of this process? 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?

The Government has indicated that it wishes at least 1,000,000 new homes to be delivered within this Parliament. The current acute housing shortage is now regarded as one of the top priorities for Government, LPA's and the private sector. Paragraph 47 of the NPPF emphasises the need for a significant boost in the supply of housing. Indeed, the RTPI has launched a national campaign entitled 'Housing the Nation' in an attempt to redress the problem and both the public and private sector are being urged through emerging legislation in the Neighbourhoods Bill to improve their delivery.

If these pressing objectives are to be met, those authorities which do have legitimate housing needs and have the potential capacity (as well as the infrastructure support to them) should commit to meeting those needs, and where appropriate help accommodate the housing needs of neighbouring authorities. Yet Document F2 states that the Council will not assist in meeting the shortfall of homes for the West Midlands conurbation or South Staffordshire.

Yet Telford and Wrekin is not only sharply reducing its housing target – down from 1325 per year in the Regional Spatial Strategy to 777 per year in the T & W Submitted Local Plan, but is seemingly consciously delivering a shortfall in new homes compared with its economic and employment objectives – meaning that the Local Plan is completely out of synch.

The March 2015 PBA report should be viewed both in the context of the 2014 Housing Vision SHMA (produced on behalf of T & W). Paragraph ES24 makes it clear that *'taking account of both the requirement for affordable housing from the existing population between 2011-2016 and the requirements for all housing from projected household growth over the period from 2011-2031 there is a requirement for 18,691 additional dwellings in the Telford and Wrekin area between 2011 and 2031'*.

The Housing Vision report refers to Core Housing Market Areas (Map 1.3) which extend beyond the boundaries of Telford and Wrekin, but also show the 'Core, Wider and

Peripheral Housing Market Areas' (on Map 1.4) which extend throughout Shropshire, Staffordshire and the West Midlands conurbation. There can be no doubt that the economic influence of Telford extends well beyond its Borough boundaries and that Telford serves a regional, if not a national role. Logically the same principle should apply to the housing market.

The 2015 PBA report, (produced subsequently) takes a somewhat different stance, defining the Telford Housing Market as co-terminus with the Borough boundaries. This naturally results in a much more limited housing requirement. The case for this approach is based on a 'containment test' dependent upon at least 70% of households moving to and from houses within the Borough – based on a single year prior to the 2011 Census (which Telford still doesn't quite meet). This presents a distorted impression of the degree of containment 'enjoyed' by Telford, since the 2010-2011 period represents a low level in the delivery of homes (according to Figure 4.1 of the PBA report only 551 dwellings were built during 2010-2011), when, due to the 2008/9 recession, people were not able or less inclined to move home and/or migrate to Telford and Wrekin.

Therefore contrary to the Housing Vision report, the PBA report undertakes a **policy-off** 'Objectively Assessed Housing Need' of 9,940 new homes over the 20 year plan period – or 497dpa - based on Telford being a self-contained housing market. However, the PBA study has three clear shortcomings.

Firstly, it was published before the 2014 based Household projections were issued which now point to a higher level of basic household need triggered by slightly greater migration flows and a higher level of population growth. This needs to be updated to reflect the most up to date position,

Secondly, it does not make a positive allowance for economic indicators, despite the evident difference in strategy between employment and housing. (Other participants at the EIP will present evidence on the economic projections which apply to Telford & Wrekin), and

Thirdly, it ignores the changes in housing market signals which point towards Telford becoming less affordable for people than hitherto (especially in the more rural parts of the Borough).

Above all however, the PBA assessment as a **policy-off** assessment is emphatically **not** equivalent to a Local Plan housing requirement, nor should it be used as a basis for the calculation of housing land supply – which is what the Council has done. Housing Land Supply Studies should be related to the **full adopted Local Plan (policy-on) adopted housing requirement** for the Borough.

Against that background, the **policy-on** calculation of the OAN should be influenced by:-

Firstly, an acknowledgement (as set out in the PBA report itself) that any Plan targets should be seen as **minima** and not simply based on the product of raw housing projections – important though those may be. The report reiterates the policy within the NPPF which emphasises that plan targets cannot undershoot the OAN, unless an authority can

demonstrate that it lacks the sustainable capacity to meet it, (para 6.8). In this case an adherence to the exact PBA calculation of 497 dwellings per year ignores both the intention and the spirit of this advice,

Secondly, the requirement should allow for the 'traditional' and functional role of Telford as former New Town and a receptor for inward migration flows both from Shropshire and from Staffordshire and the West Midlands. This is not something which can simply be forgotten. Britain has invested substantial amounts of public money in Telford's infrastructure and supported its inward investment through Assisted Area status. It should not now simply close its doors to new migrants simply to reflect the parochial view of existing Councillors,

Thirdly, Telford has a practical role as a natural home for newcomers with a modern image and an ambition for growth. Whilst the town is now maturing and has arguably moved beyond its adolescent stage (with its awkward growing pains) it is nevertheless ill-suited to becoming a stagnant middle-aged settlement with declining ambitions and negative growth aspirations,

Fourthly, in view of the wealth of land opportunities (beyond those simply identified by the Council) and good quality of infrastructure Telford should be performing a 'service' to neighbouring authorities with tighter constraints and more pressing problems and helping to meet the needs of neighbouring areas as part of a wider strategic role. The mean-spirited response within Document F2, that it is not reasonable to assist other authorities in neighbouring South Staffordshire and the West Midlands to meet their needs, is both disappointing and depressing and runs counter to the wider policy advice given to local authorities.

Turning finally to the publication of **the Council's Evidence Base documents**; I raised objection to the Council's Chief Executive at the end of the Publication Plan consultation stage, that notification about a new SHMA produced by ARC4 has been circulated to participants only two working days before the end of the consultation period and that the new document had been placed on the website at a time when most participants would have already completed and submitted their comments. I pointed out that the previous SHMA produced by Housing Vision had also mysteriously disappeared from the Council's website.

I received an email reply from the Council's Assistant Director, Katherine Kynaston, indicating that the document could not be published earlier because it was not available, but accepting that ideally it was 'good housekeeping' to issue evidence at the beginning of a consultation period. (I have since been made aware however that the new ARC4 document was made available at a previous planning appeal). I replied to the email from Katherine Kynaston pointing out that the policies and proposals in the plan appeared to be 'putting the cart before the horse' – and pointing out that it was an important principle in planning that policies and proposals should flow from the evidence (rather than vice versa). In this case, it seemed to me, the reverse seemed to be true. (I attach a copy of the email exchange).

I undertook that I would write to the Inspector about this, which I have since done. Notwithstanding the absence of any reference to this in the pre-examination correspondence, the issue has now been placed on the agenda and the Housing Vision SHMA has now been placed on the website. However, the matter of what information was put in front of the public when people made their representations in March 2016, remains an issue. With that in mind, Legal Advice has been obtained from David Manley QC from Kings Chambers (which I attach) which questions the procedural approach adopted by the Council and raises concerns about the appropriateness of the consultation undertaken. This should perhaps be discussed during the procedural stage at the outset of the EIP.

1.2 Is the Plan's proposed housing requirement (totalling 15,555 homes for the Plan period) sufficiently justified in line with the Framework and PPG? In particular, can it be shown that this figure is both deliverable and sustainable?

The 15,555 housing requirement target set by the Council represents a sharp reduction compared with the former RSS target, (26,500 dwellings), a decline compared with the Housing Vision housing requirement (18,691 dwellings), and a significant shortfall compared with the Preferred Options (Housing & Employment Sites) version (Document D3a) which stated in paragraph 3.21 *'A growth target of c20, 000 additional homes to be built over the Plan period.. is slightly higher than the assessed needs identified in para 3.18. The various factors set out in para 3.20 justify setting the Plan target above assessed needs. This is in line with Government policy objectives seeking to boost housing supply. Indeed, it would be inappropriate for us to adopt a Plan which merely delivers past trends'*.

It is also at the bottom end of the range of figures set out in the original *'Shaping Places: Strategy & Options Document'* produced in April 2013 which showed a range of targets from 682 per year (housing completion led) to 1325 per year (hub for growth and business) spelled out within Table 1 and paragraph 4.1.2 of the document.

This demonstrates very clearly both the low rate of recent completions (over the 10 year period up to 2013 when strategic allocations have been slow to come forward) and also the fact that the Council have clearly now departed from a 'growth and business led' strategy. In my representations I argued that at least 20,000 dwellings, or 1,000 dpa should be the Council's target.

In terms of the **sustainability** of the housing number, we take the view that in the absence of physical and environmental policy constraints and the economic, social and environmental imperative for delivering new housing in places where infrastructure either already exists or can readily be provided, there should be a clear emphasis towards providing **more** rather than **less** housing in Telford & Wrekin. The calculation of an OAN is not intended to be a 'brake' on development. On the contrary, it is intended to be a base figure from which LPA's should build. Furthermore, the NPPF emphasises that the presumption in favour of sustainable development should be a 'golden thread' running through the policy provision, plan making and decision taking.

In Telford & Wrekin a completely contrary philosophy has taken hold and the Council is firmly resisting new development even to the point where it is referring a recently upheld

planning appeal at Wellington to the High Court on Agricultural Land Quality grounds (because it forms Grade 2 agricultural land) – whilst simultaneously promoting its own land at Muxton through the Local Plan (which is also Grade 2 agricultural land).

In terms of **deliverability**, the Council emphasises that it has adequate housing land supply to deliver its proposed target, albeit the rate of deliverability will inevitably depend upon the scale of land release (and whether it matches the housing requirements in the Borough – with sufficient flexibility to allow for non-implementation), the range of sites available and the extent to which they appeal to home-buyers (and renters), the speed of building (which again is partially dependent upon the housing market in a particular location), the speed of issuing consents (together with the rate of discharging conditions, negotiating Section 106 agreements, overcoming any legal, ownership or practical constraints) and the Council's attitude to further proposals brought forward as windfalls.

In the past, Council and HCA land has been slow to come forward and there has long been a view locally that the HCA has delayed marketing housing land in order to secure 'best value'. During the mid 2000's several strategic sites were released including Lawley, Dawley, Lightmoor (Bourneville Village) and Ketley (Millenium Village), so that gradually housing output improved, but from a very low base and well short of 1980's and 1990's levels.

There is a clear need however for a wider range of small and medium sized sites to fill in the gaps, as well as for a larger strategic site to provide for the housing needs of the future. The Wappenshall site fulfils that objective extremely well, insofar as it is well related to infrastructure, well linked to employment and has huge heritage, ecological and recreational advantages in terms of creating a positive link with the Shrewsbury and Newport Canal.

1.3 The PBA Objectively Assessed Housing Need Report (para 6.15) states that the Plan's intended growth option would "add 6,700 workers to the resident labour force over and above the Trends scenario; but other things being equal the number of workplace jobs would increase only by hundreds." Can the Council clarify how this likely imbalance will be addressed and explain the likely source of this additional population?

The statement in paragraph 6.15 of the PBA report pre-supposes that the 497 dwellings per year represents a sound assessment of housing growth and therefore that a 777 dwelling target would represent a 'super-growth' option. It suggests that this would result in a dramatic increase in the workforce and a fundamental change in the commuting patterns. However, there is already a heavily distorted homes/jobs strategy within the plan whereby the Council is anticipating substantial employment growth in Telford. Furthermore, there is a marked difference in the amount of outward v inward commuting to/from Telford whereby Telford is a **net importer** of labour on a daily basis, both from Shropshire and the West Midlands, as shown in Table 2.26 – 2.28 of the Housing Vision report – amounting to 5,765 net commutes per day in 2001.

1.4 Can an adequate and flexible supply of housing land be demonstrated in respect of (1) the Local Plan's housing target and (2) the five year housing land supply as required by the Framework and PPG? In both of these cases, are the components of housing supply clearly set out and appropriately justified? [Inspector's note: It is suggested that the

Council revises its Housing Land Supply Statement¹ to cover the components of overall land supply (through the Local Plan period) and to update five year land supply data to accord with the Plan's proposed housing requirement.]

The Inspector will need to be able to demonstrate that the Council can deliver a 5 year housing land supply (based on a realistic assessment of housing requirements – ie. not the 497 figure currently used by the Council). This requires a more thorough consideration of sites and a recalculation of the 5 year supply assessment to revert to a 20% buffer, rather than the 5 % buffer which the Council has used by changing the base target. It will also necessitate a full review of lead-in times and build-out rates to ensure that enough sites have been identified to deliver the 5 year supply and satisfy peoples' housing needs. Further evidence on this will be presented at the EIP.

In looking further ahead it should be borne on mind that the Inspector for the current Telford & Wrekin Core Strategy was compelled to limit the adoption of the plan to a 10 year period (from 2006-2016) simply because the Council could not demonstrate that they had proposed the release of sufficient land to provide for the full 20 year period. This is contrary to good practice and is completely unacceptable in a town such as Telford where land supply should not be an issue.

1.5 Are adequate safeguards in place to address any unanticipated shortfalls in housing supply during the Plan period?

No. There is no trigger mechanism to release further land if there turns out to be a shortfall and the Council has tended to take an aggressive approach towards resisting un-allocated sites privately owned sites which do not conform to their strategy. There needs to be a suitable release mechanism, perhaps within Policy SP 4, to allow suitable sites to come forward without the risk, costs and delay of reverting to an appeal and without the time lag of waiting for a Local Plan review.

Notwithstanding this, there should also be a suitable trigger to ensure that a review can take place to bring forward further longer term land, especially if the strategic sites are slow to come forward.

The Government now attaches critical importance to achieving the delivery of new housing, including affordable housing. This Local Plan appears to want to aim for the 'lowest common denominator and avoid the important decisions which are necessary to plan ahead.

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