

Gladman Developments Ltd

**Matter 2 Hearing Statement
Telford and Wrekin (2011 – 2031)**

**Duty to Co-operate and
Relationship with Other Plan Areas**



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

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

- 1.1.1 Telford and Wrekin is considered to be a self-contained Housing Market Area (HMA) but one which has strong links with the wider sub-region including Shropshire, the Black Country and Birmingham both in terms of travel to work and migration.
- 1.1.2 It is therefore essential, that Telford and Wrekin work with the surrounding authorities on cross boundary strategic issues to ensure that these are addressed and to ensure that housing and employment needs are met in full.
- 1.1.3 The Council has stated within the Local Plan (para 1.3.2.2) that they have had and continue to have discussions on cross boundary planning issues with other Councils across the West Midlands. However, they have also stated (para 1.3.2.3) that they have not been convinced, based on the current evidence, that they should be a participant in any redistribution of any future housing growth outwards from the conurbation.
- 1.1.4 Given the scale of the unmet housing need problem in the West Midlands (See response to Question 2.2 below) and the Government's continued and renewed vigour to tackling the housing crisis, reducing high housing costs and resolving falling social mobility¹ it is incumbent upon every LPA with links to the West Midlands conurbation to do everything it can to contribute to the solution.
- 1.1.5 This includes Telford and Wrekin Council who at present, have simply not tested with any rigour, the ability of the area to contribute to the wider needs of the conurbation, despite requests from surrounding Local Planning Authorities (LPAs) to do so.
- 1.1.6 With the Telford and Wrekin Local Plan covering the period to 2031 and no review mechanism currently written into the Plan, there is a serious danger that this issue will simply not be tackled let alone be resolved.
- 1.1.7 It is therefore considered that Telford and Wrekin's current position on the issue of unmet housing need from the West Midlands conurbation could amount to a failure of the Duty to Co-operate.

¹ Prime Minister's , Speech to Conservative Party Conference 2016 (<http://press.conservatives.com/post/151378268295/primeminister-the-good-that-government-can-do>)

1.2 Question 2.2 - Given the Plan seeks to set a housing requirement that exceeds its stated assessment of Telford and 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?

1.2.1 As set out above, the Council have stated within the Local Plan (para 1.3.2.2) that they have had and continue to have discussions on cross boundary planning issues with other Councils across the West Midlands. However, they have also stated (para 1.3.2.3) that they have not been convinced, based on the current evidence, that they should be a participant in any redistribution of any future housing growth outwards from the conurbation.

1.2.2 This continues to be the view of the Council, as set out in their correspondence with the Inspector (Document Ref F2a) which states that the Council has concluded that it is both inappropriate and unreasonable to accommodate any of the unmet housing need from the West Midlands or South Staffordshire.

1.2.3 This view has been maintained despite the fact that there continues to be requests from the Black Country authorities and South Staffordshire to accommodate a proportion of Birmingham's unmet need. The Council continue by stating that Officer's have explored these requests and contend that without any substantive evidence supplied by the Black Country authorities, it continues to be unreasonable to be asked to meet the unmet requirements of neighbouring authorities.

1.2.4 However, the issue of Birmingham's unmet needs is serious and of such a substantial scale that it will need the full cooperation of all Local Planning Authorities with strong links to Birmingham to resolve. This must surely put Telford and Wrekin's current position in serious doubt.

1.2.5 The Inspector's Report on Birmingham's Development Plan 2016 (Doc Ref G4(a)) states at para 216 that:

'Birmingham is not the only local planning authority area that faces difficulties in providing sufficient housing land to meet the needs arising within its own boundaries. But the scale of potentially unmet need in the city is exceptional, and possibly unique. Without strategic Green Belt release, there are sites for around 46,000 new dwellings – only just over half the objectively-assessed need for 89,000. The release of Green Belt to provide an additional 5,000 dwellings at Langley over the Plan period, and a further 350 dwellings at Yardley, would make a very substantial contribution towards meeting the shortfall. For the reasons set out above, the evidence does not support any additional strategic residential allocations in the Green Belt.

1.2.6 Paragraph 217 goes on to state that:

'Even with the release of the Langley and Yardley sites, the BDP will leave a shortfall of around 38,000 dwellings that will need to be met elsewhere in the Greater Birmingham HMA. The duty to co-operate requires good faith on the part of other authorities in the HMA in helping to meet the shortfall. Equally, though, it requires that BCC should maximise the provision of housing land within the city boundary to meet the assessed needs, to the extent that this is compatible with the objectives of sustainable development. The release of the Langley and Yardley sites is necessary to achieve this'.

- 1.2.7 The Birmingham Inspector's report highlights the scale of the issue facing the West Midlands and this is based on the figures contained in the Birmingham Development Plan which has subsequently been 'called-in' by the Secretary of State. There were others at the Birmingham Local Plan Examination who had undertaken OAN exercises for the HMA who were suggesting that the OAN could be considerably greater than that included within the Development Plan. In addition, the 2014-based Household Projections have subsequently been released and show a considerable increase in population growth for the West Midlands above the 2012-based Projections upon which the Birmingham Development Plan was based. This increased growth is driven predominately by both Birmingham and Coventry.
- 1.2.8 The scale of the unmet need is colossal (at minimum 43,000 dwellings) and the situation is only getting worse. It's an issue which needs to be addressed in the immediate future to ensure that housing needs are met, social concerns are addressed and the Government's agenda of increasing home ownership is achieved.
- 1.2.9 These social concerns are at the heart of the Government's present approach to housing. In his conference speech², the new Secretary of State characterised it thus:

'Far too many young people can't get a foot on the housing ladder. Many are being forced to live back with mum and dad, as rents soar faster than wages.

Here in Birmingham, in 1997 the average house price was around 3 times the average income. Last year it was more than 5 times. One and a half million households contain at least one adult who says he or she wants to buy or rent their own home but simply can't afford to do so.

Harold MacMillan put it best, more than 90 years ago: "Housing is not a question of conservatism or socialism," he said. "It's a question of humanity."

Tackling this housing shortfall isn't about political expediency. It's a moral duty. And it's one that falls on all of us.'

²Sajid Javid, Speech to Conservative Party Conference 2016 (<http://press.conservatives.com/post/151284016515/javid-speech-toconservative-party-conference>)

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- 1.2.10 The North Warwickshire Draft Local Plan (July 2016) has met this issue head on and is testing the potential delivery of 3,790 units to meet the Greater Birmingham and Black Country HMA's identified housing shortfall (para 7.39). This is a Local Plan that covers the same plan period as the Telford and Wrekin Local Plan and is for a LPA which like Telford and Wrekin, sits outside of the HMA. It is therefore somewhat surprising, that Telford and Wrekin have not even attempted to test similar options.
- 1.2.11 In addition, the Council's stance on OAN is that they have set a housing requirement (778 dwellings per annum) that is in excess of the Council's current assessment of OAN (497 dwellings per annum). It is Gladman's firm view that the Council's assessment of OAN is fundamentally flawed and is a significant under-estimation of the level of housing need within Telford and Wrekin across the Plan period. Gladman commissioned Barton Willmore to undertake a Framework and PPG compliant assessment of OAN (See Hearing Statement on Matter 1) which concludes that the true OAN for Telford and Wrekin is between 826 and 891 dwellings per annum. This is significantly above the housing requirement included within the Plan and therefore the issue of whether the housing requirement exceeding the OAN assessment justifies the Council's position is moot.
- 1.2.12 Even if the Inspector is minded to accept the Council's assessment of OAN, the housing requirement set by the Council is required to address both housing needs and the level of economic growth that the Council is anticipating will be delivered. The Housing requirement as set does not address any unmet housing needs from any other HMA.
- 1.2.13 It is therefore considered that Telford and Wrekin's position of not seeking to meet any unmet housing demand from the West Midland's conurbation is not justified.
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