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Submission on Behalf of Redrow Homes Midlands.

Telford and Wrekin Local Plan Examination

Matter 2 Duty to Co-operate.

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?

[Inspector's note: the Council is also asked to comment on findings in paragraph 6.13 of the PBA Objectively Assessed Housing Need Report2]

1 We have submitted information relevant to the consideration of this matter

in the report of Mr Roland Bolton which is Appended to our Statement on Matter 1.

The issues we wish to comment are

- The unmet need in Birmingham and Shropshire as out lined in Appendix 1 of the report at paras A1 12- 20 and A21-A 32
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The Greater Birmingham and Solihull LEP Black Country Local Authorities Strategic Housing Needs Study Stage 3 Report August 2015

- 1.1** In considering the future level of migration, it should be noted that in (paragraph 10.34 of this report by the same authors as the Telford SHMA) it is highlighted that the Framework is clear that the HMA is the main geography for which housing need should be met but the Duty to Cooperate does not end at the HMA boundary. It suggests that where unmet need is a strategic issue then the Duty can be used to help meet strategic housing needs in a sustainable way beyond the HMA.
- 1.2** While the authors of the OAHN Report 2015 state (paragraph 10.35) that they did not look at this in detail, because the 'export option' was not part of the study brief they do suggest that Telford may be a suitable location to accommodate part of the shortfall.
- 1.3** It should be noted that while the authors did not look at the export option it is now clear that the "export option" is going to have to be engaged. If the principle of the framework of meeting the country's housing need is to be met (Framework paragraph 17).

The undersupply in Birmingham Housing Market Area

- 1.4 The wider Birmingham and Black Country HMA currently has a shortfall of available land in existing and emerging Local Plans. Given the historic relationship between Telford & Wrekin with the West Midlands conurbation and Shire authorities and the prevalent migration and travel to work links between the two areas, there is clearly the potential for Telford to be able to assist in meeting this need by accommodating higher levels of migration such as it has done in the past.
 - 1.5 The Main Modifications to the Birmingham Development Plan consider there to be a shortfall of 37,900 dwellings (IR 61).
 - 1.6 Only North Warwickshire is considering meeting some 10% (3790 dwellings) of this unmet need based upon patterns of migration and commuting from Birmingham (North Warwickshire Local Plan Consultation Draft, paragraph 7.38).
 - 1.7 The Birmingham Plan Inspector required a main modification to paragraph 4.7 of the plan should be amended to require further work to be undertaken to produce a strategy to meet this unmet demand and that this strategy be incorporated into future plans.
 - 1.8 The Telford and Wrekin Local Plan presents an opportunity to positively plan to accommodate some of this unmet need and the housing requirement should address this long standing and significant issue.
 - 1.9 It is notably that the increase in the output of the industry in recent years in Telford and Wrekin is being supported by much higher rates of migration than those that have occurred in the recent past. These rates appear more aligned with the experience of the council in the late 1990's rather than in the 2000's during which restrictions on greenfield development and then the recession subdued build rates and migration.
 - 1.10 This suggest that the area is already beginning to fulfil this role.
- 2 The evidence in the OAHN Report 2015 is that the Councils economic strategy is reliant upon it achieving an uplift in net in commuting, this requires other local authorities to provide housing for these workers. This is clearly a strategic cross boundary issue that requires agreement from neighbouring authorities.
 - 2.1 The Framework paragraph 158 requires that Local planning authorities ensure that their assessment of, and strategies for, housing and employment are integrated, and that they take full account of relevant market and economic signals. The OAHN Report 2015 and the SHMA 2016 are not soundly based and as such the housing and economic strategies are not interrelated.
 - 2.2 Paragraph 5.20 of the OAHN Report 2015 suggests that the prosed level of housing provision would only add some 3,100 extra resident workers to the labour force. We consider that these would take some of the 4,200 new jobs that are assumed to be filled existing residents already in employment as this figure is not supported by evidence. This still leaves all of the 3,600 jobs to be taken by the assumed increased levels of in commuting.
 - 2.3 In neither South Worcestershire or Aylesbury Vale have inspectors found that changes to levels of commuting sound. However, if such an assumption is accepted then a cross boundary arrangement needs to be entered into to secure the

- 2.4 No such arrangements have been entered into and in so far as the evidence reveals the council have failed to notify the surrounding authorities that the proposed strategy is reliant upon increased in commuting form their areas.

