



Acres Land & Planning Ltd

'Acres of space'

Hallam Land Management Ltd
Respondent No.

Matter 5 General Development Requirements & Specialist Housing

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

MATTER 5 – GENERAL DEVELOPMENT REQUIREMENTS & SPECIALIST HOUSING

5.1 Are the Local Plan's detailed requirements for new development clearly expressed and adequately justified, with particular reference to viability? Specific comments are requested in respect of the following matters:

- housing mix and housing standards (policy HO4)
- affordable housing (policies HO5 and HO6)
- biodiversity and woodland enhancement (policies NE1, NE2 and ER12)
- open space provision (policy NE4)
- promoting alternatives to the private car (policy C1)
- renewable energy and reduction of carbon emissions (policy ER1)
- waste planning (policy ER8)
- water conservation and efficiency (policy ER10) - parking standards (Appendix F).

The wording of Policy HO4 is expressed in fairly dilute terms and has been amended (within the Submission version) to include a caveat so that any requirements are intended to meet a specific need and will not threaten the viability of development overall.

Subject to these amendments we consider that this policy is broadly acceptable, albeit there should not be further technical requirements which are not fully justified. However, it should be noted that the Government has removed the requirement for developers to provide Lifetime Homes – this is now a voluntary option. Standards for accessible housing are outlined within the Building Regulations.

In addition, do the requirements of policies HO4 and ER10 accord with the Written Ministerial Statement dated 25 March 2015?

The impact of the Ministerial Statement dated 25th March 2015 has been addressed adequately by the HBF in their representations.

5.2 Are the criteria for specialist housing set out on policy HO7 adequately justified?

The HBF has highlighted the point that Policy HO 5 imposes unrealistic expectations for affordable housing where there are high development costs. Telford has a preponderance of brownfield sites with a mining history which are often prevented from coming forward. The policy needs to reflect the presence of high development costs on brownfield land.

The policy is clearly written on the basis that the 25% target for Telford and 35% target for Newport is a minimum, not a maximum and therefore there needs to be a 'viability safeguard' where sites are incapable of delivering the 25% and 35% targets. The policy should refer to **seeking** rather than **requiring** affordable housing, since a S106 agreement is a voluntary arrangement.

The solution to achieving more affordability, as always, is to tackle the scale of housing need as well as tackling the mix of housing. Inevitably, the more housing which is provided, the greater will be the tendency for prices to stabilise. We are concerned that the Council is embarking upon a strategy which restricts housing (thereby increasing problems of affordability due to rising prices), which in turn means that more subsidy is required to help people gain a foot on the ladder. The Council needs to reverse this trend to create a more virtuous circle where prices and demand/need are more in balance.

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