



Acres Land & Planning Ltd

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Hallam Land Management Ltd & Seabridge Developments Ltd Matter 1 Housing Requirements

TELFORD & WREKIN LOCAL PLAN 2011-2031: CORE STRATEGY EXAMINATION

HOUSING REQUIREMENTS – THE IMPACT OF THE HOUSING WHITE PAPER.

On Tuesday 7th February 2017, the Government finally issued their long-awaited Housing White Paper which therefore emerged just before Day 4 of the Telford & Wrekin Local Plan Inquiry reconvened to discuss housing land supply. Since few people had had time to read let alone absorb the content of the Housing White Paper, participants were given 14 days to respond with brief views on the implications for the Telford & Wrekin Plan.

The White Paper was not, as expected a firm policy document. It is more a 'Green Paper' for discussion. Furthermore, many of the proposals relate to other delivery mechanisms; such as the Housing & Planning Bill which has recently been enacted, the Neighbourhood Planning Bill which is currently going through or various previous budget announcements. In some respects the White Paper seems to take us backwards rather than forwards, so that the recommendations within the LPEG report which were published in April 2016 and could have been implemented through alterations to the PPG are now being put back into the pot with an ultimate decision date of April 2018.

There are three main areas however where the White Paper does indicate a clear shift which in my view will affect Telford & Wrekin DC:

Firstly, in the whole emphasis given to **meeting housing needs** and in particular the commitment to 1 million new homes by 2020. The Prime Minister's Foreword to the document makes it abundantly clear that we are not building enough homes, we are not building them quickly enough and we do not have sufficient diversity in our housing market.

In contrast, the Telford & Wrekin Plan proposes a reduction in housing provision, moving from a decade of underperformance, based on previous targets, they have now dramatically lowered their target for their future needs so that they can re-write the last decade of history as 10 years of success, showing that with their new lower figure they have 'over-provided'. They are using this to justify throttling back further on housing provision.

Paradoxically, in a New Town built with massive public funded infrastructure delivered over a long period of time, the Council now want to ignore the pressures from Birmingham and the Black Country (where many of their existing residents come from and which is reflected in the names given to the local communities) and turn their backs on the source of their former wealth and success – despite the fact that many of their youngsters are moving to Birmingham and the Black Country to get jobs and to study. This is completely counter to the policy and spirit of the White Paper.

Secondly, the Government now attaches critical importance to '**Housing Delivery**' rather than just allocating sites. At several passages within the document, the White Paper says that it will hold local authorities to account through a 'Housing Delivery Test'. Developers may also find themselves under scrutiny if they 'bank' sites without producing new housing.

Telford has a long history of HCA allocations which have blocked the progress of other suitable housing land and yet have not always been released in a timely fashion. In their efforts to achieve 'best value' former CLA, EP and now HCA land have often been held back and released 'on the drip' to maximise the land value. Major sites, such as Lawley, Lightmoor and Ketley for example were slow to come forward accounting for the decade of under-performance in the 2000's. The Council now use this slow delivery as the justification for even lower targets in the future. As more recent evidence shows, when private sector sites are released through the submitted Local Plan, such as Priorslee, they tend to gain consent quickly and are likely to perform well. The White Paper is clear that local authorities should not hold back on the release of suitable sites and land can be traded at below market value if the Council wishes to secure benefits such as affordable housing. Furthermore there should be a wider range of sites of different tenure, ownership, size and location to meet the full breadth of the market.

Thirdly, the Government is keen to raise the **quality of design** and to introduce 'Garden Towns and Villages in the context of delivering more and better quality housing. Our proposal at Wappenshall fulfils many of the characteristics of the Government's Garden Villages but the Council were not interested in exploring and imaginative initiatives and has simply ridiculed the idea. Telford does not account for any of the Designated Garden Villages and Garden Towns in the White Paper Map. Despite its experience it would prefer not to relinquish power to a Development Corporation which is committed to success but would prefer to retain power within the Council and carry on the same way.

Fourthly, the White Paper makes it clear that the list of '**restrictive designations**' within the NPPF (footnote 9) will now become the formal 'planning constraints', with the addition of 'Ancient Woodland'. This list therefore includes Green belt but does not include Green Network, Strategic Landscape Areas or Minerals Consultation Areas. The Council only has one such designation, an SSSI at Allscott, close to the recently approved housing site.

The White Paper strengthens (or clarifies) green belt policy by introducing an additional 'sequential approach' to judge whether the 'exceptional circumstances' have been met. This will put additional pressure on neighbouring green belt authorities such as Stafford, South Staffordshire and Wyre Forest to find land elsewhere if they have insufficient capacity outside the green belt in their own District. It will also narrow the options for those West Midlands' authorities looking to accommodate their housing shortfalls elsewhere. Telford & Wrekin's approach of notating 'Constraints', primarily Minerals Safeguarding Areas and Strategic Landscape Areas (without apparent justification) on other land around the New Town boundary (but not including its own land) will no longer be deemed acceptable.

I hope these points are sufficiently helpful. Please send me a copy of other responses.