

Telford & Wrekin Local Plan: Examination in Public

Matter 2: Duty to Cooperate

Further representations on behalf of the Association of Black Country Authorities (ABCA) Birmingham City Council (BCC) and South Staffordshire District Council, otherwise referred to as the Birmingham and Black Country Housing Market Area (BBCHMA).

Question 7 in document K24 requires that:

Council and BBCHMA authorities to try to agree a wording for a proposed modification and/or statement of common ground to address the issue of housing need numbers from those other HMA authorities

Discussions have been ongoing in this regard but unfortunately neither agreement nor common ground has been reached. The BBCHMA authorities, therefore, wish to submit their own wording for a proposed modification to be considered by the Inspector. A copy is attached.

Question 6 in document K24 requires that:

Council to set out and propose arrangements for it to make written representations in response to the documents submitted to the hearing by the 'Birmingham and Black Country Housing Market Area' authorities

Document K5 was submitted on behalf of ABCA and **Document K6** was submitted by Birmingham City Council (BCC), both on 31st January.

Telford and Wrekin Council (TWC) has subsequently responded to these with **document K5a and K6a**. The BBCHMA authorities wish to respond to this latest submission to offer further clarification.

With regard to **document K5**, TWC refers to the report of the West Midlands Land Commission to the West Midlands Combined Authority (WMCA). In considering this report at its 17th February 2017 meeting WMCA¹ agreed that:

That the Final Report be received and in so doing acknowledge that it is not a material consideration in the determination of planning applications or the formulation of planning policies.

The report, therefore, is of no relevance to this examination.

¹ <https://westmidlandscombinedauthority.org.uk/committees/west-midlands-combined-authority-board/west-midlands-combined-authority-board-3-march-2017/>

The Housing White Paper was published in February 2017 after the Matter 2 hearings closed. This further clarifies Government's policy towards safeguarding Green Belt; paragraph 1.39 which requires local authorities constrained by Green Belt to explore *whether other authorities can help to meet some of the identified development*

By refusing to acknowledge that growth beyond local needs does not originate from the BBCHMA, the TWC local plan will lead to calls to release additional Green Belt land, which is contrary to the aims of Government policy.

With regard to **document K6**, the document in the Examination Library is incomplete. The letter referred to (dated 21st February 2014) was accompanied by a note of a meeting that took place on 20th February 2014 between officers of TWC and BCC. This is not in the Examination Library and it is requested that it is included; a copy is attached. This note is in the public domain as it comprised part of the Duty to Cooperate background paper submitted to the Birmingham Development Plan (BDP) examination². As the note makes specific reference to the Telford Local Plan, it is considered that it is directly relevant to this examination.

In this note, TWC clearly acknowledges that growth over and above its local needs could help address the housing shortfall emanating from Birmingham. The BBCHMA authorities have been consistent throughout the TWC preparation and examination process in maintaining this position. What is not clear, however, is on what evidence TWC has determined that this is no longer the case?

In terms of acknowledging the linkages between the two areas, dialogue between TWC and Black Country Transport Officers on strategic transportation considerations such as Wolverhampton to Shrewsbury rail line electrification, future connections into HS2 and freight needs have been on-going, predominantly as part of the Midlands Connect and West Midlands Rail work, but also through Highways England engagement as part of their development of the specific M54 / M6 / M6 Toll link road proposals

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https://www.birmingham.gov.uk/downloads/file/1883/dc2_duty_to_cooperate_appendices_13_to_17_2014pdf see appendix 16

Proposed Modification – Matter Two

Submitted on behalf of the Association of Black Country Authorities, Birmingham City Council and South Staffordshire District Council

Please note that this modification is drafted on the basis that the plan's OAN and housing requirement remain as stated. Any increase to the OAN that requires additional in-migration needs to reflect that the most likely source is the GBBCHMA. Likewise, any increase in the housing requirement needs to be deducted from the GBBCHMA shortfall.

The housing requirement set in this Plan is 5,555 homes (50%) above the OAN for the Plan period, in order to support Telford & Wrekin's plans for economic growth and to help deliver more affordable housing. As Telford and Wrekin is a self-contained Housing Market Area, it follows that this extra housing growth will be associated with increased net in migration compared to past trends in order to provide the necessary labour supply.

A shortfall of 37,900 dwellings has been established thus far in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) through the Birmingham Development Plan. Whilst it is yet to be determined how much of this shortfall can be accommodated and delivered in the GBBCHMA, it is acknowledged that it will require a review of Green Belt boundaries. Government policy is clear that Green Belt should be safeguarded and only released through plan reviews in exceptional circumstances.

The National Planning Policy Framework requires that plans should consider unmet requirements from neighbouring authorities *where it is reasonable to do so and consistent with achieving sustainable development*. As Telford and Wrekin's original role as a New Town was to accommodate needs that could not be met in the conurbation, it is entirely appropriate that it continues to fulfil this, particularly as the principal source of net in-migration and commuting is from the GBBCHMA. The additional 5,555 houses above OAN, therefore, will make a contribution to meeting the shortfall in the GBBCHMA. This will assist Telford in providing the necessary labour supply whilst minimising the loss of Green Belt, which is consistent with national policy.

It is estimated that Telford and Wrekin's population will increase to approximately 198,000 upon implementation of the plan, this remains below its original planned capacity of 220,000. Should it be established that the remaining GBBCHMA shortfall cannot be met within its boundaries, then it will be appropriate for the Telford and Wrekin local plan to be reviewed to test whether any additional growth can be accommodated and delivered.