

Telford & Wrekin Local Plan: Examination in Public – Matter 2**Response to document K24/2a submitted on behalf of the Association of Black Country Authorities (ABCA), Birmingham City Council and South Staffordshire District Council**

From here onwards the grouping is referred to as referred to as the Greater Birmingham and Black Country Housing Market Area (GBBCHMA).

GBBCHMA has submitted a draft proposed modification to the examination (K24/2b) unilaterally as unfortunately it has not been possible to come to agreement. Telford responded to this draft proposed modification via document K24/2a and following the Inspector's invitation, GBBCHMA has taken the opportunity to comment as set out in the below schedule.

Telford and Wrekin – comments in doc K24/2a	GBBCHMA response
ABCA and South Staffordshire confirmed at the EIP that the Council has complied with its Duty to Cooperate in the plan preparation.	<p>GBBCHMA agreed that the legal Duty to Cooperate had been met, in that engagement does not necessarily have to result in agreement. However, in terms of the NPPF soundness tests, paragraph 182 requires plans to be:</p> <p><i>Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i></p> <p>For the reasons set out throughout the examination process and reiterated below, it is contended that a modification as proposed in K24/2b is required to achieve this.</p>
ABCA, Birmingham and South Staffordshire accept that Telford is a separate	This is agreed. As Telford is a single authority HMA, then if it is proposing to

<p>housing market area (HMA).</p>	<p>attract additional migrants to support economic growth, it follows that they must come from elsewhere. As has repeatedly been evinced, the most likely source of this additional in-migration is the GBBCHMA. This has already been set out in more detail in the GBBCHMA response to Matter 2.</p>
<p>The Council has repeatedly asked ABCA to produce a credible justification for any number they propose regarding households or homes; an explanation of how this would work relative to calculating ABCA's OAN and Telford & Wrekin's; and how ABCA consider that the number of households they propose can be persuaded to come to Telford & Wrekin given that it is agreed that these are different HMAs.</p>	<p>The PBA Strategic Housing Needs Study (SHNS doc G4) and Telford OAN document (doc C2a-i) have been prepared by the same consultants using the same methodology. There is a risk therefore, of double counting if Telford's OAN is inflated or a requirement is set in excess of it without considering the source.</p> <p>Conversely, Telford has offered no credible alternative explanation as to how people from other HMA's will be attracted or existing residents prevented from leaving. There is no evidence of Telford having brokered agreements via the Duty to Cooperate with other authorities to accommodate any surplus growth that they cannot accommodate.</p>
<p>ABCA and South Staffordshire have not provided any more statistical evidence to justify their view that this Council should take some of Birmingham's unmet housing need. ABCA are still relying on NHS data that relates to patients and not households.</p>	<p>The NHSCR data is the standard proxy measure of internal migration change and is an input into the Sub National Population Projections. It is standard practice to derive households from population.</p>
<p>The Council maintains, as a result, that it does not have an obligation to contribute towards the unmet housing needs of the GBBCHMA in the Local Plan.</p>	<p>In accordance with para 182 of the NPPF, it is considered that the Telford Plan should acknowledge that it is <i>meeting unmet requirements from neighbouring authorities</i> for the following reasons:</p> <ul style="list-style-type: none"> • There is a well evinced shortfall in the GBBCHMA • Telford is a self-contained HMA, hence above trend growth needs to come from elsewhere

	<ul style="list-style-type: none"> • There is sufficient capacity and evidence of past delivery in Telford to meet higher than trend based needs • The threat to the West Midlands Green Belt can be minimised by acknowledging the evidence that in- migration from the GBBCHMA will exceed past trends.
<p>The Council assumes that the ABCA authorities and the other authorities in the HMA must now review how they will accommodate unmet need from within the HMA first, before looking elsewhere. This will mean following through on the advice that Peter Brett Associates gave them and consider, among other things,</p> <ul style="list-style-type: none"> • promoting urban extensions • encouraging new development on public transport corridors • pursuing a dispersed growth strategy • or supporting new towns and settlements <p>The Council recognises that Green Belt reviews are politically sensitive but Government policy post-NPPF has directed many authorities across England to do this. ABCA are not in an unusual position.</p>	<p>Both the PBA Strategic Housing Needs Study and Telford's SHMA document suggest that Telford has the potential to accommodate some of the shortfall, particularly given its origins as a New Town. The GBBCHMA is not denying the need to undertake a review of all opportunities within the HMA and it is in the process of doing so. A 'Strategic Locations Growth Study' has recently been let to identify broad locations for growth, including further Green Belt locations.</p> <p>It has already been established that there is a need for a Green Belt review through the PBA SHNS (doc G4). The extent of the GBBCHMA shortfall has been formally acknowledged as standing at 37,900 dwellings through the adopted Birmingham Development Plan. This may well be an underestimate given early evidence emerging from the Black Country Core Strategy review (doc K5). Consequently, the contribution from Telford's plan (as submitted), would still leave a shortfall in excess of 30,000 dwellings, almost double Telford's proposed requirement.</p> <p>Unfortunately plans do not come forward in a preferred sequence and if this work were to be completed prior to consideration of Telford's surplus capacity, then there is a risk of serious delay, which is not in the interests of any party and inconsistent with Government policy. Moreover, meeting some of the shortfall in Telford also accords with the NPPF in terms of protecting the Green Belt as it would minimise the amount of the West</p>

	Midlands Green Belt that would need to be considered for release. If this were not considered, then there is a risk of double counting.
<p>It is not relevant to the consideration of the current Local Plan to refer to the original New Town target population of 220,000. This is a new point in the ABCA position and a substantial departure from previous submissions. Planning for a population of 220,000 would theoretically require the Council to plan for a much higher level of housing than the already ambitious housing requirement set out in Policy HO1. Moreover, an open ended requirement for Telford & Wrekin Council to review the plan to meet the problems from Birmingham is not reasonable or justified and effectively provides the neighbouring HMA authorities with a position that does not require or incentivise them to solve their own unmet housing first before looking outside their Housing Market Area.</p>	<p>Telford originally expressed a desire to grow to its target capacity (doc K6 addendum), whereby assistance from the GBBCHMA was sought. Telford has subsequently backtracked from this position without offering an explanation, whereas the GBBCHMA position has been consistent.</p> <p>Whilst the GBBCHMA submitted representations to the hearings based on the level of growth in the submitted plan (15,500) units, it also referred to the potential additional capacity within Telford. Throughout the hearings other parties have suggested that Telford's requirement could be increased and this merely reflects that. Even if Telford were to expand to its full potential over the plan period, there would still remain a significant amount of development that would need to be met within the GBBCHMA.</p>
<p>The Council has accepted there has been a trend of net in-migration from the Black Country and South Staffordshire to Telford & Wrekin in the past. However, these trends have already been incorporated into future projections produced by the ONS (2012-based and updated following the release of the 2014 data), which underpin the analysis of the OAN statements prepared by Peter Brett Associates on behalf of the Council.</p>	<p>Future projections project past trends and are reflected in the OAN. Telford's <i>requirement</i> seeks population growth in excess of past trends (OAN) and the only realistic flex is additional net in-migration.</p>
<p>It is important to set out how the Birmingham Development Plan- which was adopted in January 2017 – seeks to plan to meet unmet housing need and to relate this to other activities in the West Midland Combined Authority.</p> <p>Policy PG1 – Overall levels of growth - of the adopted Plan states that the City will work “actively with neighbouring authorities through the Duty to</p>	<p>The City Council is actively engaged in the process of doing this with its partners. As is clearly articulated in the GBBCHMA statement to Matter 2, HMAs are not hermetically sealed.</p>

<p>Cooperate to ensure appropriate provision is made elsewhere within the Greater Birmingham Housing Market Area to meet the shortfall of 37,900 homes, including about 14,400 affordable dwellings, within the Plan Period".</p>	
<p>Policy TP48 – Monitoring and promoting the achievement of growth targets (extract attached) identifies a number of key indicators that would trigger a review of the plan. These are mostly housing related. This requires Birmingham to maintain a five year housing land supply and to ensure that neighbouring authorities undertake Local Plan reviews to deliver housing growth to meet Birmingham's needs. This policy places no obligation on Telford & Wrekin.</p>	<p>As above, the City Council is working with its partners to achieve this, but given that there are 14 local authorities, with plans at different stages there is no quick fix, hence a pragmatic approach is required.</p>
<p>After the closing of the Local Plan EiP hearings, the West Midlands Combined Authority met on 17 February and agreed that its constituent members should conduct a review of Green Belt to address Birmingham's problems. It is suggested again that ABCA authorities take up their responsibility to look to meet the GBBCHMA's unmet need from within their HMA before looking to other HMAs.</p>	<p>This is incorrect, it was agreed that:</p> <p><i>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 policies¹.</i></p>

¹ <https://westmidlandscombinedauthority.org.uk/committees/west-midlands-combined-authority-board/west-midlands-combined-authority-board-3-march-2017/> see section 2