



**Examination of the
Telford & Wrekin Council Local Plan
Consultation on Proposed Main Modifications
31 July 2017 to 5pm 22 September 2017**

**Response from the
Campaign to Protect Rural England
(Shropshire Branch)**

September 2017

M07 - Campaign to Protect Rural England (CPRE)

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1. Introduction

- 1.1. CPRE Shropshire welcomes the opportunity to respond to the consultation on the Proposed Main Modifications to the Telford & Wrekin Council Local Plan.
- 1.2. Our comments are confined to the Housing Need Assessments, and consequently to the soundness of the Local Plan under examination in relation to those aspects, although that should not be taken to imply we necessarily agree or disagree with other policies.

2. Housing Need assessments

- 2.1 The Telford & Wrekin Objectively Assessed Housing Need Final Report dated March 2015¹ suggested that demographic evidence from the Government (Department of Communities and Local Government) would produce a maximum OAHN of 461 dwellings per year, to satisfy an increase in population of just under 600 per year². The consultant's own figures, using its own modelling, produced a figure of 493 dwellings per year³, which was the OAN figure it proposed on demographic evidence.
- 2.2 The OAN report then considered an OAN of 750 dwellings per year (with a consequent increase in population of 1,522 person per year), in order to serve the Council's own policy objectives⁴. It was proposed that such a high target might help to achieve (1) a greater supply of affordable housing, (2) healthier and more sustainable communities⁵ and (3) the accommodation of exported housing need from the Black Country⁶.
- 2.3 This 'super-growth' option, which would add a further 6,700 workers to the resident labour force, was effectively the strategy put forward by the OAN report, equivalent to 15,000 new dwellings over the plan period⁷.
- 2.4 The Schedule of Proposed Main Modifications now states that The Council is planning for approximately 17,280 net new dwellings up to 2031⁸. This is equivalent to 864 dwellings per year.
- 2.5 CPRE Shropshire is particularly concerned that this inflation of housing numbers threatens to increase the level of green field development allocations at the expense of delivering brown field housing, thereby increasing the loss of important countryside.
- 2.6 We are not convinced that such high housing numbers are needed to meet genuine need or are justified, even under the current methodology for determining need.
- 2.7 They should be avoided if at all possible.

¹ http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/911/objectively_assessed_need

² Page 15 paragraph 3.23.

³ Page 16 paragraph 3.25

⁴ Page 16 paragraph 3.30

⁵ Page 41 paragraph 6.9

⁶ Page 41 paragraph 6.12

⁷ Page 42 paragraphs 6.15 and 6.16

⁸ Page 8 ref MM37 for Policy HO1 on page 66 of the Plan

- 2.8 One key piece of new evidence is the new approach being suggested by Government for establishing the OAN. We believe that, given the importance of this issue, the Council needs to reassess its need, taking account of the implications of that approach, before proceeding further.

3. The Government’s proposed approach to OAN

- 3.1 On 14 September 2017 DCLG published its consultation paper “*Planning for the right homes in the right places: consultation proposals*”⁹. The paper included the long-awaited detail of the proposed standardised method of calculating housing need¹⁰.
- 3.2 Alongside the consultation paper itself the Government has published its calculation of housing need for each Local Authority, in the *Housing need consultation data table*.
- 3.3 The calculation for Telford & Wrekin would suggest that the need could be only 555 dwellings per year. The calculation reproducing that result is set out below:

	2016	2026
Step 1: Setting the baseline¹¹		
2014-based Subnational household projections	69,400	74,331
Increase over 10 years		4,931
Step 2: An adjustment to take account of market signals¹²		
Table 5a (Median house price) - Q3 2016	156,000	
Table 5b (Median earnings) - 2016	25,984	
Table 5c (Median affordability ratio)	6.00	
Adjustment factor: (affordability ratio - 4)/4 x 0.25	0.125	
Adjustment		616
Objectively Assessed Need		5,547
Dwellings per year		555

- 3.4 A calculation over the twenty years from 2016 to 2036 produces a need of only 483 dwellings per year.

⁹ <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

¹⁰ Pages 10 - 12 paragraphs 15 - 25

¹¹ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

¹² <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

- 3.5 The Government proposes that its methodology will become incorporated into the NPPF, and therefore it will be a mandatory method to be used by all Local Authorities.

4. Conclusion

- 4.1 The Government suggests that, if its approach is adopted, there will be transitional arrangements for plans such as that for Telford & Wrekin that are at the examination stage. However, we submit that this Government calculation of a need for as little as 555 houses per year must call into question the underlying justification for a borough wide plan target of 17,280 net new dwellings up to 2031 (i.e. 864 dwellings per year) and that it is a relevant consideration given the questions already relating to the high level of the housing provision using existing methodology.
- 4.2 There will clearly be elements in the new approach that require clarification, but in our view the extent of the divergence risks rendering the plan unsound.
- 4.3 We believe that further work should now be done by the Council based on the implications of this new approach before the plan progresses further.