

### Telford and Wrekin Local Plan Consultation Response

Thank you for the opportunity to comment on the draft Telford and Wrekin Local Plan (TWLP). Please note this represents an officer-level response at this stage, which will be subject to formal Cabinet approval in early 2024.

The TWLP is at Regulation 18 draft plan stage. This is the second stage of the plan preparation and follows consultation on the Issues and Options in October 2020 – January 2021. The draft plan contains policies, housing, and employment allocations, and includes a strategic objective to deliver 20,200 homes (1,010 per year) and 167ha of employment land over the proposed plan period (2020 – 2040).

### Policy Strategic S4 Housing Delivery Strategy

Telford & Wrekin's Draft Local Plan is supported by several evidence documents that are intended to justify the proposed policies. The Housing Requirement Technical Paper notes that the local housing need calculated using the Standard Method produces a requirement of 475 dwellings per annum. However, the Technical Paper sets out the Council's proposed justified alternative to the calculation of housing need using the Standard Method. This produces a total for objectively assessed housing need equivalent to 930 dwellings per annum, taking account of adjustments for market signals for economic development, improved household formation and additional flexibility in the form of the affordability adjustment applied to the Standard Method.

A separate assessment of demographic trends (projected population and household change) identifies a dwelling equivalent growth of 1,010 dwellings per annum. This represents a total of 80 dwellings per annum (1,600 dwellings over 20-year Plan period) not captured by the total of components forming the Council's alternative to local housing need. **The difference of 80 dwellings per annum forms the basis of the Council's proposed approach to contribute towards part of the Black Country's unmet housing need.**

The proposed contribution to the Black Country's housing need is welcomed. However, the supporting Technical Paper lacks clarity regarding how and why the alternative housing need figure is significantly in excess of that generated by the Standard Method and how the figures for Telford & Wrekin's housing need and the Black Country Authorities'

offer have been calculated. On this basis, Dudley Council request further clarification and detail on why an alternative approach to calculating housing need has been used and how the need figure has been established by Telford and Wrekin Council. In addition, we would also like to understand which sites proposed in the TWLP have been identified to meet the needs of the Black Country.

### **Policy Strategic S3 Economic Delivery Strategy**

Policy S3 states that Telford & Wrekin council are planning to deliver 167ha of employment land over the plan period (2020 – 2040), which is informed by the Telford and Wrekin Economic Housing Development Needs Assessment (EHDNA). The policy states that 90.5ha of this will be “new employment land” – Appendix B, Table 11 identifies 13 proposed employment sites accounting for 91.6ha.

The EHDNA identifies a range of employment land need figures. Three trends/forecasts were used to determine the employment land requirement –

- Experian forecast shows a need for around 140ha of employment land,
- Labour Demand Growth Scenario shows a need for around 167ha of employment land,
- Completions Trend, including MOD Donnington, shows a need for around 189ha of employment land.

The Labour Demand Growth Scenario (LDGS) includes provision for increased levels of home working, which is considered to be more realistic moving through the Plan period, and therefore the LDGS figure of 167ha has been used in the Draft Local Plan.

Telford lies outside the Black Country’s functioning economic area (FEMA – the area within which the majority of workers travel for employment). Therefore, the Black Country’s employment land shortfall would be better met by land closer to the Black Country. Telford & Wrekin’s EHDNA identifies that the Black Country does not fall within the FEMA and does not indicate that any part of its employment supply would contribute to the needs of the Black Country. \*Subject to change.

\*paragraph 3.30 states the employment land policy is S1 – actual policy number in document is S3 (this occurs for S1 – S5)

Whilst the Telford does not form part of the Black Country's FEMA, Dudley Council would welcome an opportunity to discuss any potential employment land contributions should it prove that the Black Country Authorities' employment land shortfall is unable to be met.

### **Policy EC3 Waste Management Facilities**

Dudley MBC has not identified any strategic issues in relation to waste and minerals matters between our local authorities at this time, but this position should be kept under review as work on our respective local plans progress. We will continue to engage and work with Telford and Wrekin Council on any relevant strategic waste issues via the West Midlands Resource Technical Advisory Board (WMRTAB) and strategic minerals issues through the West Midlands Aggregates Working Group (WMAWG) under the Duty to Cooperate.

### **Policy HO2 Sustainable Urban Extension Sites**

Land North-East of Muxton – approximately 27.5 miles from Dudley Town Centre

Land North-West of Bratton and Shawbirch – approximately 30 miles from Dudley Town Centre

Land North of A442 Wheat Leasows – approximately 30 miles from Dudley Town Centre

The distance of the proposed Sustainable Urban Extensions from Dudley is unlikely to result in any significant issues, and detailed proposals for the SUE's are not provided in this draft plan process. However, the Highways Department have been consulted as part of this response and further comments have been provided below

### **Policy HO8 Gypsy, Traveller, and Showpeople Accommodation**

Telford and Wrekin's Gypsy and Traveller Accommodation Assessment (GTAA) identifies a need for 26 additional pitches over the proposed plan period.

Page 34 of the GTAA identifies a shortfall of 23 pitches when comparing supply and demand in the first five years of the proposed plan period. The GTAA then goes on to detail that 26 additional pitches are required from 2026 – 2040.

The TWLP does not identify how the shortfall of pitches will be met but does state in paragraph 7.66 that the 'Council will monitor the number of pitches in the borough to meet the identified need'.

There does not appear to be a DtC requirement in either the TWLP or the GTAA. Further clarity is requested in regard to the overall shortfall of gypsy and traveller pitches and how the pitch requirement detailed in the GTAA will be met.

### **Policy HO10 Stalled Development Sites**

Dudley Council support the proposal for proactively and positively working with owners and developers when sites with planning permission are significantly delayed in completion of the site.

### **Policy ML1 Mineral Safeguarding & Policy ML3 Mineral Development**

Dudley MBC has not identified any strategic issues in relation to waste and minerals matters between our local authorities at this time, but this position should be kept under review as work on our respective local plans progress. We will continue to engage and work with Telford and Wrekin Council on any relevant strategic waste issues via the West Midlands Resource Technical Advisory Board (WMRTAB) and strategic minerals issues through the West Midlands Aggregates Working Group (WMAWG) under the Duty to Cooperate.

Overall, Dudley Council largely supports the TWLP, particularly the proposed housing contribution to partly meeting the Black Country housing needs. Further clarity is required in terms of how the housing need figures have been calculated. As detailed in the Duty to Cooperate letter sent to you on the 12<sup>th</sup> December, we would like to continue engagement with Telford and Wrekin Council to discuss any DtC issues as we progress with our Local Plans.