Strategic Planning Research Unit

A specialist team within DLP Planning Ltd

For and on behalf of
Telford & Wrekin Council

Economic and Housing Development Needs Assessment Update

Prepared by
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Appendix 2 Telford & Wrekin Older Persons Housing Needs Assessment (DLP, February 2025)

0.0 EXECUTIVE SUMMARY

a) Introduction

0.1 DLP Planning were appointed by Telford & Wrekin Borough Council to undertake an update of the housing needs sections of the Economic and Housing Development Needs Assessment (EHDNA) Part 1 (October 2020) to reflect the release of revised and up to date Mid-Year Population Estimates (MYEs), 2021 Census data and the new National Planning Policy Framework (NPPF, December 2024) including the updated Standard Method calculation.

0.2 The objective of the update is to identify future housing growth needs across Telford & Wrekin for the period covering 2023 to 2040. This EHDNA Update report also includes evidence on the housing needs of other specific groups, which were previously presented in a Draft EHDNA Part 2 (May 2021, unpublished).

0.3 This EHDNA Update will provide a robust and up to date evidence base from which the emerging Local Plan will be prepared.

0.4 The chronology of evidence base documents that have been prepared to inform policies on housing and employment needs within the Telford & Wrekin Local Plan are as follows:

- **EHDNA Part 1 (October 2020)** – this document initially informed the Issues and Options (Regulation 18) Local Plan and still contains the latest up-to-date evidence on employment needs.
- **Draft EHDNA Part 2 (May 2021, unpublished)** – this document contained draft evidence on the needs of other specific groups and was used to inform policy-making subsequent to the Issues and Options consultation. However, the inputs it relied upon were substantially superseded by data released in advance of the October 2023 draft (Regulation 18) Local Plan consultation.
- **Housing Requirement Technical Paper (October 2023)** – this document set out updated evidence on overall housing needs, taking account of the Census 2021 but in advance of revision of Mid-Year Population Estimates. It updated the scenarios contained in the EHDNA Part 1 in the context of then-applicable national policy and guidance, and justified alternatives to the calculation of local housing need using the Standard Method. It was published alongside the draft (Regulation 18) Local Plan.
- **Housing Mix and Affordable Housing Needs (October 2023)** – this document accompanied the Housing Requirement Technical Paper and presented further detailed background information on the needs of different groups, housing mix and affordable housing needs using the information available at the time. It also comprised a partial update to the Draft EHDNA Part 2 (unpublished) on key policy areas. It was also published alongside the draft (Regulation 18) Local Plan.
- **EHDNA Update (February 2025)** – this current report supersedes earlier evidence on housing needs and presents the latest up-to-date evidence on overall housing needs, affordable housing and housing mix, and the housing needs of other specific groups in the context of current national policy and guidance, including the revised Standard Method to calculate local housing need. This has informed the Regulation 19 Local Plan.

b) Policy Context

0.5 The Council conducted a Regulation 18 consultation on the draft Local Plan from October 2023 to January 2024. The draft Plan set out the Council's vision for the borough, Plan priorities, preferred policies and proposed housing and employment sites. The draft Plan was informed by the Issues and Options consultation which concluded in 2021.

0.6 The findings from this EHDNA Update will be used to finalise the Regulation 19 submission version Local Plan.

0.7 The approach taken in this EHDNA Update is underpinned by policies set out in the National Planning Policy Framework published in December 2024 (NPPF2024) and guidance set out in Planning Practice Guidance (PPG).

c) Updated Demographic Scenarios and Implications of the Revised Standard Method

0.8 A range of updated demographic scenarios have been prepared by Edge Analytics using the POPGROUP model which take account of the Census 2021 data and the latest Mid-Year Population Estimates (MYEs).

0.9 The benchmark scenario is linked to the government's new Standard Method LHN figure for Telford & Wrekin (857 dwellings per year), developed using a 'dwelling-led' configuration of the POPGROUP model. Also included is a dwelling-led scenario linked to the previous LHN calculation of 463 dwellings per year.

0.10 The evidence presented in Chapter 3 of this EHDNA Update provides reasoned justification for why the dwelling-led scenario linked to the revised Standard Method is the minimum level of housing that should be planned for and is an appropriate starting point to consider the needs of different groups. Several key points that support this justification include:

- **Alignment with Local Ambitions:** Following changes to national planning policy, the revised stock-based Standard Method supports Telford & Wrekin's existing housing delivery goals, providing a strong basis to build upon options previously consulted upon as part of plan-making.
- **Addressing Affordability:** The Standard Method's incorporation of the affordability adjustment reflects the need to address housing affordability in the area, which aligns with national policy objectives to significantly boost the supply of housing and locally aligns with maintaining similar levels of housebuilding to those achieved recently and not adversely constraining opportunities for households to form.
- **Robust Justification for Alternative Housing Requirement Scenarios:** The alignment between the new Standard Method, local ambitions (for both economic development and sustaining rates of housing delivery) and demographic trends provides a robust justification for Telford & Wrekin Council's housing requirement options assessed as part of the emerging Local Plan. In supporting local authorities to plan for more ambitious levels of growth paragraph 69 of the NPPF2024 does not require that reasons for this must be considered separately or cumulatively in relation to supporting job creation or responding positively to requests to address neighbours' unmet needs. Even allowing for improvements in household formation scenario, testing in the EHDNA Update indicates sustaining higher levels of net internal migration is also likely to be a function of responding positively to requests to accommodate neighbouring authorities' unmet needs. This reinforces the justification for making provision for an overall requirement in excess of local housing need that would support unmet need and economic development components of local growth ambitions simultaneously.

d) Stakeholder Engagement

0.11 Three workshops were undertaken with key stakeholders including Telford & Wrekin Council officers, Registered Providers (RPs) and estate agents to draw upon their locally specific knowledge of the housing market.

0.12 All types of residential property are in demand from renters, from 1-bed homes to 5-bed homes. 2 and 3-bedroom houses are in the highest demand for all tenures.

0.13 There have been reports of overcrowding in some family homes due to lack of affordability whilst some are renting larger properties than they need.

0.14 There has been a large influx of international migrants to work within the residential care sector or the Princess Royal Hospital. Cheaper house prices and the commutable distance to Birmingham act as pull factors for international and internal migration supporting the housing market and recent population growth.

0.15 The demand for accessible and adapted homes is higher than ever.

e) Affordable Housing Needs

0.16 As outlined in the PPG, the assessment of current affordable need should include: homeless households and those in temporary accommodation, overcrowded households, concealed households and households in unsuitable housing.

0.17 There is a total of 1,208 households in need including 416 homeless households, 90 lettings to reasonable preference categories, 438 overcrowded households and 264 concealed households.

0.18 Adding the number of newly forming households unable to afford lower quartile rents (787) to the number of existing households falling into need (338) produces an estimated gross figure of 1,125 households per year falling into need over the plan period.

0.19 There is an identified need for 824 affordable homes per year to 2040. Social and affordable rent accounts for 696 of this total whilst affordable home ownership accounts for 128.

f) Housing Mix Recommendations

0.20 Paragraph 63 of the NPPF December 2024 stipulates that the size, type and tenure of housing needed for different groups in the community should be considered in the context of the housing needs assessment.

0.21 The EHDNA Update provides recommendations for housing mix by tenure based on occupancy characteristics. Given the relative stability of overall occupancy characteristics (taking account of change amongst existing households) the effect of net change over the plan period on the split of total stock by bedroom number is relatively limited.

0.22 The number of households is projected to increase by 14,050 over the 2023-2040 plan period. Household growth is concentrated in the 65+ age group as well as the 45-54 age group.

0.23 Based on indicative modelling of future housing delivery across a mix of tenures the recommended range for monitoring overall change over the plan period has therefore remained consistent across iterations of the EHDNA and is intentionally broad.

0.24 This comprises 5-15% 1-bed properties, 20-30% 2-bed properties, 40-50% 3-bed properties and 15-30% 4+ bed properties.

0.25 Planning for the centre of this range across the overall mix of future development is recommended as a starting point but this may be applied flexibly. This takes into account for example the demand for family housing, pressure upon existing stock within the private rented sector and the important role of affordable home ownership and affordable housing for rent in increasing the supply of smaller properties in-line with projected trends.

g) Housing Needs of Other Specific Groups

0.26 The chapter presents evidence on the housing needs of other specific groups, as required by NPPF2024 Paragraph 63, including older people, families with children, people with disabilities, students, service families, black and minority ethnic households, private rented sector, self and custom-build housing and children in care/care leavers.

Older People

0.27 Using the local prevalence rates in the SPRU Older Persons Housing Need model and the **2018 SNPP** results in a need for all specialist older persons housing at 2023 of 2,570 units. This is total need figure is projected to rise to **3,942 units** by 2040 driven by the increase in the population that will be over 75 by that date.

0.28 If existing and pipeline supply is taken into account, the largest proportion of unmet need is in Older Persons Market Housing with Care (including Enhanced Sheltered and Extra Care 24/7 Support), where **1,372 additional dwellings are likely to be required by 2040**.

0.29 The use of the dwelling-led population projections derived from the Standard Method local housing need figure of **857 dwellings per annum (857 HH-14r scenario)** results in an immediate need of some 2,621 specialist older persons housing units, with this figure rising to **3,927 units by 2040**. This is only slightly below the need figure derived from the SNPP 2018 population projections.

0.30 If existing and pipeline supply is taken into account, the largest proportion of unmet need is in Older Persons Market Housing with Care (including Enhanced Sheltered and Extra Care 24/7 Support), where **1,366 additional dwellings are likely to be required by 2040**.

0.31 Under both scenarios (2018 SNPP and Standard Method LHN) the SPRU model identifies there is no current or projected future need for additional social specialist housing with care (including Sheltered, Enhanced Sheltered and Extra Care housing types). However, the results of the SPRU model for these tenures should not be considered to represent an 'oversupply'.

0.32 There may be a need for existing stock to be upgraded or replaced over time to ensure it continues to meet residents' needs. There is no guarantee that housing with support within these tenures (sheltered) will remain optimal to meet the needs of older people (for example as their care needs increase), or that these units will necessarily be allocated to those in most need.

0.33 In respect of a policy response going forwards, it is recommended that (in accordance with the recommendations of the Taskforce[1]) consideration is given to identifying sites that are suitable to accommodate specialist older persons housing including ensuring that any larger strategic allocations deliver a proportion of specialist older persons housing, where appropriate.

Families with Children

0.34 The dwelling-led LHN 857 HH-14r scenario projects a 14% growth in family households, reflecting sustained rates of development and in-migration together with relatively high fertility rates among the younger population.

0.35 It is therefore likely to be the case that accommodating the growth in family households within the existing dwelling stock would require a substantial turnover of existing property, including amongst the increase in older households living in larger dwellings. This is likely to require significant market intervention – for example support to encourage households to downsize to smaller dwellings or specialist accommodation for older people brought forward as part of future provision. **It may therefore be appropriate to plan for an increased proportion of the housing mix comprising larger units.**

0.36 It is also relevant to note the potential constraints on the private rented sector in terms of

[1] MHLGC/DHSC "Our Future Homes: Housing that promotes wellbeing and community for an ageing population page 100

meeting the future accommodation needs of families with children, including potential affordability constraints and limits to the level of private rented stock available for letting to families with children due to the relatively higher rental cost for larger properties.

0.37 This may add weight to recommendations to support intermediate affordable housing and routes to affordable home ownership where these options can provide property at an equivalent cost to private rent that may be better suited to meeting the needs of family households.

People with Disabilities

0.38 There is an annual need for 180 dwellings to be built with appropriate adaptations and 51 dwellings to be wheelchair adaptable over the plan period.

0.39 It is recommended that in preparing policy options, the Council takes account of a need for **at least 20% of the overall assessment of local housing need to be provided at the Part M4(2) Category 2 standard for accessible and adaptable homes**.

0.40 It is further recommended that **a minimum of 5% of new market housing in Telford & Wrekin should be required to meet the wheelchair user dwelling standards of Part M4(3)**.

0.41 It is also considered reasonable that **up to 10% of affordable housing should be required to meet the wheelchair user dwelling standards of Part M4(3) (accessible or adaptable dwellings), subject to viability.**

Student Housing

0.42 There are no planned significant increases in student numbers at higher education establishments across the borough. Past growth in student numbers is likely to have been reflected in observed trends in increased demand within the private rented sector together with occupation of a higher proportion of large 3+ bedroom dwellings.

0.43 The needs of students identified within these trends in household composition will already be reflected in terms of the overall housing requirement. However, in relation to recommendations on housing mix and management of existing stock it is suggested that that **the provision of larger 3+ bedroom properties should be at the upper end of the suggested range**.

0.44 Given the increased role of the private rented sector across the borough and the specific function of this tenure in meeting needs of student households in Newport, the Council should closely **monitor overall demand for property in terms of trends in affordability and potential barriers to accommodation suitable to meet overall needs**.

Service Families

0.45 Both of the two barracks at Donnington (Venning Barracks and Parsons Barracks) have been announced for closure with resident personnel to be relocated elsewhere in the West Midlands. On this basis it is not expected that there will be any new military facilities opening in the borough in the foreseeable future that would generate housing needs associated with an increased number of service families.

0.46 It is therefore expected that the vast majority if not all future housing requirements of armed forces veterans (at least in quantitative terms) are captured within the household projections themselves.

0.47 While the non-household population associated with defence establishments in the borough as recorded in the 2021 Census is relatively small the Council may wish to monitor how recent and future reorganisation impacts upon the living arrangements of personnel.

0.48 Any service families that remain resident within the borough and occupy general housing to meet their housing needs may represent a small increase in the use of existing housing stock though this is very likely to be more than outweighed by the effect of personnel already owning or renting stock relocating elsewhere and freeing up housing.

Black and Minority Ethnic Population

0.49 The population within Telford & Wrekin is relatively less ethnically diverse than the rest of the West Midlands region of the average for England.

0.50 Housing trends in BME populations do not correspond with consistent patterns in terms of difference in household tenure, however diversity of the population may place increased pressure on the existing stock of larger dwellings in the borough.

Private Rented Sector

0.51 There is limited reliable data to illustrate the full profile of the private rented sector since 2011 in terms of the demand and supply for different types of accommodation. However, Housing Benefit Entitlement claimant data from March 2016 (prior to the main impact of introducing Universal Credit upon overall claimant data) shows that around 57% of recipients of support towards housing costs in the Private Rented Sector comprised households with dependent children.

0.52 This demonstrates that whilst the Private Rented Sector does play an important role in meeting the needs of smaller and particularly younger households, this sector is also meeting the needs of larger families (3+ bedrooms) who are in need of more 'affordable' accommodation.

0.53 The Council may wish to consider the introduction of permissive policies that support the introduction of Build-to-Rent (BTR) typologies to diversify supply, including potentially as part of larger scale housing allocations.

0.54 While such policies may be appropriate when applied to suitable schemes (such as those in the Station Quarter or other sustainable locations, reflecting the typical BTR characteristics noted above) this would be subject to relevant viability testing. The potential for BTR typologies should be assessed with reference to levels of market rent necessary to ensure development is viable.

0.55 In line with PPG, it is recommended that 20% of units in BTR schemes are delivered as affordable private rent.

Self and Custom-Build Housing

0.56 As of October 2023, the total number of self and custom-build homes granted permission in Telford & Wrekin since 2016 is 137. This equates to an average of 17 permissions per year.

0.57 **Based on the assessment of past average annual permissions (17 per year), this would result in an indicative need for the plan period (2023 to 2040) of 289 plots.**

0.58 The duty to grant planning permission is set out in the Self-build and Custom Housebuilding Act 2015 (as amended) and is defined by the need to meet identified demand on a rolling programme of 3 years by the end of the base period. During the fifth base period (31 October 2019 to 30 October 2020) a total of 12 entries were added to the register, meaning the Council had a duty to grant planning permission for 12 plots suitable for self-build and custom build housing between the period 31 October 2020 and 30 October 2023 (i.e. the 3 years following the end of the base period). During this period the Council granted planning permission for 59 plots, so the duty has been met for the fifth base period.

0.59 **In order to ensure that Telford & Wrekin continue to comply with the requirements of the Self-build and Custom Housebuilding Act 2015 (as amended) it is recommended that new local plan policies are introduced that provide support for the delivery of self**

and custom build housing.

Children in Care and Care Leavers

0.60 Under the Children Act 1989, local authorities have a legal obligation to provide care for looked after children. In May 2023, the Housing and Planning Minister released a Written Ministerial Statement reminding local authorities of the requirement to assess the housing needs of different groups, including those of looked after children and care leavers in need of social services care. This statement also said that that local planning authorities should be supportive of applications for all types of accommodation for looked after children.

0.61 Evidence set out in the Telford & Wrekin 'Placement Sufficiency: Cared for Children & Care Leavers (2024 to 2029)' report identifies that it is likely that the Council will see a reduced demand for certain types of accommodation for children in care, specifically children's homes, alongside a general decline across many accommodation types.

0.62 However, it is recommended that the Council ensure there is a continued supply of suitable accommodation available if the number of looked after children begins to increase, or alternatively, if the fall in foster parenting seen nationally presents further challenges. Strategies and efforts to support foster parents and encourage foster parent enquiries should be developed further.

0.63 The Council should take measures and implement strategies to support families and potentially allow for the appropriate placement of children with parents.

0.64 It is also recommended that the Council continues to review the capacity of Semi-Independent Living options to assess whether the current trend of high utilisation by older children is sustainable and can be accommodated into the future.

0.65 Due to the upcoming 'ageing out' of many children in the care of the authority, the Council need to ensure there is an adequate supply of accommodation to support care leavers in their transition out of the care system. An expansion of care leaver accommodation, including supported housing, may be required. **The Council may wish to consider including a positively-worded criteria-based policy within the Local Plan to support the development of this type of accommodation and to monitor the availability of stock going forwards relative to the baseline evidence**.

h) Conclusions

0.66 This EHDNA Update provides up-to-date evidence on housing needs in Telford & Wrekin, including the overall housing need, need for affordable housing, housing mix and the needs of specific groups (as required by paragraph 63 of the NPPF).

0.67 The findings and recommendations set out in this EHDNA Update have been used to inform the housing policies in the emerging Telford & Wrekin Local Plan.

1.0 INTRODUCTION

Key Points Summary

- DLP Planning were appointed by Telford & Wrekin Borough Council to undertake an update of the housing needs sections of the Economic and Housing Development Needs Assessment (EHDNA) Part 1 (October 2020) to reflect the release of revised and up to date Mid-Year Population Estimates (MYEs), 2021 Census data and the new National Planning Policy Framework (NPPF, December 2024) including the updated Standard Method calculation.
- The objective of the update is to identify future housing growth needs across Telford & Wrekin for the period covering 2023 to 2040. This EHDNA Update report also includes evidence on the housing needs of other specific groups, which were previously presented in a Draft EHDNA Part 2 (May 2021, unpublished).
- This EHDNA Update will provide a robust and up to date evidence base from which the emerging Local Plan will be prepared.
- The chronology of evidence base documents that have been prepared to inform policies on housing and employment needs within the Telford & Wrekin Local Plan are as follows:
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    - **EHDNA Update (February 2025)** – this current report supersedes earlier evidence on housing needs and presents the latest up-to-date evidence on overall housing needs, affordable housing and housing mix, and the housing needs of other specific groups in the context of current national policy and guidance, including the revised Standard Method to calculate local housing need. This has informed the Regulation 19 Local Plan.

a) Background and Context

1.1 DLP Planning were appointed by Telford & Wrekin Borough Council to undertake an update to the Economic and Housing Development Needs Assessment (EHDNA) Part 1 and to finalise the contents of the Part 2 EHDNA for publication. The objective of the update is to identify future housing growth needs across Telford & Wrekin for the period covering 2023 to 2040. This EHDNA Update will provide a robust and up to date evidence base from which the emerging Local Plan will be prepared.

1.2 The original Part 1 EHDNA Report was published as part of the evidence base which informed the Telford & Wrekin Local Plan Review Issues & Options (Regulation 18) consultation (12 October 2020 to 8 January 2021). The Part 1 Report identified overall housing and employment land needs for Telford & Wrekin and informed the selection of development requirement options for housing and economic development that were published for comment as part of the Regulation 18 consultation. The recommendations for employment and housing scenarios in the Part 1 EHDNA considered local needs and potential future growth requirements.

1.3 The Part 1 EHDNA is now being updated to reflect the release of revised and up to date Mid-Year Population Estimates (MYEs), 2021 Census data and the new National Planning Policy Framework (NPPF, December 2024). This in-turn provides the necessary information to inform robust evidence on the housing needs of different groups such as older person's housing and family housing. An assessment of employment needs does not form part of the scope for this EHDNA Update.

1.4 The Part 2 EHDNA report was drafted alongside the original Part 1 EHDNA but was not finalised. This EHDNA Update also updates and finalises the Part 2 EHDNA findings, including identifying the housing needs of different groups. The needs of different groups are informed by and considered against the overall need for housing development.

1.5 The consolidated outputs presented by the EHDNA Update also supersede evidence first updated in the context of national policy and guidance as existing at the time of the Council's consultation on a Regulation 18 draft Local Plan consulted upon in Autumn 2023/Winter 2024. Amongst the information produced to support this consultation was a standalone 'Assessment of Affordable Housing Needs and Housing Mix' Report (Edge Analytics and DLP, October 2023) and Housing Requirement Technical Paper.

1.6 The Technical Paper considers the original findings of the 2020 Part 1 EHDNA and the justification for an alternative approach to the calculation of local housing need and potential rationale for accommodating neighbouring authorities' requests to accommodate unmet housing needs. This was in the context of the draft Plan's proposals to plan for a housing requirement in excess of the result of the Government's Standard Method as it existed at that time.

1.7 The Affordable Housing Needs and Mix Report also utilised then-applicable national policy and guidance. The findings therefore identified policy considerations in relation to, for example, securing First Homes as part of total contributions towards affordable housing and resulting implications for housing type, size and mix of tenures. These outputs utilised some newly available information in respect of, for example, affordability and Census 2021 outputs but pre-dated the full revision of population and household estimates informing inputs to demographic projections which the EHDNA provides. Therefore there is further significant evidence available and against which further substantive changes to national policy and guidance should be considered before finalising the evidence base.

1.8 The context for preparation of the Council's submission version Plan, to be considered against the requirements of the revised December 2024 version of the National Planning Policy Framework and revised calculation of the Standard Method for local housing need, is substantially different. The EHDNA Update illustrates why many of the Council's considerations from earlier rounds of plan-making - such as demographic trends, support for economic development and the relationship with neighbouring authorities – remain relevant. However, changes to national policy in respect of the result of local housing need calculated using the revised Standard Method providing for the minimum mandatory level of housing to be planned for are an important and standalone change in circumstances. Furthermore, while there is only a limited direct connection between the abovementioned considerations from previous rounds of the evidence base and inputs to the revised Standard Method the EHDNA Update illustrates how the results of the two separate processes – the Council's previous justified alternative to local housing need – there is nevertheless a general alignment between support for future levels of growth and justification that the Council may wish to consider in exceeding minimum starting points.

1.9 The assessment of overall housing needs and the needs of different groups presented in this EHDNA Update will form a key part of the evidence base that will be used by the Council to inform preparation of the draft Plan.

b) Scope of the Update

1.10 This report is focused upon providing a detailed assessment of specific housing needs for Telford & Wrekin. An assessment of employment needs does not form part of the scope for this EHDNA Update. The scope of this EHDNA Update is as follows:

i) *Housing needs assessment (as previously covered in Part 1 EHDNA)*

- Estimate of total future number of households by age and type;
- Identify the minimum housing need (number of dwellings) for Telford & Wrekin Council based on the Standard Method for assessing local housing need and any alternative approach where justified; and
- Consider scenarios upwards of the minimum housing needs.

ii) *Housing mix and Affordable housing needs*

- Estimate of current number of households in housing need and future households that will require affordable housing, including estimates of current affordable housing stock and potential future affordable housing supply; and
- Estimate of the overall mix of housing required in terms of size, type, and tenure, based on the projected level of household growth to 2040.

iii) *Housing needs for different groups in the community*

- Estimate of household groups who have particular housing requirements including families, older people, key workers, black and minority ethnic groups, people with disabilities, service families, people who rent their homes, students and young people and self-build and custom housebuilding; and
- Advice on whether any of these groups' accommodation needs should be addressed through Local Plan policies.

1.11 The findings of each of the above points are presented in the following sections of this EHDNA Update report. A detailed methodology and assumptions which underpin the assessment of the housing and affordable housing needs are outlined in **Appendix 1**.

2.0 POLICY CONTEXT AND REPORT STRUCTURE

Key Points Summary

- The Council conducted a Regulation 18 consultation on the draft Local Plan from October 2023 to January 2024. The draft Plan set out the Council's vision for the borough, Plan priorities, preferred policies and proposed housing and employment sites. The draft Plan was informed by the Issues and Options consultation which concluded in 2021.
- The findings from this EHDNA Update will be used to finalise the Regulation 19 submission version Local Plan.
- The approach taken in this EHDNA Update is underpinned by policies set out in the National Planning Policy Framework published in December 2024 (NPPF2024) and guidance set out in Planning Practice Guidance (PPG).

a) Local Plan Regulation 18 Draft Plan Consultation

2.1 The Council conducted a Regulation 18 consultation on the draft Local Plan from October 2023 to January 2024. The draft Plan set out the Council's vision for the borough, Plan priorities, preferred policies and proposed housing and employment sites. The draft Plan was informed by the Issues and Options consultation which concluded in 2021.

2.2 The draft Local Plan included key housing policies which addressed housing need and other housing-related issues. Some of the most significant policies to be informed by this report are detailed below.

2.3 While not reassessed as part of this EHDNA Update Policy 18 of the Regulation 18 draft Plan sets out the economic delivery strategy for Telford & Wrekin. This proposes the delivery of around 167ha of employment land over the plan period, underpinned by assumptions for employment growth (equivalent to 859 jobs per annum) identified in a growth scenario prepared as part of the original Part 1 EHDNA. Proposed Policy S4 (Housing Delivery Strategy) identified a proposed housing requirement of 1,010 dwellings per annum.

2.4 A key requirement for the Local Plan is to meet the housing needs of the borough. This is done through a combination of existing supply and new housing allocations to support needs. The purpose of housing Policy HO1 as identified in the Regulation 18 draft Plan is to allocate sites for housing led development to meet the housing requirement. It is important that the sites deliver sustainable communities including key services such as social infrastructure, retail and leisure. While Policy HO1 sets out the guiding development principles for these sites, policies DD1 and DD2 detail the design requirements for residential development.

2.5 There are a range of housing needs that the Council must plan for. The Local Plan provides a route to address these needs and improve the mix of housing in the borough. Policy HO3 outlines the Council's approach to helping ensure the Local Plan meets the needs of diverse population groups, from the elderly to key workers. This sets out how all qualifying development is required to provide a variety of types, tenures and sizes.

2.6 The Plan proposed Policy HO4 in relation to making provision towards affordable housing needs as part of mixed-tenure development together with support for schemes providing for 100% affordable tenures. The proposed approach to mixed-tenure development addressed evidence from the EHDNA process together with other considerations including viability is seeking to meet as much of an appropriate range of the type and tenure of affordable housing needs identified as possible.

2.7 It is important for the Local Plan to clarify how the need for affordable housing will be both delivered and met over the plan period. Policy HO5 sets out the mechanism by which affordable housing contributions will be secured through new mixed tenure housing development. The Policy outlines how affordable homes should be integrated sensitively across sites and across the borough to create mixed communities. It also details how there should be little to no difference in housing quality and type between affordable homes and open market homes.

2.8 The purpose of Policy HO6 is to clarify the requirements for the delivery of supported and specialist accommodation in the borough. This is in response to the ageing population seen throughout the UK, and the growing need to meet the housing requirements for vulnerable adults and young people. The Council encourages a dispersed approach towards securing provision for specialist and supported housing through the application of criteria identified to assess a range of proposals that may be brought forward by location and type of use.

2.9 The proposed standards for many of these policies were broadly based on the Part 2 EHDNA first prepared in 2021 and evidence first updated for the consultation. The updated EHDNA will provide the Local Plan with more up-to-date evidence to more fully support the housing development requirements and needs within Telford & Wrekin.

2.10 For a more detailed summary of evidence to inform the policies as proposed in the draft Local Plan (2023) please refer to the Housing Technical Paper for the 2023 consultation.

b) National Policy and Guidance

2.11 Chapter 5 of the National Planning Policy Framework (NPPF December 2024) expands on the role of plan-making and preparation of strategic policies. This reflects the aim of meeting an area's identified housing need, including provision for an appropriate mix of housing types for the local community (paragraph 61).

2.12 Paragraph 62 of the National Planning Policy Framework (NPPF December 2024) sets out that a local housing need assessment should be prepared to determine the minimum number of homes needed, conducted using the Standard Method in national planning practice guidance. Any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

2.13 Paragraph 63 of the NPPF goes on to state that the needs of different groups are informed by and considered against the overall need for housing development. Paragraph 64 provides further detail in terms of how the types of affordable housing required and measures to secure on-site provision should be addressed by policies unless justified by arrangements and outcomes achieved through off-site delivery. Paragraph 66 outlines the role for policies to support major development including provision for a range of affordable housing needs, including an understanding of needs for Social Rent and Affordable Home Ownership.

2.14 Paragraph 71 of the NPPF2024 identifies the role that mixed tenure sites can fulfil in terms of addressing a range of affordable housing needs and the needs of different groups. The associated range of benefits can include support for increased build-out rates and the delivery of mixed communities, although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported.

2.15 National Planning Practice Guidance has been updated alongside publication of changes to national policy and underscores the role of the revised Standard Method in providing an unconstrained assessment of the minimum number of homes to be planned for within an area[2]. The PPG provides specific circumstances where the availability of data may not align

[2] ID: 2a-002-20241212

with policy-making boundaries[3] and positively prepared alternative approaches could be considered. No such circumstances affect Telford & Wrekin and the PPG therefore reiterates that the revised Standard Method should be used to assess housing needs[4].

2.16 The PPG further underlines the role of the affordability adjustment within the Standard Method as part of the unconstrained assessment in order to help direct homes to where they are most needed. This looks to ensure that minimum annual housing need starts to address the affordability of homes including increasing opportunities for people to live closer to their place of work[5].

2.17 The Standard Method does not, however, provide the figure for the housing requirement resulting from plan-making, where factors such as land availability and development constraints may affect the level of housing to be provided[6]. The PPG supports paragraph 69 of the NPPF2024 in proposing a housing requirement for their whole area, authorities should show the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

2.18 The NPPF does not (and could not) provide an exhaustive list of considerations for the ultimate relationship between housing need and the housing requirement. Paragraph 69 does provide examples where provision for neighbouring areas, or to reflect growth ambitions linked to economic development or infrastructure investment, may result in a requirement figure that exceeds identified housing need.

2.19 While no longer expressly referred to within the NPPF2024 demographic trends and market signals remain relevant to informing an assessment of whether housing need is likely to exceed the result of the Standard Method[7]. This reasons for this are explained in later sections of the EHDNA Update to illustrate the evolution of the Council's local housing need assessment.

2.20 This also reflects that assumptions for population and household change continue to inform the starting point for considering the housing needs of different groups, including affordable housing, in accordance with national policy and guidance[8].

2.21 The Planning Practice Guidance[9] in relation to assessing the needs of specific groups has not been updated since revision of the Standard Method. It is reasonable to expect that this will be subject to consequential changes but currently still states that in relation the needs of particular groups:

> *"This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the Standard Method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the Standard Method."*

2.22 Policy makers need to consider the extent to which the identified needs of specific groups can be addressed in the area, which includes considering whether the evidence suggests

[3] ID: 2a-014-20241212
[4] ID: 2a-015-20241212
[5] ID: 2a-006-20241212
[6] ID: 2a-040-20241212
[7] Although, for example, demographically derived assessments of current and future local labour supply (labour supply techniques) remain referred to in respect of assessing market signals whether needs for economic development may exceed the associated dwelling and household figure from the Standard Method (ID: 2a-027-20190220)
[8] See for example reference to projected household change (underpinned by demographic projections) in ID: 67-001-20190722 and ID: 67-006-20190722
[9] ID: 67-001-20190722

that a higher level of need than indicated by the Standard Method ought to be considered (PPG ID: 67-001-20190722).

2.23 In applying the findings of the assessment of needs for specific groups policy-making authorities should also consider the anticipated delivery of different forms of provision and how the overall extent of housing need can be translated into a housing requirement over the plan period. This should inform the preparation of policies to consider how the needs of individual groups might be addressed.

2.24 In relation to affordable housing Planning Practice Guidance states that total needs should be considered in the context of its likely delivery as a proportion of mixed-tenure developments. In these circumstances an increase in the total housing requirement may need to be considered where it would help to deliver the number of affordable homes required (PPG ID: 2a-024-20190220).

2.25 The Part 2 EHDNA builds upon the Part 1 Report and will assist the Council in considering policy options that reflect how the needs of specific groups might be addressed in the context of overall requirements for growth and current or expected future rates of development.

c) Structure of this EHDNA Update Report

2.26 The following sections of this EHDNA Update report are structured as follows:

- **Section 3: Updated Demographic Scenarios and Implications of the Standard Method in Informing the Proposed Housing Requirement** sets out a range of updated demographic scenarios which take account of the Census 2021 data and the latest Mid-Year Population Estimates (MYEs) that have been released since the Part 1 EHDNA (2020) was published. This section also recalculates an updated Local Housing Need (LHN).
- **Section 4: Stakeholder Engagement** summarises and analyses the key findings from the stakeholder engagement. This includes findings from the three key stakeholder workshops and how these are integrated into the assessment outcome.
- **Section 5: Affordable Housing Needs** models net affordable housing needs based on relative costs and incomes. The analysis takes account of current unmet needs, newly arising needs and the current annual supply of affordable housing.
- **Section 6: Housing Mix Recommendations** presents the overall mix of housing required in terms of size, type and tenure, based on the projected level of household growth to 2040. The outcomes are combined with data from the Council's housing register to produce a suggested mix profile across market and affordable housing.
- **Section 7: Housing Needs of Other Specific Groups** outlines the housing needs of older people, families with children, people with disabilities, students, service families, black and minority ethnic (BME) households, private rented sector, self and custom-build housing, and children in care/care leavers. It presents key findings and makes policy recommendations to ensure housing is suitable and accessible for all.
- **Section 8: Conclusions** presents summary conclusions for the EHDNA Update report.

3.0 UPDATED DEMOGRAPHIC SCENARIOS AND IMPLICATIONS OF THE REVISED STANDARD METHOD

Key Points Summary

- A range of updated demographic scenarios have been prepared by Edge Analytics using the POPGROUP model which take account of the Census 2021 data and the latest Mid-Year Population Estimates (MYEs).
- The benchmark scenario is linked to the government's new Standard Method LHN figure for Telford & Wrekin (857 dwellings per year), developed using a 'dwelling-led' configuration of the POPGROUP model. Also included is a dwelling-led scenario linked to the previous LHN calculation of 463 dwellings per year.
- The evidence presented in Chapter 3 of this EHDNA Update provides reasoned justification for why the dwelling-led scenario linked to the revised Standard Method is the minimum level of housing that should be planned for and is an appropriate starting point to consider the needs of different groups. Several key points that support this justification include:
    - **Alignment with Local Ambitions:** Following changes to national planning policy, the revised stock-based Standard Method supports Telford & Wrekin's existing housing delivery goals, providing a strong basis to build upon options previously consulted upon as part of plan-making.
    - **Addressing Affordability:** The Standard Method's incorporation of the affordability adjustment reflects the need to address housing affordability in the area, which aligns with national policy objectives to significantly boost the supply of housing and locally aligns with maintaining similar levels of housebuilding to those achieved recently and not adversely constraining opportunities for households to form.
    - **Robust Justification for Alternative Housing Requirement Scenarios:** The alignment between the new Standard Method, local ambitions (for both economic development and sustaining rates of housing delivery) and demographic trends provides a robust justification for Telford & Wrekin Council's housing requirement options assessed as part of the emerging Local Plan. In supporting local authorities to plan for more ambitious levels of growth paragraph 69 of the NPPF2024 does not require that reasons for this must be considered separately or cumulatively in relation to supporting job creation or responding positively to requests to address neighbours' unmet needs. Even allowing for improvements in household formation scenario, testing in the EHDNA Update indicates sustaining higher levels of net internal migration is also likely to be a function of responding positively to requests to accommodate neighbouring authorities' unmet needs. This reinforces the justification for making provision for an overall requirement in excess of local housing need that would support unmet need and economic development components of local growth ambitions simultaneously.

3.1 As set out in the previous chapter it is important that this EHDNA Update considers changes to national policy and guidance, including revision of the Government's Standard Method to calculate local housing need, in the context of the existing evidence base. This includes reassessing justified alternatives to the previous Standard Method calculation considered in previous rounds of plan-making and evaluating demographic trends and market signals in the context of the local housing needs assessment. This section therefore also considers the policy context for introduction of the revised Standard Method and the implications of this in terms of interpreting previous evidence in the context of the mandatory minimum number of homes that must now be planned for.

3.2 This section sets out a range of updated demographic scenarios which take account of the Census 2021 data and the latest Mid-Year Population Estimates (MYEs) that have been released since the Part 1 EHDNA (2020) was published. This section also recalculates an updated Local Housing Need (LHN) using the currently adopted Standard Method.

3.3 The updated demographic scenarios have been prepared by Edge Analytics using POPGROUP forecasting technology, which is methodologically consistent with previous EHDNA updates but using the latest demographic statistics. A note detailing the assumptions used in preparation of the demographic scenarios and details of the revised Standard Method calculation is contained in **Appendix 1**.

i) Changes to National Policy and Guidance and Implications of the Revised Standard Method

i) *Background*

3.4 The National Planning Policy Framework (NPPF) released on 12th December 2024 significantly changed the way local housing need is calculated. These changes are part of the government's commitment to deliver 1.5 million new homes over the next five years and to support economic growth across all regions of the country.

3.5 Key changes include:

- Making the Standard Method for assessing housing needs mandatory (under the terms of national planning policy and guidance summarised above), requiring local authorities to plan for the resulting housing need figure.
- Implementing a new Standard Method calculation to ensure local plans are sufficiently ambitious.
- Removing the urban uplift and caps previously applied to the Standard Method.
- Strengthening the expectation that applications on brownfield land will be approved and that plans should promote an uplift in density in urban areas.
- Introducing the concept of 'grey belt' land within the Green Belt, to be considered for development through both plan and decision-making processes.

3.6 These changes aim to provide greater certainty to key stakeholders involved in planning for housing, including local planning authorities, communities, developers, and landowners.

3.7 The changes to the National Planning Policy Framework (NPPF) introduce a new Standard Method for calculating local housing need. This method uses a stock-based approach rather than the previous household projections-based method. For Telford & Wrekin, this change appears to align favourably with the authority's existing housing delivery ambitions.

3.8 The new Standard Method for calculating local housing need comprises two main steps:

Step 1: Setting the baseline

3.9 The baseline is set at 0.8% of the existing housing stock in each local authority area. This replaces the previous use of household projections, aiming to provide a more stable and predictable starting point.

3.10 Under the new Standard Method, the baseline is set at 0.8% of the existing housing stock. According to the most recent data available, Telford & Wrekin's housing stock is approximately 82,746 dwellings. This would result in a baseline figure of around 662 dwellings per annum (82,746 * 0.008).

Step 2: Adjusting for affordability

3.11 An affordability adjustment is applied to the baseline figure. This adjustment is calculated using the following formula:

*Adjustment Factor = ((Local affordability ratio - 5) / 5) * 0.95*

3.12 Where the local affordability ratio is the median workplace-based house price to earnings ratio, averaged over the most recent five years for which data is available. The adjustment is applied as follows:

*Local Housing Need = Baseline * (1 + Adjustment Factor)*

3.13 This method aims to direct more homes to areas where they are most needed and least affordable, ensuring all areas contribute to meeting the country's housing needs.

3.14 Telford & Wrekin's median workplace-based affordability ratio for 2024 is 6.55, therefore the adjustment factor is calculated as follows:

*Adjustment Factor = ((6.55 - 5) / 5) * 0.95 = 0.3*

3.15 This results in a multiplier of 1.3 (1 + 0.3).

Resulting Housing Need Figure

3.16 Applying this multiplier to the baseline figure results in the following Local Housing Need:

*662 * 1.3 = 857 dwellings per annum*

ii) *Implications of the Revised Standard Method*

3.17 Telford & Wrekin's current Local Plan, adopted in January 2018, sets out a housing requirement of 778 dwellings per annum over the period 2011-2031. This figure was based on an objectively assessed need of 678 dwellings per annum, with an additional allowance to support economic growth ambitions.

3.18 The outcome of the new Standard Method calculation (857 dwellings per annum) falls just below Telford & Wrekin's intended housing requirement figure of around 1,000 homes per year. This suggests that the authority's existing ambitions are well-aligned with the updated December 2024 NPPF approach.

3.19 Prior to the updated December 2024 NPPF, Telford & Wrekin had set an intention to aim for a housing figure of around 1,000 homes per year which was consistent with options first tested as part of the original EHNA evidence base in 2020. This proposed figure was based on local economic growth ambitions as well as planning positively in response to evidence of demographic trends and market signals including seeking to address affordability constraints and barriers to accessing housing. The Housing Requirement Technical Paper published alongside consultation on the Regulation 18 draft Local Plan also identified that, taking into account these justified components of an alternative to the then-current Standard Method, a proposed requirement of around 1,000 dwellings would allow the Council to respond positively to requests to accommodate a proportion of neighbouring authorities' unmet needs (around 80 dwellings per annum).

3.20 The comparison between the current Local Plan and previously proposed (Regulation 18 draft) housing requirements in adopted strategic policies and the outcome of the new Standard Method calculation reveals:

- **Increased Housing Need:** The new Standard Method suggests a housing need of 857 dwellings per annum, which is approximately 10% higher than the current Local Plan target.
- **Alignment with Economic Ambitions:** The higher figure aligns more closely with Telford & Wrekin's economic growth aspirations, potentially supporting job creation and economic development in the area.
- **Addressing Affordability**: The increased housing need figure reflects the affordability pressures in the area, which the current Local Plan may not fully address.
- **Continuity in Planning:** Despite the increase, the new figure falls just below the range of 900-1,000 homes per year that Telford & Wrekin had already been considering. This suggests that the authority's forward-thinking approach has positioned it well to adapt to the policy changes.
- **Potential for Plan Review:** While the difference between the current target and the new calculated need is not dramatic, it may prompt consideration of whether an early review of the Local Plan is necessary to ensure it remains up-to-date and effective in meeting housing needs.
- **Implications for Land Supply:** The higher housing need figure may require identification of additional sites for housing development.

3.21 The implications of the revised Standard Method are likely to represent a far less significant departure from previous plan-making considerations. This is despite the revised Standard Method exceeding the previous result for local housing need (463 dwellings per annum) by around 85%. This underscores scenarios that the local planning authority had considered previously which identified that housing need was likely to exceed the previous Standard Method result.

3.22 In conclusion, while the new Standard Method does suggest a higher housing need than the current Local Plan target, Telford & Wrekin appears well-positioned to respond to this change. The authority's existing ambitions and forward planning have created a strong foundation for adapting to the new policy context, potentially minimising disruption to the local planning process while ensuring that future housing needs are met.

3.23 The majority of Telford & Wrekin's housing stock is concentrated in Telford itself, with a large rural hinterland and the outlying settlement of Newport. Specifically, around 63,000 of 79,000 existing dwellings are located in Telford, which remains the primary focus for growth.

3.24 While the spatial strategy is outside the scope of this assessment, the implications of a stock-based approach appear consistent with sustaining current levels of development. The 'need' generated by the revised Standard Method is likely to align more closely with the area's historical development trends.

3.25 It is important to note that while not currently part of the changes to the Standard Method, demographic trends or market signals could potentially indicate that housing need exceeds the result of this calculation.

3.26 The proposed stock-based approach to the Standard Method does not include any specific figure corresponding to contributions to unmet needs from neighbouring authorities. Such unmet needs would continue to be considered separately from, and in addition to, Telford & Wrekin's own housing need as determined by the Standard Method.

3.27 Moving forward, the key consideration will be whether and how the mandatory level of housing to be planned for provided by the revised (December 2024) Standard Method for Telford & Wrekin can be accommodated in full, taking into account local constraints and opportunities for sustainable development, and how to respond to requests to accommodate unmet need from neighbouring areas. The following sub-section of the EHDNA Update provides outputs from a range of assessment scenarios to allow these points to be considered as part of demographic trends and market signals and informing their relationship with other aspects of the local housing need assessment.

j) Scenario Definition

3.28 Using Edge Analytics' POPGROUP model, six scenarios have been developed for Telford & Wrekin for the 2023-2040 plan period, as summarised in the table below. The justification for this is provided by the contents of this report, read as a whole, and specifically with reference to the background for plan-making outlined in preceding sections.

Table 1. Telford & Wrekin Scenario Definition

Name	Description
SNPP-2018	Replicates the 2018-based Office for National Statistics (ONS) subnational population projection for T&W
SNPP-2018 Rebased (2023)	2018-based ONS SNPP, rebased to MYE 2023, following the original trend thereafter
PG-10yr	10-year migration trend scenario, with a MYE 2023 base year
PG-5yr	5-year migration trend scenario, with a MYE 2023 base year
Dwelling-led LHN 463	Population growth is determined by the growth in the number of dwellings, based on the current LHN of **+463** dwelling per year (MYE 2023 base year, 5-year migration trends).
Dwelling-led LHN 857	Population growth is determined by the growth in the number of dwellings, based on the LHN of **+857 dpa** (MYE 2023 base year, 5-year migration trends).
Dwelling-led 1010 dpa	Population growth is determined by the growth in the number of dwellings, based on the LHN of **+857 dpa plus +153 dpa** (MYE 2023 base year, 5-year migration trends), broadly consistent with housing requirement options previously consulted upon by the Council.

Source: Edge Analytics

3.29 The benchmark scenario is linked to the government's new Standard Method LHN figure for Telford & Wrekin (857 dwellings per year), developed using a 'dwelling-led' configuration of the POPGROUP model. Also included is a dwelling-led scenario linked to the previous LHN calculation of 463 dwellings per year.

3.30 An additional dwelling-led scenario based on the 'proposed LHN plus an additional 153 dwellings per annum' has also been prepared. This corresponds to housing requirement options consulted upon previously and where the difference between the result of revised Standard Method and proposed figure could include responding positively to requests to accommodate unmet needs from neighbouring areas.

3.31 In a dwelling-led scenario, population growth is linked to the annual increase in the number of dwellings. The relationship between dwelling growth and population growth is determined by three key assumptions: a household to dwelling conversion factor (dwelling vacancy rate), communal population assumptions (accounting for the population not living in households, e.g., those living in student halls of residence or residential care homes), and household headship rates. Internal (domestic) migration is used to balance between population and dwelling growth; if the resident population is insufficient in size and structure to populate the additional dwellings, a higher level of net in-migration will result. Detail on the assumptions used are outlined in the section below.

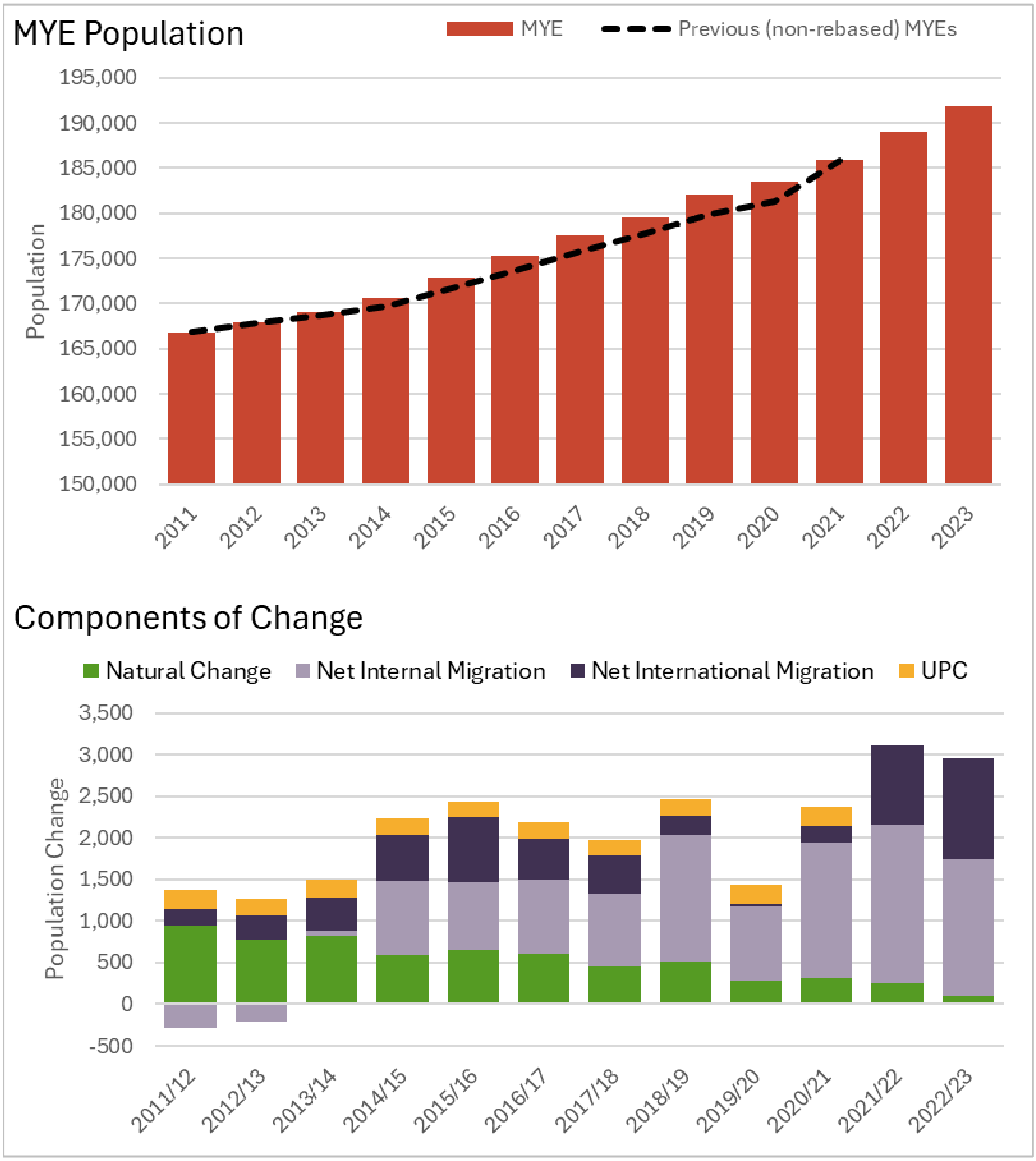
3.32 Using the latest mid-year population estimates (MYEs) and associated components of change (see figure below) (to mid-year 2023), two ‘alternative trend’ scenarios have been developed, using different migration histories from which to calibrate future growth assumptions. These ‘PG’ scenarios are based on a continuation of a 5-year and a 10-year migration history.

3.33 Within the historical rebased MYE, which were released in November 2023 to better align the population estimates between the 2011 Census and 2021 Census, is an unattributable population change (UPC) component. ONS considers it likely that UPC is associated with migration, either internal and/or international, although it does not assign it to any flow in particular. Within the scenarios presented here, UPC is included within the historical international migration flows as this has historically been the most difficult component to estimate.

3.34 As in previous rounds of forecasting, the latest official population projection from the ONS has been included, the 2018-based subnational population projection (SNPP-2018). This scenario has also been rebased to the 2023 MYE (SNPP-2018 Rebased (2023)), following its original trend thereafter. The availability of revised population estimates is an important change since consultation on the Council’s Regulation 18 draft Plan. This enables the latest demographic trends to be considered and an assessment of the more dated (and pre-2021 Census) inputs to the last official 2018-baed subnational population projections (see Figure 1 below).

3.35 To determine the relationship between population and households, each scenario has been run with household headship rates, drawn from the 2014-based household projection model from the Ministry for Housing Communities and Local Government (MHCLG). Two variants have also been applied to each scenario, in which the headship rates in the younger adult age groups have been gradually improved over the forecast period.

Figure 1. Telford & Wrekin: MYEs & Components of Change



Source: Edge Analytics

k) Scenario Inputs & Assumptions

Population

3.36 In each of the **PG** and **Dwelling-led** scenarios, the projection base year is the 2023 ONS MYE, disaggregated by single year of age and sex. From 2023 onwards, future population counts are estimated by single year of age and sex, using defined assumptions on fertility, mortality, and migration.

3.37 In the **SNPP-2018** scenario, the 2018 base year and growth trajectory are drawn directly from the official principal subnational population projection for Telford and Wrekin. In the **SNPP-2018 Rebased (2023)** scenario, the scenario has been rebased to the 2023 MYE population, following its original trend thereafter.

Households & Dwellings

3.38 The Census defines a household as, *"one person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room or sitting room or dining area".* In the POPGROUP model, a dwelling is defined as a unit of accommodation which can either by occupied by one household or can be vacant.

3.39 The household and dwelling growth outcomes in the SNPP and PG scenarios have been estimated through the application of communal population statistics, household headship rates, and a household to dwelling conversion factor. These assumptions have been sourced from the 2021 Census, and the MHCLG 2014-based household projection model. In the Dwelling-led scenarios, these assumptions are used to derive the level of population growth required to meet the defined dwelling-growth targets in each year of the forecast.

Dwelling Growth Targets

3.40 In the Dwelling-led scenarios, the annual dwelling growth targets have been calculated using both the current and proposed Standard Methods for calculating LHN.

3.41 The previous Standard Method (outlined in subsequently archived PPG) resulted in a calculation of local housing need of 463 per year (Dwelling-led LHN 463).

3.42 The revised Standard Method (as outlined in changes to national policy and guidance) results in a LHN of 857 per year (Dwelling-led LHN 857). The third dwelling-led scenario is based on the proposed LHN, plus an additional 153 units per annum consistent with housing requirement options consulted upon previously (Dwelling-led 1010).

I) Scenario Outcomes

3.43 The population growth outcomes for each of the scenarios are summarised below in the table. For the official and trend-based scenarios, the headship rate assumptions applied do not influence the population growth outcomes. In the dwelling-led scenarios, the headship rates are used to determine the level of population growth required to support the annual defined dwelling growth. The population growth outcomes are therefore dependent on the headship rate assumptions applied.

Table 2. Demographic Scenarios: Population Growth Outcomes 2023-2040

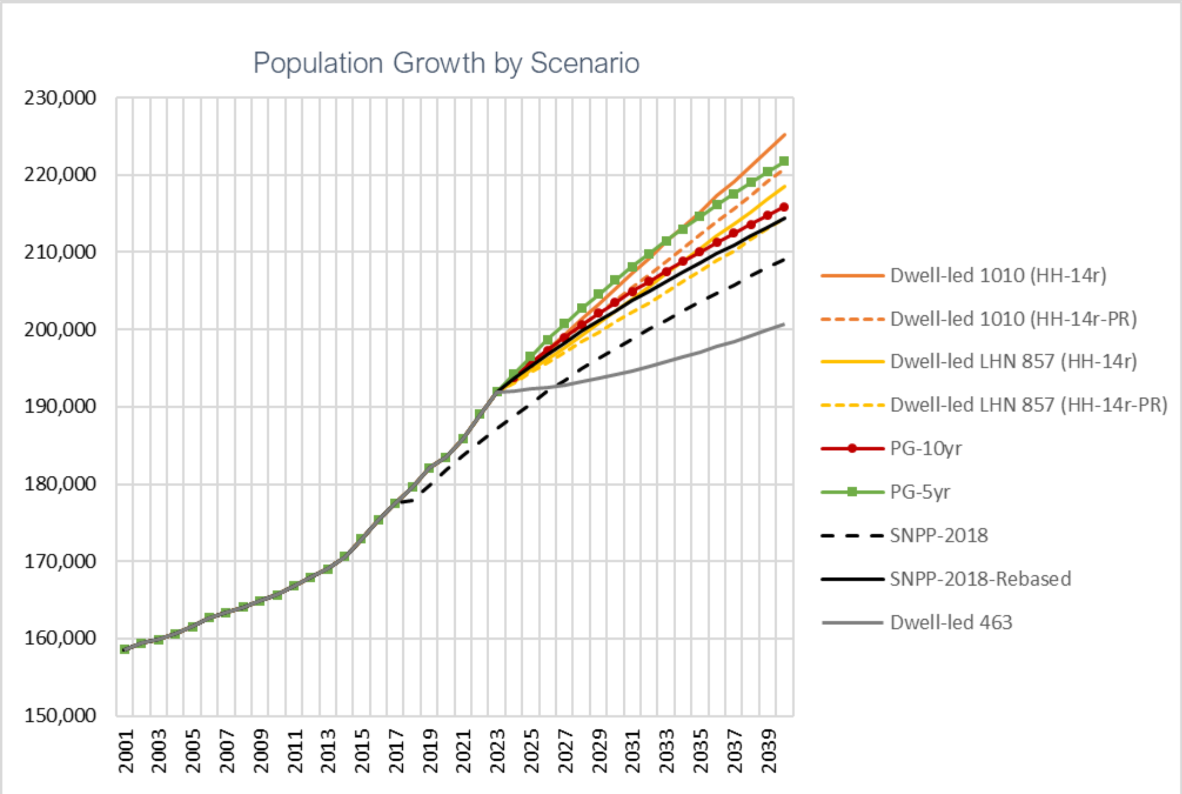
Scenario	Change 2023-2040		Average Change per Year (2023-2040)					
	Population Change		Net Migration		Dwellings		Employment	
	HH-14r-PR	HH-14r	HH-14r-PR	HH-14r	HH-14r-PR	HH-14r	HH-14r-PR	HH-14r
Dwelling-led 1010	28,948	33,228	1,582	1,808	1,010	1,010	832	967
Dwelling-led LHN 857	22,520	26,594	1,243	1,459	857	857	630	759
Dwelling-led LHN 463	4,720	8,781	307	522	463	463	74	201
PG-10yr	23,991		1,300		925	830	697	
PG-5yr	29,860		1,615		1,037	939	852	
SNPP-2018	21,924		1,132		840	752	568	
SNPP-2018-Rebased	22,495		1,041		861	767	583	

Source: Edge Analytics

3.44 Population growth is highest under the *Dwelling-led 1010* scenario that uses the baseline 2014-based headship rates (HH-14-R) (33,228 persons – significantly exceeding recent demographic trends). With improvements to rates of household formation, a greater proportion of the resident population occupies the new dwellings, resulting in lower levels of net migration and, consequently, lower levels of population growth. With regards the highest dwelling-led figure population change assuming a partial return to trend in household formation would still be broadly consistent with the very high levels of population growth observed in the latest five year trend (28,948 persons versus 29,860 persons).

3.45 The population growth linked to the revised Standard Method figure of 857 dwellings per annum using the baseline 2014-based headship rates (i.e. *Dwelling-led LHN 857 HH-14-R*) results in a population growth outcome that is slightly below the 5-year trend scenario (*PG-5yr*), at approximately +26,500 persons 2023–2040. This level of population growth would, however, exceed previous trend-based series including the next highest 10-year migration trend (23,991 persons 2023-2040). The revised dwelling-led LHN scenario with a Partial Return to trend in household formation applied produces projected population change more closely aligned with the total for the 10-year trend (22,500 versus 24,000 persons).

Figure 2. Scenario Population Growth Outcomes



Source: Edge Analytics

m) Evaluation of Scenario Findings and Planning for the Revised Standard Method

3.46 The revised Standard Method provides for the minimum mandatory level of housing to be planned for in Telford & Wrekin. The scenarios summarised above demonstrate why in applying the result of local housing need to an understanding of the needs of different groups and in translating the assessment of housing need into a housing requirement the local authority will wish to give consideration to any factors that may continue to support setting this at a higher level than indicated by the result of local housing need. Key considerations for the Council in selection of the proposed requirement that are in-part underpinned by the findings of the housing need assessment include demographic trends, housing market and migration links with the Black Country and recent build rates together with the nature of requests to accommodate neighbouring authorities' unmet needs.

3.47 The Council will also wish to continue assessing support for more ambitious growth. The EHDNA Update has illustrated why the result of the revised Standard Method is a significantly different starting point for this exercise than evaluating the previous result of local housing need which was ill-suited to use in Telford & Wrekin. Two points should be highlighted.

3.48 Firstly, because the revised Standard Method is not demographically driven it does not follow that planning for the minimum mandatory local housing need result would *not reflect growth ambitions* (or more correctly, demographic trends and market signals) covered by previous EHDNA evidence base and the Council's options for plan-making.

3.49 The result of demographic scenarios derived from the revised Standard Method figure indicates its broad comparability with very high recent migration trends that the Standard Method does not specifically demand continue. On this basis what the Government's minimum Standard Method now prescribes is very similar to what would be achieved by a justified alternative to the previous Standard Method, as explored under the Part 1 EHDNA.

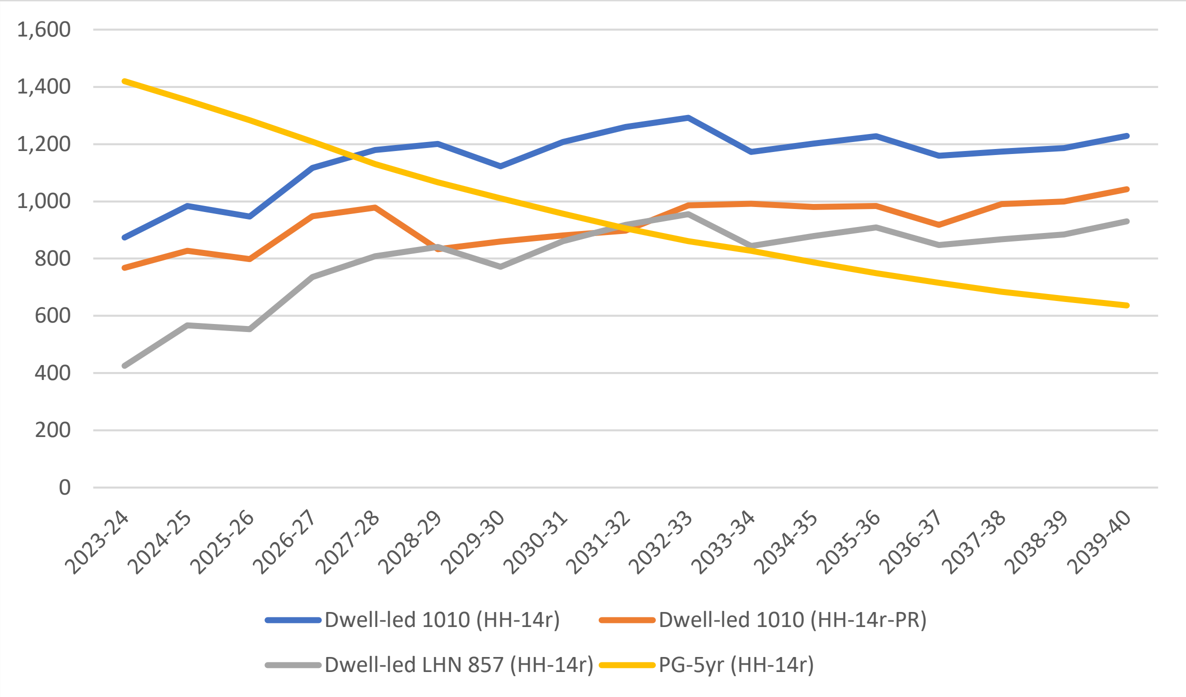
3.50 Secondly paragraph 69 of the NPPF2024 does not require that reasons to plan for more ambitious levels of growth need to be considered separately or cumulatively. Paragraph 69 instead states ***"The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, <u>or</u> reflects growth ambitions linked to economic development or infrastructure investment"***. This does not indicate that authorities plan for *both* growth ambitions *and* unmet needs. By responding positively to unmet needs requests *or* indicating that levels of housing provision would support opportunities for economic development over-and-above what other migration trends derived from the Standard Method would suggest there is no material reason that both of these components of growth ambitions would not be supported by an overall requirement in excess of local housing need.

3.51 The following sub-sections provide further justification for the application of the revised Standard Method as the minimum level of housing to be planned for, including the reasons why it represents an appropriate starting point to consider the needs of different groups, together with the extent to which other growth ambitions can be considered to remain captured within the Standard Method figure and housing requirement options consulted upon by the Council previously.

i) *Migration Trends and Levels of Population Change Derived from the Standard Method*

3.52 The most recent five-year migration trend corresponds to an exceptionally high level of population change in Telford & Wrekin principally driven by high levels of net population gain from internal migration within England & Wales and in-part associated with recent levels of housebuilding. The short-term future projection of net internal migration would suggest a higher equivalent dwelling yield than recorded in recent delivery and significantly in excess and the Standard Method dwelling figure or housing requirement options consulted upon previously. However, as the demographic profile of the borough changes over time rates of internal migration in trend-based projections are reduced whereas dwelling-led scenarios sustain more stable levels of migration associated with population to fill housing expected to be provided over the plan period. The annual component of net internal migration for a selection of scenarios is shown below.

Figure 3. Net Internal Migration Component of Change



Source: Edge Analytics

3.53 Average internal migration over the plan period (2023-2040) would equate to an average of 800 persons. This compares with 956 persons under the five-year trend but exceeds any other trend-based series or official subnational projections. Given that the application of the revised Standard Method forms part of a national policy objective to boost supply and thus increase levels of housebuilding in areas with poorer records of delivery, it is reasonable that a population derived from the result of the revised Standard Method falling short of the most recent five-year trend should still be used to assess the needs of different groups. In these circumstances it is appropriate that any policies indicating that a given proportion of new development should be provided to meet a particular need should be derived from a projection of population change linked to the Standard Method scenario.

3.54 Housing requirement options consulted upon previously by the Council could result in the five-year migration trend being sustained or exceeded (average of 923 or 1149 persons depending on assumptions for household formation). As detailed below it is reasonable to consider these circumstances would more likely arise in circumstances where neighbouring areas are failing to provide for the Standard Method.

ii) *Relationship Between Alternative Migration Trends and Requests to Accommodate Unmet Housing Need*

3.55 The EHDNA Update concludes that any level of future population change consistent with higher levels of net internal migration will only arise primarily from responding positively to requests to accommodate neighbouring authorities' unmet needs. The most recent five-year migration trend is already substantially informed by very low levels of housing delivery in neighbouring authorities.

3.56 Making sustained provision for higher rates of net internal migration (as assumed by dwelling-led scenarios) would principally be reasonable in circumstances where delivery elsewhere was not expected to improve. While separate to the assessment of local housing need and the level of housing requirement that can provided for in strategic policies it is relevant to note the following background and approach to assessing requests received by the Council.

3.57 The Council recognises that there is a significant level of unmet need across the four Black Country local planning authorities (LPAs), and the current published figure stands at 30,427 dwellings.

3.58 It is a requirement of the National Planning Policy Framework (NPPF) that LPAs should seek to help meet the unmet needs of neighbouring areas, in order for plans to demonstrate they have been positively prepared.

3.59 As part of refining the evidence base for the plan, the Council has (using recently available Census migration data) made a revised estimate of the contribution towards the unmet development needs of four named LPAs. This revised estimate would stand at c.126 homes per annum based on potential out-migration from the four LPAs to Telford & Wrekin and based on the extent of unmet need currently indicated by the LPAs (as evidenced in a separate Technical Paper prepared by the Council).

3.60 This compares to a difference of 153 dwellings per annum where the result of the revised Standard Method is compared with housing requirement options consulted upon previously.

3.61 It is also the Council's view that due to the contained nature of the borough and the connectivity to the Black Country area via the M54 and rail line any contribution will be 'top sliced' from the Council's annual housing completions and, subject to adoption of the plan will be backdated to the plan start date and not ring-fenced to specific sites.

3.62 For these reasons it is considered that even in circumstances where requests to address neighbouring authorities' unmet needs are accommodated, five-year internal migration trends would not exceed those most recently recorded even where contributions towards neighbouring authorities' unmet needs are proposed.

iii) *Relationship with Household Formation and Dwelling-Led Population Growth*

3.63 In principle, housing requirement options consulted upon by the Council would rely on additional population growth exceeding the most recent five-year trend (33,200 persons versus 29,900 persons) in order to populate dwellings associated with higher levels of housing delivery. This is not considered a reasonable starting point for the wider findings of the local housing need assessment. These levels of population growth would be unprecedented.

3.64 While it is reasonable to think that population growth could sustain the most recent five-year trend, the source of any additional population and its characteristics cannot be dictated by either the Standard Method calculation (which includes no demographic component) or trend-based alternative scenario. Indeed, even for the purposes of comparison with official subnational projections there have been changes to fertility and mortality rates (as described in **Appendix 1**) that run counter to expectations of increased population growth.

3.65 The characteristics of additional population growth that may be associated with pursuing ambitions for housing growth in excess of the Standard Method should be excluded for the purposes of assessing housing needs of different groups. However, it is reasonable to assume that national policy provides support for delivery which, as a minimum, improve rates of household formation. This is consistent with the view that providing for higher levels of housing delivery would be broadly likely to maintain rather than exceed recent short-term migration trends which are already very high.

3.66 Accordingly any change to demographic trends to increase levels of population growth (beyond five-year trends) would be expected to exist where there is improved household formation. In other words, provision for an increased housing requirement in these circumstances would support five-year migration trends but equate to a lower level of additional population growth than would be expected if the level of dwellings to be delivered were occupied using unadjusted 2014-based household formation rates. This reduces projected population change under housing requirement options consulted upon previously by the Council from 33,200 to 28,900 persons.

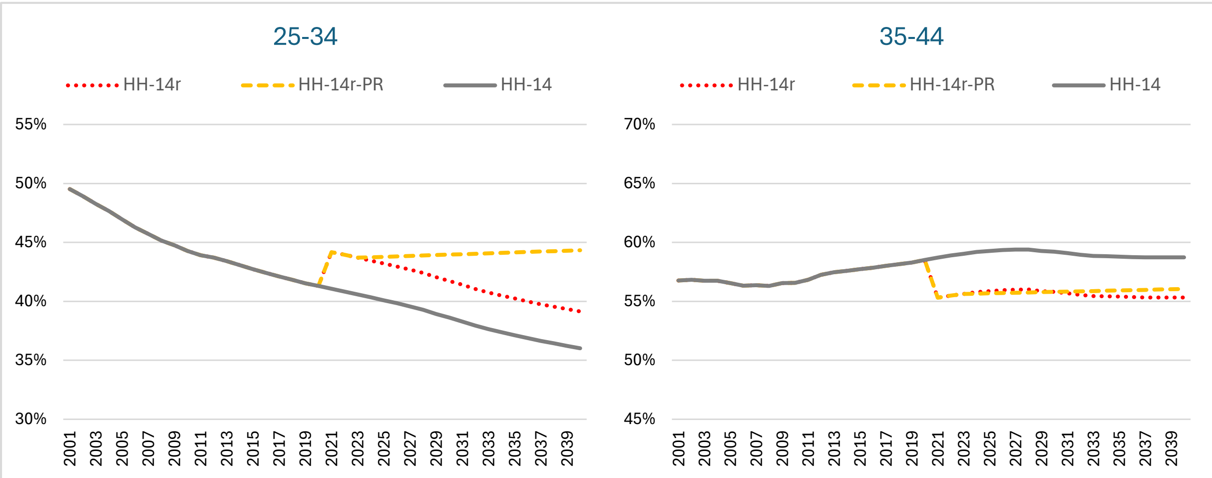
3.67 This provides headroom for a partial ‘return to trend’ in terms of household formation – though whether any more significant improvement in household formation is likely to occur will be dependent on other factors such as changing demographics and the wider housing market.

3.68 The relevant conclusion for this housing needs assessment, and making policy provision for the housing needs of different groups calculated using the Standard Method, is that there is an expectation that those policies would be applied to the total level of housing to be planned for under any scenario where the proposed housing requirement exceeds the result of this figure. This would improve the prospects for meeting the housing needs of different groups in full taking account of the fact that the housing requirement includes some additional assumptions for population growth to which relevant policies apply, together with an increased level of housing provision relative to projected population change should an improvement in household formation rates to realised.

iv) *The Extent of Improvement in Rates of Household Formation*

3.69 **Appendix 1** of the EHDNA Update justifies why it is only appropriate to apply a partial return to trend for rates of household formation in Telford & Wrekin. The reasons that a full return to 2001 rates of household formation should not be applied are also considered in **Appendix 1** and further take account of the much higher level of household growth observed in the period to 2023 relative to the official 2014-based household projections. The figure below shows the effect of these changes on the profile of headship rates for the age groups it is applied.

Figure 4. Headship rate profiles for ages 25–34 and 35–44

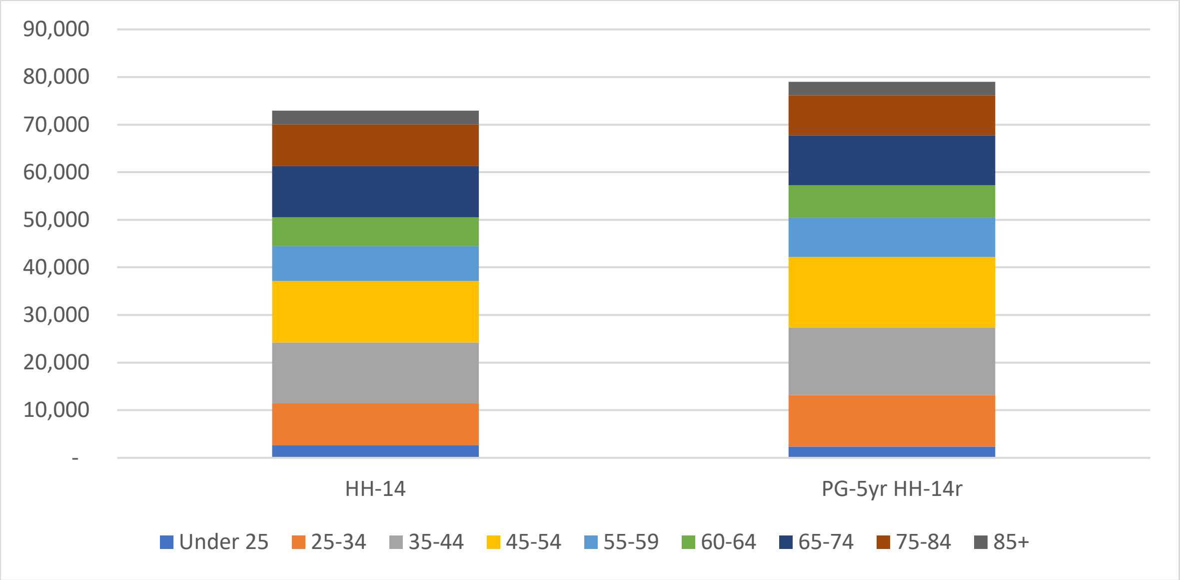


Source: MHCLG, Edge Analytics, Census 2021)

3.70 While actual household growth is largely a function of demographic change there is invariably a feedback process where these demographic characteristics would not have taken place is household formation was significantly suppressed and worsening further. In these circumstances, and where annual change in households since 2014 has exceeded the official projections, the rationale for a return to trend in household formation is weaker.

3.71 The figure below illustrates this, with the 2023 total for households (79,008) exceeding a forecast total of around 73,000 from the 2014-based projections and showing higher than projected numbers of younger households (10,900 aged 25-34 versus 8,800).

Figure 5. Households by Age (2023)

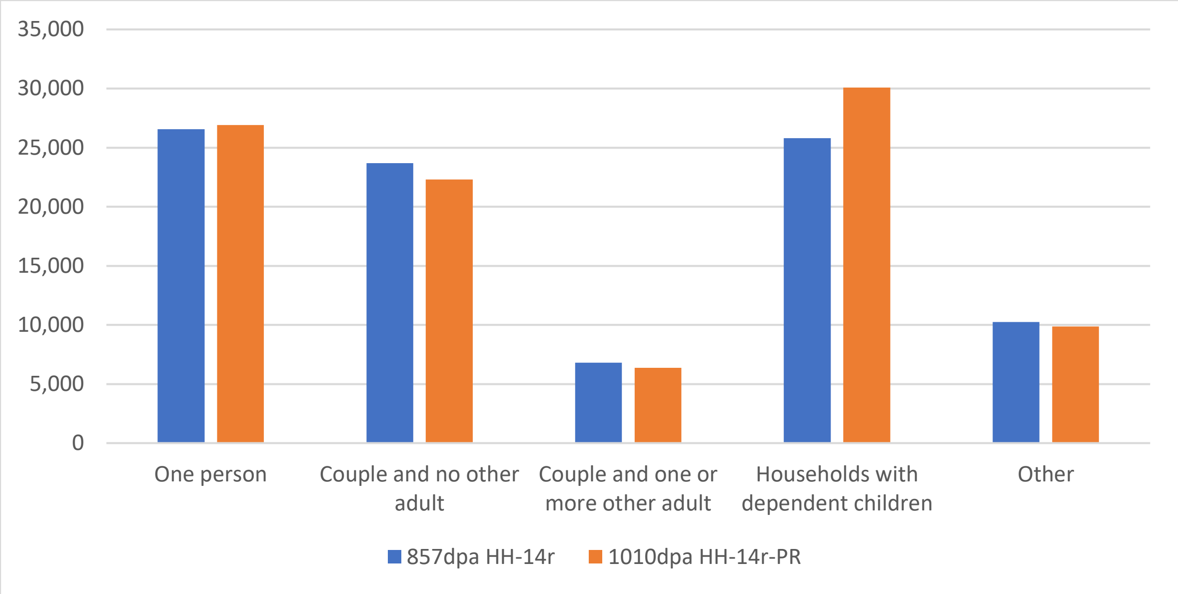


Source: Edge Analytics

3.72 However, the effect of the 2014-based formation rates is that even when these are re-scaled to the 2021 Census they are higher than originally forecast to 2023 and a reduction in household formation rates would apply to the remainder of the plan period. The effect of this would be to constrain housing growth relative to population change. This would limit the ability to meet future needs even where the Standard Method would indicate lower population growth than the highest short-term trends.

3.73 The figure below illustrates that although the revised Standard Method scenario equates to fewer households per annum, when these characteristics are derived without any improvement in household formation rates certain types of household such as ‘other’ households experience greater change than the dwelling-led 1,010 scenario with a partial return to trend. The partial return to trend assists in limiting these constraints.

Figure 6. Households by Type (2040)



Source: Edge Analytics

3.74 It is not appropriate to apply an improvement in household formation rates when assessing the needs of different groups using a demographically derived output from the revised Standard Method. Applying a partial return to trend therefore effectively holds rates of household formation closer to those experienced as part of higher levels of delivery in recent years.

3.75 For the purposes of policies that seek to provide for an absolute level of need for specific groups, these should be derived from the dwelling-led revised Standard Method scenario as a realistic measure of current demographic trends. The effect of this is that achieving provision for these absolute levels of need would correspond to a lower proportion of the total result of population and household change based on a requirement in excess of the Standard Method, allowing for some increase in household formation as opposed to, for example, trend-based projections generating a lower dwelling-equivalent figure without adjustments to household formation.

3.76 When applied to the dwelling-led 1,010dpa scenario the effect is to generate a level of population change based on the characteristics of improvements in household formation that is broadly consistent with past five-year trends.

v) *Implications for Labour Supply and Economic Growth*

3.77 The Part 1 EHDNA identifies an employment growth scenario based on the creation of 859 jobs per annum 2020-2040 which the Council has applied for plan-making. This represents an ambitious level of growth based on recovery following the Coronavirus pandemic. The recovery in levels of employment and productivity has generally been shallower than the assumptions underpinning this scenario.

3.78 While there is no express link in national policy and guidance between housing need and supporting levels of population change consistent with the labour supply equivalent to a given level of job creation, this can form part of meeting an area's growth ambitions. **Appendix 1** to this EHDNA Update summarises the assumptions for labour force and employment generated by the revised scenario assessment and their relationship with this employment-led growth figure.

3.79 It should be noted that while unemployment and commuting rates are very similar to the

Census 2011 data informing the Part 1 EHDNA, economic activity rates based on the 2021 Census are lower. For derived labour supply and employment outputs to compare against the Part 1 EHDNA growth scenario this means that any improvement and recovery in activity rates would increase the number of jobs that could potentially be supported. The derived employment figures in terms of jobs supported under the different scenario assumptions also include no allowance for double-jobbing. This means that the comparisons are conservative.

3.80 The effect of applying these assumptions to the revised scenario assumptions and comparing these to the Part 1 EHDNA dwelling-equivalent outputs from the jobs growth scenario are shown in the table below.

Table 3. Population and Employment Scenario Output Comparison

	Annual Total by Component and Year						Average Change per year (2023 - 2040)	
	Population			Employment				
	2020	2023	2040	2020	2023	2040	Population	Employment
Dwell-led 1010 (HH-14r-PR)	183,483	191,915	220,863	N/A	91,998	106,141	28,948	+832
Dwell-led 1010 (HH-14r)	183,483	191,915	225,143	N/A	91,998	108,444	33,228	+967
Dwell-led LHN 857 (HH-14r-PR)	183,483	191,915	214,435	N/A	91,998	102,706	22,520	+630
Dwell-led LHN 857 (HH-14r)	183,483	191,915	218,509	N/A	91,998	104,894	26,594	+759
Employment-led Experian Growth (2014-based)	179,631	182,606	204,044	90,920	94,752	108,092	24,413	+859

Source: SPRU / Edge Analytics

3.81 The main point to highlight is that while the revised scenarios indicate higher populations at 2023 and 2040 than the Part 1 EHDNA scenarios, they show lower derived employment totals in 2023. This illustrates the effect of lower assumed rates of economic activity. However, even with these lower rates of economic activity applied, the equivalent rates of employment growth ('jobs supported') produce similar outputs to the EHDNA Employment-led Growth Scenario.

3.82 The revised Standard Method scenario (857dpa HH-14r) is considered to represent a reasonable comparison with the Growth Scenario (759 versus 859 additional jobs supported per year) and given the underlying assumptions is unlikely to constrain opportunities for economic growth. The comparison is closest for the housing requirement options previously assessed by the Council with a partial return to trend in household formation (Dwell-led 1010 HH-14r-PR) (832 versus 859 additional jobs supported per year).

3.83 Assuming levels of population growth for this scenario without improvement in household formation would exceed recent demographic trends and indicate a level of employment growth in excess of the Growth Scenario (967 versus 859 additional jobs supported per year). This level of employment growth is not considered to represent realistic assumptions based on demographic trends or market signals captured by the Growth Scenario but nonetheless indicates that planning for in excess of the Standard Method could capture even higher levels of economic development.

n) Discussion and Conclusions on Application of the Revised Standard Method

3.84 The PPG underlines the flexibility that exists for authorities seeking to plan positively, explaining that the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. As a result, and consistent with PPG prior to revision of the Standard Method, where authorities plan for higher growth this should not normally have to be thoroughly justified at examination[10].

3.85 The previous EHDNA evidence base for Telford & Wrekin has identified that housing need is likely to exceed the result of previous iterations of the Standard Method and the Council has sought to respond to this positively in previous rounds of plan-making. Within this context it is not inappropriate to have regard to indicators from the pre-existing evidence base that have informed the Council's reasons for planning positively. The remit of the current PPG is not exhaustive on these points and so it is also relevant to have regard to the archived PPG.

3.86 This confirmed that in determining the number of homes needed in an area as it does not predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. The PPG (Reference ID: 2a-010-20190220) highlighted that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the Standard Method indicates – which remains as summarised in Paragraph 69 of the NPPF2024. Where applicable, considerations such as growth strategies for the area or requests to accommodate unmet needs should be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan).

3.87 While the inputs to a stock-based approach to the revised Standard Method have less direct regard to matters it was relevant to address under the previous PPG for the preceding Standard Method (underpinned by household projections), it is no less true that the relationship with the impact of other past or future government policies may be relatively weak. This is particularly the case where the following applies, as set out in the previous PPG: *"there may, occasionally, also be situations where previous levels of housing delivery in an area [or previous assessments of housing need] are significantly greater than the outcome from the Standard Method"*.

3.88 While stock provides a stable and predictable baseline to denote a proportion share of the contribution to local housing need nationally, it may be the case that previous levels of stock growth have been greater than 0.8% and these levels of growth may be indistinguishable from (or much more closely aligned with) aspirations for economic development that local authorities expect to sustain.

3.89 It is also relevant that the previous PPG identified whether, in the context of the impact of future policies or the relationship of local housing need with past trends, approaches that identify a need higher than the Standard Method should adequately reflect current and future demographic trends and market signals[11]. This reflects that there may be implications for the level of housing need to be planned for, even where the primary considerations for planning positively in excess of the Standard Method may be relatively discrete (such as ensuring labour supply and commuting factors are considered when planning for increased economic development).

3.90 The context for the revised Standard Method in relation to assessing the needs of different groups is therefore also now different as it is not underpinned by a baseline assumption for new household formation. This provides no demographic component whatsoever in terms of the relationship between the Standard Method and characteristics of need. Needs may therefore still be high relative to the result of the Standard Method, though this is equally dependent on the actual demographic characteristics to be assessed entirely independently from the Standard Method result. It is, however, the case that all things being equal an increase in the result of the Standard Method would equate to other needs corresponding to

[10] ID: 2a-040-20241212
[11] ID: 2a-015-20190220

a lower rather than higher proportion of the level of housing to be planned for.

3.91 The assessment of needs of different groups is informed by demographic trends and market signals together with a range of other indicators and evidence that may be relevant to identifying people and households with particular characteristics of need. This also enables evaluation of the level of need as a proportion of the total existing or future number of households or population.

3.92 This could, for example, be the case if projected demographic trends over the last few years and recent levels of housing delivery are expected to continue and produce equivalent dwelling and household numbers that exceed the result of local housing need. While this evidence *may* draw upon the same characteristics that indicate housing need is greater than the result of the Standard Method, the extent of housing needs of different groups taking account of demographic characteristics *is,* by definition, independent from stock-based inputs to the calculation.

3.93 The ability of policies subsequently prepared to address the identified housing needs of different groups may therefore also be impacted by conclusions on the housing requirement. This process determines these needs as a proportion of the overall housing requirement. This could be lower if, for example, the local planning authority proposes a housing requirement that exceeds the result of the Standard Method. That, in-part at least, would assist in addressing these needs.

3.94 Several key points emerge from this analysis:

- **Alignment with Local Ambitions:** Following changes to national planning policy, the revised stock-based Standard Method supports Telford & Wrekin's existing housing delivery goals, providing a strong basis to build upon options previously consulted upon as part of plan-making.
- **Addressing Affordability:** The Standard Method's incorporation of the affordability adjustment reflects the need to address housing affordability in the area, which aligns with national policy objectives to significantly boost the supply of housing and locally aligns with maintaining similar levels of housebuilding to those achieved recently and not adversely constraining opportunities for households to form.
- **Robust Justification for Alternative Housing Requirement Scenarios:** The alignment between the new Standard Method, local ambitions (for both economic development and sustaining rates of housing delivery) and demographic trends provides a robust justification for Telford & Wrekin Council’s housing requirement options assessed as part of the emerging Local Plan. In supporting local authorities to plan for more ambitious levels of growth paragraph 69 of the NPPF2024 does not require that reasons for this must be considered separately or cumulatively in relation to supporting job creation or responding positively to requests to address neighbours’ unmet needs. Even allowing for improvements in household formation scenario, testing in the EHDNA Update indicates sustaining higher levels of net internal migration is also likely to be a function of responding positively to requests to accommodate neighbouring authorities’ unmet needs. This reinforces the justification for making provision for an overall requirement in excess of local housing need that would support unmet need and economic development components of local growth ambitions simultaneously.

4.0 STAKEHOLDER ENGAGEMENT

Key Points Summary

- Three workshops were undertaken with key stakeholders including Telford & Wrekin Council officers, Registered Providers (RPs) and estate agents to draw upon their locally specific knowledge of the housing market.
- All types of residential property are in demand from renters, from 1-bed homes to 5-bed homes. 2 and 3-bedroom houses are in the highest demand for all tenures.
- There have been reports of overcrowding in some family homes due to lack of affordability whilst some are renting larger properties than they need.
- There has been a large influx of international migrants to work within the residential care sector or the Princess Royal Hospital. Cheaper house prices and the commutable distance to Birmingham act as pull factors for international and internal migration supporting the housing market and recent population growth.
- The demand for accessible and adapted homes is higher than ever.

a) Purpose and Methodology

4.1 A key part of the research to inform this study involved engaging directly with stakeholders with interests in the delivery of market and affordable housing. Three stakeholder workshops were undertaken with senior individuals from a wide range of organisations and sectors including those listed below. In each workshop the discussion was framed around a series of open questions to draw upon the expertise and locally specific knowledge of each stakeholder:

- Telford & Wrekin Council officers, including those working in housing strategy;
- Registered Providers (RPs);
- Estate agents and property professionals;
- Developers and housebuilders;
- Community representatives

4.2 In addition to these workshops, a survey was distributed by email to stakeholders where requested. The aim of the workshops (and survey) was to seek views on the current market performance, the types of properties in demand, the suitability of the existing housing stock, and the affordable and specialist forms of accommodation in Telford & Wrekin.

b) Summary of Key Findings

4.3 A summary of the key headline findings from the stakeholder engagement workshops is provided in the table below.

Table 4. Stakeholder Response Summary

Theme	Stakeholder Response Summary
Recent performance / changes in the property market	Developers raised some historic concerns around Brexit but noted that it has had no real impact on the current market. Interest rates have had a massive impact on the local property market, causing the market to be volatile in the last 6 months. It was noted that there had been increasing stability during the second half of 2024. Landlords are demanding higher rents because of the interest rate increases. Construction and labour costs are expensive, and there have been some struggles with the availability of labour within the construction sector in particular. A Telford & Wrekin Council Officer commented on how sales rates are quite good for both affordable and market units. Properties are selling especially well on large development sites such as those at Lawley and Priors Lee. Shared ownership is being sold very quickly. This could drop off if interest rates lower and mortgages become more affordable. Average house prices have been increasing since Covid-19 in Telford. Local estate agents emphasised how these increases are significant, with average house prices being 8-9 times higher than average incomes. From the perspective of the homeless accommodation sector, the market has not improved. Private rents are still unaffordable to a majority. The only option for a large number of homeless people is a multiple occupancy home with fairly high rent which is just about affordable. There has been a possible slowing in terms of new residential planning applications for market and affordable housing, particularly in major applications recently. A Telford & Wrekin Council Officer speculated that this could be due to developers waiting for the new Local Plan or the fact that there are fewer allocated sites left to develop. Some of the major developments are delivering a wider tenure mix including delivery for private rent. A developer stated that their private partners think there is a strong rental demand. Landlords have been concerned with proposed changes in the law, such as private tenants receiving more rights, as proposed in the Renters' Rights Bill. It was also noted that there is an ageing landlord population in Telford and some are looking to sell their entire portfolios.
Types and size of properties most in demand	All types of residential properties are in demand from renters, from single homes to 5 bed houses. The period between tenancies is a lot lower than before, and it may only be a week where a property sits without tenants. There is a very strong demand for private rentals. A social housing group stated how properties can let within '30 seconds' of being advertised. A developer noted that houses are most in demand for rent and purchase, but apartments are not. 2 and 3-bedroom houses are the most in demand for all tenures, with 3-bedroom properties, particularly ones with a garage and ensuite in the main bedroom, are proving most popular. 1-bedroom properties are in high demand from renters in particularly. The Council is seeing increased demand for larger family housing with over 4 bedrooms. There are families with over 8 children being referred and there is no space for them. The Station Quarter housing development was noted by a Telford & Wrekin Council Officer as being an interesting project that will serve a variety of different needs and people, such as students. As a result of this development, central Telford will have a more residential feel. It has historically been difficult

Theme	Stakeholder Response Summary
	to generate the residential market in central Telford on all schemes.
The suitability of the existing house stock and gaps in its provision	People who are renting cannot afford to apply for their correct bedroom sizing. For example, families with 2 children are being forced into 2-bedroom houses. This is resulting in overcrowding. However, it was noted that some people are renting larger properties than they need, where they can afford to, because of a demand for more space. Working from home was strongly considered to represent a factor in this demand for more accommodation. There have been reports of larger properties (4-beds and above) being turned into houses in multiple occupation (HMOs) even though there are waiting lists of hundreds of people needing 4-bedroom properties. Though shared ownership properties are selling quickly, a social housing group stated that they are not sure it is a tenure that is needed. This statement was also supported by a homelessness group, as they outlined a desire for single occupancy units rather than HMOs. There is a large unmet need for 1-bedroom properties. A Telford & Wrekin Council Officer commented on how there are issues with the suitability of 1-bed rented stock that comes through. A lot of 1-bedroom properties tend to be apartments but this isn't necessarily suitable for all because of accessibility issues, pet rules and barriers for housing benefit tenants. It was noted by a developer that there is a lack of smaller allocated sites in Telford Town as these are mostly focused in rural areas. The developer was concerned as they believed large Sustainable Urban Extension sites do not fit all needs. Concerns were raised about the condition of rental stock. There are significant amounts of damp and mould where there hasn't been before. According to an estate agent, families are being deterred from renting new build properties as the space is much smaller and the rents are higher. Larger properties with big gardens in Woodside and Sutton Hill for example (~£800pcm) are being desired over new build properties in Donnington (~£900pcm), which have smaller rooms and average-sized gardens. The Council has a number of large families in temporary accommodation as there is nowhere to place them.
Migration flows – patterns and pull factors	It was noted that there has been a large influx of international migrants, including those who work in medicine at the Princess Royal Hospital. They also come to Telford to work within the residential care sector. One significant 'pull' factor is thought to be cheaper house prices compared to other locations. Local estate agents noted that a 1-bedroom flat in Birmingham had a similar price as a 4-bed home in Telford. Another main 'pull' factor is thought to be accessibility to Birmingham, as Telford is within a commutable distance for those who work in the city. It was noted by a developer that people tend to move out of the Black Country into Telford & Wrekin because of the close location and large housing supply. Telford & Wrekin Council have been very proactive with regards to planning and supply.
Demand for affordable housing and the barriers to delivery	Developers remarked on how their affordable and rented housing partners say demand is solid and that they have the scope to deliver additionality on affordable housing requirements. Developers noted there has not been a struggle to get housing providers to take on affordable units. However, there is uncertainty about the future availability for grant funding.

Theme	Stakeholder Response Summary
	This could be a major constraint on future affordable housing delivery. A stakeholder from a vulnerable housing and support group noted that there is a struggle to find affordable one bed properties for vulnerable people or those in temporary accommodation.
Demand for other specialist forms of accommodation and gaps in provision for specialist groups	There is a healthy supply and demand for future delivery of older persons' sheltered and extra care accommodation. The demand for accessible and adapted homes is higher than ever, but a lot of existing properties are not easily adaptable or suitable for accommodating disabled or older people. Funding is dwindling for retrospective adaptations and there are not a lot of properties being built to accommodate additional needs. Properties with adaptations are quite expensive to rent or buy, which is more difficult for disabled people/older people who cannot work and have to claim benefits. People are living longer and there are more children with additional needs, but it was noted that private landlords do not have the money to provide for this and councils do not have the appropriate housing stock. There is a lack of accessible well-located bungalow accommodation for people with disabilities and older persons. Some stakeholders however felt that the Council have a good delivery of specialist and supported accommodation across most groups, but that perhaps the mix of general needs affordable and accessible/adapted properties could be broadened. A Council Officer stated how they seemed to be reaching saturation point for extra care. By building too many specialist housing units, it was noted that Telford & Wrekin may attract a lot of in-migration with a perception that this could place added pressure on local healthcare providers. An estate agent believed that most of the self/custom build demand in Telford & Wrekin came from agricultural workers wishing to convert barns in rural areas. They stated that there was not a huge open market for self-build.

c) Integration of Stakeholder Input

4.4 Stakeholder engagement is a key element of this EHDNA Update, as the issues discussed in the workshops helped to inform the recommendations of this report. For example, discussions were had surrounding demand in the private rented sector. Key themes such as the housing mix and the suitability of the current stock emerged, have helped to inform recommendations on housing mix and tenure set out later in this report.

4.5 Consensus was largely reached by stakeholders on a variety of themes, including recent disruptions to the market, the types of properties in demand and migration flows. All stakeholders were in agreement that the market had recovered from the disruption of Covid-19 and Brexit, though the impacts of Brexit were considered to be relatively low. However, the interest rate increases and rising construction costs are causing problems in the current market. Stakeholders also agreed that all types of property are in high demand across all tenures in Telford, though the market for two-to-three-bedroom homes had the strongest demand. Furthermore, many stakeholders made the observation that long waiting lists exist for large families waiting for homes of over four bedrooms, though many of these are currently underoccupied or being turned into Houses in Multiple Occupation. All stakeholders commented on the strong commuter and transport links between Telford and Birmingham which act as a strong pull factor for people moving to Telford from elsewhere.

4.6 However, there were some areas of divergence in stakeholder views, particularly surrounding homes requiring adjustments. Some stakeholders commented on how there was a good supply and mix of older persons housing and accessible and adapted homes, with high delivery rates. Other stakeholders said there is a growing demand for adjusted properties but neither private landlords nor the Council have the money or stock to match this. The lack of accessible well-located bungalow accommodation for older groups was raised as a particular issue. Differing concerns were also shared, with some stakeholders noting the uncertainty of future funding which may further reduce supply of specialist older persons' accommodation, whilst others raised concerns over reaching a saturation point in terms of provision and the perceived risk of placing increased pressure on local healthcare infrastructure.

5.0 AFFORDABLE HOUSING NEEDS

Key Points Summary

- As outlined in the PPG, the assessment of current affordable need should include: homeless households and those in temporary accommodation, overcrowded households, concealed households and households in unsuitable housing.
- There is a total of 1,208 households in need including 416 homeless households, 90 lettings to reasonable preference categories, 438 overcrowded households and 264 concealed households.
- Adding the number of newly forming households unable to afford lower quartile rents (787) to the number of existing households falling into need (338) produces an estimated gross figure of 1,125 households per year falling into need over the plan period.
- There is an identified need for 824 affordable homes per year to 2040. Social and affordable rent accounts for 696 of this total whilst affordable home ownership accounts for 128.

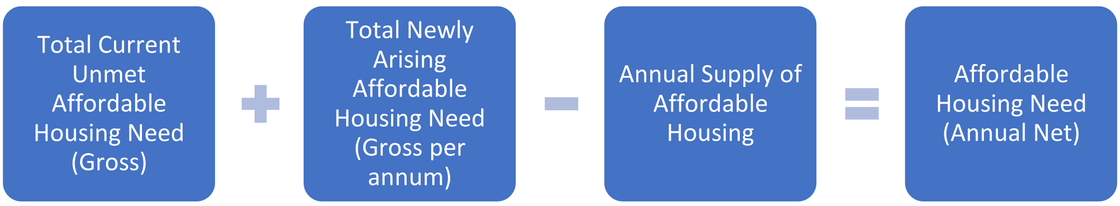
a) Introduction

5.1 In this section, an assessment of affordable housing need is presented for Telford and Wrekin, in line with the requirements of the NPPF and following the method outlined in the PPG.[12]

5.2 Affordable housing is defined in the NPPF as *"…housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)"*.[13] This includes affordable housing for rent (either social or affordable), including starter homes, discounted market sales housing, and other affordable routes to home ownership (including shared ownership, relevant equity loans, rent to buy).

5.3 The need for affordable housing has been assessed following the steps outlined in the PPG. This includes an assessment of current and future need, estimates of current affordable housing stock and potential future affordable housing supply. The total net need for affordable housing (calculated by subtracting total available stock from the gross need) is converted into an annual flow based on the plan period (see figure below**Error! Reference source not found.**). In line with the proposed reforms to the NPPF, this assessment also includes a consideration of the need for social rent.

Figure 7. Methodology for the Assessment of Affordable Housing Need



Source: Edge Analytics

[12] PPG paragraph 020 Reference ID: 2a-020-20190220
[13] NPPF Annex 2: Glossary

5.4 Further detail on the methodology used to calculate affordable housing needs in Telford & Wrekin is set out in the accompanying 'Telford & Wrekin Demographic & Housing Needs Modelling: Data Inputs & Assumptions' note prepared by Edge Analytics which is contained at **Appendix 1**.

5.5 The outputs of the analysis undertaken by Edge Analytics is presented below for both social and affordable rent, followed by affordable home ownership.

b) Social & Affordable Rent

5.6 The current need for social and affordable rent housing has been calculated using a range of data sources including homeless households and those in temporary accommodation, households with priority needs, overcrowded households, concealed households, and households in unsuitable housing.

5.7 Adding together those households that are homeless or in temporary accommodation (416), with priority needs (90), or in overcrowded (438) or concealed (264) households produces a current estimate of need of 1,208. Annualised, this equates to **71** households per year, as summarised in the table below.

Table 5. Summary: Households in Need

Category of Need	
Homeless Households including Temporary Accommodation	416
Lettings to Reasonable Preference Categories (insanitary/unsatisfactory, hardship, medical/welfare)	90
Overcrowded Households	438
Concealed Families	264
Gross need	**1,208**
Annual quota of current need (gross need / 17)	**71**

Source: MHCLG, CORE, Edge Analytics, ONS

5.8 The second step of the affordable need calculation involves an assessment of the number of newly arising households likely to be in affordable housing need in the future which includes:

- New household formation, and the proportion of these unable to rent in the market area.
- An estimate of the number of existing households falling into need.

5.9 Based on the *Dwelling-led LHN 857 (HH-14-R)* scenario, gross household formation is calculated at **1,689** per year in Telford and Wrekin. Analysis of income data reveals **787** newly forming households per year unable to afford open market rents over the plan period in Telford and Wrekin.

5.10 The number of existing households that might be expected to fall into affordable need in the future, including an estimated 'flow' of households onto the housing registers has been calculated, averaging **338** households per year.

5.11 Adding the number of newly forming households unable to afford lower quartile rents (787) to the number of existing households falling into need (338) produces an estimated gross figure of **1,125** households per year falling into need over the plan period.

5.12 Finally, to calculate the net need for affordable housing, an estimate of the current and future affordable housing supply is required, to offset against the gross need figures identified above. The supply of affordable housing is calculated from re-lets data and committed supply, based on past trends, in line with PPG. Adding together the annual supply of re-lets (451) to the annualised committed supply figure (49) results in an annual supply figure of 500.

5.13 To finalise the calculation of affordable housing need, the current and future supply of affordable rental housing (500) is subtracted from the total need figure of 1,196 (current plus future need at 71 and 1,125 per year respectively) to give a net annual affordable housing need figure of **696** per year. This is summarised in the table below.

Table 6. Social and Affordable Rental Housing Need Calculation: Telford & Wrekin

Step 1: Current Need		
1a	Homeless Households including Temporary Accommodation	416
	Lettings to Reasonable Preference Categories (insanitary, hardship, medical/welfare)	90
	Overcrowded Households	438
	Concealed Households	264
1b	Gross need	1,208
1c	**Annual quota of current need (1b / 17)**	**71**
Step 2: Future Need		
2a	New household formation (gross p.a.)	1,689
2b	% households that cannot afford to rent in the open market	47%
2c	No. households that cannot afford to rent in the open market (2a x 2b)	787
2d	Existing households falling into need	338
2e	**Total newly-arising housing need (gross each year)** (2c + 2d)	**1,125**
Step 3: Housing Supply		
3a	Existing Affordable Tenure Units occupied by households in need (accounted for at Step 1)	0
3b	Annual supply of re-lets (net)	451
3c	Committed Supply	49
3d	Surplus stock (vacant but available for letting)	0
3e	Units to be taken out of supply	0
3f	**Total affordable housing supply available per year** ((3b + 3c) - (3d + 3e))	**500**
Step 4: Estimate of Annual Housing Need		
4a	Gross annual affordable need (1c + 2e)	1,216
4b	Annual affordable Supply (3f)	500
NET Annual Affordable Housing Need (to rent) (4a - 4b)		**696**

Source: Edge Analytics

c) Affordable Home Ownership

5.14 PPG states that households that cannot afford to buy their own homes should also be considered in the estimation of affordable need. To estimate the current need for affordable home ownership in Telford and Wrekin, a similar approach has been followed to that taken to calculate the need for affordable housing to rent, starting with an estimate of current and future needs, and taking into account the supply of affordable housing through re-sales.

5.15 Households that fall into the 'gap' between being able to afford lower quartile market rents and open market property prices are the ones targeted for affordable home ownership products (such as Shared Ownership and Rent to Buy). To afford lower quartile market rents (£565 pcm), an income of £22,600 is required in Telford and Wrekin. To purchase an entry-level (lower quartile) property, at a price of £160,000 , an income of £38,860 is required (assuming a loan to income ratio of 3.5 and a mortgage deposit of 15%).

5.16 Analysis undertaken by Edge Analytics (set out in **Appendix 1**) calculates the number of households currently in need of affordable home ownership as **49** per year. The annual number of additional households seeking to become a homeowner (but are unable to afford open market property prices is **92** per year. Combined with the current backlog of need, this suggests a gross affordable home ownership need figure of **142** per year in Telford and Wrekin.

5.17 The affordable re-sales per year (**7**) combined with the affordable home ownership committed supply (**7**) results in a total affordable housing supply of **14** dwellings per year.

5.18 Combining the identified level of need (**142**) with the re-sales and committed supply data (**14**) results in a net annual net need for **128** affordable homes (for ownership) per year in Telford and Wrekin, as summarised in the table below.

Table 7. Need for Affordable Home Ownership: Telford & Wrekin

Step 1: Current Need		
1a	Current households in private rent	16,374
1b	No. private rent households in 'gap' between open market rent and purchase (1a x 30%)	4,912
1c	No. seeking to become a homeowner (EHS) ((1b x 59%) x 29%)	840
1d	**Annual quota of current need (1a / 17)**	**49**
Step 2: Future Need		
2a	New household formation (Gross p.a.)	1,689
2b	No. newly-forming households in 'gap' open market rent and purchase (2a x 29%)	490
2c	**Newly-forming households seeking to become a homeowner (EHS) (2b x 65%) x 29%)**	**92**
Step 3: Affordable Housing Supply		
3a	Affordable resales per annum	7
3b	Affordable Home Ownership committed supply	7
3c	**Total supply (3a + 3b)**	**14**
Step 4: Estimate of Annual Housing Need		
4a	Gross need for Affordable Home Ownership (1d+ 2c)	142
4b	Total annual supply (3c)	14
NET Annual Affordable Housing Need (to purchase) (4a – 4b)		**128**

Source: Edge Analytics

d) Affordable Needs Split

5.19 The analysis presented above has identified a net need for **824** affordable homes per year to 2040 in Telford & Wrekin.

- Social and affordable rent = **696** (84%)
- Affordable home ownership = **128** (16%)

5.20 Further analysis of income requirements and affordability thresholds (see **Appendix 1**) identifies a suggested split between the need for affordable and social rent as 34%/66%.

Table 8. Housing Need Split

Housing Option	Number	% of Total Affordable Need	% Affordable/ Social Rent Split
Affordable Home Ownership	128	15.5%	-
Affordable Rent	237	28.8%	34%
Social Rent	459	55.7%	66%
Total	**824**	**100%**	**100%**

Source: Edge Analytics

e) Implications for Affordable Housing Policy

5.21 Since the Regulation 18 Local Plan was published the NPPF has been revised. In respect of planning for affordable housing the requirement for at least 10% of the total number of homes to be available for affordable home ownership (paragraph 66) has been removed and replaced with a requirement that policies should *"expect that the mix of affordable housing required meets local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures".*

5.22 The requirement to secure 25% of all affordable housing as First Homes has also been removed.

5.23 Draft Policy HO4 of the Regulation 18 Local Plan seeks to maximise affordable housing delivery across the borough with developments providing up to 100% provision being supported where they contribute to mixed and balanced communities (paragraph 7.28). It also identifies the delivery of high-quality affordable homes for rent as being a priority (paragraph 7.27), which aligns with the affordable housing need split identified in this EHDNA Update.

5.24 Draft Policy HO5 sets out how affordable housing delivery will be secured through mixed tenure developments. Part 1(a) of this policy states that *"Affordable housing is expected to be delivered on site. This will be achieved through: Provision of a mix of affordable housing sizes and tenures based on local housing needs evidence. The tenure split should prioritise genuinely affordable housing, particularly social rented housing".*

5.25 The supporting policy text (paragraph 7.38) goes on to state that *"Affordable housing is expected to be delivered on-site and based on evidence in the EHDNA should comprise 80% affordable rent or social rent, and 20% intermediate (including shared ownership)".*

5.26 The latest evidence now presented in this EHDNA Update identifies a slightly higher proportion of need for affordable rent or social rent (84%) and a slightly lower proportion of need for affordable home ownership (16%), although these do broadly align with the figures previously consulted on.

5.27 It is however acknowledged that the Council may need to adopt a flexible approach to the suggested affordable housing split identified above to take account of viability and other property market characteristics which may affect deliverability on a site-by-site basis. The application of the Council's previously proposed approach to seek to provide 20% of homes secured via contributions towards affordable housing as affordable home ownership units is considered to remain an appropriate starting point in seeking to maximise the delivery of affordable housing.

5.28 Whilst it is recommended that delivery of affordable housing is maximised on site where possible, we note that paragraph 7.46 of the Regulation 18 Local Plan states *"There may also be overriding public benefits to higher off-site contributions as oppose to standard onsite affordable homes; for example, specialist supported housing where it may not ordinarily (or appropriate to) be delivered on-site".* Such specialist and supported housing may for example include housing for older people (as identified in Draft Policy HO6) or children in care. The needs of these groups are considered in sections 7(a) and 7(i) of this report respectively.

6.0 HOUSING MIX RECOMMENDATIONS

Key Points Summary

- Paragraph 63 of the NPPF December 2024 stipulates that the size, type and tenure of housing needed for different groups in the community should be considered in the context of the housing needs assessment.
- The EHDNA Update provides recommendations for housing mix by tenure based on occupancy characteristics. Given the relative stability of overall occupancy characteristics (taking account of change amongst existing households) the effect of net change over the plan period on the split of total stock by bedroom number is relatively limited.
- The number of households is projected to increase by 14,050 over the 2023-2040 plan period. Household growth is concentrated in the 65+ age group as well as the 45-54 age group.
- Based on indicative modelling of future housing delivery across a mix of tenures the recommended range for monitoring overall change over the plan period has therefore remained consistent across iterations of the EHDNA and is intentionally broad.
- This comprises 5-15% 1-bed properties, 20-30% 2-bed properties, 40-50% 3-bed properties and 15-30% 4+ bed properties.
- Planning for the centre of this range across the overall mix of future development is recommended as a starting point but this may be applied flexibly. This takes into account for example the demand for family housing, pressure upon existing stock within the private rented sector and the important role of affordable home ownership and affordable housing for rent in increasing the supply of smaller properties in-line with projected trends.

a) Introduction

6.1 Paragraph 63 of the NPPF December 2024 stipulates that the size, type, and tenure of housing needed for different groups in the community should be considered in the context of the housing needs assessment.

6.2 In this section, the overall mix of housing required is presented, in terms of size, type, and tenure, based on the projected level of household growth to 2040. The methodology firstly utilises data on the future size and structure of Telford and Wrekin's population and the associated household characteristics from the revised Standard Method **(Dwelling-led LHN 857 (HH-14r))** scenario, in combination with 2021 Census data on household composition, bedrooms and property type.

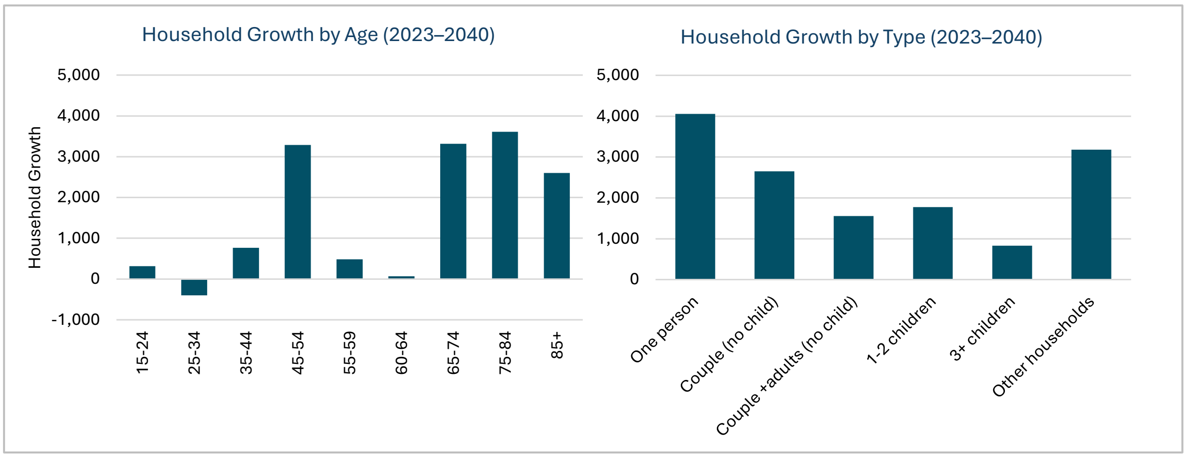
6.3 This produces a profile of growth for each dwelling size, type and tenure (owned, private rent, social rent), by age of the household representative person (HRP), and a suggested mix profile across market and affordable housing (split between social/affordable rent, and affordable home ownership). Further details of assumptions underpinning the profile of household growth are contained in **Appendix 1**.

b) Household Growth Profile

i) *Projected Household Growth*

6.4 Under the **Dwelling-led LHN 857 (HH-14r)** Standard Method scenario, the number of households in Telford and Wrekin is projected to increase by 14,050 over the 2023–2040 plan period. Household growth is concentrated in the 65+ age groups, which is reflected in the growth by type (one person and couple with no child), as well as in the 45-54 age group, linked to projected increased rates of household formation in the underpinning 2014-based household projection (from which the headship rate assumptions are drawn).

Figure 8. Household Growth by Age of Household Representative Person (HRP) and Type



Source: Edge Analytics POPGROUP modelling

6.5 In terms of applying recommendations for the future change in housing stock by type and bedroom number corresponding to occupancy characteristics by age it is relevant to update recent contextual information for household change in Telford & Wrekin between 2011 and 2021. This reflects that changes observed in the estimated number of households by bedroom number are sensitive to changes in occupancy between different household type and age of households.

6.6 The table below summarises actual estimated change for a summary of household types by bedroom number between 2011 and 2021.

Table 9. Change in Households by Type and Bedroom Number – 2021 versus 2011

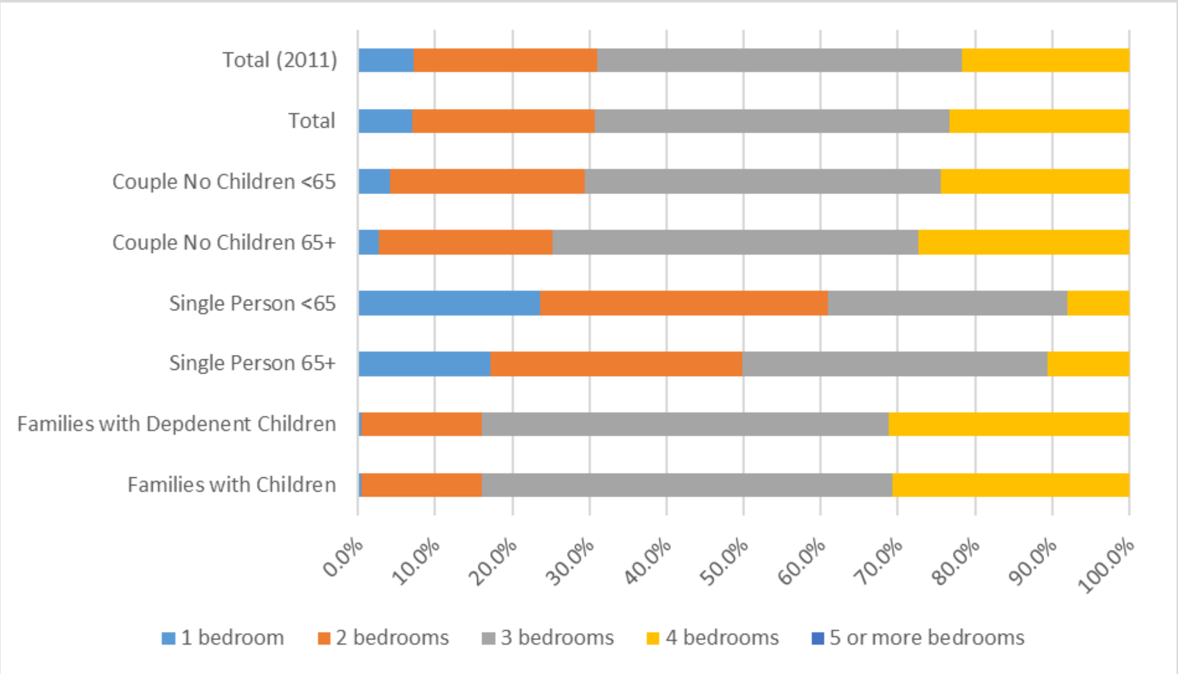
Households	1 bedroom	2 bedrooms	3 bedrooms	4+ Bedrooms	Total
Families with Children	-240	435	1,094	1,032	2,321
Families with Dependent Children	-198	179	454	547	982
Families all children non-dependent	-42	256	640	485	1,339
Single Person 65+	111	601	803	420	1,935
Single Person <65	866	829	616	168	2,479
Couple No Children 65+	-445	-1,817	-2,633	-1,151	-6,046
Couple No Children <65	388	2,217	3,832	2,516	8,953
All Other Households (including non-dependent children)	-104	202	789	714	1601
Total	618	2,211	3,861	3,457	10,147
% of total	6%	22%	38%	34%	

Source: Census 2011; Census 2021; SPRU Analysis

6.7 There has been an overall reduction in the proportion of households within smaller properties, with growth in households occupying 1-bedroom properties being only 6% of the total change and 2-bedroom properties 22%. These proportions are lower than the existing distribution of stock in Telford & Wrekin comprising around 7.5% one-bedroom and 24% two-bedroom properties. This primarily reflects the characteristics of an ageing population within existing household types and occupancy characteristics – for example the majority of growth amongst single person households aged 65+ has been for 3+ bedroom properties and this is likely to reflect those households continuing to occupy larger dwellings within the existing stock into later life.

6.8 The greatest percentage change between 2011 and 2021 has thus been recorded in 4+ bedroom households (+24%) but these rates have generally been higher for household types not typically associated with larger properties (such as single person older households (+79%). The figure below shows the total for each household type by proportion of bedroom numbers.

Figure 9. Occupancy Characteristics – Household Type by Bedroom Number (2021)



Source: Census 2011; Census 2021; SPRU Analysis

6.9 The 2011 total is included for comparison to illustrate very little overall change in the bedroom profile over the last decade. The principal reason for this is that the household types of single persons under 65 and couples under 65 with no children have witnessed the largest absolute change in households. Notwithstanding the general trend towards occupancy within larger properties as the population ages these households are by definition younger and the characteristics of these populations are generally consistent with the re-occupation of smaller stock.

6.10 A large proportion of the absolute growth in larger households such as families with children and other household types is offset by an absolute reduction in the number of older couple households with no children (-3,784 households within 3+ bedroom properties albeit the proportion of remaining households in larger dwellings has slightly increased).

6.11 A key consideration in understanding the characteristics of change particularly amongst smaller households and the net change in larger households corresponds to trends by tenure. These changes between 2011 and 2021 are summarised in the table below.

Table 10. Change by Tenure and Bedroom – 2011 and 2021

		2011	% of Total by Tenure	2021	% of Total by Tenure	Change by Tenure and Bedroom	% Change
Owner Occupied	**1 bedroom**	754	2%	651	1%	-103	-14%
	2 bedrooms	7640	19%	7588	16%	-52	-1%
	3 bedrooms	21644	53%	22995	50%	1351	6%
	4+ bedrooms	10568	26%	15217	33%	4649	44%
Social Rent	**1 bedroom**	2787	21%	2914	21%	127	5%
	2 bedrooms	4777	37%	5364	39%	587	12%
	3 bedrooms	4868	37%	4801	35%	-67	-1%
	4+ bedrooms	565	4%	706	5%	141	25%
Private Rented	**1 bedroom**	1253	12%	1845	11%	592	47%
	2 bedrooms	3391	32%	5069	31%	1678	49%
	3 bedrooms	4829	46%	7405	45%	2576	53%
	4+ bedrooms	1001	10%	1957	12%	956	96%
Total	**1 bedroom**	4794	7%	5410	7%	616	13%
	2 bedrooms	15808	25%	18021	24%	2213	14%
	3 bedrooms	31341	49%	35201	46%	3860	12%
	4+ bedrooms	12134	19%	17880	23%	5746	47%

Source: Census 2011; Census 2021; SPRU Analysis

6.12 These data show there has been very limited net change within social (affordable) housing stock. Absolute levels of change have had impact on the split of bedroom numbers although the reduction in 3-bed dwellings is likely to reflect loss of stock to other tenures (or redevelopment) whereas most gains have comprised two-bedroom dwellings (and likely to reflect the main characteristics of new build supply). This reinforces the importance of aligning the housing mix of future provision of affordable housing towards projected trends in need as the occupancy profile of current and future households changes.

6.13 Owner-occupied stock has also seen very limited net change other than within 4+ bedroom dwellings (likely to be in-part influenced by new build stock) and there has been a small net loss of 1 and two bedroom properties – either to other tenures or redevelopment.

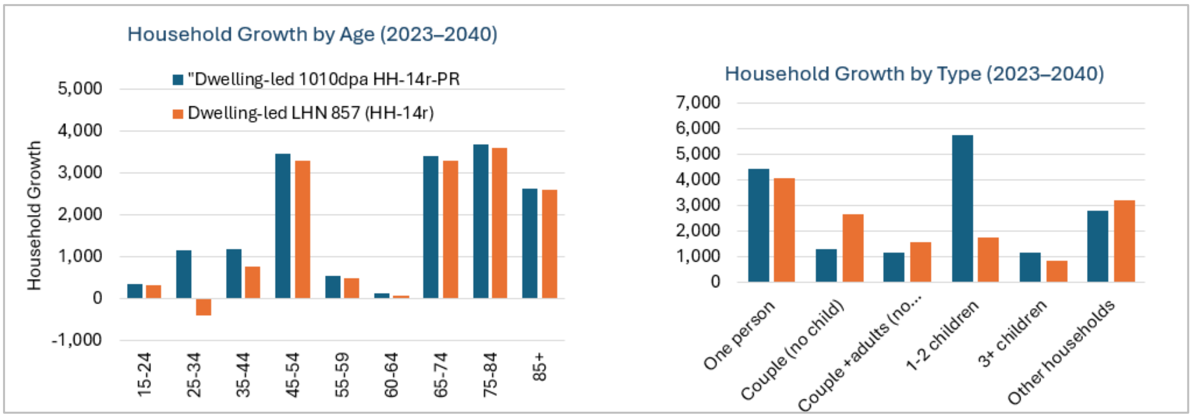
6.14 The main implication of this is that the understanding of absolute change in household type and occupancy by bedroom number is heavily linked to change in the size of the private rented sector. The absolute size of this sector has increased by around 55% - or 5,800 properties. This is heavily driven by re-use of the existing housing stock for private rented tenure rather than new development. In contrast, of an estimated growth in c.2,800 households occupying one and two-bedroom dwellings only around 550 can be attributed to net change in stock of this size across other tenures. The private rented sector therefore plays an important role in addressing the needs of smaller and particularly younger households (see section 7(g) of this report for further analysis of need in this sector).

6.15 The private sector has also seen growth in larger properties and the overall absolute change has not significantly altered the sector in terms of split by bedroom number. Growth of 2,576 three-bedroom properties illustrates an important role in addressing a wider range of housing needs. While the absolute estimated change in occupancy by bedroom number for 3+ bedroom properties is largely attributable to owner occupation (7,318 versus 6,074) the private rented sector will play a role. This is particularly likely to be the case for younger households where affordability restrictions are greatest and under-occupancy of larger private rented properties is less likely to be affordable particularly into older age.

6.16 While the housing need assessment is therefore underpinned by the population and household implications arising from the **Dwelling-led LHN 857 (HH-14r)** it is relevant to consider the potential effects of provision exceeding this figure, such as housing requirement options consulted upon previously by the Council in the **Dwelling-led LHN 1010 (HH-14r-PR)** scenario.

6.17 The figure below compares the two scenario household outputs by age and type of household. The **Dwelling-led LHN 1010 (HH-14r-PR)** scenario supports increased household formation and population growth amongst younger people. In practice this is likely to be more consistent with recent levels of migration and thus the characteristics of household formation (including growth in the private rented sector).

Figure 10. Comparison of Household Change by Age and Type (2023-2040)



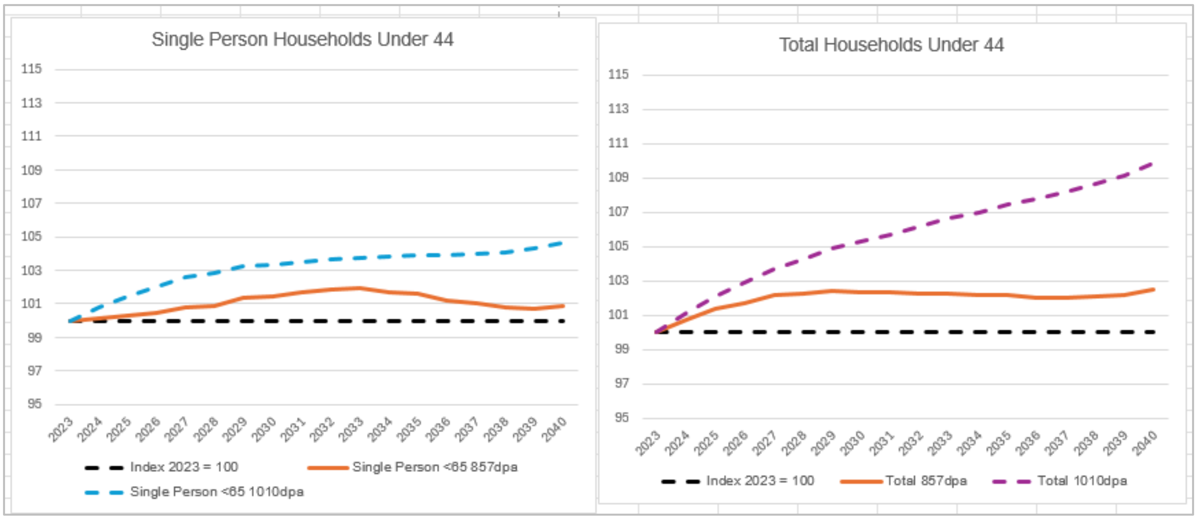
Source: Edge Analytics POPGROUP modelling

6.18 A key consideration is therefore whether application of the housing mix to future development proposing changes to stock for given tenures (e.g., mixed-tenure housing for owner-occupation and affordable housing for rent) is consistent with enabling these households to form when accounting for factors such as affordability of flexibility to subsequently re-locate.

6.19 Conversely the prospect of provision in excess of the Standard Method could reduce expected growth in households with no dependent children. This could lead to reduced pressure upon the private rented mix in the immediate term. However, in these circumstances it is also likely to be relevant to optimise the delivery of family housing based on projected change in these house types within the under 44 age groups – where the greatest difference exists.

6.20 The figures below illustrate that in terms of the difference in total households between the two scenarios, the indexed growth of the **Dwelling-led LHN 1010 (HH-14r-PR)** increasingly departs from the Standard Method scenario in later years as the effect of increased dwelling provision, population growth (including increased births) and household formation increases. However, there are some household types where the difference in indexed growth is apparent sooner – this particularly includes higher numbers of single person households and a commensurate reduction in 'other' households (including adult children living with parents).

Figure 11. Difference in Indexed Growth in Households 2023-2040



Source: Edge Analytics POPGROUP modelling

6.21 The main implication of these trends, based on recent local evidence, may be increased demand in the private rented sector particularly for smaller properties. Unless the provision of similar properties was increased in other tenures, a lack of continued growth in these types of units could restrict the ability of these smaller households to form.

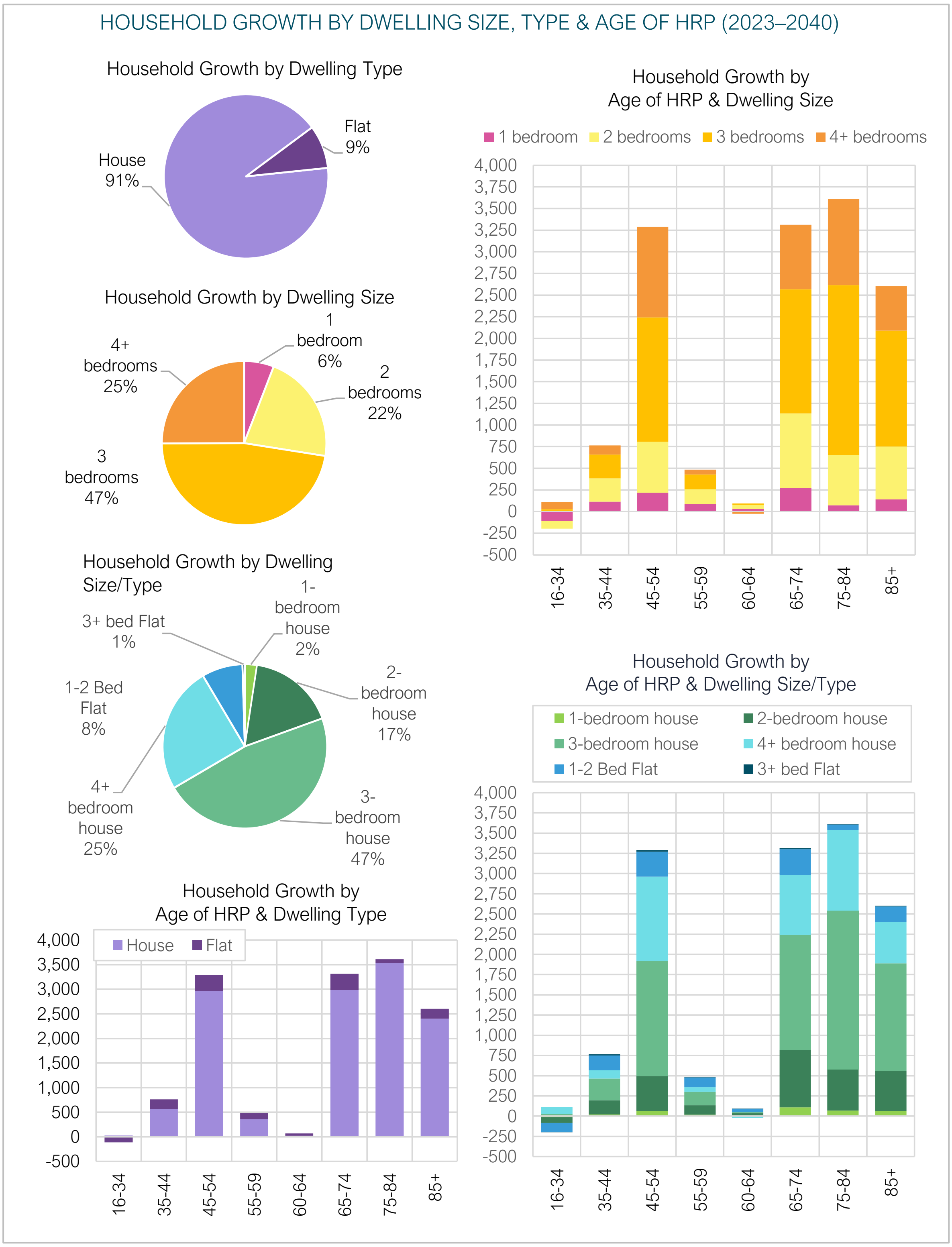
6.22 Conversely, the effect of these changes in future years – in terms of an increase in the number of families with children and a commensurate reduction in for example couples without children and 'other' households – would put increased demand on the need for larger properties in future years amongst age groups (i.e., a generally younger population). These groups are less likely to under-occupy property based on current occupancy trends. However, there is little difference in the projected change in older households between the two scenarios.

6.23 This means that unless there is a stronger departure from occupancy trends in older age groups (for example through downsizing) the majority of any additional demand for larger properties under the **Dwelling-led LHN 1010 (HH-14r-PR)** in future years is likely to require a greater absolute increase in the housing stock of larger dwellings. Recent evidence locally is that the increase in larger properties has been greatest in owner-occupied tenures. This suggests that for any additional housing provision above the Standard Method the application of the proposed Plan's housing mix policy to mixed-tenure development is likely to provide a good prospect of addressing differences in demand based on increased population and household formation including the need for larger properties.

ii) *Household Growth by Age, Dwelling Size & Type*

6.24 Data from the 2021 Census has been used to model the potential impact of the projected household growth by age of the household representative person (HRP) on the future profile of housing by type and size in Telford & Wrekin. It is important to note that this split does not take into account future policy changes, nor socio-economic changes that might influence how households occupy housing.

Figure 12. Household Growth by Dwelling Size, Type and Age of HRP, 2023-2040



Source: Edge Analytics POPGROUP modelling; 2021 Census

6.25 When viewed by tenure (owner occupied, private rent and social rent), the Census-led analysis suggests that the greatest proportion of household growth will occur in the owner occupied sector, accounting for 69% of household growth Telford and Wrekin (see table below). In terms of percentage growth, the number of households in private rent are projected to increase by 11%, compared to 20% growth in the owner-occupied sector, and 19% in the social rent sector. This reflects the current dominance of the owner-occupation amongst the tenure profile of housing stock and effectively projects the same occupancy profile by tenure forward over the plan period albeit with a further slight increase in the proportion of owner-occupation.

Table 11. Household Growth by Tenure (2023-2040)

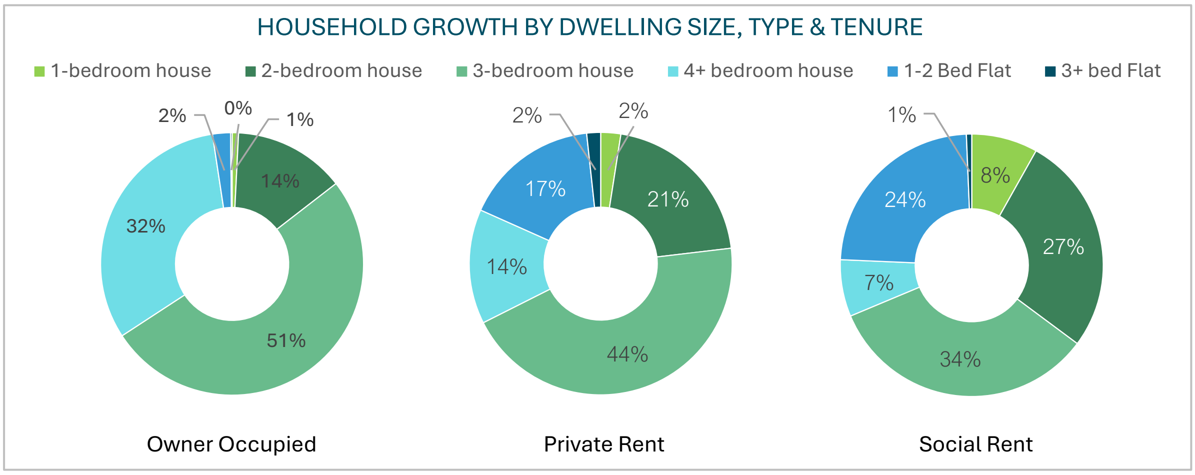
Tenure	2023	2040	Change	% Growth	% share of Growth
Owner occupied	48,455	58,091	9,636	20%	69%
Private rent	16,629	18,422	1,793	11%	13%
Social Rent	13,924	16,545	2,621	19%	19%
All tenures	**79,008**	**93,058**	**14,050**	**18%**	**100%**

Source: *Edge Analytics POPGROUP modelling; 2021 Census. Numbers may not sum due to rounding; SPRU Analysis.*

6.26 For the owner occupied and private rent sector a greater proportion of household growth is in houses, with a greater proportion of growth in 1-2 bed flats in the private and social rent sectors.

6.27 When viewed by bedroom number, the household growth projected under the **Dwelling-led LHN 857 (HH-14r)** scenario results in the following profile in 2040 (Figure 10 below). Household growth is highest in 3-bed households (+6,664 2023–2040) and lowest in 1-bed households (+825).

Figure 13. Household Growth by Dwelling Size, Type and Tenure (2023-2040)



Source: *Edge Analytics POPGROUP modelling; 2011 Census, Council Tax (VOA)*

6.28 Whether the actual change in stock over the plan period matches the split of bedroom numbers projected based on occupancy modelling also depends on the tenure profile of housing delivery over the same period and how closely or not this aligns to the projected change in households by tenure. The distribution of total projected change by bedroom number and tenure is illustrated in the table below and compared with the estimated change by tenure and bedroom recorded in Census 2011 and Census 2021.

Table 12. Change in Households Distributed by Age and Tenure – 2011-21 and 2023-40

Change by Tenure and Bed (% of Total) 2023-2040	**1-bed**	**2-bed**	**3-bed**	**4+-bed**	**% share of Growth**
Owner occupied	1%	11%	35%	22%	69%
Private rent	1%	4%	6%	2%	13%
Social Rent	4%	7%	6%	1%	19%
All tenures	**5.9%**	**21.6%**	**47.4%**	**25.1%**	**100%**
Estimated by Tenure and Bed (% of Total) 2011-2021	***1-bed***	***2-bed***	***3-bed***	***4+-bed***	***% share of Growth***
Owner occupied	*-1%*	*0%*	*11%*	*37%*	*47%*
Private rent	*5%*	*13%*	*21%*	*8%*	*47%*
Social Rent	*1%*	*5%*	*-1%*	*1%*	*6%*
All tenures	**5.0%**	**17.8%**	**31.0%**	**46.2%**	***100%***

Source: Edge Analytics POPGROUP modelling; 2021 Census. Numbers may not sum due to rounding; SPRU Analysis.

6.29 The Census data reflects the significant growth in the private rented sector and very limited absolute change in smaller owner-occupied dwellings and the affordable housing stock (see table below).

Table 13. Household Growth by Tenure (2011 and 2021)

Tenure	**2011**	**2021**	**Change**	**% Growth**	**% share of Growth**
Owner occupied	40,606	46,451	5,845	14%	47%
Private rent	10,474	16,276	5,802	55%	47%
Social Rent	12,997	13,785	788	6%	6%
All tenures	**64,077**	**76,512**	**12,435**	**19%**	**100%**

Source: 2011 Census; 2021 Census; SPRU Analysis.

6.30 This reflects the change in the occupancy profile by tenure and household size having been heavily impacted by the growth of the private rented sector, and in terms of the overall total stock of properties has increased the proportion of 3+ bedroom properties since 2011. These changes have exceeded the projected change in proportion by bedroom number based on the occupancy characteristics across all housing stock.

c) Housing Mix Recommendations

6.31 The household growth by size, type and tenure has been used to illustrate what an appropriate housing mix might be across market, social/affordable rent, and affordable home ownership. It is important to note that, as above, this assessment does not take into account future policy changes, nor socio-economic changes that might influence how households occupy housing over time. Rather, it assesses what the housing mix profile would look like with the current patterns of occupation being applied to projected population change associated with the result of the Standard Method.

6.32 This requires the most appropriate component of the mix profile to be applied to additional development that will be brought forward under the Plan. This will principally comprise mixed-tenure development comprising market and affordable housing and will also include examples of purely market housing or 100% affordable schemes. While there may also be schemes for development for private rent this is not necessarily a component of the mix profile that would be expected to apply exclusively to a large proportion of schemes despite informing projected trends in occupancy over the plan period. Absolute change in household type and size for this tenure may depend to a more significant extent on the re-use of existing stock.

6.33 For market housing, the mix across property size and type (dwelling/flats) has been derived from the Census-led analysis on occupancy characteristics in the owner occupied and private rented sector. For affordable home ownership, the profile of occupancy is based on the private rented sector characteristics, and for social/affordable rent, the mix is derived from the social rent occupancy profile.

6.34 The tables below set out recommendations for the overall housing mix by tenure and number of bedrooms for Telford & Wrekin. This mix is based on an assumed overall tenure profile of 75% market, 5% affordable ownership and 20% social/affordable rent.

Table 14. Recommendations for Overall Housing Mix – Telford & Wrekin

Change by Delivery Modelling	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Total Projected Households (2040)	6,746	22,079	42,621	21,612
Total Net Change by Bedroom Number	908	3,166	6,598	3,378
% Of Total Change	6.5%	22.5%	47.0%	24.0%
Range	**5-15%**	**20-30%**	**40-50%**	**15-30%**
Overall Projected Change in Existing Occupancy Characteristics by Tenure	**5.9%**	**21.6%**	**47.4%**	**25.1%**

Source: Edge Analytics; SPRU Analysis

Table 15. Recommendations for Housing Mix by Tenure – Telford & Wrekin

Housing Mix by Need	1-bed	2-bed	3-bed	4-bed	Total
Market (Owned and Private occupancy, overall average)	3%	18%	50%	29%	100%
Affordable Home Ownership (based on PRS occupancy)	10%	30%	46%	15%	100%
Affordable/social rent (based on social rent occupancy)	20%	39%	34%	7%	100%

Source: Edge Analytics; SPRU Analysis

6.35 The proposed recommendations for housing mix applied based on estimated split for delivery of additional housing by tenure using the Standard Method figure (**Dwelling-led LHN 857 (HH-14r)**) broadly correspond to projected change in household size by existing occupancy characteristics across tenures and existing stock. Drawing upon the previous EHDNA evidence base it remains appropriate to set out the total expected change in dwelling stock that should be monitored over the plan period as a range. Given the relative stability of overall occupancy characteristics (taking account of change amongst existing households) the effect of net change over the plan period on the split of total stock by bedroom number is relatively limited. The potential range for monitoring overall change over the plan period has therefore remained consistent over time and is intentionally broad.

6.36 It is clear that the proportion of net household change with two or fewer bedrooms would be driven largely by the modelling of delivery of affordable home ownership and affordable rented property with a more limited contribution from market tenures (29% of total change). Reflecting the general trend within the ageing population and needs for market and affordable housing it is appropriate that application of the housing mix recommendations by tenure would as a minimum broadly maintain the existing proportion of smaller properties available to meet future need.

6.37 As a proportion of total net change this significantly exceeds the proportion of total change attributed to properties with two or fewer dwellings across all tenures between 2011 and 2021 (23%). This was largely as a result of no growth in smaller owner-occupied properties and largely driven by growth on the private rented sector. Taking account of projected change in households by age and type, and the overall scale of development proposed under the Standard Method, it is appropriate that the suggested housing mix would secure a more balanced range of housing than recent estimated change in households by bedroom number.

6.38 It should also be noted that the modelling in the EHDNA Update does not forecast change in occupancy amongst older households based on increasing the delivery of specialist housing for older people. However, the effect of achieving this in practice would typically reflect the delivery of additional smaller properties and freeing up of family housing alongside the net additional delivery of a relatively high proportion of housing large properties recommended as part of the housing mix based on current occupancy trends (i.e., where there are more limited options for downsizing).

6.39 It follows that if the provision of additional stock based on delivery modelling is not achieved that there may be constraints in maintaining the overall projected occupancy characteristics unless other changes within the housing stock enable the provision of smaller properties – for example continued growth in the private rented sector. It would therefore be appropriate to seek to achieve the proposed mix for affordable home ownership and affordable rented tenures in terms of securing one-bedroom and two-bedroom properties and where possible seek to achieve the middle of the range identified (inclusive of market dwellings within mixed-tenure development). In these circumstances delivery of one-bedroom and two-bedroom properties could reasonably slightly exceed the proportion of total change captured in overall deliver modelling.

6.40 For schemes providing a mix of tenures and housing types including contributions towards affordable housing it is also appropriate that the Council considers whether the housing mix of larger market properties could be optimised in some cases. This takes account of the projected growth in family households and previous iterations of the EHDNA evidence base have noted that due to the occupancy characteristics of existing stock in some sub-areas there may be greater constraints on access to larger properties for the net growth in family households without prioritising this as a proportion of new stock.

6.41 For example for development that proposes the levels and mix of affordable home ownership and affordable rented property and contributes to addressing needs for a range of properties in these tenures it may be appropriate to plan for higher levels of 3+ bedroom market properties. In these circumstances this would correspond to schemes achieving the upper end of the overall range for 3+ bedroom properties suggested within the overall mix. The outcome of this should, however, be monitored in terms of the role of the existing stock (and particularly change in the private rented sector) providing for a range of housing needs together with ensuring proposals have sought to maximise the delivery of a range and choice of affordable housing.

6.42 Finally, it is important to note that the Council has consulted upon housing requirement options in excess of the Standard Method figure. The associated **Dwelling-led LHN 1010 (HH-14r-PR) scenario** has not been used for the purposes of projected trends in occupancy and housing mix but would result in the provision of additional housing taking account of additional population growth and increased household formation. In principle, it is appropriate that the provision of additional housing would broadly follow the recommended housing mix and projected trend underpinning the Standard Method scenario.

6.43 This would be expected to both increase the overall supply of affordable housing but also the delivery of higher absolute totals for 3+ bedroom dwellings. The provision of housing in excess of the Standard Method would reinforce planning for the centre of the range in one-bedroom and two-bedroom properties as a proportion of total change in stock. This takes into account points covered by this analysis, including the greater proportion of growth in younger households generated by the **Dwelling-led LHN 1010 (HH-14r-PR)** scenario and recent growth in the private rented sector.

6.44 An indicative scenario, which applies the mix profile for affordable home ownership (equivalent to private rented occupancy) to 10% of this total (together with 70% market and 20% affordable housing for rent) is shown in the table below. This reinforces the additional demand for smaller properties that might be partly associated with assumptions for increased household formation but would also equate to seeking over 2,000 additional 3+ bedroom properties compare to planning for the Standard Method.

Table 16. Indicative Recommendations for Overall Housing Mix and Total Change in Stock – 1,010dpa

Change by Delivery Modelling	**1 bedroom**	**2 bedrooms**	**3 bedrooms**	**4+ bedrooms**
Total Projected Households (2040)	7,008	22,888	44,043	22,239
Total Net Change by Bedroom Number	1171	3975	8020	4004
Difference versus Standard Method	+263	+809	+1422	+626
% Of Total Change	6.82%	23.15%	46.71%	23.32%
Range	**5-15%**	**20-40%**	**30-50%**	**15-30%**

Source: Edge Analytics; SPRU Analysis

7.0 HOUSING NEEDS OF OTHER SPECIFIC GROUPS

7.1 This chapter presents evidence on the housing needs of other specific groups, as required by NPPF2024 paragraph 63, including older people, families with children, people with disabilities, students, service families, black and minority ethnic (BME) households, private rented sector, self and custom-build housing, and children in care/care leavers. It presents key findings and makes policy recommendations to ensure housing is suitable and accessible for all.

a) Older People

Key Points Summary

- Using the local prevalence rates in the SPRU Older Persons Housing Need model and the 2018 SNPP results in a need for all specialist older persons housing at 2023 of 2,570 units. This is total need figure is projected to rise to 3,942 units by 2040 driven by the increase in the population that will be over 75 by that date.
- If existing and pipeline supply is taken into account, the largest proportion of unmet need is in Older Persons Market Housing with Care (including Enhanced Sheltered and Extra Care 24/7 Support), where 1,372 additional dwellings are likely to be required by 2040.
- The use of the dwelling-led population projections derived from the Standard Method local housing need figure of 857 dwellings per annum (857 HH-14r scenario) results in an immediate need of some 2,621 specialist older persons housing units, with this figure rising to 3,927 units by 2040. This is only slightly below the need figure derived from the SNPP 2018 population projections.
- If existing and pipeline supply is taken into account, the largest proportion of unmet need is in Older Persons Market Housing with Care (including Enhanced Sheltered and Extra Care 24/7 Support), where 1,366 additional dwellings are likely to be required by 2040.
- Under both scenarios (2018 SNPP and Standard Method LHN) the SPRU model identifies there is no current or projected future need for additional social specialist housing with care (including Sheltered, Enhanced Sheltered and Extra Care housing types). However, the results of the SPRU model for these tenures should not be considered to represent an ‘oversupply’.
- There may be a need for existing stock to be upgraded or replaced over time to ensure it continues to meet residents’ needs. There is no guarantee that housing with support within these tenures (sheltered) will remain optimal to meet the needs of older people (for example as their care needs increase), or that these units will necessarily be allocated to those in most need.
- In respect of a policy response going forwards, it is recommended that (in accordance with the recommendations of the Taskforce) consideration is given to identifying sites that are suitable to accommodate specialist older persons housing including ensuring that any larger strategic allocations deliver a proportion of specialist older persons housing, where appropriate.

7.2 This section details the need for older persons housing using a model developed by the Strategic Planning and Research Unit (SPRU) at DLP Planning. A detailed report which provides further context and explanation of the model used in developing this evidence is contained in a separate **Appendix 2**.

7.3 This report provides up-to-date evidence of the need for different types and tenures of older persons housing in Telford & Wrekin. Previous evidence of older persons housing need was prepared by the Housing Learning and Improvement Network (Housing LIN) using their SHOP Toolkit, based on demographic projections set out in the Part 1 EHDNA. The evidence from Housing LIN was used to inform the Telford & Wrekin Council's Specialist and Supported Accommodation Strategy (2020-2025).

7.4 This evidence is now out-of-date as does not reflect updated demographic evidence, including the latest dwelling-led population projections derived from the Standard Method scenario which underpins the overall housing need presented in this EHDNA Update. The Council's decision to update the assessment of older persons housing needs will ensure that the evidence underpinning the emerging Local Plan is robust and reflects the specific context of Telford and Wrekin.

i) *Policy Context*

7.5 The need for older persons housing is recognised as being 'critical', with evidence of this need at a national level being reinforced in recent publications including the Chief Medical Officer's Annual Report (2023) 'Health in an Ageing Society', the Mayhew Review (2022) 'Future Proofing Retirement Living – Easing the Care and Housing Crises', and the Report of the Older People's Housing Taskforce (2024) ''Our Future Homes: Housing that promotes wellbeing and community for an ageing population'.

7.6 The need to properly plan for older persons housing is supported in both PPG and the NPPF2024. The PPG[14] in particular states that:

> *"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking."*

7.7 The PPG[15] also recognises that these needs are diverse and states that:

> *"For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people."*

ii) *Types of Specialist Older Persons Housing*

7.8 The four main types of older persons housing referred to in this section and the supporting evidence report (**Appendix 2**) include:

- **Age-exclusive** i.e., designated for older people, but with no specific support or care provision.
- **Sheltered housing** for rent, retirement housing for sale, and some shared housing models such as Abbeyfield houses.

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[14] PPG Housing for Older and Disabled People Paragraph 001 Reference ID: 63-001-20190626
[15] Ibid Paragraph 003 Reference ID: 63-003-20190626

- **Enhanced sheltered housing** and assisted living; Provides residents with the independence of having their own front door and self-contained flat whilst also having access to some on-site support services. Most developments will have a scheme manager and alarm systems in the property, and there may also be some personal care and home help services that can be arranged by the management.
- **24/7 Extra Care housing** (both care and support are available). These schemes provide a more intensive level of support than traditional sheltered housing for older people who need some personal care or other types of help, but who are otherwise able to live safely and independently on their own. There will usually be at least one member of staff on hand 24 hours a day. Additional facilities are often available to cater for people who are not able to get out regularly, perhaps including a restaurant, shop, gym or hobby room.

7.9 The need for each of these accommodation types is split into two tenure categories, including:

- Social (including rented from the Local Authority, other social rented, and shared ownership provided by Registered Social Landlords (RSLs))
- Market (including ownership, shared ownership (when provided by the market sector) and private rented)

iii) *The Older Persons Housing Model*

7.10 The methodology used to identify older persons housing needs in Telford & Wrekin is based upon evidence researched and published by the Strategic Planning and Research Unit (SPRU) of DLP Planning Limited within The Older Persons Housing Need Model[16].

7.11 This methodology builds on previous approaches but recalculates prevalence rates to reflect up-to-date evidence on need and to reflect local circumstances. Prevalence rates are the number of units or bed spaces available per 1,000 of the population who are over 75 years old and are expressed as ‘units per 1,000 pop 75+’.

7.12 Two adjustments seek to reflect local circumstances with regard to tenure, size, health and price of housing when compared to the national position which have an impact on demand for market specialist older persons housing. The local adjustment is the average between the two adjustment ratios, which for Telford & Wrekin is 0.85. This adjustment factor is applied to the national prevalence rates for market units to produce a set of local prevalence rates which are specific to Telford & Wrekin.

7.13 The proposed local prevalence rates are compared to the national prevalence rates in the table below.

[16] https://www.dlpconsultants.co.uk/wp-content/uploads/2022/04/DLP-SPRU_Older_Person_Housing_Need_Research.pdf

Table 17. Existing and proposed national and local prevalence rates for Telford and Wrekin

Type	Tenure	National Prevalence Rates (from SPRU Model)	Proposed Local Prevalence Rates
Age Exclusive	Social Landlord	14	14
	Ownership	6	5
Sheltered Housing	Social Landlord	42	42
	Ownership	25	21
Enhanced Sheltered Housing	Social Landlord	1	1
	Ownership	3	3
Extra Care 24/7 support	Social Landlord	20	20
	Ownership	68	58
Total		**179**	**164**

Source: SPRU/ONS/EAC

iv) *Indicators of Need*

7.14 In terms of indicators of need for older persons housing in Telford & Wrekin, the 2018 Sub National Population Projections (SNPP) show there will be a 78.6% increase in the over-75 population by 2042, which highlights growing demand. The evidence also shows a significant disparity between the availability of all types of specialist market accommodation available to homeowners compared to the availability for social renters. In particular there is a very low level of provision of specialist market accommodation when compared to the proportion of the over 75 population presently residing in the market sector but who experience limited mobility or poor or very poor health. 90% of older market property dwellers in Telford & Wrekin occupy homes with 3+ bedrooms, further underscoring inefficiencies in occupation of properties as the population ages.

v) *Existing and Potential Future Supply*

7.15 The existing supply of older persons housing in Telford & Wrekin has been calculated from the data provided by the Elderly Accommodation Counsel (2023, Quarter 4). The breakdown of the existing supply by tenure and type is set out in the table below.

Table 18. Existing supply of specialist older persons accommodation by type and tenure

Type	Tenure	Telford & Wrekin
Age Exclusive	Social Landlord	74
	Ownership	34
Sheltered Housing	Social Landlord	1,537
	Ownership	53
Enhanced Sheltered Housing	Social Landlord	24
	Ownership	0
Extra Care 24/7 support	Social Landlord	672
	Ownership	0
Total		**2,394**

Source: EAC/SPRU

7.16 A review of previous planning approvals and pending applications has revealed the following older persons housing schemes which have been granted planning permission and are likely to form part of the future supply. These have been taken into account alongside the existing supply in the analysis of future need.

Table 19. Potential schemes for specialist older persons housing

Type	Tenure	Units	Application	Status	Site	Description
Sheltered Housing	Ownership	12	TWC/2024/0642	Approved	Site of The Lion, 3 Whitchurch Road, Wellington, Telford, Shropshire	Retention and restoration of locally listed front facade walls and the demolition of the former public house for the erection of 12no. supported living units (Use Class C2) with associated infrastructure, landscaping and parking
Sheltered Housing	Ownership	20	TWC/2021/0046	Approved	Land North/East of Lodge Road Caravan Site, Donnington Wood Way, Donnington Wood, Telford, Shropshire	Erection of 233 dwellings, 76 unit care home (Use Class C2) including Community Hub (Use Class E(b)), 20 unit supported accommodation, areas of public open space and LEAP, access, drainage and associated works
Extra Care 24/7 support	Social Landlord	70	TWC/2021/0796	Approved	Land West of Station Road, Newport, Shropshire	Erection of an extra care facility containing 70no. affordable self-contained apartments (Use Class C2) and associated communal and public facilities with associated access, car parking and landscaping
Extra Care 24/7 support	Ownership	80	TWC/2011/0871	Approved	Land to the East and West of Station Road, Newport, Shropshire	Erection for up to 350 no. dwellings (Use Class C3); extra care housing (Use Class C2); 4.5ha of employment land (Use Classes B1, B2 and B8); public open space and landscaping provision including sports pitch and landscaped park; demolition of existing industrial buildings; highway works and associated infrastructure development (Outline to include Access)
	Total Units	**182**				

vi) *Future need based on 2018 SNPP*

7.17 The table below compares the existing supply and projected future pipeline with the modelling of need based on applying local prevalence rates from the SPRU model to the population of older people in 2023 and projected forward to 2040 using the 2018 SNPP.

Table 20. Existing and potential supply of specialist older persons accommodation by type and tenure compared to need derived from 2018 SNPP

Type	Tenure	Existing Supply	Total Need 2023	Pipeline	Net need 2023	Total Need 2040	Net Need 2040
Age Exclusive	Social Landlord	74	220	0	146	338	264
	Ownership	34	80	0	46	123	89
Sheltered Housing	Social Landlord	1,537	660	0	-877	1,013	-524
	Ownership	53	333	32	248	511	426
Enhanced Sheltered Housing	Social Landlord	24	16	0	-8	24	0
	Ownership	0	40	0	40	61	61
Extra Care 24/7 support	Social Landlord	672	314	70	-428	482	-260
	Ownership	0	907	80	827	1,390	1,310
Total		**2,394**	**2,570**	**182**	**-6**	**3,942**	**1,366**

Source: EAC/SPRU

7.18 Using the local prevalence rates in the SPRU Older Persons Housing Need model and the 2018 SNPP results in a need for all specialist older persons housing at 2023 of 2,570 units. This is total need figure is projected to rise to **3,942 units** by 2040 driven by the increase in the population that will be over 75 by that date.

7.19 If existing and pipeline supply is taken into account, the largest proportion of unmet need is in Older Persons Market Housing with Care (including Enhanced Sheltered and Extra Care 24/7 Support), where **1,372 additional dwellings are likely to be required by 2040**.

vii) *Future need based on Standard Method 857 dpa (HH-14r) scenario*

7.20 The work undertaken by Edge Analytics as part of the wider evidence updates utilises different migration and household formation rates to those of the 2018 SNPP. In general, this results in slightly different numbers of persons in the population who are 75 or older over the plan period from 2023 to 2040.

7.21 The table below compares the existing supply and projected future pipeline with the modelling of need based on applying local prevalence rates from the SPRU model to the population of older people in 2023 and projected forward to 2040 using the new population projections from the 857 dpa (HH-14r) scenario.

Table 21. Existing and potential supply of specialist older persons accommodation by type and tenure compared to need as calculated using the Standard Method Population

Type	Tenure	Existing Supply	Total Need 2023	Pipeline	Net need 2023	Total Need 2040	Net Need 2040
Age Exclusive	Social Landlord	74	224	0	150	336	262
	Ownership	34	82	0	48	122	88
Sheltered Housing	Social Landlord	1,537	673	0	-864	1,009	-528
	Ownership	53	340	32	255	509	424
Enhanced Sheltered Housing	Social Landlord	24	16	0	-8	24	0
	Ownership	0	41	0	41	61	61
Extra Care 24/7 support	Social Landlord	672	321	70	-421	480	-262
	Ownership	0	925	80	845	1,385	1,305
Total		**2,394**	**2,621**	**182**	**45**	**3,927**	**1,351**

Source: EAC/Edge Analytics/SPRU

7.22 The use of the dwelling-led population projections derived from the Standard Method local housing need figure of 857 dwellings per annum (857 HH-14r scenario) results in an immediate need of some 2,621 specialist older persons housing units, with this figure rising to **3,927 units by 2040**. This is only slightly below the need figure derived from the SNPP 2018 population projections.

7.23 If existing and pipeline supply is taken into account, the largest proportion of unmet need is in Older Persons Market Housing with Care (including Enhanced Sheltered and Extra Care 24/7 Support), where **1,366 additional dwellings are likely to be required by 2040**.

viii) *Future Need for Specialist Social Housing with Care*

7.24 Under both scenarios (2018 SNPP and Standard Method LHN) the SPRU model identifies there is no current or projected future need for additional social specialist housing with care (including Sheltered, Enhanced Sheltered and Extra Care housing types). However, the results of the SPRU model for these tenures should not be considered to represent an ‘oversupply’. There may be a need for existing stock to be upgraded or replaced over time to ensure it continues to meet residents’ needs. There is no guarantee that housing with support within these tenures (sheltered) will remain optimal to meet the needs of older people (for example as their care needs increase), or that these units will necessarily be allocated to those in most need.

7.25 If no account is taken of the 2023 baseline of stock and recent delivery of this type of supply, then the future net needs for affordable housing with care should be treated as zero for the period up to 2040, even accounting for projected population growth to 2040 above existing levels. However, if recent trends in delivery were to be considered alongside future population growth and an update to delivery of the Council’s strategy to date, then the current baseline could be taken to show supply and demand for these tenures effectively in balance. This means that a prevalence rate should be applied to future population growth beyond 2023. The SPRU local prevalence rate should be used for the purpose of this sensitivity test.

7.26 The projected population growth of 75+ between 2023 and 2040 is 8,388 persons. If the

SPRU prevalence rate for social specialist housing with care is applied to this population (20 per 1,000), that would suggest a further 168 units above the existing baseline would be needed.

ix) *Conclusions and Recommendations on Older Persons Housing Needs*

7.27 In light of the evidence presented here and in **Appendix 2** the following can be concluded in terms of future needs for older persons housing in Telford & Wrekin:

a) The need to address the provision of specialist housing for older persons remains "critical".

b) There remains a specific and immediate need for all forms of market provision and social age exclusive housing even taking account of the potential pipeline of supply.

c) The release of family housing resulting from the provision of specialist older persons housing should be given significant weight.

d) The health and well-being benefits of delivering specialist older persons housing should be given significant weight.

7.28 In respect of a policy response going forwards, it is recommended that (in accordance with the recommendations of the Taskforce[17]) consideration is given to identifying sites that are suitable to accommodate specialist older persons housing including ensuring that any larger strategic allocations deliver a proportion of specialist older persons housing, where appropriate.

[17] MHLGC/DHSC "Our Future Homes: Housing that promotes wellbeing and community for an ageing population page 100

b) Families with Children

Key Points Summary

- The dwelling-led LHN 857 HH-14r scenario projects a 14% growth in family households, reflecting sustained rates of development and in-migration together with relatively high fertility rates among the younger population.
- It is therefore likely to be the case that accommodating the growth in family households within the existing dwelling stock would require a substantial turnover of existing property, including amongst the increase in older households living in larger dwellings. This is likely to require significant market intervention – for example support to encourage households to downsize to smaller dwellings or specialist accommodation for older people brought forward as part of future provision. It may therefore be appropriate to plan for an increased proportion of the housing mix comprising larger units.
- It is also relevant to note the potential constraints on the private rented sector in terms of meeting the future accommodation needs of families with children, including potential affordability constraints and limits to the level of private rented stock available for letting to families with children due to the relatively higher rental cost for larger properties.
- This may add weight to recommendations to support intermediate affordable housing and routes to affordable home ownership where these options can provide property at an equivalent cost to private rent that may be better suited to meeting the needs of family households.

7.29 It is relevant to consider the implications of the housing needs assessment in relation to the needs of families with children. This takes account of the differences in terms of projections of demographic and household change within the **Dwelling-led LHN 857 (HH-14r)** scenario over the plan period and associated with planning for the minimum Standard Method figure.

7.30 Telford & Wrekin accommodates a slightly higher proportion of families with children than the England and Wales average and the percentage increase in these household types has slightly exceeded the national average since 2011. As a proportion of total household change the increase in the proportion of families with children has been relatively lower – this is a function of the impacts of greater population growth amongst the older population and in younger adults without dependent children (noting downward trends in fertility rates). However, the distribution of growth in the number of dependent children per household demonstrates stronger growth in larger family households (three plus children) than observed nationally. This is summarised in the table below.

Table 22. Comparison of Change in Families with Children 2011 vs 2021

	Telford & Wrekin				England and Wales (000s)			
	2011	**2021**	**Change**	**% Change**	**2011**	**2021**	**Change**	**% Change**
One Child	10,074	10,260	186	**2%**	3,073	3,102	29	**1%**
Two Children	8,129	8,525	396	**5%**	2,582	2,793	212	**8%**
Three + Children	3,810	4,220	410	**11%**	1,138	1,151	13	**1%**
Total - Households with Dependent Children	22,013	23,005	992	**5%**	6,793	7,046	253	**4%**
Total Households	66,669	76,510	9,841	**15%**	23,366	24,783	1417	**6%**
Households with Dependent Children as % of Total Change	33%	30%	N/A	**10%**	29%	28%	N/A	**18%**

Source: Census 2011; Census 2021

7.31 For the purposes of understanding the housing need implications of families with children it is appropriate to group categories comprising two or more children as this denotes the point at which the number of dependent children in household impacts upon assumptions for household mix and bedroom number.

7.32 Potential implications of the projected growth in family households will be dependent on changes in the absolute number and proportion of such households relative to the borough total. This will establish the potential role for the net increase to be accommodated within the existing dwelling stock as a result of changes to overall household composition as well as informing potential recommendations on the mix of future supply in order to meet the needs of family households. It is also relevant to consider the proportion of households with one child compared to those comprising two or more children in terms of potential changes in dwelling size requirements to avoid overcrowding.

7.33 The **Dwelling-led LHN 857 (HH-14r)** scenario reflects provision for slightly lower levels of net population gain through migration amongst younger age groups than recorded in the most recent official statistics but still reflects the current characteristics of population growth over recent years.

7.34 Over the plan period this corresponds to continued growth in the number of families with children. Specific trends in terms of the number of children in each household are determined by longer-term trends in fertility rates, which have decreased slightly in recent years.

7.35 Alternatively, the implications for making provision for housing and associated demographic and household change (including family housing) based on housing requirement options consulted upon previously by the Council have been illustrated using the **Dwelling-led LHN 1010 (HH-14r-PR)** scenario. This more closely reflects recent levels of population growth observed in short-term migration trends and also makes provision for an improvement in household formation. The combined effect of these differences is to support an increased projection of future population and household change including in potential family households.

7.36 The table below compares the 2011-baseline for the **Dwelling-led LHN 857 (HH-14r) and Dwelling-led LHN 1010 (HH-14r-PR)** scenarios with the 2023 base-date and in 2040.

Table 23. Projected Increase in Families with Children Since 2011

	2011	Dwelling-led LHN 857 (HH-14r)		Dwelling-led LHN 1010 (HH-14r-PR)	
		2023	2040	2023	2040
Households with Dependent Children - % of Total Households	33.0%	29.3%	27.7%	29.3%	31.5%
Net Increase Since 2011		1,168	3,774	1,168	8,082
% Of Total Net Increase		9.5%	14.3%	9.5%	28.0%
Total - % Of which One Child Households	45.8%	44.8%	45.9%	44.8%	43.3%
Total - % Of which Two or More Children	54.2%	55.2%	54.1%	55.2%	56.7%

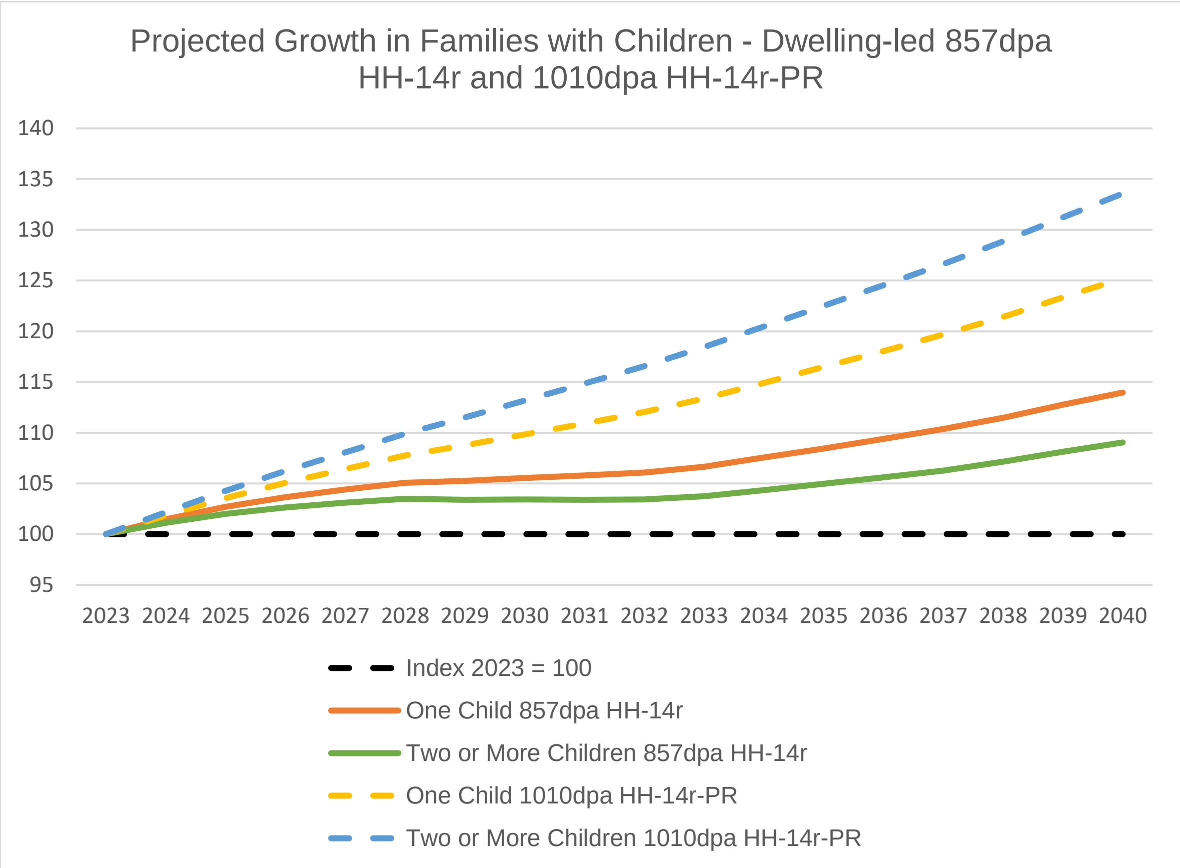
Source: 2011 Census; Edge Analytics; SPRU Analysis

7.37 The implication is that planning for the revised Standard Method figure will result in a higher proportion of the increase in households comprising families with children than observed in the previous decade (around 14% and in-line with the national trend between 2011 and 2021). However, a greater proportion of this growth will be in one child households meaning that the proportion of households with two or more children would reduce slightly by 2040 (54.1% versus 55.2% in 2023). This would be contrary to trends in Telford & Wrekin during the 2011 to 2021 period.

7.38 Making provision for the higher **Dwelling-led LHN 1010 (HH-14r-PR)** would result in 28% of all household growth comprising families with children. This reflects the increased population associated with the higher dwelling figure including supporting increased in-migration amongst younger people in the early years of the projection period. The proportion of households with dependent children would still be below the 2011 level (31.5% versus 33%). In terms of the characteristics of families with children the proportion of households with two or more children would increase between 2023 and 2040 (56.7% versus 55.2%) consistent with the trend between 2011 and 2021.

7.39 The figure below presents the projected growth in families with children based on the **Dwelling-led LHN 857 (HH-14r) and Dwelling-led LHN 1010 (HH-14r-PR)** scenarios. This comparison shows the distinction in indexed growth by number of dependent children, where one child households show a higher rate in the 857dpa scenario and two or more children are greater in the 1,010dpa scenario. The indexed rate of growth in the 857dpa is also negatively impacted during the first part and middle of the projection period, which in-part reflects lower levels of in-migration and the impact of ageing and potential constraints to household formation upon the existing population.

Figure 14. Comparison of HNA Based on Trends in Families with Children from 2023



Source: 2011 Census; Edge Analytics; ONS; SPRU Analysis

7.40 As higher rates of migration are sustained and the incoming population ages over the plan period, the absolute number of households comprising larger families will continue to increase in both scenarios. The Council is advised to note that all other things being equal, the net increase in families with children may be even greater than indicated by the **Dwelling-led LHN 857 (HH-14r)** scenario if average rates of development continue to exceed the recommendations on local housing need. This takes account of the findings of dwelling-led scenarios modelled within this EHDNA.

7.41 The table below demonstrates that amongst households with dependent children, the proportion occupying households with three bedrooms and four or more bedrooms exceed the proportion in the borough as a whole (46.0% and 23.4% respectively).

Table 24. Occupancy by Bedroom Number and Characteristics of Families with Children

%	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms	5 or more bedrooms
Families with Children	1.3%	15.3%	53.8%	24.2%	5.4%
Families with Dependent Children	1.4%	15.5%	53.0%	24.4%	5.7%
Families all children non-dependent	1.1%	14.4%	56.1%	23.7%	4.6%

Source: 2021 Census; SPRU Analysis

7.42 Previous elements of this assessment have demonstrated that the alignment between the supply and demand of stock for family households is not evenly distributed by tenure. Across the borough over 79% of dwellings in owner-occupied tenures comprise three or more bedrooms, compared to only around 42% in the social rented sector. This corresponds to higher levels of overcrowding in family households with dependent children in the social rented (and to a lesser degree private rented) sector.

7.43 In terms of projected trends in family households there is not expected to be a substantial increase in the proportion of one-child households relative to the total. This means that the accommodation requirements of family households (in terms of avoiding overcrowding) are unlikely to materially reduce over the plan period. The evidence locally indicates that this will particularly be the case if increased levels of in-migration continue to be supported over those assumed under the revised Standard Method.

7.44 Under either the **Dwelling-led LHN 857 (HH-14r) or Dwelling-led LHN 1010 (HH-14r-PR)** scenarios the proportion of growth in family households (14% or 28%) is expected to exceed that observed between 2011 and 2021. This is likely to reflect sustained rates of development and in-migration together with relatively high fertility rates amongst the younger population.

7.45 Given these characteristics it is likely to be the case that accommodating the growth in family households within the existing dwelling stock would require a substantial turnover of existing property, including amongst the increase in older households living in larger dwellings. This is likely to require significant market intervention – for example support to encourage households to downsize to smaller dwellings or specialist accommodation for older people brought forward as part of future provision.

7.46 In terms of relying on the release of existing stock to meet the future housing needs of family households it is the case that should trends in under-occupation continue there is likely to be a substantial requirement to meet needs through additional provision.

7.47 In terms of the future needs of families with children, these households are more likely to comprise younger and newly forming households. This is likely to exaggerate gaps between supply and demand based on geography and housing tenure, particularly given the greater constraints to affordability amongst this cohort.

7.48 The findings of the original Part 1 EHDNA remain relevant in identifying that it may therefore be appropriate to plan for an increased proportion of the housing mix comprising larger units in some instances. In sub-areas with the highest projected rate of population growth it is likely to be appropriate to prioritise the delivery of larger 3+ bedroom properties (particularly as part of the tenure mix for affordable housing) to meet future accommodation requirements. This is particularly the case where the existing supply and potential demand for affordable housing tenure are not well-matched. For example, the South Central sub-area is expected to witness the fastest rates of overall growth and greatest overall increase in families with children but has amongst the lowest proportions of 3+ bedroom properties, including 3+ bedroom properties in the social rented sector.

7.49 These observations were noted as part of discussions with stakeholders. Several Registered Providers noted that they were seeing an increase in large families on the register with no appropriately sized property to place them in. At the same time, stakeholders commented on the number of larger homes currently being underoccupied or turned into houses of multiple occupation (HMOs). 3-bedroom properties are also the size most in demand by residents of Telford & Wrekin.

7.50 It is also relevant to note the potential constraints on the private rented sector in terms of meeting the future accommodation needs of families with children. The proportion of private rented households comprising families with children exceeds the borough average according to the 2021 Census. This sector is also associated with higher rates of overcrowding. It is likely that continued growth in the private rented sector has been associated with meeting the needs of families with children, particularly given the 'rent/buy' affordability gap. However, it is relevant to note potential affordability constraints and limits to the level of private rented stock available for letting to families with children due to the relatively higher rental cost for larger properties.

7.51 This may add weight to recommendations to support intermediate affordable housing and routes to affordable home ownership where these options can provide property at an equivalent cost to private rent that may be better suited to meeting the needs of family households.

c) People with Disabilities

Key Points Summary

- There is an annual need for 180 dwellings to be built with appropriate adaptations and 51 dwellings to be wheelchair adaptable over the plan period.
- It is recommended that in preparing policy options, the Council takes account of a need for at least 20% of the overall assessment of local housing need to be provided at the Part M4(2) Category 2 standard for accessible and adaptable homes.
- It is further recommended that a minimum of 5% of new market housing in Telford & Wrekin should be required to meet the wheelchair user dwelling standards of Part M4(3).
- It is also considered reasonable that up to 10% of affordable housing should be required to meet the wheelchair user dwelling standards of Part M4(3) (accessible or adaptable dwellings), subject to viability.

7.52 This section considers the housing needs of disabled people. Planning Practice Guidance states that this is an important component of the housing needs assessment in terms of reflecting the implications of an ageing population and how this affects the need to plan for the needs of individuals (including those with disabilities) over their lifetime[18]. Provision of housing for people with disabilities should also take account of the availability of specialist and supported housing enabling people to live independent lives, together with the potential benefits of meeting the need for adaptations through the provision of housing for older people.

7.53 This section specifically addresses recommendations for the provision of accessible and adaptable general needs housing to specialist housing with high levels of care and support. National planning policy recognises the need to address those with disabilities comprising a mental or physical impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. More detail on those with specific disabilities is provided in the Council's Specialist Housing and Supported Accommodation Strategy (2020-2025). In terms of the Council's assessment of policy options this analysis should also be considered alongside the specific recommendations regarding the provision of housing for older people[19].

7.54 Planning Practice Guidance supports the assessment of the need to make provision for accessible and adaptable homes and the needs of wheelchair users in accordance with the optional technical housing standards. This recognises the health and social benefits of building accessible housing from the outset and avoiding the additional cost of adaptations at a later stage[20]. This assessment considers recommendations for the following categories of accessible and adaptable homes following a review of indicators of housing need:

- M4(2) Category 2: Accessible and adaptable dwellings
- M4(3) Category 3: Wheelchair user dwellings

[18] PPG ID: 63-002-20190626
[19] PPG ID: 63-003-20190626
[20] PPG ID: 63-009-20190626

i) *Projected Growth in People and Households with Disabilities*

7.55 Within Telford & Wrekin, the 2021 Census reports that 12,145 of 31,942 (38.0%) residents over the age of 65 had recorded long-term health problems or disabilities (LTHPDs) that either limited activities a little or a lot. In total, 35,552 out of 183,634 residents had a LTHPD recorded in the 2021 Census, meaning an overall rate of 19.4%.

7.56 However, these trends are not reflected equally within the tenure profile of all households in Telford & Wrekin as shown in the table below**.** By a significant margin, social rented accommodation is more likely to be home to those with long-term illnesses or disabilities, at 56.5% of households. Those in the private rented sector are least likely to have a long-term illness or disability (31.3%), with those living in privately owned accommodation having a similar rate of 32.9% of households.

Table 25. Households with Long-Term Illness & Disability by Tenure

Tenure	Population With a Long-Term Illness or Disability	% With a Long-Term Illness or Disability
Private Owned	15,894	32.9%
Private Rented	4,552	31.3%
Social Rented	8,147	56.5%

Source: EHS 2022/23; Edge Analytics; SPRU Analysis

7.57 It is important to note that the pattern of those with LTHPDs is slightly higher than that of the English average for those aged over 65, particularly where day-to-day activities are limited a lot, suggesting a slight disproportionate rate or distribution of those living with disabilities.

Table 26. Proportion of Persons 65+ with Limiting Long-Term Health Problems

All Usual Residents	Day-to-day activities limited a lot	Day-to-day activities limited a little
Telford & Wrekin	18.3%	19.7%
England	15.5%	18.2%

Source: Census 2021; Edge Analytics analysis

7.58 In terms of the household composition of those whose day-to-day activities are limited it is important to establish the potential distribution amongst those living with disabilities amongst the total household population. This can be considered in the context of projected future trends in household formation and the likely proportion of future households containing at least one person with a long-term disability based on current rates.

7.59 Planning Practice Guidance recognises the relationship between trends in health conditions that limit day-to-day activities and the scope for local planning authorities to consider policy requirements to increase the supply of accessible and adaptable homes.

7.60 The tables and figures below show the prevalence rates of those living with a long-term health problem or disability (LTHPD) by age category. This distinguishes between those whose day-to-day activities are limited and those whose activities are limited a lot. The figures also show the prevalence rate of those whose day-to-day activities are limited a lot and are also not in good health.

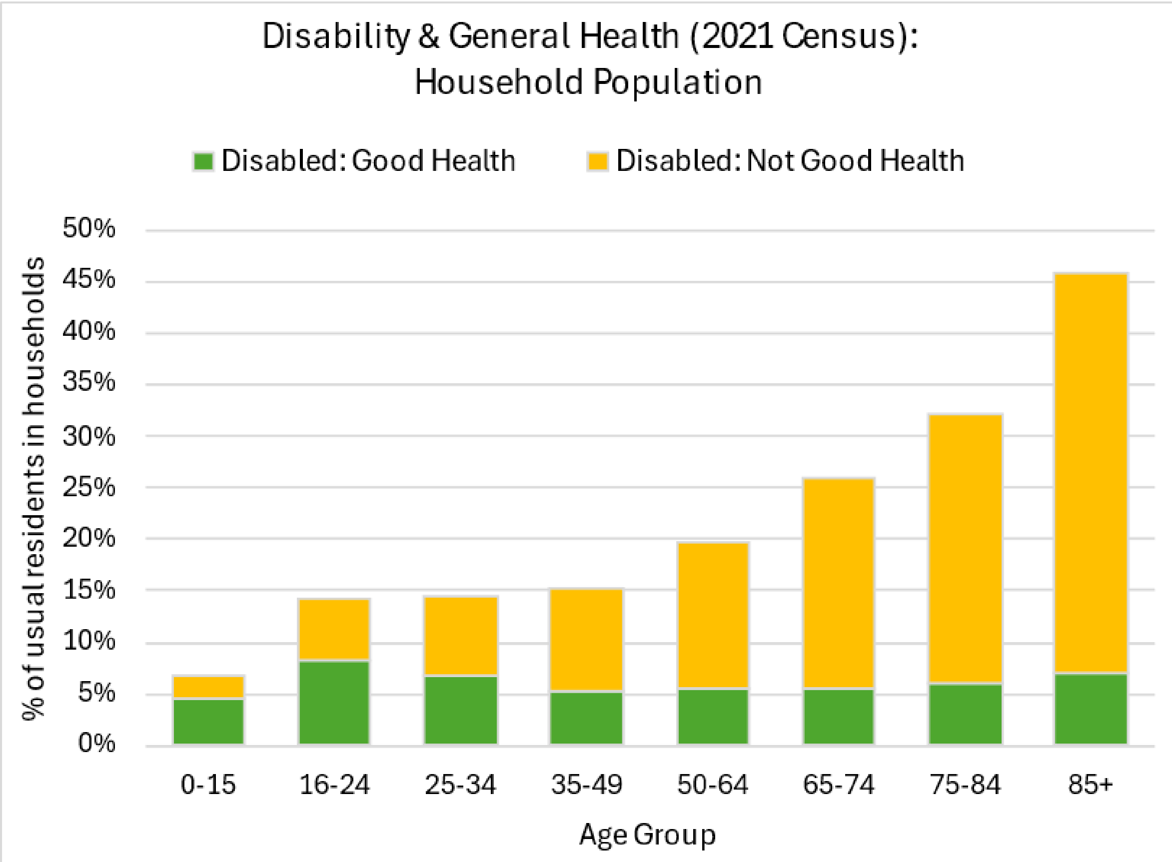
7.61 According to 2021 Census data, in Telford & Wrekin, 19.4% of the population has a disability which means that their activities are either limited a little or limited a lot. This figure is higher than the equivalent figure for England at 16.9%. Of the 8.4% who stated that their daily activities were limited a lot due to disability, 85.7% also said they were not in good health. This equates to 7.2% of the local authority population having their daily activities limited a lot and not being in good health.

Table 27. Prevalence Rates of Household Population with a Long-term Health Problem or Disability in Telford & Wrekin

Disability	All Ages	0-14	15-24	25-34	35-49	50-64	65-74	75-84	85+
Limited	19.4%	6.9%	14.2%	14.6%	15.2%	19.7%	25.9%	32.1%	45.9%
Limited a lot	8.4%	2.8%	5.2%	5.0%	5.9%	8.5%	11.7%	14.4%	23.5%
Limited a lot & not in good health	7.2%	1.3%	3.3%	3.9%	5.0%	7.7%	11.0%	13.5%	22.2%

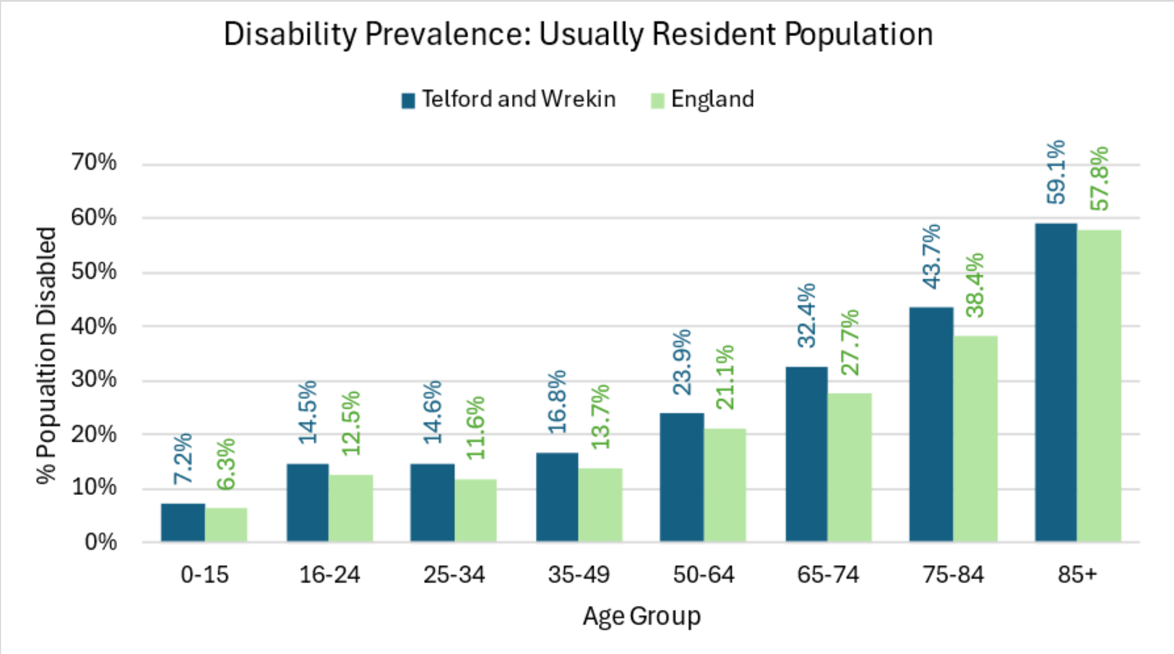
Source: Census 2021, Edge Analytics analysis

Figure 15. Disability & General Health in Telford & Wrekin



Source: Census 2021, Edge Analytics analysis

Figure 16. Disability Prevalence in the Usually Resident Population in Telford & Wrekin and England



Source: Census 2021, Edge Analytics analysis

7.62 Using the **Dwelling-led LHN 857 (HH-14-R) Scenario** and applying the prevalence rates by age category set out above to calculate the number of residents with a long-term health problem or disability indicates a net growth of 7,377 (20.0%), with a higher rate of growth in those who are disabled and limited a lot (21.4%) as shown in the table below.

Table 28. Telford & Wrekin Disability Growth Indicators based on Dwelling-led LHN 857 (HH-14-R) Scenario for the Household Population

	2023 Estimates	2040 Estimates	Growth	Growth per Annum	% Change
Long Term Health Problem or Disability					
Disabled & Limited a Little	20,960	24,905	3,945	232	18.8%
Disabled & Limited a Lot	16,012	19,443	3,432	143	21.4%
DWP Benefits					
Personal Independence Payment (PIP) Entitlement	12,563	13,776	1,213	71	9.7%
Attendance Allowance Entitlement	5,082	7,133	2,051	121	40.4%

Source: Stat-Xplore and Edge Analytics analysis

7.63 The projected future growth in households with disabilities that may affect their housing needs is calculated as a function of total net growth in households coupled with the changing age structure and projected household composition in each authority area.

7.64 Based on the household growth projected in the **Dwelling-led LHN 857 (HH-14R) Scenario** and the prevalence rate of households requiring adaptations by age group (derived from the

English Housing Survey 2019/20), it is anticipated that there will be a total of 1,792 additional households requiring adaptations by 2040, representing a percentage change of 28.5%. The projected growth is broken down by age group in the table below.

7.65 The age group comprising the vast majority of the projected growth in households requiring additional adaptations is for those over 65. The growth per annum is approximately 95 households compared to 9pa for those under 55 and 2pa for those between 55 and 64.

Table 29. Households Requiring Adaptations (2023-2040) based on Dwelling-led LHN 857 (HH-14R) Scenario

Age	2023 Estimates	2040 Estimates	Growth	Growth per Annum	Growth %
Under 55	1,552	1,698	146	9	9.4%
55-64	1,074	1,114	39	2	3.7%
65+	3,672	5,279	1,607	95	43.8%
Total	6,298	8,091	1,792	106	28.5%

Source: English Housing Survey (EHS 2019-20 – Home Adaptations), Edge Analytics and SPRU

7.66 This indicates a potentially substantial need for accessible and adaptable homes over the plan period, but it should be noted that not all incidences of long-term health problems are disabilities directly affecting housing needs. There are also differences in terms of tenure and age of the household reference person that are likely to affect the suitability of existing accommodation.

7.67 Due to uncertainty regarding the ability of those requiring adaptations to make their existing accommodation suitable, it is reasonable to consider that, on the basis of the English Housing Survey results, around 20% of households whose accommodation needs are affected by disability have a current unmet need. These requirements should be considered in addition to projected household change.

7.68 The table below estimates the total current households whose accommodation is unsuitable in 2023 (20% of all households requiring adaptations), plus the additional households that are expected to require adaptations by 2040. Taking these inputs together it is possible to identify the housing requirement to address the accommodation needs of those who may be affected by long-term health problems or disabilities and the suitability of existing stock.

Table 30. Total Projected Need for Households Requiring Adaptations (2023-2040)

	Current Unmet Need* (2023)	Projected Additional Need (2023-2040)	Total Need (2023-2040)	Need Per Annum
Households Requiring Adaptations	1,260	1,792	3,052	180

*Source: SPRU Analysis, Edge Analytics. *Unmet need based on 20% of existing households requiring adaptations living in unsuitable accommodation (as derived from EHS 2019-20).*

7.69 Based on future projections, combined with estimates of existing unmet need, there is a total need for 3,052 households with appropriate adaptations over the period 2023 to 2040. The 180 need per annum represents 21% of the 857 overall annual dwelling need figure. This assumes all newly occurring need will not, at present, have the appropriate adaptations. What cannot be assessed is the degree to which this newly occurring need could be met by adaptations to the dwelling that the person is currently residing in.

ii) *Wheelchair User Needs*

7.70 Based on the household growth projected in the **Dwelling-led LHN 857 (HH-14R) Scenario** and the prevalence rate of households with wheelchair users by tenure (derived from the English Housing Survey 2018-2019), it is anticipated that there will be a total of 512 additional wheelchair user households by 2040, as shown in the table below. Not all of the projected net additional need for wheelchair users will result in properties requiring adaptations and this therefore reflects an upper estimate of potential need.

Table 31. Projected Growth in Wheelchair User Households (2023-2040) based on Dwelling-led LHN 857 (HH-14R) Scenario

Wheelchair User Households	2023 Estimates	2040 Estimates	Growth	Growth per Annum	Growth %
Owned	1,517	1,819	302	18	19.9%
Private Rent	227	251	24	1	10.8%
Social Rent	989	1,176	186	11	18.8%
Total	**2,733**	**3,246**	**512**	**30**	**18.7%**

Source: English Housing Survey (EHS) 2018-19 – Accessibility of English Homes, Edge Analytics, SPRU

7.71 The table above shows how the largest projected growth in wheelchair user households is in the owned tenure, with a growth of 18 per annum with a rate of 19.9%. Conversely, the private rented sector growth is lower with an annual increase of 1 wheelchair user household and a growth rate of 10.8%.

7.72 As well as considering projected future wheelchair user needs, it is reasonable to assume that a proportion of current wheelchair user households face unmet needs in terms of requirements for home adaptations or the availability of an accessible property.

7.73 Research by Habinteg Housing Association and London South Bank University (supported by the Homes and Communities Agency)[21] identified that around 13% of wheelchair users nationally had an unmet requirement for adapted property. If applied locally this suggests that, in 2023, 355 of the 2,733 wheelchair user households had an unmet requirement for an adapted property.

7.74 Combining the projected future needs and current unmet needs for wheelchair adapted housing results in a total projected need for wheelchair adapted housing of 867 over the plan period, as shown in the table below.

Table 32. Total Projected Need for Wheelchair Adapted Dwellings (2023-2040)

	Current Unmet Need	Projected Additional Need (2023-2040)	Total Need (2023-2040)	Need per Annum
Wheelchair Adapted Dwellings	355	512	867	51

Source: SPRU analysis, Edge Analytics

iii) *Policy Recommendations*

7.75 The evidence in this section provides justification for the need to ensure a proportion of all new qualifying residential development in Telford & Wrekin provides for accessible and adaptable homes in accordance with the government's optional technical housing standards.

[21] 'Mind the Step: An estimation of housing need among wheelchair users in England' (2010)

Planning Practice Guidance[22] states that:

"Where an identified need exists, plans are expected to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing. In doing so, planning policies for housing can set out the proportion of new housing that will be delivered to the following standards:

- *M4(1) Category 1: Visitable dwellings (the minimum standard that applies where no planning condition is given unless a plan sets a higher minimum requirement)*
- *M4(2) Category 2: Accessible and adaptable dwellings*
- *M4(3) Category 3: Wheelchair user dwellings*

Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site specific factors."

7.76 It should be noted that in September 2020, the government consulted on proposals to accessibility standards for new homes, recognising the importance of suitable homes for older and disabled people. The outcomes of this consultation, published in July 2022, recommended that the most appropriate way forward is to mandate the current Part M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes. M4(1) would apply by exception only, where M4(2) is impractical and unachievable. Part M4(3) (Category 3: Wheelchair user dwellings) would continue as now where there is a local planning policy in place in which a need has been identified and evidenced. Local authorities will need to continue to tailor the supply of wheelchair user dwellings to local demand.

7.77 Mandating M4(2) will require a change to Building Regulations and statutory guidance in Approved Document M (volume 1). The government proposes to consult further on the technical changes to the Building Regulations to mandate the higher M4(2) accessibility standard. This further consultation has not yet taken place (at the time of writing).

7.78 Based on the analysis set out in this section, **it is recommended that in preparing policy options, the Council takes account of a need for at least 20% of the overall assessment of local housing need to be provided at the Part M4(2) Category 2 standard for accessible and adaptable homes.** This level of provision is considered to be an appropriate starting point to test policy options for provision within market housing as part of a mixed-tenure development, noting the Government's ambition for this provision to be increased.

7.79 The English Housing Survey (2018-19) confirms that around 3.51% of households in England home to a wheelchair user. The data for Telford & Wrekin largely aligns with this, though has a slightly lower rate of 3.46% of households with a wheelchair user. Unsurprisingly, the wheelchair user prevalence rates are higher in the older age categories.

7.80 Using the above percentages to inform a policy recommendation would only take account of newly arising need and would not address existing unmet needs for wheelchair user dwellings. The evidence presented in the table above identifies a total projected need per annum of 51dpa. This figure represents 6.0% of the total dwelling requirement (857dpa), though this is an upper estimate as not all of the projected net additional need for wheelchair users will result in properties requiring adaptations.

7.81 **Based on the evidence of this EHDNA, it is reasonable to recommend that a minimum of 5% of new market housing in Telford & Wrekin should be required to meet the wheelchair user dwelling standards of Part M4(3) to provide for wheelchair adaptable dwellings (a home what can be easily adapted to meet the needs of a household**

[22] PPG Paragraph: 009 Reference ID 63-009-20190626

including wheelchair users).

7.82 There is also a need to consider the substantially greater need for accessible and adaptable homes in the affordable housing sector. According to the EHS (2018-19), approximately 7.1% of social housing households in Telford & Wrekin have a wheelchair user, compared with 3.1% of owner-occupied households and 1.4% of private rented households. It is therefore considered appropriate for policy options to consider a higher requirement for wheelchair user dwellings within new affordable housing for those unable to meet market housing costs. **It is therefore considered reasonable that up to 10% of affordable housing should be required to meet the wheelchair user dwelling standards of Part M4(3) (accessible or adaptable dwellings), subject to viability.**

7.83 As set out in PPG, the Council should note that Local Plan policies for wheelchair accessible homes (a home readily useable by a wheelchair user at the point of completion) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (PPG ID: 56-009-20150327).

7.84 It should also be kept in mind that there is a substantially higher prevalence of wheelchair users amongst older age groups. While there is scope that the impacts of an ageing population would increase the overall proportion of wheelchair user households there is likely to be a relationship between meeting respective needs within other types of specialist accommodation for older people, such as Extra Care. This is likely to be in addition to an increased rate of adaptation within the existing dwelling stock where this is feasible.

d) Student Housing

Key Points Summary

- There are no planned significant increases in student numbers at higher education establishments across the borough. Past growth in student numbers is likely to have been reflected in observed trends in increased demand within the private rented sector together with occupation of a higher proportion of large 3+ bedroom dwellings.
- The needs of students identified within these trends in household composition will already be reflected in terms of the overall housing requirement. However, in relation to recommendations on housing mix and management of existing stock it is suggested that that the provision of larger 3+ bedroom properties should be at the upper end of the suggested range.
- Given the increased role of the private rented sector across the borough and the specific function of this tenure in meeting needs of student households in Newport, the Council should closely monitor overall demand for property in terms of trends in affordability and potential barriers to accommodation suitable to meet overall needs.

7.85 Paragraph 63 of the NPPF December 2024 confirms that the future housing needs of students should be considered amongst different groups in the community. The relationship between the student population of Telford & Wrekin and demographic and household formation patterns is in-part determined by details of student numbers and households recorded in the 2021 Census for England and Wales.

7.86 The Census identifies the household composition within Telford & Wrekin based on the total of all usual residents recorded as full-time students and living in 'all student' households. This reflects details of students at their term-time address. 257 'all student' households are recorded with a population of 1,204 usual residents. In addition, the Census also records the accommodation occupied by all full-time students and also notes 205 students living alone (i.e., single person households).

7.87 This gives a total of 462 households where all occupants are students and a total of 1,409 residents, representing an average student household size of 3.0 persons per household.

7.88 Details of the accommodation of other full-time students includes those living in other household types (1,013 full-time students). The data also record the total for those living with parents (2,407 full-time students, a proportion of which includes those at sixth form and not at university).

7.89 For the purposes of the official subnational household projections all of those living in private housing (i.e., either as a wholly student household, living alone or within another household) form part of the total population projection to which assumptions for household formation are applied.

7.90 The household projections do not include the proportion of the population that is not assumed to be resident within households i.e., the 'non-household' or communal establishment population. An estimate for students living in 'halls of residence' and other non-household populations are removed and projected forward separately. Based on the methodology provided by MHCLG, the number of people age below 75 and comprising the non-household population is assumed to remain constant. This effectively means that even if there is growth in student number of the period the supply of non-household accommodation (i.e., halls of residence) remains fixed.

7.91 Under these circumstances any additional provision of purpose-built student accommodation would result in the movement of persons from the household population to non-residential establishments and thus release supply in the existing housing stock. This pattern of development could be counted towards the housing requirement; however, the needs assessment should consider whether the growth in student numbers is reflected in current and expected future demographic trends.

7.92 The 2021 Census records a total of 689 full-time students whose accommodation is list as within a communal establishment (i.e., the non-household population). This includes 630 persons where the communal establishment is listed as a 'halls of residence' and 59 persons where the establishment is listed as 'other'.

i) *Students in Higher Education*

7.93 The profile of relevant higher education establishments has been considered as part of preparing this needs assessment. Notably this includes the Harper Adams University and the University of Wolverhampton (Telford Campus). Both of these establishments provide a range of courses for undergraduates and post-graduates and provide on-site accommodation options (primarily for first-year students) within halls of residence together with support for students living as part of private housing.

7.94 The two establishments are geographically distinct, with Harper Adams University based towards the north of the borough. The nearest significant built settlement comprises Newport, although the campus including halls of residence and most teaching facilities are located at Edgmond Marsh to the west (located in the Rural sub-area). The University of Wolverhampton (Telford Campus) is based at Priorslee, within the North East sub-area and forms part of the main Telford conurbation. The halls of residence for both facilities are recorded on the Council's property register.

7.95 Telford College, located in Wellington towards the centre of the borough, provides education primarily for 16-18 year-olds, but the range of courses offered has expanded significantly in recent years. The college provides a number of apprenticeships, preparatory degrees, and options for entry into higher education meaning that the profile of students served by the establishment is likely to have broadened. The college has sought to match the curriculum more closely to the former Marches Local Enterprise Partnership's economic priorities.

7.96 However, in terms of housing needs, representatives of Telford College have confirmed that almost all students will live at home rather than in student accommodation.

7.97 For Harper Adams University and the University of Wolverhampton details of student numbers are recorded by the Higher Education Statistics Agency (HESA) with details available for the last five years (2018/19 to 2022/23). This provides more up-to-date information on student numbers although the series does not allow direct comparison with the 2021 Census data. For the University of Wolverhampton data are only available by the total for the establishment (I.e., across all Campuses) but show little change in terms of overall student number (c.17,000 – 18,000) between 2018/19 and 2022/23.

7.98 For Harper Adams University there is less than a 10% decrease in terms of the total numbers of students between 2018/19 and 2022/23, though there was a significant decline in the number of students enrolled in 2019/20. The number of non-UK students was largely consistent until the most recently recorded data in 2022/23, where the number more than halved from 230 to 110.

Table 33. Five-Year Trend in Total Students Enrolled in Higher Education

Harper Adams University	2018/19	2019/20	2020/21	2021/22	2022/23
Total Higher Education Enrolments	5,375	4,680	5,135	5,270	5,070
Of Which Non-UK	260	265	265	230	110

Source: HESA; SPRU Analysis

7.99 In terms of future student numbers, discussions with representatives from Harper Adams University noted that the success of the establishment is focused upon its specialisms in food science and agriculture. Overall student numbers have been generally flat since 2010, but the University is increasingly recruiting a lower proportion of students from within the region (around 21%) but retaining a higher proportion (around 28%) in the local area following graduation. The key sectors supported by the University are partly reliant on recruitment from outside the UK and the strength of the local economy.

7.100 While first-year and some post-graduate students live on campus the majority live in private residential lettings (mainly in Newport). Overall, it is not expected that there will be a substantial increase in student number or requirements for purpose-built accommodation in the immediate term that would affect overall housing needs.

7.101 Discussion with stakeholders did identify that there are options within the existing campus to increase the total amount of bedrooms provided within halls of residence through redevelopment and densification of existing facilities. The Council should monitor future plans for redevelopment, which subject to no overall increase in student numbers may release housing supply in the surrounding area.

ii) *Implications for the Housing Needs Assessment*

7.102 There are no planned significant increases in student numbers at higher education establishments in the borough that are likely to impact overall population growth or demand for purpose-built student accommodation. It is therefore relevant to consider the relationship between the needs of the student population in the context of the wider housing market.

7.103 In terms of the overall impact of the role of higher education in Telford & Wrekin in relation to projected growth over the plan period, the close relationship between the opportunities available and the area’s economic priorities should not be understated. Growth in student numbers together with reconfiguration of the curriculum is likely to have contributed to recent increases in recorded net in-migration, which coupled with higher retention rates for graduates, have translated into higher total fertility rates and growth in younger households. The resulting implications for housing need, principally in terms of reflecting increasing patterns of demand amongst younger households, will be implicit in the official subnational population and household projections upon which this assessment has been prepared.

7.104 There is a clear relationship between the role of Harper Adams University and implications for use of existing stock in the Newport sub-area. There is also likely to be a localised impact on future demographic change in terms of the proportion of graduates retained in the local area. In terms of recent patterns of growth and future projected change this is reflected in the relatively high proportion of projected growth in family households identified as part of sub-area projections prepared for the original Part One EHDNA. In terms of use of existing stock, the sub-area contains an above-average proportion of private rented tenure and dwellings comprising 4 or more bedrooms.

7.105 While less than 1% of all households in Telford & Wrekin comprise ‘all student’ households, approximately 70% of the total are located in Newport (around 3% of the area total). These households have an average size of over 4 persons per dwelling. In terms of other impacts upon household composition the 2021 Census records a relatively small proportion of students aged 16+ living with parents in Newport. In addition to all-student households there is also a relatively high total of 'other' households containing students and other adults together with students in 'one family' households (which may reflect a higher proportion of post-graduates).

7.106 The needs of students identified within these trends in household composition will already be reflected in terms of the overall housing requirement. However, in relation to recommendations on housing mix and management of existing stock it is suggested that that the provision of larger 3+ bedroom properties should be at the upper end of the suggested range. Given the increased role of the private rented sector across the borough and the specific function of this tenure in meeting needs of student households in Newport, the Council should closely monitor overall demand for property in terms of trends in affordability and potential barriers to accommodation suitable to meet overall needs.

7.107 The impact of the University of Wolverhampton Telford campus on overall housing needs is less clearly discernible based on Census data. There are only 40 residents in communal halls of residence establishments in the Priorslee ward recorded by the 2021 Census. This indicates that the population within the Priorslee campus may not be recorded in this location or has increased substantially since 2021.

7.108 This would also indicate that student numbers at the Priorslee campus as a proportion of the overall student population are not fully reflected in the non-household component of the household projections. However, in terms of the total population of full-time students by sub-area the Priorslee ward records no 'all student' households and only slightly higher rates of other households containing students. While to some degree the needs of students at the Telford campus may be met in dwellings across the conurbation it appears more likely that the impact on overall needs has increased since 2021.

7.109 Given that the non-household component of the household projections is held constant, any growth in student numbers recorded since 2021 (in terms of population and household growth) will be reflected in the overall housing requirement. In terms of trends in tenure and household composition, based on the findings of the 2021 Census for Newport, this is likely to have reflected part of trends in increased demand within the private rented sector together with occupation of a higher proportion of large 3+ bedroom dwellings. However, these potential impacts upon housing mix are likely to affect the wider Telford urban area and may not necessitate a specific policy response in the Priorslee ward.

e) Service Families

Key Points Summary

- Both of the two barracks at Donnington (Venning Barracks and Parsons Barracks) have been announced for closure with resident personnel to be relocated elsewhere in the West Midlands. On this basis it is not expected that there will be any new military facilities opening in the borough in the foreseeable future that would generate housing needs associated with an increased number of service families.
- It is therefore expected that the vast majority if not all future housing requirements of armed forces veterans (at least in quantitative terms) are captured within the household projections themselves.
- While the non-household population associated with defence establishments in the borough as recorded in the 2021 Census is relatively small the Council may wish to monitor how recent and future reorganisation impacts upon the living arrangements of personnel.
- Any service families that remain resident within the borough and occupy general housing to meet their housing needs may represent a small increase in the use of existing housing stock though this is very likely to be more than outweighed by the effect of personnel already owning or renting stock relocating elsewhere and freeing up housing.

7.110 Paragraph 63 of the NPPF December 2024 states that the accommodation requirements of service families should be considered as part of the housing needs of different groups within the borough.

7.111 Statutory guidance updated in December 2024 detailed the Prime Minister's ambition to house all veterans in housing need. This included measures such as excluding veterans of the Regular Armed Forces from local connection tests to facilitate access to social housing across the country. Local authorities are asked to more generally consider the ways in which qualification criteria disadvantages members of the Armed Forces. Authorities should also facilitate veterans' access to specialist housing where required due to physical or mental illness or disability.

7.112 The 2021 Census records 16 non-household residents within communal establishments under the 'Defence' category. The Council's Housing Strategy (March 2021) records around 3,831 armed forces veterans of working age within the borough. However, Council Tax data provided by the Council do not list any exemptions based on the identification of separate armed forces accommodation units.

7.113 The only relevant defence facility listed is the relatively recently expanded Ministry of Defence logistics facility at MOD Donnington. The facility formed the West Midlands headquarters of the 11th Signal Brigade, though this unit disbanded in November 2024 with its sub-units resubordinated. The facility is expected to close in 2029 and it is anticipated that the operational structure will relocate to Beacon Barracks (Stafford).

7.114 Both of the two barracks at Donnington (Venning Barracks and Parsons Barracks) have been announced for closure with resident personnel to be relocated elsewhere in the West Midlands. On this basis it is not expected that there will be any new military facilities opening in the borough in the foreseeable future that would generate housing needs associated with an increased number of service families.

7.115 It is therefore expected that the vast majority if not all future housing requirements of armed forces veterans (at least in quantitative terms) are captured within the household projections themselves.

7.116 While the non-household population associated with defence establishments in the borough as recorded in the 2021 Census is relatively small the Council may wish to monitor how recent and future reorganisation impacts upon the living arrangements of personnel. Any service families that remain resident within the borough and occupy general housing to meet their housing needs may represent a small increase in the use of existing housing stock though this is very likely to be more than outweighed by the effect of personnel already owning or renting stock relocating elsewhere and freeing up housing.

f) Black and Minority Ethnic Population

Key Points Summary

- The population within Telford & Wrekin is relatively less ethnically diverse than the rest of the West Midlands region of the average for England.
- Housing trends in BME populations do not correspond with consistent patterns in terms of difference in household tenure, however diversity of the population may place increased pressure on the existing stock of larger dwellings in the borough.

7.117 The population within Telford & Wrekin is relatively less ethnically diverse than the rest of the West Midlands region of the average for England. The 2021 Census reports that around 11.8% of usual residents were classed as being from a Black or Minority Ethnic (BME) Group. 88.2% of household reference persons are recorded as White.

Table 34. Population by Ethnic Group

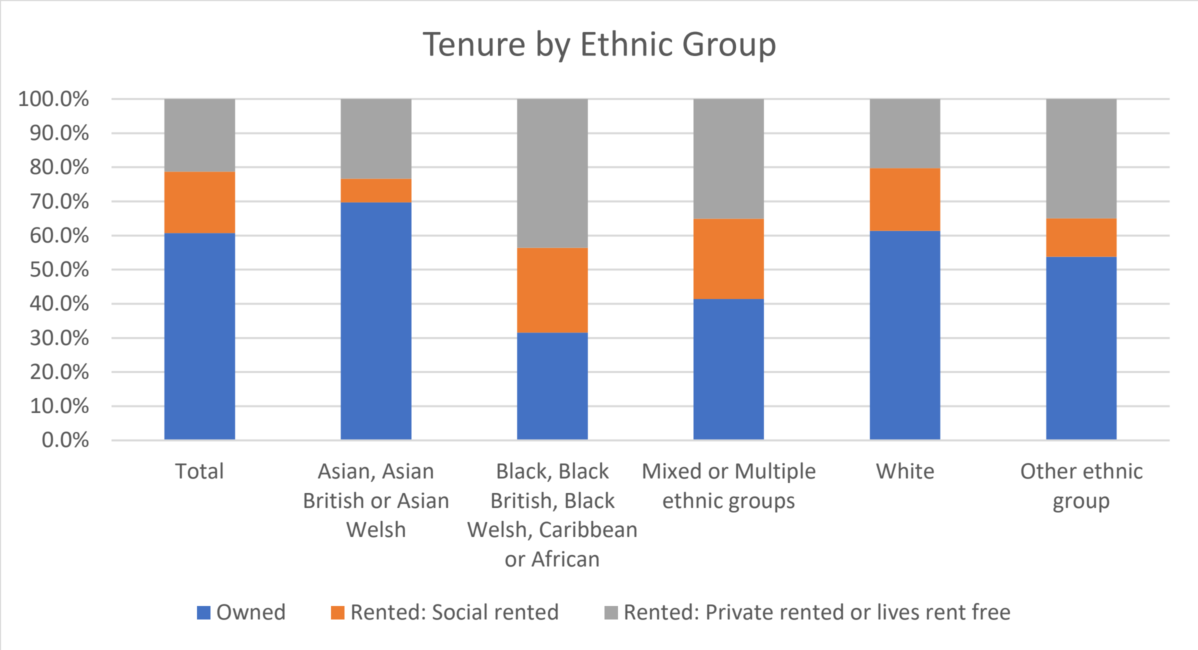
Ethnic Group	Number	Percentage
Asian, Asian British or Asian Welsh	9,964	5.4%
Black, Black British, Black Welsh, Caribbean or African	5,314	2.9%
Mixed or Multiple Ethnic Groups	4,812	2.6%
White	161,911	88.2%
Other Ethnic Group	1,636	0.9%

Source: 2021 Census; SPRU Analysis

7.118 Trends in BME population do not correspond with consistent patterns in terms of difference in household tenure. The highest levels of owner occupation are identified amongst Asian and Asian British households (around 70%), with owner occupation among White households (around 61.4%) largely aligning with the total ownership rate of 60.7%.

7.119 Black and Mixed or Multiple Ethnic Group households are much less likely to own their homes than White and Asian households, with ownership rates of just 31.6% and 41.4% respectively. Black and Mixed or Multiple Ethnic Group households are also more likely to socially rent at 24.8% and 23.5% compared to the rate of 18% across the borough. In contrast, Asian and Asian British households are much less likely to socially rent at only 6.8%.

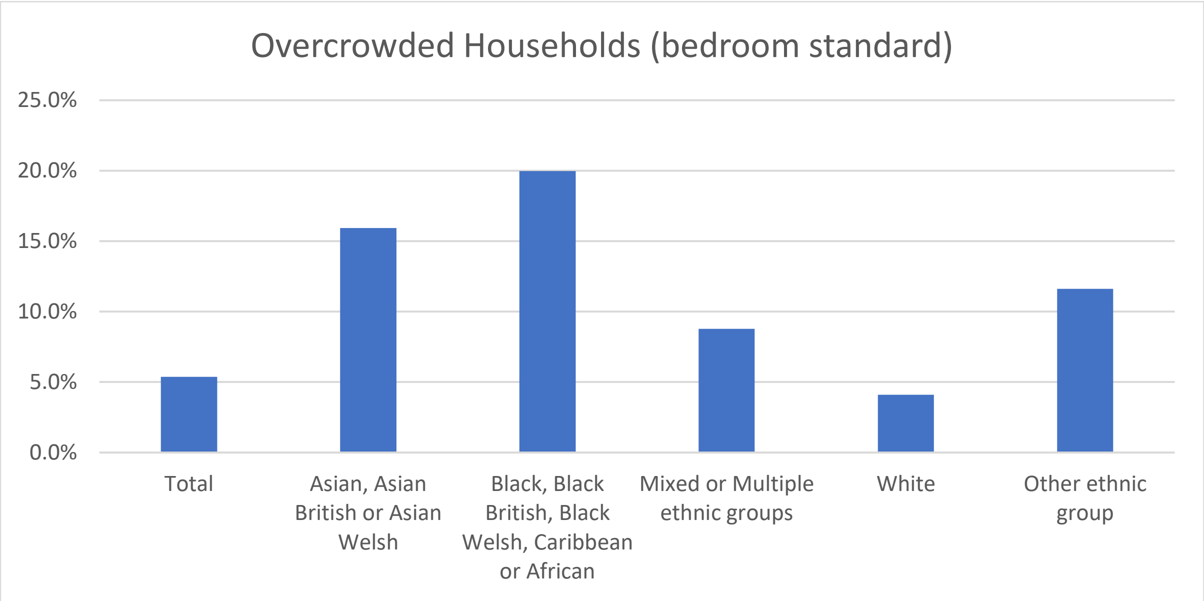
Figure 17. Tenure by Ethnic Group



Source: 2021 Census; SPRU Analysis

7.120 In terms of potential indicators of unmet and future housing needs, the most pronounced trends in overcrowding are associated with Black/Black British households. The proportion of overcrowded households is around 5 times higher than the rate in all-white households at 20% compared to 4.1%.

Figure 18. Overcrowding by Ethnic Group



Source: 2021 Census; SPRU Analysis

7.121 Specific characteristics based on average household size are not available by ethnicity as the Census only records details on the household reference person and not the ethnic composition of all corresponding household residents. However, only around 10% of all households recorded in the 2021 Census for England comprise mixed ethnic groups meaning that averages based on the respective totals for household reference person and usual household residents in each ethnic group are generally robust.

7.122 59% of White households occupy up to only 0.5 persons per room. This is compared to 39% of Asian households, 37% of Black households, 46% of Mixed households and 41% of Other households. Conversely, the proportion of households with over 1 person occupying each room is highest in Black households and Asian households at 20% and 14% respectively, which is compared to just 4% in White households.

7.123 The overall trend diverges when looking at estimated overall average household size. Mixed households have the largest estimated household size for a single ethnic group (4.79) followed by Asian households (3.24). Black households have a smaller overall average household size at 2.87 persons per household. This would indicate a trend towards smaller properties and smaller overall family size with Black and Black British households. These observations are also generally consistent with the potential impact of other domains of deprivation including income deprivation preventing access to larger property in either the social or private rented sector.

7.124 In terms of implications for this housing needs assessment it should therefore be noted that cultural/lifestyle differences and fertility rates will not necessarily correspond to assumptions in increased household formation or downsizing but diversity of the population may place increased pressure on the existing stock of larger dwellings in the borough.

g) Private Rented Sector

Key Points Summary

- There is limited reliable data to illustrate the full profile of the private rented sector since 2011 in terms of the demand and supply for different types of accommodation. However, Housing Benefit Entitlement claimant data from March 2016 (prior to the main impact of introducing Universal Credit upon overall claimant data) shows that around 57% of recipients of support towards housing costs in the Private Rented Sector comprised households with dependent children.
- This demonstrates that whilst the Private Rented Sector does play an important role in meeting the needs of smaller and particularly younger households, this sector is also meeting the needs of larger families (3+ bedrooms) who are in need of more 'affordable' accommodation.
- The Council may wish to consider the introduction of permissive policies that support the introduction of Build-to-Rent (BTR) typologies to diversify supply, including potentially as part of larger scale housing allocations.
- While such policies may be appropriate when applied to suitable schemes (such as those in the Station Quarter or other sustainable locations, reflecting the typical BTR characteristics noted above) this would be subject to relevant viability testing. The potential for BTR typologies should be assessed with reference to levels of market rent necessary to ensure development is viable.
- In line with PPG, it is recommended that 20% of units in BTR schemes are delivered as affordable private rent.

7.125 Built to Rent (BTR) is a relatively new but increasingly popular mechanism for delivering homes in the private rented sector (PRS). Savills identifies current (Q4 2024) BTR stock as 123,500 units nationally, with a further 49,000 under construction. There are an additional 109,800 homes in the planning pipeline, including at pre-application stage[23].

7.126 Investment in BTR properties was at its highest recorded level in 2024 at £5.1 billion total. This represented a 6% increase on the previous record achieved in 2022. Of the total real estate investment made in the UK in 2024, BTR comprised 13%, up from 5% in 2021 (Savills, February 2025).

7.127 BTR is defined in the latest versions of the NPPF and PPG, with LPAs required to identify needs for BTR to meet overall housing needs.

7.128 BTR has, to date, been focused in London and other major cities. However, there has been growing interest in other areas, driven by:

- Increasing affordability pressures resulting in increasing numbers renting.
- Nationwide housing pressures, central Government (e.g. Letwin Review, Housing White Paper) and local authorities exploring diverse housing delivery models.
- Changes to tax and regulations and increasing mortgage costs reducing attractiveness of buy-to-let mortgages, meaning housebuilders are considering options besides sales

[23] UK Build to Rent Market Update – Q4 2023 (Savills, February 2024)

to buy-to-let landlords.

- Mature student accommodation market – nationally 35% of full-time students live in purpose-built housing.

7.129 The British Property Federation Build to Rent Map[24] identifies a total of 84 BTR units in Telford & Wrekin with planning permission, 739 BTR units under construction and 273 BTR units completed. This represents a total of 1,096 BTR units distributed across nine schemes, all of which are located within the Telford urban area.

7.130 PPG defines BTR as a distinct asset class within the PRS. Demand for BTR is typically driven by households which would otherwise occupy the PRS. There is no formal definition of BTR, however BTR is often distinguished from other forms of PRS because it tends to reflect the following characteristics:

- BTR homes are designed and built for long-term renting. Tenancies tend to be longer (minimum 1 year) than in the PRS where buy-to-let landlords are restricted by lenders from granting longer tenancies.
- BTR providers are long-term investors. The financial model depends upon the rental yield over the medium- to long-term, not by short-term capital growth potential.
- BTR schemes provide a fully integrated management service, and a range of services to tenants.

7.131 However, BTR shares key aspects with traditional PRS, including:

- Occupier demand driven by demographics, lifestyle choices and lack of supply / affordability of housing.
- Predominantly younger demographic: 60.3% of people who live in private rented accommodation in England and Wales are aged under 35 (Census, 2021).
- Renters typically drive less and use more public transport and therefore want to be close to transport nodes / town centre locations.

7.132 PPG requires LPAs to consider the need for BTR in an area, which should consider demographic drivers of need.

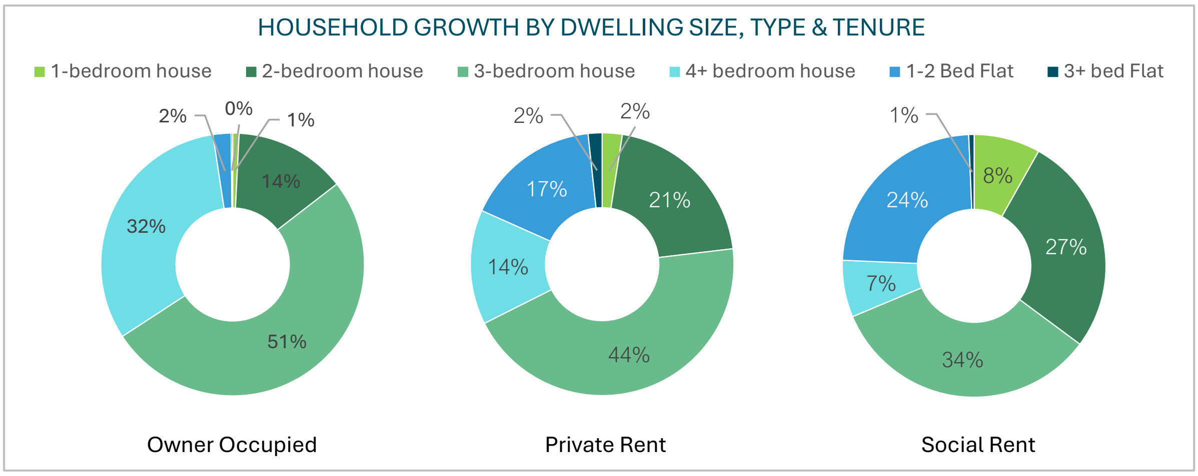
7.133 In terms of future needs, the 2021 Census identified that within Telford & Wrekin there was a higher proportion of families with children in the private rented sector (around 54%) compared with the overall average (around 45%). The 2021 Census presents the same pattern with lower figures, as approximately 45% of private rented households are families with children compared to 38% of the all the households in Telford & Wrekin being families with children. The sector is also marked by a concentration of younger households and relatively few households containing older people.

7.134 Taking account of the characteristics of households in the private rented sector, there is also a relatively small proportion of larger properties comprising 4 or more bedrooms (around less than half of the rate amongst owner-occupiers). There is also a lower growth rate of 14% in properties of 4 or more bedrooms in the private rented sector compared to 32% in the owner-occupied sector. This is despite the outlined higher proportion of families with children in the private rented sector. The household growth by dwelling size, type and tenure is shown below.

7.135 It should be noted however that much of the growth in the Private Rented Sector between 2011 and 2021 has been driven by the re-use of existing housing stock for private rented tenure rather than new development (see section 6(b)(i) above).

[24] https://bpf.org.uk/about-real-estate/build-to-rent/ (February 2025)

Figure 19. Household Growth by Dwelling Size, Type and Tenure



Source: Edge Analytics POPGROUP modelling; 2021 Census

7.136 There is limited reliable data to illustrate the full profile of the private rented sector since 2011 in terms of the demand and supply for different types of accommodation. However, Housing Benefit Entitlement claimant data from March 2016 (prior to the main impact of introducing Universal Credit upon overall claimant data) shows that around 57% of recipients of support towards housing costs in the Private Rented Sector comprised households with dependent children. This demonstrates that whilst the Private Rented Sector does play an important role in meeting the needs of smaller and particularly younger households (as discussed above and in section 6(b)(i)), this sector is also meeting the needs of larger families (3+ bedrooms) who are in need of more 'affordable' accommodation. Stakeholders indicated that private rental costs within existing stock are low relative to the surrounding region, facilitating these characteristics of demand and supply, whereas rental values in new build development are higher and thus often serve different market segments.

7.137 In terms of household composition, the same data confirm that only 36% of recipients in the private rented sector comprise single adult households with no dependent children, compared to 56% in the social rented sector. However, amongst households with dependent children the rate for lone parents (36%) exceeds the total proportion of couples with dependent children (20%).

7.138 The lower quartile rent in Telford & Wrekin is estimated to be £565 per calendar month[25]. This equates to an annual housing cost of £6,780. On the assumption that 30% of a household's income is spent on housing costs,[26] the minimum household income needed to afford lower quartile rents, is estimated to be £22,600 in Telford & Wrekin. Compared to the West Midlands and England in the table below, the lower quartile rent is £50 and £85 lower per month respectively.

[25] ONS 2023 Private rental market summary statistics
[26] Proportion of household income spent on housing costs drawn from EHS 2022-23.

Figure 20. Private Rental Costs in Telford & Wrekin, the West Midlands and England

Geography	Lower Quartile Private Rent	Median Private Rent
Telford & Wrekin	£565	£650
West Midlands	£615	£750
England	£650	£850

Source: ONS Private Rental Market Statistics (Oct 2022 – Sep 2023), Edge Analytics

7.139 On average, private renters earn 85% of the average household income in Telford & Wrekin compared to owner-occupiers who earn 114%. It is estimated that 53% of private rent households cannot afford lower quartile rents compared to 39% of owner-occupiers.

7.140 To determine the current (backlog) need for affordable home ownership, the number of households in the private rented sector in 2023 has been estimated at 16,374 using assumptions on household occupancy from the 2021 Census and demographic modelling outputs from POPGROUP. Assuming that just under a third of these households fall into the gap between being able to afford to rent and purchase lower quartile properties, an estimated **4,912** households are identified as being potentially in need.

7.141 However, some of these households will remain in the private rented sector, either through choice or due to affordability issues (e.g., due to a lack of savings or inability to secure a mortgage). The English Housing Survey reports that over half (59%) of private renters expect to buy at some point in the future, with 29% of these expecting to buy in the next two years.[27] With these assumptions applied to the estimate of private renters in the rent/buy 'gap', it is estimated that the current backlog of affordable housing need is 840 in Telford and Wrekin. Annualised over the 2023–2040 plan period, this equates to 49 households per year.

7.142 To reflect the evidence within the EHDNA Update and some emerging evidence of demand the Council may wish to consider the introduction of permissive policies that support the introduction of BTR typologies to diversify supply, including potentially as part of larger scale housing allocations. While such policies may be appropriate when applied to suitable schemes (such as those in the Station Quarter or other sustainable locations, reflecting the typical BTR characteristics noted above) this would be subject to relevant viability testing. The potential for BTR typologies should be assessed with reference to levels of market rent necessary to ensure development is viable.

7.143 In respect of affordable housing provision within BTR schemes, the PPG states that "*20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. If local authorities wish to set a different proportion they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their local plan*" (PPG ID: 60-002-20180913). There is no evidence to suggest a requirement in excess of 20% affordable private rent should be applied to BTR schemes in Telford & Wrekin.

7.144 The starting point in national policy, and also any departure from it to seek a different requirement for contributions, would in the first instance need to be considered in terms of potential viability implications while also having regard to relatively limited expectations for current and future demand. The provision of BTR schemes, capturing contributions towards affordable private rented accommodation in accordance with national policy, would be unlikely to prejudice meeting overall needs unless they are expected to provide a very large proportion of total identified supply. The Council should also consider where applying any

[27] English Housing Survey 2022-23 Headline Report (July 2024)

policy approach to future potential BTR schemes would be undertaken in the context of these representing additional sources of delivery on sites not identified in the development plan.

h) Self-Build and Custom Build Housing

Key Points Summary

- As of October 2023, the total number of self and custom-build homes granted permission in Telford & Wrekin since 2016 is 137. This equates to an average of 17 permissions per year.
- Based on the assessment of past average annual permissions (17 per year), this would result in an indicative need for the plan period (2023 to 2040) of 289 plots.
- The duty to grant planning permission is set out in the Self-build and Custom Housebuilding Act 2015 (as amended) and is defined by the need to meet identified demand on a rolling programme of 3 years by the end of the base period. During the fifth base period (31 October 2019 to 30 October 2020) a total of 12 entries were added to the register, meaning the Council had a duty to grant planning permission for 12 plots suitable for self-build and custom build housing between the period 31 October 2020 and 30 October 2023 (i.e. the 3 years following the end of the base period). During this period the Council granted planning permission for 59 plots, so the duty has been met for the fifth base period.
- In order to ensure that Telford & Wrekin continue to comply with the requirements of the Self-build and Custom Housebuilding Act 2015 (as amended) it is recommended that new local plan policies are introduced that provide support for the delivery of self and custom build housing.

7.145 Self-build and custom-build housing are defined by the NPPF 2024 in Annex 2: Glossary as:

"Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing."

7.146 Paragraph 63 of the Framework states that the size, type and tenure of housing needed for different groups should be assessed and reflected in planning policies, and this includes those wishing to commission or build their own homes.

7.147 Under section 1 of the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under section 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand on their Register on a rolling programme of 3 years by the end of each base period. As also advised in the PPG, to ensure there is a robust assessment of demand for self and custom build housing, local planning authorities should assess and review the data held on the registers, and this can be supplemented with secondary data sources such as plot searching tools (Paragraph: 011 Reference ID: 57-011-20210208).

7.148 The Council should therefore consider the findings on current demand for self-build and custom-build development within the context of overall housing need and should set out future arrangements for monitoring and preparation of policy options that are likely to support granting sufficient permissions.

7.149 The self and custom build housing register for Telford & Wrekin dates from April 2016 to October 2023. There are currently 221 entries on the register, as summarised in the table below. There are no charges for entry onto the register, nor is there a local connection test.

This means the figures below are likely to show more accurate demand for self and custom builds.

Table 35. Self and Custom-Build Register Summary

Base Period	Number of Entries on Register	Number of Permissions	Cumulative Total Entries on Register	Cumulative Total Permissions
1 (01/04/16 – 20/10/16)	23	-	23	-
2 (31/10/16 – 30/10/17)	36	2	59	2
3 (31/10/17 – 30/10/18)	29	2	88	4
4 (31/10/18 – 30/10/19)	37	56	125	60
5 (31/10/19 – 30/10/20)	18	18	143	78
6 (31/10/20 – 30/10/21)	43	32	186	110
7 (31/10/21 – 30/10/22)	23	13	209	123
8 (31/10/22 – 30/10/23)	12	14	221	137
Base Period Average	**28**	**17**		

Source: Telford & Wrekin Council, MHCLG, SPRU analysis

7.150 As of October 2023, the total number of self and custom-build homes granted permission since 2016 is 137. This equates to an average of 17 permissions per year.

7.151 The duty to grant planning permission is defined by the need to meet identified demand on a rolling programme of 3 years by the end of the base period. During the fifth base period (31 October 2019 to 30 October 2020) a total of 12 entries were added to the register, meaning the Council had a duty to grant planning permission for 12 plots suitable for self-build and custom build housing between the period 31 October 2020 and 30 October 2023 (i.e. the 3 years following the end of the base period). During this period the Council granted planning permission for 59 plots, so the duty has been met for the fifth base period.

7.152 Those on the self-build register typically have a local connection to Telford & Wrekin, with over 70.9% already living in the area. 32.5% of registered people have a family connection to the area, and 32.5% also work in the area. Typically, those interested do not have previous experience of a self-build, with only 27% having experience. The vast majority of people are interested in individual plots at 91.4%, though 20.5% would also consider group plots.

7.153 Those on the custom and self-build register are more likely to be interested in detached plots with a larger number of bedrooms. 84.2% are interested in a detached house, with a further 25.3% interested in a detached bungalow. In contrast, 7.9% are interested in a semi-detached house and just 1.7% for a terraced house. The most popular number of bedrooms that those on the register are interested in developing is 4, with 49% interested. 3-bedroom homes are the second most demanded, with 38% considering this. In contrast, only 8.6% are interested in building 1-bedroom homes.

7.154 There is one reference to self-build and custom-build housing in the Local Plan 2011-2031. Policy HO11 details how the Council will support affordable self or custom-build housing schemes in rural areas, provided that the applicants can meet a number of criteria including demonstrating a local connection and that the proposal addresses an identified local housing need. The Local Plan was prepared prior to the introduction of the Self-build and Custom Housebuilding Act 2015.

7.155 As shown in the table below, Telford & Wrekin perform better than surrounding authorities in terms of the inclusion of self and custom-build policies in Local Plans. Of the neighbouring authorities, South Staffordshire authority is the only one to have an adopted policy of general support for self and custom-build housing. However, it does not promote self-build housing as part of its housing mix policy, nor does it have an adopted percentage policy at larger sites. Shropshire was drafting for all three levels of Local Plan policy listed in the table prior to withdrawal of the emerging Plan.

Table 36. Telford & Wrekin and Surrounding Authorities Self and Custom-Build Local Plan Policies as of October 2023

	Local Plan policy - included general support for custom and self-build?	Local Plan policy - promoted custom and self-build as part of housing mix policy?	Local Plan policy - adopted a percentage policy for self and custom build at larger sites?
Telford & Wrekin	Adopted	Draft	Draft
Shropshire	Draft	Draft	Draft
South Staffordshire	Adopted	No	No
Stafford	Other	Other	Other

Source: MHCLG Right to Build Registers Monitoring 2016-2023

7.156 In terms of the wider policies and promotion surrounding self and custom-build housing, Telford and Wrekin have been less supportive than neighbouring authorities. Only one of the six actions presented below has been taken by the Council, which is the introduction of consideration as part of land allocations, disposals and acquisitions. Whereas, South Staffordshire Council and Stafford Borough Council have taken three actions and Shropshire Council have taken all six actions, including: proactively communicating self-build opportunities to those on the register, introducing supplementary planning policies and taking action through Housing Strategy.

Table 37. Telford & Wrekin and Surrounding Authorities Self and Custom-Build Planning Policies and Communication as of October 2023

	Proactively communicating self-build and custom housebuilding opportunities to those on your register?	Introduced supplementary planning policies/ guidance?	Introduced consideration as part of land allocations, disposals and acquisitions?	Specifically supported identified projects	Taken action through Housing Strategy	Adopted Neighbourhood Plans which incorporate policies on self and custom build
Telford & Wrekin	No	No	Yes	No	No	No
Shropshire	Yes	Yes	Yes	Yes	Yes	Yes
South Staffordshire	No	No	Yes	No	Yes	Yes
Stafford	Yes	No	No	Yes	No	Yes

Source: MHCLG Right to Build Registers Monitoring 2016-2023

7.157 At a national level, the most up-to-date available data according to MHCLG shows that the total applications to join self and custom build housing registers between 31 October 2022 and 30 October 2023 was 4,849, which represents a decrease of 39.6% on the previous year. Similarly, the 5,182 planning permissions granted for serviced plots suitable for self and custom build also decreased by 18% on the previous year. However, this data does not necessarily suggest a declining demand for self and custom build housing plots and may instead reflect constraints associated with plot availability and desire of individuals to join registers.

7.158 As recommended by the PPG, demand data from local authority self-build registers should be supported, as necessary, by data from secondary sources, including from The National Custom & Self Build Association (NaCSBA). A YouGov Survey commissioned by NaCSBA, published in October 2020, revealed that awareness of the Right to Build legislation remains low, with only 17% of people aware of self-build council registers. However, 32% of people are interested, with 12% very interested, in self-building in the future.

7.159 The Custom and Self Build Report 2023/24[28] shows that there is an overall under-measurement of demand by 64% in local authority self and custom build registers. The Report found that while 83,430 people were interested in the self-build route between 2019 and 2022, only 29,697 people had signed a register. This suggests that self-build registers alone are not a perfect measure of demand and that data from secondary sources is necessary to consider.

7.160 In August 2021, the government's independent review to develop a plan for a major scaling-up of self-commissioned new homes (the Bacon Review) identified that whilst the registers suggest that demand for custom and self-build housing is just over 16,000 a year, the true level of demand is likely to be much higher at around 30,000. This is due to restrictions placed on joining some registers, such as local connection tests, financial tests or the application of registration charges.

7.161 NaCSBA projections made in October 2020[29] estimate the number of self and custom-build homes which could be delivered between 2020 and 2027. This data presents the differences made in the number of deliveries with legislation continuing as is, with limited support, and with full support. If legislation continued as is, 154,000 self and custom-build homes are projected to be expected to be delivered between 2020 and 2027. With limited support, meaning the challenges associated with legislation are addressed, estimated a delivery of 195,000 homes between 2020 and 2027. With full support, which includes a Help to Build offering on top of the addressed challenges, an estimated 317,500 homes could be delivered across the same period.

7.162 As such, the government is continuing to encourage self and custom build housing, including through the Help to Buy equity loan scheme which was introduced in June 2022 and provides a £150 million equity loan scheme which allows self-builders to obtain mortgages with just a 5% deposit, compared to the average deposit of 25%.

7.163 Amendments to the Levelling Up and Regeneration Bill have also been proposed which specifies that planning permissions will only qualify towards meeting demand for self-build and custom housebuilding (as set out in the 2015 Act) if they are actually designed for this purpose, rather than allowing authorities to count planning permissions that 'could' be used for self and custom-build housing, even if they are not ultimately used. The regulations are likely to require any permissions granted for self and custom build to be characterised by a condition or planning obligation making that requirement explicit. It is therefore recommended that permissions are closely monitored to confirm that where serviced plots are provided, these are ultimately delivered as self and custom-build housing.

7.164 **Based on the assessment of past average annual permissions (17 per year), this would result in an indicative need for the plan period (2023 to 2040) of 289 plots.**

7.165 **In order to ensure that Telford & Wrekin continue to comply with the requirements of the Self-build and Custom Housebuilding Act 2015 (as amended) it is recommended**

[28] Custom and Self Build Market Report 2023/24
[29] NaCSBA Longer-term Forecasts

that new local plan policies are introduced that provide support for the delivery of self and custom build housing.

7.166 Though outlining support for self and custom-build homes, existing Policy HO11 in the Local Plan (2011-2031) addresses only affordable self-build homes in rural areas. In order to fully address demand and requirements in line with the Self-build and Custom Housebuilding Act 2015, the Council must expand their support and include policies on a wide mix of tenures and types of self and custom-build properties.

7.167 It may also be desirable to seek a higher level of provision of serviced plots in areas or on specific allocation sites where levels of demand are known to be higher, subject to viability and site suitability.

7.168 In order for the Council to more accurately measure demand for self and custom builds through the register, the following information should be promoted as outlined by the PPG (Paragraph: 022 Reference ID: 57-022-20210508):

- The purpose of the self-build register and how to apply;
- Local eligibility criteria;
- Site information including plan allocations and suitable development permissions; and
- Details of activities to promote self and custom housebuilding.

7.169 The PPG also provides information on how the number of planning permissions for self and custom housebuilding could be increased (Paragraph: 025 Reference ID 57-025-20210508):

- Support Neighbourhood Planning groups where self and custom-builds are included in policies;
- Work across service delivery areas with local delivery partners including Housing Associations;
- Use and market Council land which is suitable and available for self and custom-builds;
- Work alongside Homes England to unlock sites in public ownership for delivery;
- Encourage developers and landowners to consider self and custom housebuilding; and
- Work with local partners to custom build affordable housing for veterans and other groups in acute housing need.

i) Children in Care and Care Leavers

Key Points Summary

- Under the Children Act 1989, local authorities have a legal obligation to provide care for looked after children. In May 2023, the Housing and Planning Minister released a Written Ministerial Statement reminding local authorities of the requirement to assess the housing needs of different groups, including those of looked after children and care leavers in need of social services care. This statement also said that that local planning authorities should be supportive of applications for all types of accommodation for looked after children.
- Evidence set out in the Telford & Wrekin 'Placement Sufficiency: Cared for Children & Care Leavers (2024 to 2029)' report identifies that it is likely that the Council will see a reduced demand for certain types of accommodation for children in care, specifically children's homes, alongside a general decline across many accommodation types.
- However, it is recommended that the Council ensure there is a continued supply of suitable accommodation available if the number of looked after children begins to increase, or alternatively, if the fall in foster parenting seen nationally presents further challenges. Strategies and efforts to support foster parents and encourage foster parent enquiries should be developed further.
- The Council should take measures and implement strategies to support families and potentially allow for the appropriate placement of children with parents.
- It is also recommended that the Council continues to review the capacity of Semi-Independent Living options to assess whether the current trend of high utilisation by older children is sustainable and can be accommodated into the future.
- Due to the upcoming 'ageing out' of many children in the care of the authority, the Council need to ensure there is an adequate supply of accommodation to support care leavers in their transition out of the care system. An expansion of care leaver accommodation, including supported housing, may be required. The Council may wish to consider including a positively-worded criteria-based policy within the Local Plan to support the development of this type of accommodation and to monitor the availability of stock going forwards relative to the baseline evidence.

7.170 Under the Children Act 1989, local authorities have a legal obligation to provide care for looked after children. Sections 22A to 22D and 22G set out the duties local authorities have regarding the accommodation and maintenance of child:

- Section 22A states that it is the duty of local authorities to provide accommodation when a child is in their care;
- Section 22B states that it is the duty of local authorities to maintain the child they are looking after in other respects apart from accommodation provision;
- Section 22C sets out the ways the looked after child is to be accommodated and maintained;
- Section 22D states that a review of the child's case must be made before making alternative arrangements for accommodation; and

- Section 22G details the general duty of the local authority to secure sufficient accommodation for looked after children.

7.171 In May 2023, the Housing and Planning Minister released a Written Ministerial Statement reminding local authorities of the requirement to assess the housing needs of different groups, including those of looked after children and care leavers in need of social services care. This statement also said that that local planning authorities should be supportive of applications for all types of accommodation for looked after children.

7.172 The publication of the NPPF in December 2024 included an addition within Paragraph 63 to explicitly include looked after children as a group whose housing size, type and tenure needs should be assessed and reflected in planning policies.

7.173 In 2024, Telford & Wrekin Council published their Children's Commissioning Strategy 2024-2029, comprising of the Placement Sufficiency 2024 to 2029 and the Children's Social Care Market Position Statement 2024 to 2029. These outline the Council's strategy for the commissioning of services for children who require community support, on the edge of care, children in care and care leavers. The strategy also analyses existing trends and future needs for children in care.

7.174 Telford & Wrekin is home to 438 children in care out of a total of 43,091 children in the borough, as of November 2023. This is a higher rate than the national average, at 102 per 10,000 compared to a national rate of 70 per 10,000. The rate of children in care was roughly in line with the national average until 2008, when numbers begin to rapidly rise. There are also higher rates of children on child protection plans at 50.4 per 10,000 compared to the English rate of 42.1 per 10,000.

7.175 As of March 2024, there are 243 care leavers and 708 children in need. Children in need are defined in the 2019 Government Review of Children in Need as a group supported by children's social care who have safeguarding and welfare needs, and includes: children on child in need plans; children on child protection plans; looked after children; and disabled children.

7.176 Following a population spike in the 10-15 age group and a shifting age profile, this has resulted in this age category making up 41.4% of children looked after. The 16-18 age group is the next highest, containing 25.1% of looked after children.

7.177 There is a significant number of looked after children who may require additional specialist support. Nationally, unmet demand for supported housing is among the highest for young people leaving care, with 60% of authorities having reported an unmet need (Supported Housing Review, 2024). Supported housing is defined by the Supported Housing Review as accommodation which is provided alongside care, support or supervision to help people with specific needs to live as independently as possible in the community.

7.178 58 children in the care of the Council have a disability, with the highest need being learning disabilities and autism. 41% of looked after children in the borough have an emotional wellbeing that is a cause for concern. The Council intends to build on the range of quality community-based support services to support those with disabilities, which may include personal assistants, independent living skills training and social activities.

7.179 The Council are currently purchasing from external providers:

- 103 fostering placements
- 45 residential/residential education settings
- 38 supported accommodation settings
- 6 home care providers
- 5 supported lodgings/shared lives provision

7.180 Looked after children in Telford & Wrekin are homed in a range of different placement types. Foster care is the most common placement type for children, with 144 internally fostered, 107 externally fostered and 53 fostered by a relative or friend as of 2044 (Placement Sufficiency Report, 2024 to 2029). Telford & Wrekin has a low number of Kinship Fostering arrangements compared to many authorities where approximately one third of children in Foster Care are placed with family or friends.

7.181 However, there has been a trend of a reducing Foster Carer cohort which is set to worsen. Across England, there has been a higher number of enquiries into becoming a Foster Carer, but the number of enquiries that have led to approval has declined from 7% in 2013 to 1% in 2022. This is due to a higher number of applicant withdrawals (nearly 50% of applications) and fewer enquiries progressing to formal applications.

7.182 The situation in Telford & Wrekin is more positive, with the Fostering Service able to convert enquiries into approval at a rate approximately 10 times the national average. Telford & Wrekin does, however, score relatively low regarding the perceived ability to make new Foster Care placements, particularly as this is impacted by pressures from the surrounding West Midlands where several local authorities fall into the bottom 10% nationally. There is a need for action to increase the recruitment of foster carers as identified in the Placement Sufficiency Report 2024 to 2029.

7.183 There are a relatively small number of children placed in residential children's homes at 41 according to the Placement Sufficiency Report 2024 to 2029. This number has remained relatively consistent across recent years. Nationally, there have been increases in Children's Home provision to meet gaps in need, whereas children's social care in Telford & Wrekin has been able to scale placement types according to an increased number of looked after children.

7.184 The number of looked after children in children's homes is projected to decrease to 25 by 2028 due to changes in demographics and current practice[30]. There are projected to be fewer children and young people entering care in comparison to those 'ageing-out' or finding permanence. However, if the recently identified trend of a greater number of older-aged children entering care compared to those ceasing to be looked-after continues (rather than being treated as anomalous), it is likely that Children's Homes will be required at a greater proportion[31].

7.185 Since 2020, there has been a recent increase in the number of looked after children in Semi-Independent Living from almost none to 46 according to the Placement Sufficiency Report 2024 to 2029. This can be attributed to legislation changes discouraging the use of fully independent placements, as well as the number of older children in care in Telford & Wrekin. The sustainability of this trend towards high utilisation of Semi-Independent Living is challenging, particularly if the number of cared for children remains at its high rate. To potentially maintain a sustainable usage of this type of accommodation, the rate of looked after children would need to reduce to a level similar to that of the national average, which is currently being projected[32].

7.186 Telford & Wrekin is in the lowest 10% nationally for placement with parents. The statistics published within the Placement Sufficiency Report 2024 to 2029 reveal there were 22 children in care placed with their parents. This presents the potential opportunity for a strategy to manage the reunification of looked after children with parents if and where appropriate.

7.187 The long-term data trend concerning the rates of children entering and leaving care indicates

[30] Placement Sufficiency: Cared for Children & Care Leavers (2024 to 2029), Table E, page 52
[31] Placement Sufficiency: Cared for Children & Care Leavers (2024 to 2029), page 52
[32] Placement Sufficiency: Cared for Children & Care Leavers (2024 to 2029)

that there will be a decrease in looked after children over the next 5 years, bringing the rate of cared for children in Telford & Wrekin down to just above the national average. This is partly due to the high numbers of those aged 10-15 and 16-18 'ageing out' of the system. However, there is still a need to provide care leavers with appropriate accommodation as outlined in the Written Ministerial Statement published in May 2023.

7.188 Given the projections outlined above, it is likely that the Council will see a reduced demand for certain types of accommodation for children in care, specifically children's homes, alongside a general decline across many accommodation types. **However, it is recommended that the Council ensure there is a continued supply of suitable accommodation available if the number of looked after children begins to increase, or alternatively, if the fall in foster parenting seen nationally presents further challenges. Strategies and efforts to support foster parents and encourage foster parent enquiries should be developed further.**

7.189 Placement with Parents, where suitable, presents a potentially significant opportunity to the Council. Living arrangements with kin are described as a 'first option' for children in care as outlined in the Children and Young Persons Act 2008, yet the Council sits in the bottom 10% nationally for children being Placed with Parents. **The Council should take measures and implement strategies to support families and potentially allow for the appropriate placement of children with parents.**

7.190 **It is also recommended that the Council continues to review the capacity of Semi-Independent Living options to assess whether the current trend of high utilisation by older children is sustainable and can be accommodated into the future.**

7.191 **Due to the upcoming 'ageing out' of many children in the care of the authority, the Council need to ensure there is an adequate supply of accommodation to support care leavers in their transition out of the care system. An expansion of care leaver accommodation, including supported housing, may be required. The Council may wish to consider including a positively-worded criteria-based policy within the Local Plan to support the development of this type of accommodation and to monitor the availability of stock going forwards relative to the baseline evidence.**

7.192 The Council must also ensure that in the above recommendations there is the capacity to provide a range of suitable accommodation options for those with more complex needs including both physical and mental disabilities.

7.193 Any proposed developments must align with Ofsted's Location Assessment to be situated in the most appropriate locations. This ensures that looked after children have a home in a safe location which also meets their needs through accessibility and the promotion of positive opportunities.

8.0 CONCLUSIONS

8.1 DLP Planning were instructed by Telford & Wrekin Council to undertake an update to the Economic and Housing Development Needs Assessment (EHDNA) Part 1 to reflect the release of revised and up to date Mid-Year Population Estimates (MYEs), 2021 Census data and the new National Planning Policy Framework (NPPF, December 2024), and to finalise the contents of the Part 2 EHDNA for publication.

8.2 The objective of the update is to identify future housing growth needs across Telford & Wrekin for the period covering 2023 to 2040. An assessment of employment needs does not form part of the scope for this EHDNA Update.

8.3 This EHDNA Update provides up-to-date evidence on housing needs in Telford & Wrekin, including the overall housing need, need for affordable housing, housing mix and the needs of specific groups (as required by paragraph 63 of the NPPF).

8.4 The findings and recommendations set out in this EHDNA Update have been used to inform the housing policies in the emerging Telford & Wrekin Local Plan.

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