



Date: 04/02/2025

Our ref: JD/VP-TWLP

Dear

**Ref: Telford & Wrekin Local Plan review – development needs**

I am writing to you regarding the request that Dudley Council has made to Telford & Wrekin Council to assist in meeting the city councils unmet housing development needs.

The draft Local Plan consultation concluded in January 2024 and a number of responses were received from the following Black Country Local Planning Authorities (LPAs), Wolverhampton, Dudley, Walsall and Sandwell in relation to the contribution that Telford & Wrekin Council towards unmet housing development needs. As part of developing the draft plan the Council had identified a contribution of 81 homes per annum. In summary the Council had identified what it considered was a justified alternative to the previous calculation of local housing need using the pre-December 2024 standard method, taking account of demographic trends and market signals. Within this context, and as part of positive plan-making, the Council considered that an offer to contribute to the unmet housing needs should be made based on the difference between housing need indicated by this justified alternative and the middle of three options previously published for consultation in October 2020.

The Council is progressing under the new NPPF (Dec 2024) which includes the new Local Housing Need figure of 857 homes per annum. The Council has commissioned an update to its EHDNA to reflect that the revised standard method represents the mandatory minimum number of homes to be planned for and that the local housing need the Plan must address is based on this figure.

The Council is also maintaining a consistent position regarding its housing requirement of 1,010 homes per annum into the Regulation 19 version of the Local Plan. The Council also recognise that there is a significant level of unmet need across the four LPAs, current published figure stands at 30,427. 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.

The Council has also considered the responses received and matters raised during previous consultation. The continued selection of the proposed requirement reflects demographic trends, housing market and migration links with the Black Country and recent build rates together with specific evidence of the extent of unmet need declared by the four LPAs. For example, 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 c126 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.

Therefore, in the interests of meeting the NPPF requirements the Council are prepared to offer a contribution of 153 homes per annum to the unmet housing needs of Wolverhampton, Dudley, Walsall and Sandwell LPAs. This offer is additional to the result of the Government's standard method generating a local housing need of 857dpa.

It is also the Council's view that in light of the revised Local Housing Need figures, the published unmet housing need and the contributions that the Black Country LPAs have received to date there is a need for the four LPAs to set out how they will maximise their housing land supply. The lack of Green Belt reviews in the plans progressing to Regulation 19 stage need to be addressed so as to reduce the need to ask for further contributions in future iterations of the plan making.

It is the Council's position that any contribution towards unmet housing development needs will be made to the four LPAs as a whole. It will then be for the four LPAs to apportion this figure amongst themselves. This approach is consistent with the discussions held on Duty to Cooperate matters to date.

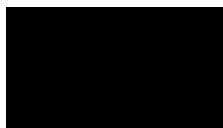
It is also the Council's view that due to the contained nature of the borough and the relative proximity to the Black Country area via the M54 and rail line any contribution will be 'top sliced' from the Council's annual housing completions and, subject to adoption of the plan will be back dated to the plan start date. The Council are clear that it is not necessary or practical to identify specific sites that would meet this contribution, this is consistent with discussions held to date.

Subject to cabinet approval on Thursday 13 February, the Regulation 19 (Publication) version of the Local Plan review will be presented to Full Council on Thursday 27 February. If approved by Full Council, the Local Plan will then be published to allow the public and stakeholders to make final comments as regards matters of soundness and legal compliance before the plan and any comments made are submitted to the Government's Planning Inspectorate for examination.

The plan and accompanying evidence base will be published to allow members of the public and stakeholders to make final comments between the 17 March and 5 May 2025, subject to the approval of Full Council. Following publication of the plan documents, on the 17 March, and evidence base comments can be made via [www.telfordandwrekinlocaplan.co.uk](http://www.telfordandwrekinlocaplan.co.uk).

On the basis of the above the Council have clearly taken a positive approach to assisting your organisation meet its unmet development needs. Therefore, I would be grateful if you would please confirm that, in principle, you're in agreement with this approach.

Yours sincerely



**Director – Prosperity & Investment**