

100
YEARS



**Campaign to Protect
Rural England
Shropshire**

**Representor ID: E170
CPRE Shropshire**

**Examination of the
Telford and Wrekin Local Plan Review 2021-2041**

**Hearing Statement for:
Matter 3: Strategic Policies (Housing)**

January 2026

1. Issue 1: The approach to the housing requirement

Question 26. The housing requirement:

- 1.1 The annual housing need for Telford is 881 dwellings per annum (dpa) using the Standard Methodology (SM). It has risen from 857 dpa in 2024 due to inherent inflation in the new methodology.
- 1.2 That methodology is based on a percentage of existing housing stock and does not reflect the extent to which an area is expected to grow (or not), so in most areas, including Telford, leads to figures above genuine demographic need.
- 1.3 The problem is worse because the affordability add-on has been raised and, in Telford's case, amounts to 32% of the total.
- 1.4 The resulting SM requirement can only to be achieved with significant in-migration.

Table 1: Need Calculations for Telford (2024 affordability)

Telford Need 2022-2041 (including 2023 affordability uplift)	Base Rate (dpa)	Affordability Add On	Percentage Add On	Total (dpa)	Plan Period (20 Years)
New Standard Methodology	668	213	32%	881 (857)	17,620 (17,140)
Old Standard Methodology (Using ONS 2014)	383	51	13%	434 (463)	8,680 (9,260)

- 1.5 The old methodology was significantly lower for Telford. Even the February 2025 EDHNA update which used the 2018ONS figures (Table 4), (heavily redistributing housing to Telford), only justified 767 dpa.
- 1.6 And while a comparison of the baseline Interim 2021 CENSUS results (Table 2) supported the use of the ONS2018 figure for Telford, across the West Midlands the best household match was the ONS2016 figures which suggested higher CENSUS figures in Telford reflected in-migration resulting from existing Local Plan targets.

Table 2: Comparison of CENSUS and ONS Projections for Telford

Population				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	185,600	174,800	179,100	183,627
Difference to Census		-10,800	-6,500	-1,973
Household				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	76,500	72,014	71,255	72,881
Difference to Census		-4,396	-5,245	-3,619
Household Size				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	2.43	2.43	2.51	2.52
Difference to Census		0	0.08	0.08

- 1.7 The SM is a minimum (NPPF, Para 62). However, the Plan's requirement of 20,200 (to 2040) is 2,580 above the SM figure.

Economic and Housing Development Needs Assessment Update (February 2025)

- 1.8 To support Telford's approach the EHDNA Update (Edge Analytics) modelled population growth using alternative assumptions (as set out in Table 2).

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

- 1.9 The dwelling-led approaches converted the Plan's housing numbers (under old and new methodologies) into population figures, then considered two assumptions about household

size. Both assumed Household Representative Rate (HHRs) returned to the ONS2014 household projection levels (the 'PR' assumption was only partial).

1.10 As the EHDNAU explained (Para 3.35):

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.

1.11 And in Para 3.74:

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.

1.12 These assumptions may be wrong. Critically the factors suppressing or delaying household formation, particularly among young people, may be structural. If neither assumption proves correct household sizes will stay higher.

1.13 The PG Scenarios projected forward population growth from the past 5 or 10 years. The 5-year scenario reflected higher recent growth, mainly from in-migration.

1.14 As Para 3.52 of the EHDNAU explains:

The most recent five-year migration trend corresponds to an exceptionally high level of population change in Telford and Wrekin principally driven by high levels of net population gain from internal migration within England and Wales and in-part associated with recent levels of housebuilding.

1.15 The importance of migration is further stressed in Para 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.

- 1.16 Nevertheless, only the 5-year growth figure (predicated on high in-migration) suggested a need above the SM figure.
- 1.17 All scenarios relied heavily on net in-migration. In the two plan-led scenarios, for example, it amounted to either 26,894 out of 28,948 or 30,736 out of 33,228 homes.

Existing Plan

- 1.18 The recent high population growth is not surprising given how the existing housing target was derived. The 864 dpa in the current plan (17,280 from 2011-2031) resulted from housing needs work by Peter Brett Associates (PBA. March 2015).¹
- 1.19 They identified a need of 483-497 dpa (Para 3.25) but then considered a scenario of 750 dpa to boost Telford's population, support economic growth and reach Telford's planned population size of 225,000.
- 1.20 The 864 dpa in the Plan exceeded PBA's highest growth suggestion and has been itself exceeded in delivery terms, especially since 2015.
- 1.21 By 2021 the Council had delivered 1,244 more houses than required (according to the 2022 Housing Land Supply Statement, (Table 1.1)) even allowing for a dip in 2020-2021.
- 1.22 If Peter Brett's figure represents a demographic base, there has been planned over-supply of some 360 dpa, 3,600 up to 2021, or 4,800 including additional actual supply, consistent with the observed difference in the CENSUS.

Employment Needs

- 1.23 A final question is whether this growth would meet Telford's employment needs.
- 1.24 Section 9.0 of the October 2020 EHDNA considered future employment land needs by comparing three econometric forecasts: Cambridge Econometrics, Oxford Economics and Experian, along with a Growth Scenario (the Experian forecast with upward adjustments to growth sectors identified in the Marches LEP's Local Industrial Strategy).

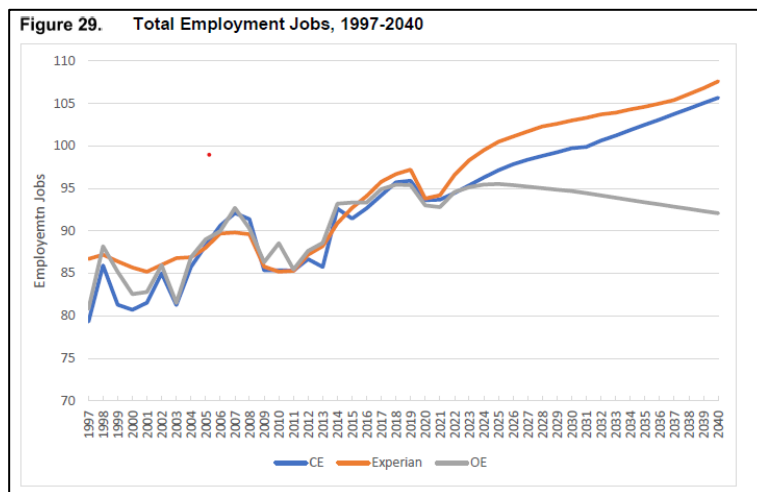
¹ Telford & Wrekin Objectively Assessed Housing Need Final Report, March 2015

1.25 The key results are shown below.

Table 3 Result of Employment Population Modelling (from EHDNA)

EHDNA Table	Model	Total Employment Growth 2020-2040	Yearly Growth
Table 46	CE	12,100	605
Table 47	OE	-900	-45
Table 48	Experian	14,000	700
Table 49	Growth Scenario	17,100	855

1.26 The considerable variation is evident in Figure 29 of the EHDNA.



1.27 The difference between these approaches is discussed in Paras 7.5-7.23. The key conclusion is set out in Paras 7.47-7.48:

Taking all of the analysis set out above into account, and drawing on analysis throughout the various other sections of this report, the Experian forecast is considered to provide the most positive yet realistic basis for planning for future economic growth in Telford & Wrekin compared to the other forecasts.

However, in accordance with PPG, assessments of future economic growth should take account of LEP Local Industrial Strategies (LIS).

1.28 The latest EHDNAU does not update this evidence although Para 3.50 considers how the housing requirement might be influenced by economic needs, saying:

*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, or 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.*

1.29 But even when adopting the most optimistic projection, the Growth Scenario (which is an optimistic forecast linked to LEP aspirations, and not a firm basis for plan-making), the SM is in line with forecast jobs, and also contributes to Black Country needs.

1.30 **We, therefore, see no need for a requirement above the SM figure of 17,620 dwellings, and all additional supply should support needs in other authorities.**

Question 27. The Black Country:

1.31 Policy S4 sets out the contribution to Black Country (BC) housing need. The Duty to Cooperate statement considers how this might be apportioned (although that is not in policy).

1.32 We welcome this improvement from the Regulation 18 Plan which did not include a separate BC allowance, especially since evidence suggests in-migration would represent a higher component than this contribution.

1.33 The approach is supported by Para 3.57 of EHDNAU which refers to the published figure of BC unmet need of 30,427 dwellings, based on the November 2024 Statement of

Common Ground (SoCG) position statement, the last agreed housing need document across the Greater Birmingham and Black Country Housing Market Area,².

- 1.34 That is out of date as it was based on the 2023NPPF SM.
- 1.35 Currently Dudley, Wolverhampton and Sandwell are progressing plans under the transitional arrangements.
- 1.36 Walsall, meanwhile, is assuming a shortfall of 4,979 in their recent Regulation 18 Plan, (although CPRE consider there is additional supply).
- 1.37 More notably, the recent Birmingham Regulation 18 Plan acknowledges a surplus of 13,306 dwellings (the new SM drastically cuts Birmingham's need, partly by removing the 35% urban uplift).
- 1.38 CPRE consider that underestimates their windfall supply and Birmingham actually has a surplus of at least 23,926, which an uplift in city centre densities and bringing empty homes back into use could increase, something Birmingham are actively looking at.
- 1.39 Birmingham's supply has also consistently improved during their plan making process. For example, in the eighteen months between Issues and Options and Preferred Option the acknowledged 2023SM shortfall fell from 78,415 to 46,153, a drop of 32,262 or 41%.
- 1.40 The table below includes CPRE's most conservative calculation for Birmingham's surplus and the highest figure for Walsall.

Authority	Plan Stage (used in SoCG)	Relevant NPPF	Shortfall (in SoCG)
Birmingham	Regulation 18	NPPF2024	-23,926
Dudley	Regulation 19	NPPF2023	699
Sandwell	Regulation 19	NPPF2023	15,916
Walsall	Regulation 18	NPPF2024	3,621
Wolverhampton	Regulation 19	NPPF2023	10,398

- 1.41 This suggests an overall BC shortfall of 30,635 dwellings, or 6,708 including Birmingham.

² [Appendix 2 - 2025.01 Officer agreed GBBCHMA SoCG.pdf](#) (Stratford-on-Avon District Council website)

- 1.42 There are on-going discussions about the apportionment of Birmingham's surplus (not only with BC) to inform a new SoCG. Until that is published it is hard to quantify exact levels of unmet need.
- 1.43 And those bare figures do not account for the impact of sites currently proposed for allocation, particularly important in Walsall (currently at Regulation 18 stage) where most are in Green Belt and virtually none are grey belt.
- 1.44 We, therefore, support the allocation of housing in Telford for the Black Country but do not think commuting rates are the most relevant measure as they do not reflect the level of out-migration inherent in this and previous plans.
- 1.45 **Based on our analysis of supply (below) we believe the contribution should be at least 6,382 dwellings over the plan period.**

2. Issue 2: The five-year supply and overall housing supply position.

- 2.1 At the time of Table 4 of the Plan there were 11,612 homes in the system. These came from commitments (sites with permission not expired), sites with resolution to grant existing housing, planning approval and remaining Local Plan housing allocations.
- 2.2 A further 8,588 homes would be provided to exactly meet the 20,200 requirement. A final figure of 429 was added to Table 4 although we were unclear what that related to.
- 2.3 The Regulation 19 Plan included 2,043 on Proposed Housing Sites and 551 on Mixed Use Sites.
- 2.4 7,000 dwellings were identified in the Sustainable Communities identified in Policies SC1, SC2 and SC3 but only 5,595 were assumed to be completed within the plan period (although delivery could increase on larger sites if it suited developers).

Table 4: Sustainable Communities Housing Totals (Regulation 19 Plan)

Sustainable Communities	Site	Dwellings (in Plan Period)	Dwellings (Total)
SC1	Land at Bratton	2,100	2,100
SC2	Land North East of Muxton	2,305	2,700
SC3	Land North of A442 Wheat Leasows	2,190	3,100
		5,595	7,900

- 2.5 Table 4 to the Housing Topic Paper (HTP) updated this to 11,206 existing commitments plus 10,984 allocations and windfalls (to 2040), or 10,379 plus 11,539 (2041).

Table 2: Summary of Housing Supply Components

Contribution to Supply	2020-2040	2021-2041
Existing completions from start of plan period to 23/24	5,287	4,470
Housing allocations	9,424	9,859
Major site commitments	5,429	5,429
Minor site commitments	517	517
Windfall allowance	1,560	1,680
Lapse allowance	-37	-37
Total	22,180	21,918

- 2.6 However, as discussed below, the latest evidence on windfalls justifies a further 84 small windfalls as well as at least 2,000 large windfalls. This would increase the overall supply of 21,918 dwellings to at least 24,002, 6,382 above the SM figure (17,620).
- 2.7 **This could either reduce the need for allocations or increase the housing allocated to meet need in the Black Country.**

Density

- 2.8 A further supply-side issue is that the plan has no density policy. In reference to Town Centres Para 8.43 says:

Well designed, higher density major mixed use development schemes that include residential development will be supported.

2.9 Para 10.2 adds:

The Council is committed to promoting high quality design which includes its scale, massing, form, density, orientation and layout...

2.10 And Para 11.2 says:

The Local Plan will re-shape and create an urban form and density that is more conducive for cycling, walking and public transport provision.

2.11 Policy ST5 4(a) relates parking to density, and Policy HE4 1(b) provides a specific density caveat for Conservation Areas.

2.12 Table 3 of the 2023 SHELAA shows assumed densities but this has never been transferred into policy.

Table 3: Housing site density assumptions

Site location	Density assumption range
Newport	45 - 55 dwellings per hectare (dph)
Telford less than four hectares	35 - 45 dph
Telford four hectares and above	30 - 40 dph
Central Telford (in and around Telford Town Centre)	45 - 75 dph

2.13 That table may now be out of date anyway because Para 9.6 of the Plan says:

The indicative housing number is derived from the council's updated Site Density Study and the site assessment process.

2.14 That study has not been published so it is hard to know what it assumes.

2.15 Even so, based on the SHELAA figures, the densities in Telford are lower than many authorities seek to achieve. Notably central locations often aim for 100 dph.

2.16 There may be limiting factors but these are not made explicit.

2.17 It is still unclear how increasing densities could impact on supply or if additional benefits have been assessed, particularly in the centre of Telford, where higher densities could

improve the overall sustainability of the town in terms of access to services and public transport use.

2.18 The vague reference to density in the text, in among other criteria and not in policy, is unhelpful.

2.19 **A Policy specifically including minimum densities (subject to design considerations) would ensure the Plan maximised the efficient use of land and could increase supply.**

Question 28. Five-year supply:

2.20 Yes, there is a clearly identified 5-year supply, increased further if some additional large windfalls were added.

Question 29. Years 6-10 and 11-15:

2.21 There is sufficient supply for the whole plan period, especially if large windfalls are included and if delivery of the Sustainable Communities is accelerated.

Question 30. Windfalls and lapses:

2.22 NPPF Para 75 sets out how windfalls should be addressed. Importantly, neither NPPF, its glossary (nor NPPG) restrict the size of windfalls.

2.23 Para 4.40 of the Plan referred to a windfall supply of 60 dpa which was already at odds with the 2023 SHELAA average small site completion rate.

2.24 That supply figure has now been updated to 120 dpa and the justification is set out in the HTP. Table 6 shows completions from 2013-2024 and usefully now includes large windfalls.

Table 6: Average number of windfall completions in the past 3 years, 5 years, 8 years and all years 2013/14 – 2023/24

Monitoring Year	3 years	5 years	8 years	All Years
All Windfall Data available	545	388	548	696
<i>Major Applications</i>	423	256	416	570
<i>Minor Applications</i>	122	132	132	126

2.25 Yet the current windfall allocation is lower than the small windfalls achieved on any measure since 2013. Using 126 dpa would add 84 dwellings over the Plan Period.

2.26 More importantly no allowance is made for large windfalls. This is explained in Para 5.19 of the HTP:

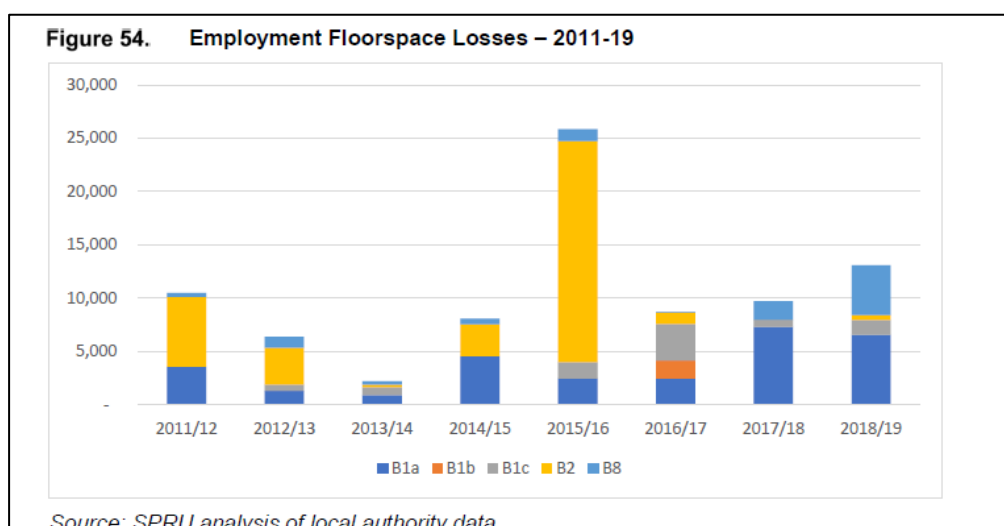
While major windfall sites can contribute significantly, its irregular nature and dependence on wider supply factors means it should not be relied upon within the annual allowance, particularly where a Local Plan is up to date and provides a clear development framework.

2.27 This justification (which would effectively rule out including large windfalls in any local plan) cannot apply throughout the plan period because, even with a good plan, large new windfall sites will inevitably come forward at some point (particularly later in the Plan Period).

2.28 It is also contrary to the Employment Needs evidence.

2.29 The 2023 EHDNA (Table 55) assumed 52.8 hectares of Employment Land would be lost over the Plan Period (still the basis for the 167 hectares employment land provision in Policy S3).

2.30 Para 9.19 of the EHDNA gave the average as 10,561 sq. m. per annum, although excluding the 2015/16 outlier year, would make it closer to 7,000 sq. m³. The replacement demand (52.8 hectares in Table 55) would then be closer to 35 hectares.



2.31 The EHDNA did not examine the reasons for this but, assuming it is partly due to change of use (and usually on sites of more than 10 dwellings), releasing half the replacement figure to

³ It is impossible to calculate exactly without the figures behind that graph

housing creates 26.4 hectares of housing land, or 792 additional homes (at a modest 30 dph).

2.32 Other large windfalls will no doubt come forward from other sources, such as retail closures and new mixed-use developments.

2.33 In our view, the EDNA figure should be considered a base.

2.34 Half the historic rate of delivery gives 3,990 dwellings, and a midpoint would be 2,391.

2.35 **We, therefore, consider an addition of at least 2,000 large windfalls would be conservative and supported by quantitative and qualitative evidence, as well as 84 additional small windfalls.**

Question 31. Sustainable Communities:

2.36 The Sustainable Communities are implicit in Table 4. They could be referred to in Policy S4 subject to their adoption in the final plan.

Question 32. Criterion 4 of Policy Strategic S4:

2.37 CPRE support this approach to ensuring sites are delivered and consider it is sufficiently clear.

Question 33. Criterion 5c of Policy Strategic S4: 'brownfield first' approach:

2.38 CPRE support a brownfield first approach and proactive support for suitable windfall development. However, further explanation may be welcome.

Word count:

2,968 words (excluding title page and this paragraph).