



Shropshire Council Local Plan Examination

Matter 2 – The duty to co-operate

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MATTER 2 – THE DUTY TO CO-OPERATE

Question 5: What is the justification of 1500 homes to meet some of the unmet housing need from the Black Country?

- 1.1.1 The latest expected shortfall from the Black Country is 28,239 homes. This is the figure that was consulted upon from August to October 2021. As is set out in the statement of common ground with the Black County Authorities (EV042), whilst discussions with neighbouring authorities are ongoing it is still anticipated that there will be a residual shortfall in the period 2020-2039.
- 1.1.2 Whilst there is support for a contribution towards meeting some of these unmet needs the Black Country authorities are seeking an early review mechanism be inserted into the Shropshire Local Plan. Shropshire Council is resistant to such an approach and an element of disagreement remains.
- 1.1.3 As there is expected to be a shortfall of housing needs within the plan period, of a need that is arising now, Gladman suggest that there would be justification for the Shropshire Local Plan to increase its contribution towards these unmet needs now, above the 1,500 homes currently included within the housing requirement.
- 1.1.4 Support for such an approach is drawn from the Hart Local Plan Inspector's report¹ (dealt with through paragraphs 33-40) into the Hart Local Plan. Hart was expected to take unmet needs arising from Surrey Heath in the current plan making cycle as there was little prospect of the needs being met elsewhere within the HMA and the figure had been quantified through a consultation document.
- 1.1.5 Furthermore, in increasing a level of unmet need now, if this is no longer required, this could be considered through a future review of the Local Plan, another point discussed in the Hart Local Plan Inspector's report.

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https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Hart%20Local%20Plan%20Report%20-%20Final.pdf

1.1.6 Through the Black Country Authorities statement of common ground, it is clear that there are locations within Shropshire that they would support housing provision being increased to credibly meet the unmet needs of the Black Country. Gladman supports such a view

APPENDIX – EXTRACT FROM HART LOCAL PLAN
INSPECTOR'S REPORT

consider this to be appropriate. The most up-to-date data provided by the Council suggests that concealed families in Hart has slightly increased, but I am not of the view that it is of such significance to require a change to the OAHN.

30. An alternative ‘stock based’ approach to calculating housing need has been suggested. However, there is no clear support for such an approach in national policy.
31. It is important to emphasise that the calculation of housing need is not an exact science. Overall and having regard to all of the above findings, I consider that an OAHN of 382 dpa is robust and should be used as the starting point for the consideration of the housing requirement in the Plan. As a consequence, it is necessary to correlate the start of the Plan period, with the base date of the SHMA, which is 2014, particularly as this results in a greater level of overall need, given its longer timeframe (2014-2032). The Plan needs to therefore be clear that the Plan period is 2014 to 2032 and changes are needed (**MM1, MM18, MM19, MM21, MM23, MM121** and **MM140**) for the Plan to be effective. The housing trajectory and completion figures (from 2014) in the Plan therefore also need to be amended (**MM139** and **MM140**) to reflect this change. This will also ensure the Plan is effective and in accordance with national policy.
32. There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF’s preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years.

The housing requirement and unmet need

33. At the hearing sessions, representatives from SHBC provided an update in relation to unmet need, which results from the heavily constrained nature of Surrey Heath. SHBC has published an Issues and Options/Preferred Options consultation of its Local Plan, which identifies a shortfall in supply of 731 dwellings over its plan period (2016-2032). SHBC advised that although there are on-going attempts to try and find more sites, this is unlikely to significantly reduce. The Council had set out that any unmet need from SHBC would occur towards the end of the Plan period, however, this view was not shared by SHBC at the hearing session, who set out that the unmet need is imminent.
34. RBC the other authority in the HMA has received its Inspector’s Report following their Plan’s examination. The Rushmoor Plan does not make any provision for any unmet need from SHBC. There is a surplus in supply identified in the Rushmoor Plan of around 1,000 dwellings. However, it is clear that this is necessary to mitigate risks from some large sites in that Plan failing to deliver as anticipated and should not be seen to be off-setting any unmet need from SHBC.

35. It was accepted by the Council at the hearing sessions that Hart is the least constrained authority in the HMA. Given this, the matters discussed above and the fact that the Rushmoor Plan is unlikely to be reviewed for a period of 5 years following its adoption, I consider that this Plan should seek to meet the identified unmet needs of SHBC of 731 dwellings, which represents the most up-to-date figure at this point in time.
36. I am not of the view that it is premature to require the Plan to accommodate the unmet needs of SHBC or that it will prejudice the plan making process in Surrey Heath. The SHBC unmet need figure is within a formal consultation document and is based on a recognised method of calculating housing need encouraged by national policy. Further, SHBC’s Issues and Options/Preferred Options consultation is supported by a SHLAA, which provides an assessment of potentially suitable sites. I am also mindful that to be positively prepared the Plan should seek to meet unmet requirements from neighbouring authorities, as set out in Paragraph 182 of the NPPF.
37. In terms of any potential additional impacts on the environment and infrastructure from accommodating the unmet need, I have found under Matter 4 that the Plan can accommodate the unmet need from SHBC without the need to include additional sites, albeit with a relatively modest shortfall of 230 dwellings during the last year of the Plan period.
38. It has been suggested that SHBC is able to provide circa 350 units per annum between 2023-2027 whilst in the latter years they are only able to demonstrate approximately 130 dpa. However, even if I was to accept that this was the case, this would appear to ignore more immediate needs before 2023.
39. If in the future, the SHBC unmet need changes either positively or negatively, this will need to be considered in a future review of the Plan or could trigger an early review if necessary. Notwithstanding this, I am mindful that housing requirements are not maximums and Hart accommodating the currently identified unmet needs of SHBC would not rule out sustainable development being permitted in SHBC.
40. Accommodating SHBC’s unmet need would add 41 dpa to the housing requirement over the revised Plan period (2014 to 2032), which would result in a total housing requirement of 7,614 dwellings over the Plan period, which equates to 423 dpa. Modifications (**MM10, MM19, MM21, MM26 and MM139**) are therefore necessary to the strategic objectives, Policy SS1, its supporting text and the housing trajectory to amend the housing requirement. This will ensure that the Plan is positively prepared and in accordance with national policy.

Affordable housing

41. The SHMA calculates the level of affordable housing need within the HMA and for each of the authorities. In Hart the identified need for affordable housing

