

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0487
Matter	Matter 4 – Housing & Employment Land Needs (Policy SP2)
Relevant Questions Nos.	1, 2, 3, 4, 5 & 6

SHROPSHIRE LOCAL PLAN EXAMINATION
MATTER 4 – HOUSING & EMPLOYMENT LAND NEEDS (POLICY SP2)

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission Local Plan consultation dated 26 February 2021. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document (ID7) issued on 12 April 2022.

Issue : Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall provision for housing and employment land.

Questions - Housing

Q1. Is the preferred approach to housing growth and the housing requirement set out in Policy SP2 of 30,800 dwellings (1,400 dwellings per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

The HBF support the Council’s preferred approach to housing growth. Policy SP2 sets out a housing requirement of 30,800 dwellings (1,400 dwellings per annum) between 2016 – 2038, which is above the minimum LHN. There are justifications for this higher housing requirement including the aspirations of the Economic Growth Strategy for Shropshire, past housing delivery rates, the delivery of affordable housing need and a contribution towards meeting unmet housing needs from the Black Country.

The Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID:2a-010-20190220). The NPPG states that a higher figure “*can be considered sound*” providing it “*adequately reflects current and future demographic trends and market signals*”. However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement, the HBF contend that the Council could have been more ambitious (see HBF answers to Q2 and Q3 below).

Q2. Is the housing requirement in the Local Plan appropriately aligned with forecasts for jobs growth?

Policy SP2 proposes delivery of around 300 hectares of employment land. The Shropshire Economic Development Needs Assessment (EDNA) Final Report by Lichfields dated April 2021 (EV043) indicates that using a labour supply scenario (net jobs growth of +12,145), a housing requirement of 1,400 dwellings per annum aligns with an employment land requirement of 151 hectares (Table 8.17). Therefore, there is a misalignment between the

housing requirement and the employment land requirement in Policy SP2, which is confirmed in the ENDA (para 9.10). The HBF contend that the Council could have been more ambitious with its housing requirement to achieve a sustainable balance between housing and employment growth.

Q3. What provision is made within the Local Plan to fulfil the identified unmet housing needs of the Black Country, and will the Local Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?

The Local Plan makes provision for only 1,500 dwellings to meet unmet needs from the Black Country, which is incorporated into the overall housing requirement and distributed in accordance with the proposed development strategy. The Local Plan's approach of not specifying a site allocation or settlement to meet this contribution is effective and sustainable. However, a higher housing requirement to balance housing and employment growth (see HBF answer to Q2 above) would also make a greater contribution to unmet housing needs from the Black Country and reduce in-commuting.

Q4. The soundness of proposals for the land allocations in the Local Plan will be considered at Stage 2 of the Examination. However, given that many 'saved' sites which are not before us are included in the housing land supply, is it realistic that this examination can determine if the Council have a 5-year supply of deliverable housing land?

This Examination could only determine the Council's 5 YHLS if detailed information about the deliverability of "saved" sites included in the 5 YHLS is provided. The deliverability of "saved" sites in the 5 YHLS should be subject to the same level of scrutiny as proposed site allocations.

Q5. The Council in response to our initial questions said that they wish to 'fix' their 5-year housing land supply and have included 10% buffer. Assuming it is agreed that we can determine if the Council have a 5-year supply of deliverable housing land, PPG at Paragraph: 010 Reference ID: 68-010-20190722 says that "When confirming their supply through this process, local planning authorities will need to be clear that they are seeking to confirm the existence of a 5 year supply as part of the plan-making process, and engage with developers and others with an interest in housing delivery (as set out in Paragraph 74a of the Framework), at draft plan publication (Regulation 19) stage." Can the Council please confirm if they did this and if so, provide evidence of it?

The Council and relevant developers / promoters of individual housing sites should confirm that this engagement was carried out.

Q6. Should the Local Plan include a housing trajectory showing the expected rate of delivery of housing land?

The Local Plan should include a detailed housing trajectory.