

**ID 10**

## **SHROPSHIRE LOCAL PLAN EXAMINATION**

<b>Representor unique Part A Ref *</b>	<b>A0073</b>
<b>Matter</b>	<b>4</b>
<b>Relevant questions nos</b>	<b>1, 6</b>

### **Stage 1 Hearing Statement**

\*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>



# Hearing Statement on behalf of The Strategic Land Group Ltd (ID: A0073)

In relation to: Matter 4 - Housing and Employment Land  
Needs (policy SP2)

Shropshire Local Plan Examination

Emery Planning project number: 22-185

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Project : 22-185  
Hearing : Land at Adderley Road,  
Market Drayton, tbc  
Client : The Strategic Land Group  
Ltd

Date : 1 June 2022  
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## 1. Introduction

- 1.1 Emery Planning is instructed by The Strategic Land Group Ltd (hereafter referred to as "SLG") and Bellway Homes Ltd to attend the Shropshire Local Plan Examination. SLG has an interest in draft allocation MDR006: Land adjoining Adderley Road and there is an agreement in place for Bellway Homes Ltd to acquire the site.
- 1.2 This hearing statement sets out our response to the Inspector's Stage 1 Matters, Issues and Questions in relation to Matter 4 - Housing and Employment Land Needs (Policy SP2). It should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan, and our other Hearing Statements submitted to this examination.

## 2. SLG response to the Inspectors' questions

### **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?**

#### **Expressing the requirement as a minimum**

- 2.1 The housing requirement set out in Policy SP2 is not consistent with national policy in respect of the use of the word 'around'.
- 2.2 Policy SP2 sets a requirement to deliver 'around' 30,800 new dwellings and 'around' 300 hectares of employment land over the plan period from 2016 to 2038. This equates to 'around' 1,400 dwellings and 15ha of employment land per annum. We object to the policy as currently drafted, as the use of the word 'around' is not consistent with national policy.
- 2.3 Paragraph 60 of the Framework sets a requirement to 'boost significantly' the supply of housing land. Paragraph 61 of the Framework also makes reference to determining the minimum number of homes needed.
- 2.4 We therefore consider that the current wording of Policy SP2 in relation to the housing requirement is not consistent with national policy. The housing requirement should be expressed as a minimum, rather than as an estimate. This matter was also highlighted in our client's previous representations.

2.5 This issue has been considered by Inspectors during the Lichfield District Local Plan Strategy and Middlesbrough Council Housing Local Plan examinations. In the case of Lichfield, the Inspector's Report concluded at paragraph 58 that:

*"Given the need to boost significantly the supply of housing land and given that the argument has not been made that factors such as Green Belt restrict the ability of the District to meet its objectively assessed need, this figure should be expressed as a minimum as is proposed in MM2."*

2.6 The Middlesbrough Council Housing Local Plan Inspector's Report (October 2014) also provided the following at paragraph 21:

*"It should be made clear in the LP that the requirements are generally to be seen as minimum requirements to ensure the LP is effective and does not stifle development unnecessarily through the imposition of ceilings."*

2.7 The Evidence Base for the draft plan indicates that there is a need for a minimum 30,800 dwellings over the plan period from 2016 to 2038, including the provision of 1,500 to support the housing needs of the emerging Black Country Plan. Paragraph 3.6 of the draft plan reiterates that this level of housing is necessary to meet housing need and support the long-term sustainability of the County. There is no reason, therefore, why the housing requirement outlined in Policy SP2 should not be expressed as a minimum.

2.8 On this basis, we consider that Policy SP2 should be amended to make it clear that the housing requirement is a minimum of 30,800 dwellings over the plan period from 2016 to 2038, in order to significantly boost the supply of housing land and comply with national policy.

## **Housing need and the housing requirement**

2.9 A housing requirement in excess of local housing need as established by the standard method is justified.

2.10 Paragraph 010 (Reference ID: 2a-010-20201216) of the NPPG sets out circumstances in which it might be appropriate to plan for a higher housing need figure than the standard method indicates. These include, but are not limited to:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals)
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally

- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground
- Previous levels of housing delivery in an area, or previous assessment of need are significantly greater than the outcome from the standard method
- Cities and urban centres, not only those subject to the cities and urban centres uplift, may strive to plan for more homes to make as much use as possible of previously-developed or brownfield land

2.11 This is an open list, and Local Authorities are not limited to these circumstances to justify a housing requirement which is higher than the local housing need. It is therefore acceptable in policy terms for the housing requirement to be in excess of local housing need.

2.12 Paragraph 61 of the Framework provides:

*"To determine the **minimum** number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, 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." (Emphasis added)*

2.13 National policy and guidance is therefore clear that local housing need is used to determine the minimum number of homes needed. The wider context is that numerous authorities across the country will not meet, or even come close to meeting, their minimum local housing need over the next 5 years. For example:

- Of the 20 authorities where the cities and urban centres uplift of 35% has been applied, 9 have adopted housing requirements which are less than 5 years old<sup>1</sup>.
- The London Plan was published in March 2021 following a lengthy examination. The London Plan sets a target of 52,287 dpa. However, total housing need for Greater London as derived by the standard method is 93,579 dpa. Therefore, the shortfall for London alone is approximately 40,000 dpa.
- Some authorities, such as Central Bedfordshire, have successfully argued that there are exceptional circumstances which warrant a departure from the standard method and

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<sup>1</sup> London, Birmingham, Leeds, Coventry, Bradford, Kingston upon Hull, Plymouth, Derby & Reading

that a significantly lower figure should apply, due to specific issues with the 2014-based household projections such as unattributed population change.

- Some authorities will be unable to meet their local housing need due to physical and infrastructure constraints. As Shropshire have identified, in this case there are neighbouring authorities telling Shropshire that they cannot meet their own needs.

2.14 Consequently, if the Government's target of delivering 300,000 dwellings per annum to address the national housing crisis is to be met, the Government is relying upon numerous authorities adopting housing requirements which exceed their minimum local housing need as established through the standard method.

2.15 The local housing needs assessment (2020 base date) carried out by the Council identified a minimum local housing need of 1,177 dwellings per annum for Shropshire using the Government's Standard Method. This does not take into account other factors, such as Council's economic strategy or ambitions, affordable housing need, or any allowance for meeting any unmet needs from the Black Country.

2.16 Recent delivery in Shropshire has been significantly above local housing need. In the five years since the beginning of the proposed plan period (2016), completions have averaged 1,754 dwellings per annum (GC4i, figure 16). In the context of the Government wishing to see ambitious authorities adopt housing requirements in excess of local housing need, it would be a significant backwards step if Shropshire was to plan to reduce housing delivery to the baseline local housing need, rather than boost it.

2.17 It can also be noted that the affordability ratio for Shropshire rose between 2020 and 2021, from 7.97 to 9.05, indicating a worsening of market signals. This is despite delivery in the last 5 years being significantly above local housing need, as discussed above. This is further justification for a housing requirement which exceeds local housing need.

2.18 Furthermore, whilst local housing need utilises the 2014-based household projections, more recent projections are capable of being a material consideration. The 2018 Sub-national Population Projections to 2043 indicate that the number of households in Shropshire is expected to increase by 24% (32,900) between 2018 and 2038 - an additional 1,645 households per annum. Therefore, whilst the 2014-based projections are presently used to determine the starting point for assessing



housing need, the proposed housing requirement of 30,800 dwellings may not be sufficient to meet the future needs of Shropshire over the plan period.

- 2.19 There are also very significant levels of affordable housing need in Shropshire. There is a net need for 799 affordable homes per annum (EV097.02, table 35). Furthermore, there are approximately 5,800 households on the Council's affordable housing register (CG4i, paragraph 4.5). The PPG is clear at paragraph 2a-024 that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. In our view the level of affordable housing need in Shropshire justifies in itself an increase in excess of the requirement currently proposed in the plan.
- 2.20 In terms of meeting the unmet needs of neighbouring authorities, the PPG is clear that this is an example of where a housing requirement in excess of local housing need should be considered. Shropshire Council has dealt with this matter in its own evidence (GC4 & GC4i). Notwithstanding the Council's own evidence, there is other justification for pursuing a higher housing requirement, irrespective of the Black Country's unmet needs.
- 2.21 Therefore, the higher housing requirement figure than indicated by the standard method is justified. In fact, we consider that an even higher figure could be justified due to the scale of affordable housing need in Shropshire.

### **Housing land supply and trajectory**

- 2.22 There are discrepancies in the evidence relating to housing land supply for the plan period. The Housing Trajectory (GC4p) indicates a housing supply of 32,781 dwellings, whilst Appendix 5 of the Draft Local Plan only amounts to approximately 27,750 dwellings. Annex 1 of the Five Year Supply Statement 2021 (GC4j) also summarises that the housing land supply across the plan period is approximately 34,589 dwellings. Furthermore, Figure 2 of the Housing Trajectory indicates that 7,914 completions are predicated in years 1-5, whereas the Five Year Supply Statement suggests a supply of 10,155 dwellings. It is not clear what evidence the Council is relying on to inform its housing land supply and the inconsistencies need to be justified and a revised housing trajectory published to clarify the housing land supply for the draft plan period in Shropshire.
- 2.23 Although we do not object to the allocation of Clive Barracks and the Former Ironbridge Power Station as strategic settlements, we do not consider that the delivery forecasts at Appendix 7 are

realistic. This issue is further discussed in our Hearing Statement in relation to Matter 7 - Strategic settlements (policies S19 - S21).

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

2.24 Yes.

2.25 As discussed above, there are currently discrepancies in the housing land supply across the evidence base and the Draft Local Plan, which need to be consolidated.

2.26 Appendices 5 and 7 of the draft plan provide information in relation to the distribution of housing and the proposed timescales for delivery on site allocations. However, this information is not sufficient to establish a detailed trajectory based on this. In accordance with paragraph 74 of the Framework, a trajectory should be prepared and included within the plan so that performance against the housing requirement can be monitored.