

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website. Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	Georgina Kean, Turley (on Behalf of Miller Homes)
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Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input checked="" type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):	Please refer to representations
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Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.

Shropshire Local Plan Examination: Further Consultation Focusing on Additional Material Prepared in Response to the Planning Inspectors Interim Findings

Miller Homes (A0682)

June 2024

Turley

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MILQ3047

Response to Consultation

Name and Contact Details: Georgina Kean, Turley (georgina.kean@turley.co.uk) on behalf of Miller Homes (“Miller” / ref: A0682).

This Representation comprises comments on the following documents:

- Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report (Examination Stage Document ref: GC44);
- Updated Housing and Employment Topic Paper (ref: GC45);
- Updated Green Belt Topic Paper (ref: GC46).

Reference to the relevant paragraph numbers; consideration to soundness/legal compliance; and comments are included within the following sections.

Attendance at Hearing Sessions: Yes, given the complexity of, and interrelationships between, issues Miller consider it necessary to attend a Hearing Session(s) to discuss the following comments made within this Representation.

1. Executive Summary

- 1.1 This Representation is submitted on behalf of Miller Homes (“Miller” / ref: A0682). Miller control land at “South West Shifnal,” as shown on the plan at **Appendix 1**, and forms the land proposed to be safeguarded under the provisions of draft Policy SP11 of the Plan.
- 1.2 Miller Homes has maintained their role as an active stakeholder within the preparation and examination of the Draft Shropshire Local Plan to date, including through individual and combined representations by Miller Homes and Wallace Land Investments. Following the acquisition of Wallace Land by Miller Homes the collective land interests are being promoted by Miller Homes, a housebuilder with a track record established over 90 years in the delivery of housing.
- 1.3 Miller Homes has attended relevant Hearing Sessions, and would wish to continue to participate in any future discussions.
- 1.4 The following representations set out Miller’s response to three key papers:
 - Updated Additional Sustainability Appraisal
 - Updated Housing and Employment Topic Paper
 - Updated Green Belt Topic Paper.
- 1.5 The remainder of this document sets out detailed responses in respect of each of the papers. However, in summary, concludes that:
- 1.6 Overall, Miller Homes continue to welcome that Shropshire Council has adopted a proactive and pro-growth approach to the principle of meeting both its own housing and employment land need as well as a quantum of unmet need from the Black Country (“Black Country Authorities” / “BCAs”), seeking to present a strategy which aims to identify and promote the most sustainable sites to meet its own need and that forecast to arise from the BCAs.
- 1.7 However, Miller Homes does consider it necessary to query the Sustainability Appraisal (SA) considerations in terms of the strategy to meet the unmet need (1500 dwellings) from the BCAs and which sites are considered to best suited to meet that need.
- 1.8 Miller also remain of the view that there is evidence of a greater housing need. The Updated Topic Paper asserts that in presenting a clear and unambiguous position it draws a clear distinction between defined housing and employment need and requirements. Our own reading of the document would suggest that the Council has not achieved this objective in so much as that it has **not provided a clear and evidential justification for its calculation of need**. This need is not just an output of a mathematical calculation, but represents real people who are in need of a home now.
- 1.9 In order to address concerns about those sites best suited to meet the identified unmet need, Miller considers that land known as “South West Shifnal” is the most

appropriate site to accommodate this need in a sustainable way that enables continued connectivity with those areas within which the need is generated. As such it is considered that the site should be proposed for allocation rather than safeguarding.

- 1.10 In the event that the Inspector's agree with Miller's conclusions regarding the presence of a greater housing need, it is also considered that land at "South West Shifnal" would offer the most logical site for allocation.
- 1.11 Regardless of whether or not the Plan includes for an increased contribution towards the unmet needs of the BCAs, the addition of an early review mechanism is required at the very least, given there is a clear and strong need that must be met over the plan period.

2. Introduction

- 2.1 This Representation is submitted on behalf of Miller Homes (“Miller” / ref: A0682).
- 2.2 Miller Homes has continued to be an active stakeholder within the preparation and examination of the Draft Shropshire Local Plan to date, including through individual and combined representations by Miller Homes and Wallace Land Investments. Following the acquisition of Wallace Land by Miller Homes the collective land interests are being promoted by Miller Homes, a housebuilder with a track record established over 90 years in the delivery of housing.
- 2.3 Miller Homes has attended relevant Hearing Sessions, and would wish to continue to participate in any future discussions.

Context: South West Shifnal

- 2.4 Miller’s representations are made in relation to c. 65ha of land being promoted at “South West Shifnal” as identified on Site Location Plan at **Appendix 1**.
- 2.5 The whole site (“SHF034”) was assessed in the “Strategic Sites Assessments” of the Sustainability Appraisal (Appendix T, SD006.21), achieving an overall sustainability score of -2 and therefore rated “Good” at Stage 2a (for housing); this score was the highest for all strategic sites at Shifnal and the best of all safeguarded land adjoining the town. Each of the individual parcels forming SHF034 were assessed. Appendix P of the document (SD006.17) includes individual assessments of sub-parcels of the site (SHF019, P15b west, SHF019VAR, SHF017 and P16a) and Stage 3 recommended that all these parcels be removed from the Green Belt and safeguarded. The “strategic considerations” and “reasoning” sections of the Stage 3 assessments considered each of the parcel’s contribution to the wider proposed site (SHF034) and provided justification for their contribution towards the safeguarded site.
- 2.6 Policy SP11 will release the land controlled by Miller from the Green Belt and safeguard it for future development needs. The Draft Local Plan acknowledges that South West Shifnal will eventually comprise a “...strategic housing extension capable of creating a new community...” and explicitly lists benefits and infrastructure improvements that will be delivered as a result (Paragraphs 5.215 and 5.216). No other safeguarded site has been similarly identified in the Draft Local Plan which properly reflects its credentials as a sustainable site which can deliver strategic benefits for Shifnal, as recognised in Paragraph 5.217 of the Draft Local Plan.
- 2.7 It is also relevant to note that in justifying the growth strategy for Shifnal the Plan (paragraphs 5.202 – 5.203) sets out the Council’s intention to recognise the level of growth that has taken place in Shifnal to date and seek to provide ‘respite’ from further development until a future date. This approach was used to justify the proposed safeguarding of the Miller sites. However, it is relevant to note that this was some three years ago, and therefore in the context of the continued delivery of sites within Shifnal it is appropriate to consider the allocation of the Miller sites now to enable certainty that housing need (from both Shropshire and the BCAs) can be met in the short to medium term.

2.8 Miller continues to strongly support the designation of South West Shifnal under SP11 as safeguarded land, and thus consider it appropriate to submit representations to this consultation, specifically regarding the “Updated Housing and Employment Topic Paper” and “Updated Green Belt Topic Paper”. Alongside this, it is also considered appropriate to submit representations to this consultation relating to the “Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.”

2.9 This Representation is structured as follows:

- **Section 3:** Comments in relation to the “Updated Additional Sustainability Appraisal;”
- **Section 4:** Comments in relation to the “Updated Housing and Employment Topic Paper;”
- **Section 5:** Comments in relation to the “Updated Green Belt Topic Paper;” and
- **Section 6:** Summary.

3. Updated Additional Sustainability Appraisal

3.1 It is recognised that a revised Sustainability Appraisal (hereafter referred to as the “Consultation SA”) has been published for consultation following a number of comments from the appointed Inspectors during the Examination in Public (“EIP”). This included a requirement to clarify the scale, nature and distribution of the unmet need from the BCAs.

3.2 This section of the representations is focused on the Consultation SA only and specifically the request from the Inspectors to undertake additional SA work to respond to a number of considered procedural deficiencies with the SA¹. These have been summarised as follows:

- Further SA work needs to be undertaken to assess the likely effects of accommodating unmet housing and employment need from the Black Country Authorities; and
- In carrying out this work, consideration also needs to be given to the selection of the preferred strategy when judged against reasonable alternatives. For example, by testing a scenario which includes the originally envisaged ‘high growth scenario’ and a contribution towards unmet housing needs.

3.3 As a result of this request from the Inspectors, Shropshire Council carried out additional SA work which identified a number of tasks which included:

- Identifying an appropriate housing requirement for Shropshire, having regard to Local Housing Need and the potential for a contribution of 1,500 dwellings towards the unmet housing needs of the Black Country;
- Identifying an appropriate employment land requirement for Shropshire, having regard to Local Employment Land Need and the potential for a contribution of 30ha towards the unmet employment land needs of the Black Country;
- Identifying an appropriate strategic distribution of development across Shropshire;
- Identifying an appropriate site(s) upon which the proposed contribution of 1,500 dwellings towards the unmet housing needs of the Black Country can be accommodated;
- Identifying an appropriate site(s) upon which the proposed contribution of 30ha of employment land towards the unmet employment land needs of the Black Country can be accommodated;
- If necessary, identifying additional housing allocations;

¹ Examination Stage Document Ref: ID28 (“Inspectors Interim Findings Letter”) Link - [id28-inspectors-interim-findings-letter-15-feb-2023.pdf \(shropshire.gov.uk\)](https://www.shropshire.gov.uk/media/128/inspectors-interim-findings-letter-15-feb-2023.pdf)

- If necessary, identifying additional employment land allocations;
 - Re-assessment of relevant draft Policies within the Draft Shropshire Local Plan, to support identification of appropriate main modifications in response to the consideration of the additional SA assessment work undertaken.
- 3.4 This additional SA work (ref: GC29) was subsequently submitted to the Examination in July 2023, with the intention of positively responding to the issues and concerns raised within ID28.
- 3.5 Upon receipt and review of this additional SA material, the Inspectors identified additional concerns² which are highlighted below given the importance of these statements to these representations:
- Paragraph 10 of ID36, reiterates paragraph 22 of ID28 and states that...*if following the additional SA work, the Council chooses to pursue the same growth option as before then it follows that the housing and employment land requirements will increase, and more sites will be required. Consideration will also need to be given to the distribution of development since accommodating some of the unmet needs may result in more sites being required in the part of Shropshire nearest the Black Country. (Turley Emphasis) It would therefore be helpful if, once the Council has carried out the additional SA work, the proposed strategy in relation to the housing and employment land requirement is set out in the topic paper requested at paragraph 12 above. The Plan should also make clear what the Council's strategy is, through main modifications.*
 - Paragraphs 15 and 16 of ID36 state that... *The SA does not appear to properly assess reasonable alternative sites to meet the unmet needs of the Black Country. Clearly sites to meet the agreed unmet needs of the Black Country are likely to be most appropriately located close to the Council's administrative boundary with the Black Country authorities. Whilst the Council identify specific sites to meet both the housing and employment needs of the Black Country the sites which have been selected are sites that underwent SA assessment to meet the needs of Shropshire as a whole and not the specific geographical needs of the Black Country. This appears to be confirmed in paragraph 9.31 of the SA as it says, 'With regard to the identification of sites, it was concluded that a comprehensive process was undertaken to identify sites for consideration within the site assessment process undertaken to inform the identification of proposed allocations within the Draft Shropshire Local Plan.'*
- 3.6 Following receipt of ID36, Shropshire Council carried out further SA work which is presented in the Consultation SA document.

²Examination Stage Document Ref: ID36 (“Substantive Letter to Council following Pre-Action Protocol Letter”) Link [id36-substantive-letter-to-council-following-pre-action-protocol-letter.pdf \(shropshire.gov.uk\)](https://www.shropshire.gov.uk/id36-substantive-letter-to-council-following-pre-action-protocol-letter.pdf)

- 3.7 Miller Homes has reviewed the Consultation SA and the associated correspondence from the Examination and would like to make a number of comments with respect to the methodology and conclusions as presented in the SA.
- 3.8 Before presenting our comments however, we do consider it important to set out the criteria identified by the Draft Local Plan for identifying sites that are considered suitable to meet the unmet needs of the BCAs. Given the commitment from the Council to provide a contribution of 1,500 homes to such unmet needs of the BCAs, Miller consider it is a reasonable and sound approach to identify sites to meet that need that are in the most sustainable locations to enable residents and workers to commute to and from the Black Country and Shropshire in the most sustainable modes possible, ideally via public transportation.
- 3.9 The original Housing and Topic Paper published in 2022 contained a description of the geographical area within which homes should be located to meet the anticipated unmet need and the features of these sites. These can be summarised as:
- Migration patterns indicate that the largest flow of people from the BCAs into Shropshire is via Dudley and Wolverhampton and vice versa³;
 - Analysis of commuting pattern data indicates that Dudley and Wolverhampton represent important commuting destinations for residents of Shropshire⁴. Shropshire is also an important destination for residents of Wolverhampton and to a lesser extent Dudley.
 - With respect to road and rail links, **Paragraph 3.64 of the Housing Topic Paper** states that: *“Shropshire and the Black Country Authorities (particularly the central and eastern portions of Shropshire and Wolverhampton and Dudley) are generally well connected by road and rail infrastructure. The A5 / M54 Corridor runs from Shrewsbury to Wolverhampton (via Shifnal and Albrighton), the A41 corridor runs from Albrighton to Wolverhampton (and also extending north into Shropshire linking with Shifnal, Market Drayton and Whitchurch), and the A454 and A458 corridors link Bridgnorth to Wolverhampton and Dudley respectively. These routes allow access to the rest of Shropshire and also to Sandwell and Walsall. Rail links are provided via the Shrewsbury to Wolverhampton railway line (with regular stops at Shifnal and Albrighton in Shropshire and Coseley and Tipton in Dudley), which then allows for onward connections in Shropshire and local connections on the urban rail network in the Black Country and Birmingham areas. “*
 - The Housing Topic Paper provided the following conclusions based on the migration, commuting and other data:
 - Migration, commuting, and road/rail links were considered stronger to Dudley and Wolverhampton and relatively less so to Sandwell and Walsall.

³ Shropshire Council. Housing Topic Paper. February 2022. Paragraphs 3.44-3.55

⁴ Shropshire Council. Housing Topic Paper. February 2022. Paragraph 3.58

- Specifically, it was considered that there are relatively stronger links to the Black Country from the eastern and central areas of Shropshire compared to the rest of Shropshire.
 - Based on this information, Miller consider it would be logical to locate any dwellings within Shropshire that are specifically intended to accommodate the unmet needs forecast to arise from the BCAs to the road and rail corridor that connects Shrewsbury to Dudley and Wolverhampton. Access to the rail network that connects these conurbations would be considered particularly important given that this would present a highly sustainable option to travel for commuters.
- 3.10 Miller Homes has reviewed the Consultation SA and broadly support the methodology deployed within the SA and specifically Sections 6 – 9 which confirms that the Council will seek to meet c 1,500 new homes from the BCAs plus an uplift on its own housing need as set out in Paragraphs 10.3 – 10.4 of the Consultation SA. It is noted within Section 4 that Miller do however remain concerned that whilst the uplift is justified, it is not positively prepared to the full extent that the evidence suggests it should be. This is explored further within Section 4.

Proposed Housing Requirement

- 3.11 Miller Homes also query the SA considerations presented within Sections 10 and 11 as these are focused on the strategy to meet the unmet need (1,500 dwellings) from the BCA and which sites are considered to best suited to meet that need.
- 3.12 Sections 10 and 11 present the summaries of the SA Assessment in terms of reasonable options for accommodating the uplift of the proposed housing requirement and the proposed employment requirement. Section 10 reiterates the position that Shropshire Council considers that “Option 3b” should form the basis for the proposed housing requirement insofar as this is “High Growth plus a 1,500 dwelling contribution to the Black Country Authorities unmet need” representing around a 15% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings), plus a 1,500 dwelling contribution toward forecast unmet housing need in the Black Country.
- 3.13 Shropshire Council has identified four reasonable options for delivering the proposed housing requirement, in particular the proposed uplift to this, including the following with updated additional SA assessment work undertaken for each of these:
- Option 1 – Increasing settlement guidelines and windfall allowances;
 - Option 2 – Densification of proposed site allocations;
 - Option 3 – Increasing site allocations; and
 - Option 4 – A combination of two or more of the other options.
- 3.14 Option 1 is considered, on balance, by Shropshire Council to be the “most sustainable” of the reasonable options.

3.15 Section 12 goes on to set out the site(s) to accommodate the proposed 1,500 dwelling and 30ha employment land contributions to the Black Country, inclusive of Table 12.3 outlining the sites identified, as follows:

Table 3.1: Sites identified through the site assessment process to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country

Site Reference, Name and Policy	Total Capacity	Black Country Contribution	Commentary as part of Representation
BRD030 Tasley Garden Village, Bridgnorth (S3.1)	1,050 dwellings 16ha employment land New local centre 20ha of green infrastructure and a 19ha linear park	600 dwellings	Not located within the Green Belt Considered to have a functional relationship with the Black Country due to A454 corridor Could accommodate sizeable contribution to unmet housing needs Does not currently have train station
SHF018b & SHF018d Land east of Shifnal Industrial Estate, Upton Lane, Shifnal (S15.1)	39 hectares (15.6ha net development)	30ha of employment land	Located within Green Belt Functional relationship with the Black Country due to strong road and rail links via the M54 corridor and Shrewsbury/Wolverhampton railway line Shifnal noted as being a key centre and focus for investment, employment, housing and development on the M54/A5 strategic corridor Could accommodate sizeable contribution towards the unmet employment needs
SHR060, SHR158 & SHR161 Land between Mytton Oak Road and Hanwood Road, Shrewsbury (S16.1)	1,500 dwellings 5ha of employment land	300 dwellings	Not located within Green Belt Functional relationship due to strong road and rail links via the M54/A5 corridor and Shrewsbury-Wolverhampton railway line.

Site Reference, Name and Policy	Total Capacity	Black Country Contribution	Commentary as part of Representation
IRN001 Former Ironbridge Power Station (S20)	Range of local services and facilities Around 1,075 dwellings Around 6ha of employment land Extensive green infrastructure	600 dwellings	<p>Constitutes a proposed sustainable urban extension, with capacity to accommodate a sizeable contribution.</p> <p>Functional relationship due to benefitting from road access to the M54/A5 corridor link to the Black Country via either the A4169 / A5523 or A4169 / A442. No reference to train station connection.</p> <p>Part of brownfield site benefitting from outline planning permission and can accommodate sizeable contribution to unmet need.</p>

3.16 It is noted that there are no new sites identified within the above list, above and beyond those already set out within the submitted Plan. Miller Homes, therefore, has concerns with respect to Sections 10 and 11 of the Consultation SA, which can be summarised as follows:

- There are concerns that the distribution strategy adopted to accommodate the uplift to the proposed housing requirement (as described in Section 10 of the SA) includes reliance on windfall allowances which are not guaranteed and introduces a degree of risk with the delivery of housing to meet the strategy. There is also already an allowance for windfall delivery within the housing land supply and therefore a potential element of ‘double counting.’ It is considered that such an approach is not the most appropriate, proactive or sustainable way to plan for additional growth within Shropshire, particularly given the (to date) carefully considered spatial strategy and Plan at Examination, and the need to ensure consistent consideration of the reasonable alternatives and strategy for the unmet need forecast to arise from the BCAs;
- Miller agree with the Council’s conclusions that Shifnal represents one of the most sustainable locations to locate residential development (as identified in Paragraph 12.38(f) of the Consultation SA) given its close proximity to the Black Country, its migration and commuting patterns and the fact that it contains a train station which can be accessed by all residents of Shifnal via both walking and cycling;

- We do have concerns that the sites allocated for development to meet the unmet need are in fact sites that were present within the submission Local Plan and therefore these are not “additional” sites, the need for which was identified by the Inspectors in ID36⁵.
- If these homes are indeed there to specifically meet the unmet need from the BCAs, then they should all be in highly sustainable locations, in particular, given the spatial strategy, these should lie along the M54 corridor that connects Shrewsbury to Dudley and Wolverhampton. They should, therefore, support the migration and commuting patterns as described in Section 12 of the Consultation SA and in Paragraph 2.10 onwards of these representations;
- Miller Homes acknowledges that the sites in Shrewsbury and Ironbridge are logically able to be considered to represent sustainable locations for development (commuter belt and brownfield land respectively) however there are concerns that the proposed allocation at Bridgnorth (Site ref: BRD030) is not in the most sustainable location to accommodate the unmet need from the BCA. The principal reason for this is that Bridgnorth does not have a train station which means that any movement to and from the Black Country must be undertaken either exclusively via private car or a car to access a nearby train station for which Shifnal is in any event one of the closest;
- Table 12.1 “Summary of the Conclusions of the Stage 2a Housing Site Assessments” concludes that Site BRD030 has a “Fair” overall settlement sustainability conclusion and “Fair” overall Black Country sustainability conclusion. SHF034 has a “Good” overall settlement sustainability conclusion and “Fair” overall Black Country sustainability conclusion. Given commentary throughout the three documents in terms of Shifnal’s strong relationship with the Black Country and the geographical location of its train station, the consideration of “Fair” is however queried by Miller.
- Appendices 4 and 8 of the Consultation SA contain the site proformas that present the justification for the inclusion of sites within the plan and their selection and rejection for sites deemed suitable for the unmet need.
- With respect to the Bridgnorth site (BRD030) Miller Homes has reviewed Appendix 4 and note the following characteristics of the site:
 - It is considered to be physically and functionally separated from the development boundary and built form of Bridgnorth by the A458, with it being acknowledged that the A458, employment allocations and a small area of third party land causing severance between the site and the existing built form of the settlement;
 - There will be a number of measures which are required to facilitate sustainable travel and address sustainability issues, including where new

⁵ Examination Stage Document Ref: ID36 (“Substantive Letter to Council following Pre-Action Protocol Letter”) Link - [id36-substantive-letter-to-council-following-pre-action-protocol-letter.pdf \(shropshire.gov.uk\)](https://www.shropshire.gov.uk/id36-substantive-letter-to-council-following-pre-action-protocol-letter.pdf). Paragraph 10

facilities are not introduced in the initial phases of the development, with direct walking and cycling routes needing to be delivered, including the creation of a footbridge (recommended to be a raised and for pedestrian and cyclist use) crossing the A458, consideration to bus provision through the site; necessary improvements to road infrastructure; and a potential park and ride, for example;

- The site’s nearest railway stations are at Telford, Albrighton and Shifnal, which would require some other form of transport to access these, and thereby create additional trips that would not be required if the Shifnal site is instead brought forward.
- Miller Homes has also reviewed Appendix 8 and the sustainability assessment of its site at Shifnal (SHF034) and note the following:
 - Shifnal is considered to have a strong functional relationship to the Black Country, benefitting from strong road links and the railway station which is within reasonable walking distance for the majority of the town. It is therefore considered within Appendix 8 that its proximity and strong transport links could enable the site to accommodate a “meaningful proportion” of the proposed contribution to the unmet development needs forecast;
 - There are no current known infrastructure requirements to make the development suitable in planning terms with these subject to relevant supporting studies to be undertaken.
- We acknowledge that the Bridgnorth site does present an opportunity to create a sustainable urban extension and is justified in terms of its allocation in order to meet the housing demand in Shropshire but it is not the most sustainable option to meet the BCA need.

3.17 Overall, Miller Homes continue to welcome that Shropshire Council has adopted a proactive and pro-growth approach to the principle of meeting both its own housing and employment land need as well as a quantum of unmet need from the BCAs, seeking to present a strategy which aims to identify and promote the most sustainable sites to meet its own need and that forecast to arise from the Black Country (“Black Country Authorities” / “BCAS”). Miller Homes, nevertheless, query the SA considerations in terms of the strategy to meet the unmet need (1500 dwellings) from the BCA and which sites are considered to best suited to meet that need, and also continue to argue that there is evidence of a greater housing need. This is explored further in the following sections.

4. Updated Housing and Employment Topic Paper

- 4.1 Miller Homes has submitted representations, including technical evidence, on the matter of housing needs consistently through the plan-making process. They were represented at the Matter 4 Hearing Session and submitted a Hearing Statement which drew on previous technical evidence and the latest available information.
- 4.2 These representations have generally supported the Council's identification of a housing requirement higher than the standard method, but they have also consistently argued that there is evidence of a greater housing need and challenged the evidential justification for the Council's chosen housing requirement.
- 4.3 The Council's latest "Updated Housing and Employment Topic Paper" attempts to justify its currently proposed requirement for 31,300 dwellings over the proposed plan period 2016-2038. This equates to an annual average of around 1,423 dwellings and represents a modest uplift from that proposed in the submission version of the plan, adding 500 homes over the plan period.
- 4.4 The latest iteration of the Topic Paper continues to advance the Council's view that this requirement is reflective of housing and employment needs within Shropshire and accommodates a contribution of 1,500 homes to address the identified unmet housing needs arising from the Black Country. This is recognised by the Council as the Paper itself identifies that its 'purpose' is to respond to the Planning Inspectors' request for a clear and unambiguous Topic Paper regarding the housing and employment land needs and requirements in Shropshire. It purports that it therefore draws a clear distinction between defined housing and employment need and requirements.
- 4.5 Where the Council has submitted limited new evidence in support of its Topic Paper, and reiterates the underpinning arguments to justify the judgements made to select the proposed housing requirement, the points previously raised through our representations remain largely pertinent. On this basis, whilst Miller are broadly supportive of the Council's approach, and as noted above specifically its decision to establish a housing requirement which is higher than the outcome of the standard method, we remain concerned that whilst the uplift is justified, it is not positively prepared to the full extent that the evidence suggests it should be.
- 4.6 A summary of the arguments previously submitted to support this conclusion are initially provided below, prior to specific submissions on the contents of the updated Topic Paper drawing on the latest data available.

Overview of previous representations on housing need matters

- 4.7 In substantiating the position above within our Matter 4 statement, reference was made to the technical submissions prepared by Turley on behalf of Miller, including a report titled *'Update to the Technical Review of Sustainable Growth Plans for Shifnal'*⁶ (September 2020), which affirmed the justification for an **evidentially based higher assessment of housing need**.
- 4.8 In the context of this evidence and a review of the latest available information available as at Summer 2022, our Hearing Statement concluded that **to ensure that the Draft Local Plan was positively prepared and therefore sound, it should make provision for a greater level of housing need**. This conclusion recognised the following key factors:
- Evidence of stronger recent demand, as demonstrated by recent rates of delivery which were higher than the proposed requirement;
 - The imbalance between housing need and forecast / planned job growth, with the Plan providing for and anticipating a level of job growth which would not be supported by the labour that would be accommodated if only 1,400 homes were provided annually;
 - The substantial unmet needs of the Black Country, and the wider GBBCHMA; and
 - The potential to meet a greater proportion of the calculated need for affordable housing, where the scale of need is significant and likely to be rising.
- 4.9 Where the Updated Topic Paper presents relatively little new evidence, nor substantive rebuttal of the above points, their relevance and applicability remains. A concise updating of the evidential basis is set out in the remainder of this section, along with other supportive analysis.

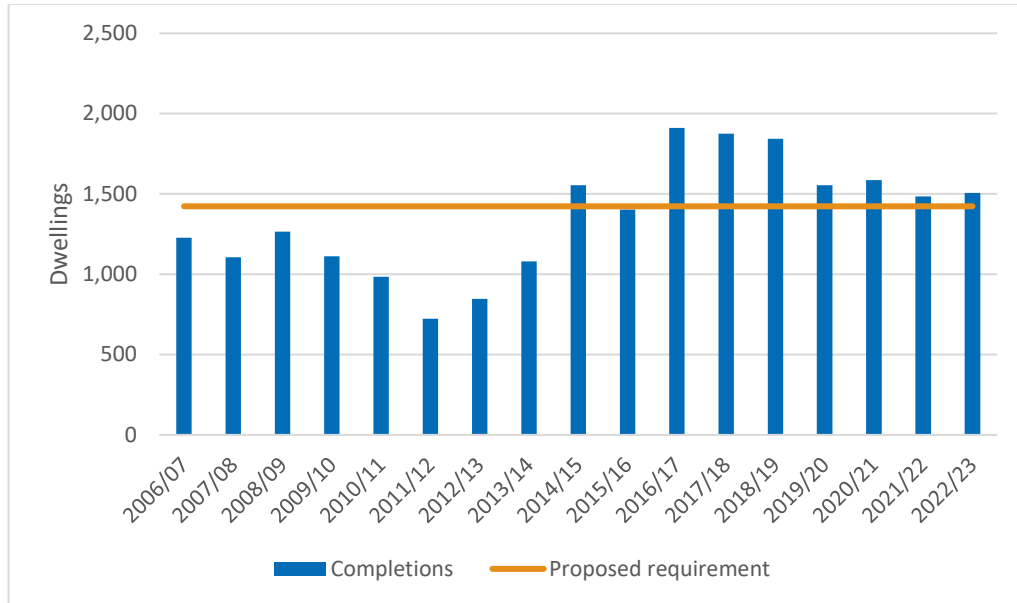
Evidence of a sustained higher demand for housing

- 4.10 The Updated Topic Paper outlines a strong track record of housing delivery on several occasions (examples including Paragraphs 7.37 – 7.41 and Figure 7.1). It uses this to affirm the 'deliverability' of the proposed requirement. However, whilst it observes that there have been peaks and troughs, in part linked to the wider housing market, it fails to adequately acknowledge the clear conclusion that demand, as represented by the strong level of delivery, has outpaced the rate of provision now proposed within the Draft Plan.
- 4.11 Figure 4.1 shows that in eight of the last nine years delivery has exceeded the proposed annual housing requirement, with delivery over this period some 15% higher than the

⁶ The report was included as Appendix 2 to the Representations submitted by Turley on behalf of Miller Homes to the Regulation 19 Consultation on the Draft Plan in February 2021. The report was an update to a previously submitted technical report which shared the same title and was submitted on behalf of Miller and Wallace Homes to the 'Preferred Sites' consultation document in January 2019.

requirement now proposed. Indeed, at the peak, in 2016/17, completions were some 34% higher than the proposed annual requirement.

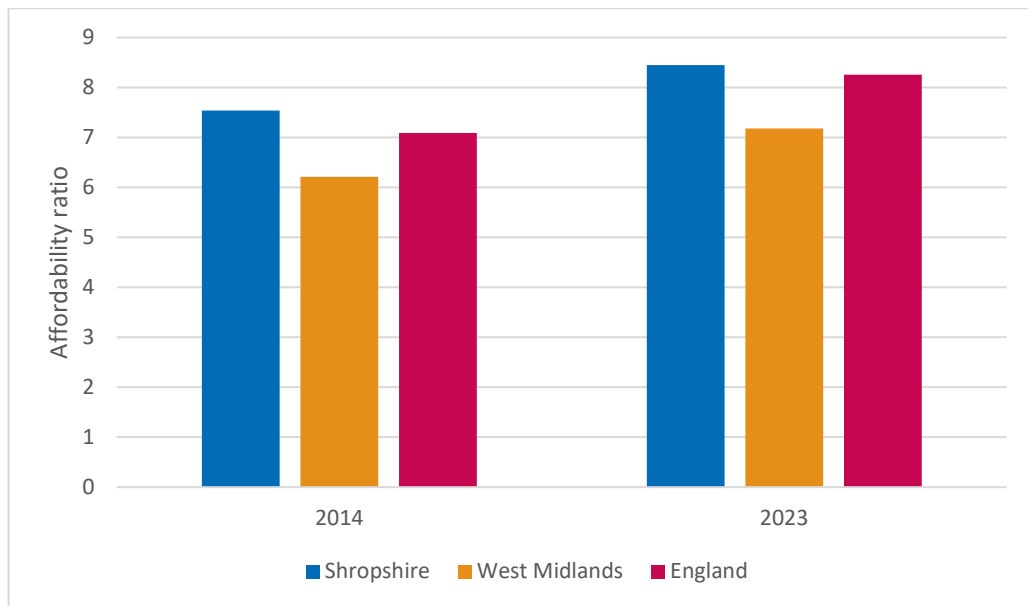
Figure 4.1: Annual completions vs proposed annual average housing requirement



Source: Figure 7.1 of the Updated Housing and Employment Topic Paper (2024)

- 4.12 Where these rates have been achieved in the absence of an up-to-date Local Plan, they strongly affirm that a high demand for housing, in excess of the current requirement, has existed within Shropshire.
- 4.13 Affordability ratios are used within the standard method as another indicator of the balance between supply and demand. It is of note that, at the start of the period where stronger levels of completions were recorded (2014/15), Shropshire was less affordable when benchmarked against both the West Midlands and national averages. Figure 4.2 confirms that this remains the case in 2023, albeit the gap to the national average has narrowed, suggesting that even a relatively strong supply of new homes has failed to stay sufficiently ahead of demand. Indeed, over the same nine years the affordability ratio in Shropshire has risen by 12% and now stands at 8.45. Supporting a reduction in delivery, as a lower requirement would do, would run the risk of affordability continuing to worsen at a greater rate. A more positive approach would be to acknowledge the strength of demand and seek to accommodate it through a higher housing requirement, thereby seeking to ensure that supply responds positively to market signals.

Figure 4.2: Affordability ratios in 2014 and 2023

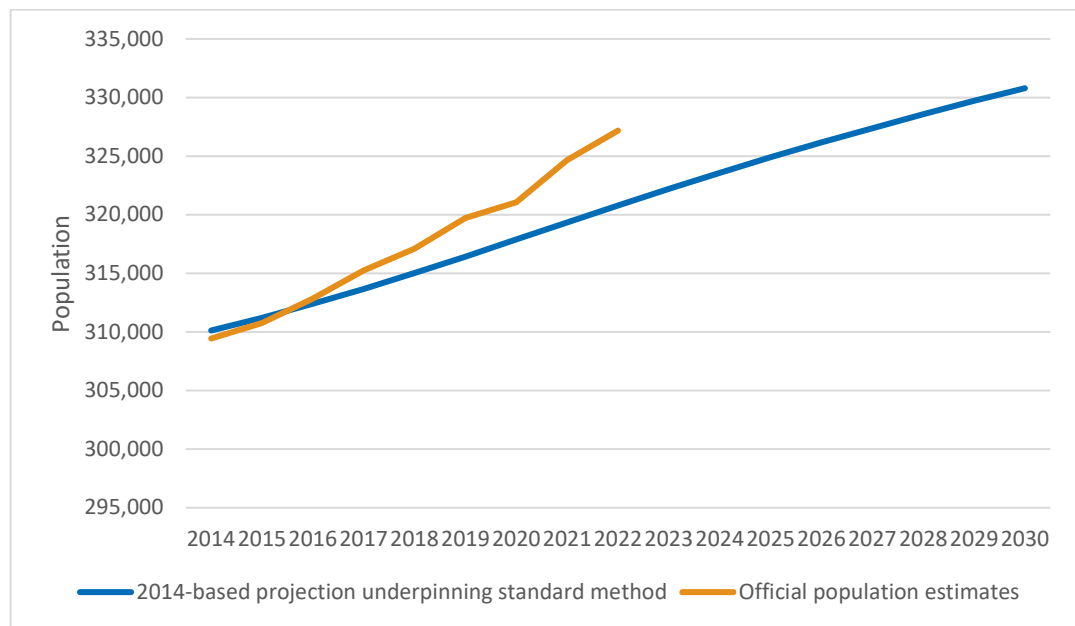


Source: ONS

Evidence of stronger demographic pressures

- 4.14 While it is appreciated that the proposed housing requirement allows for an uplift from the standard method, it is important to observe that the population of Shropshire has continued to grow at a much faster rate than the standard method implicitly assumes, in the 2014-based projections that form its demographic baseline. This makes the uplift appear much less positive, offering less in the way of flexibility.
- 4.15 Figure 4.3 compares the projected population under the 2014-based projection, which is used as the initial input (step 1) to the standard method calculation, with the latest official population estimates published by the ONS.

Figure 4.3: Comparing the 2014-SNPP (standard method demographic projection) and the latest ONS annual estimates of population



Source: ONS

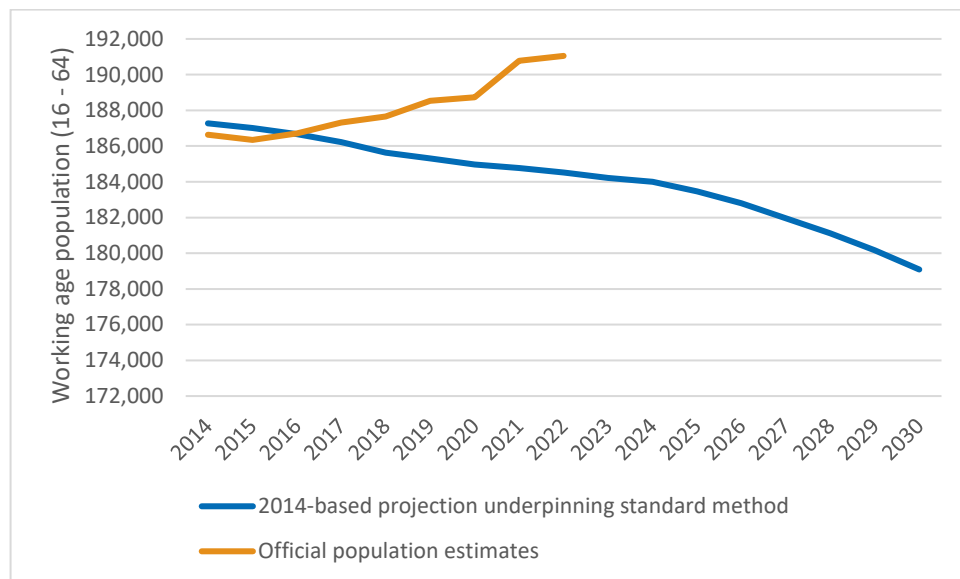
- 4.16 This illustrates the extent to which the population has significantly outpaced the earlier projection, itself linked at least in part to the more positive provision of housing in Shropshire.
- 4.17 At the base year of the calculation used by the Council (2020), there were already 3,172 more people living in Shropshire than accounted for by the standard method. Over the two years reported since, the population has continued to grow strongly, increasing by 2%, with this representing around half the 4% growth that the standard method allows for over its *ten-year* calculation period. A continuation of stronger demographic pressures would place increasing pressures on the need for housing, again strongly challenging the justification for proposing a fall from recent delivery rates, as implied by the proposed housing requirement.

Unsubstantiated alignment between job growth and housing needs

- 4.18 The Updated Topic Paper continues to imply that an important part of the justification for selecting the proposed housing requirement is to “*support the diversification of the County’s labour force*” and to “*support wider aspirations, including increased economic growth and productivity.*”
- 4.19 The importance of these factors in appraising the soundness of the assessment of need and the associated requirement is agreed. Indeed, the current iteration of the NPPF explicitly references at Paragraph 67 that: *‘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.’* (emphasis added)

- 4.20 As set out previously in our Matter 4 Hearing Statement, Miller strongly support the Draft Plan’s acknowledgement of economic growth factors, highlighting the importance of planned investment in the M54/A5 Growth Corridor and the proven capacity of the Shropshire economy to generate new employment opportunities. This positive context is reflected in the fact that over the last seven years for which data is available (2015 – 2022), Shropshire has created 11,069 jobs, a figure which is over half of the ‘job target’ (21,400 jobs) referenced in the Updated Topic Paper for the whole of the plan period. This level of growth, whilst less in absolute terms than Birmingham and Solihull, aligns closely with several of the other larger employment centres in the West Midlands such as Warwick and Stoke-on-Trent, reaffirming the strong economic credentials of the authority and its capacity to continue to grow.
- 4.21 It remains a concern in judging the soundness of the Council’s proposed housing requirement, however, that whilst asserting economic factors as part of the justification for the higher housing requirement, no substantive new evidence is presented or used to substantiate the rationale for the selected figure.
- 4.22 It remains the case, therefore, that, as explained in our Matter 4 Statement, the presented evidence continues to inadequately address or explain the acknowledged gap between the jobs associated with the Plan’s provision of 320 ha of employment land and the increase in the labour-force modelled as being accommodated through delivery in line with the housing requirement. This is sought to be addressed within the Updated Topic Paper at Paragraphs 17.16 – 17.46 and Table 7.4 (on page 162 noting that there are two Tables 7.4), with Paragraph 17.19 explicitly recognising that *“the projected labour force growth at +12,615 persons would not entirely support the jobs growth forecast at 21,400 jobs.”*
- 4.23 This sub-section of the Updated Topic Paper commences by referencing the EDNA (EV043, Table 8.11), which acknowledges that the 2014-based projections used in the standard imply a very limited growth in the potential labour-force (+1,979 persons referenced at paragraph 17.17a). This is unsurprising given the modest demographic growth implied by these projections, as shown at Figure 4.3. Where Figure 4.3 illustrates that the population has grown at a different rate than the demographic projections used in the standard method it is also the case that the structure of the population is also markedly different than projected. This is of relevance when considering the working-age population (16 – 64 years old), as illustrated in Figure 4.4.

Figure 4.4: Comparing the 2014-SNPP (standard method demographic projection) and the latest ONS annual estimates of population



Source: ONS

- 4.24 Where the demographic projection used in the standard method projected a fall in the working age population – shrinking by 3% over the 10-year period used in the Council’s need calculation – the latest population estimates suggest that this cohort has grown. This is important as it illustrates a positive relationship between the comparatively strong rates of delivery of housing seen over this period (see Figure 4.1), a growing population (see Figure 4.3) and the growth in jobs referenced above (over 11,000 jobs since 2015).
- 4.25 In contrast, and as recognised within the Updated Topic Paper (Paragraph 17.19), the lower level of provision implied under the proposed housing requirement will fall short of accommodating a labour-force of sufficient scale to support the Plan’s anticipated job growth.
- 4.26 Whilst the Updated Topic Paper seeks to present an updated re-consideration of factors which theoretically could serve to bridge this gap with the missing labour, it remains the case that the assertions made as to the source of new participants in the economy remain unsubstantiated and largely beyond the control of policy. This includes, for example, an acknowledged reliance on successfully re-engaging segments of the labour-force, without considering or understanding why they are currently disengaged, and assumed changes to commuting patterns which do not account for the implications on the surrounding economies from which such labour must be ‘reclaimed.’
- 4.27 Without the evidence to substantiate these assertions, there clearly remains a risk of imbalance between these strands of policy, thereby undermining the ability to demonstrate that the plan is ‘justified.’

- 4.28 Acknowledging the recent evidence of stronger rates of provision sustaining population and employment growth, the identification of a higher housing requirement would represent a more positive plan-led response.

Acknowledging a much greater unmet need for housing

- 4.29 Miller Homes has consistently supported the positive approach by the Council to ensure that provision is made within the housing requirement to accommodate a proportion of unmet needs from the Black Country. The scale of unmet needs across the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') and the absence of plan-led solutions for it to be addressed endorses the importance of this provision.
- 4.30 We set out within the preceding Additional Duty to Cooperate Hearing Statement the scale of the unmet housing need, based on the information available, across the Black Country authorities. This identified in Table 1.1 a shortfall of over 28,000 homes and highlighted that published Local Development Schemes confirmed that comprehensive plans across the area to address this unmet need would not be in place until March 2026 at the earliest.
- 4.31 The severity of the issue has not reduced. Turley has recently published a Report, titled *'Falling Even Shorter: an updated review of unmet housing needs in the Greater Birmingham and Black Country Housing Market Area'* (December 2023), which is included at **Appendix 2**.
- 4.32 This Report considers the conclusions of the most recent GBBCHMA Position Statement Addendum (April 2023) and challenges the stated position that the shortfall between 2011 and 2031 has fallen to 2,053 homes. It advocates for an updating of the base date to 31 March 2023 and the use of the standard method (as used to underpin Shropshire's own assessment of need), the result of which is provide a more accurate reflection of the scale of unmet needs. This suggests a shortfall of at least 34,742 homes up to 2031. Recognising that plan periods, including that of the Shropshire plan, extend beyond 2031 it identifies that where the shortfall is calculated out to 2036 the unmet need increases to 62,373 homes. Recognising that the Shropshire Plan period extends to 2038 it is reasonable to observe that the scale of the shortfall at that point would be greater still.
- 4.33 The proposed provision for 1,500 homes included within the proposed housing requirement, whilst a positive step, evidently represents a small fraction of this significant amount of unmet need. This represents real people who are in real need of a home, now.
- 4.34 In line with the evidence above, it continues to be the case that to support its economic ambitions Shropshire will need additional labour beyond that accommodated through the provision of the housing requirement. It is equally the case that the area has been successful in attracting additional residents, at a rate beyond that captured in the demographic projections used in the Council's assessment of need. Where it is accepted that the inter-relationships between different HMAs and economic centres present an opportunity for the relocation and accommodation of labour to sustainably support employment, a greater provision for unmet housing

needs would also represent a more positive step towards sustainably addressing the balance between future jobs and homes in Shropshire.

Responding more positively to the need for affordable housing

- 4.35 Where the consideration above of supply and worsening affordability indicates that supply has fallen short of demand, our previous submissions have highlighted that the proposed housing requirement is likely to continue to fall short of addressing the need for affordable housing specifically.
- 4.36 Paragraph 7.7 of the Updated Topic Paper continues to reference that one of the justifying factors to substantiate the uplift from the standard method remains the potential to *'increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire'* (emphasis added).
- 4.37 This responds to the Council's adopted Housing Strategy (GC4h – EV063.01), which importantly acknowledges the following:
- *'At the time of writing there are more than 5000 households on the housing register requiring affordable housing.'*
 - *'The number of new affordable homes over the last 5 years has averaged at 343 per year. This is significantly below the number of homes required.'*
 - *'The need for affordable housing in Shropshire is growing, as fewer households can afford rising house prices or rising private monthly rents.'*⁷
- 4.38 The Council's original Housing Topic Paper (GC4i) including a sub-section titled 'The Affordable Housing Target', which does not appear to be replicated in the Updated Topic Paper. Here the Council acknowledges (Paragraph 4.15) that the Draft Plan as submitted would be expected to deliver around 7,700 affordable dwellings over the plan period (2016 – 2038), or 350 per annum, with this representing approximately 25% of the total housing requirement. Applying a comparable percentage to the updated housing requirement would suggest only a modest uplift on this expectation.
- 4.39 Such a level of provision evidently falls somewhat short of the assessed need set out in the SHMA (EV097.02), which calculates a need for some 799 affordable homes per annum (Table 35).
- 4.40 Whilst it continues to be agreed that the proposed uplift from the minimum need derived from the standard method will allow for a greater share of this need to be met, it is still the case that planning for a higher level of housing growth – reflecting the interpretation of the evidence above – would have a greater impact. This would represent a significant benefit and further evidence of positive planning.

⁷ Shropshire Housing Strategy, Section 2. (EV063.01)

Conclusion

- 4.41 The Updated Topic Paper asserts that in presenting a clear and unambiguous position it draws a clear distinction between defined housing and employment need and requirements. Our own reading of the document would suggest that the Council has not achieved this objective in so much as that it has **not provided a clear and evidential justification for its calculation of need**. The summary explanation of the components of the housing requirement provided at Figure 11.1 of the Updated Topic Paper do not provide a sufficiently justified explanation as to how the proposed requirement relates to the different sources of need arising from, for example demographic or economic drivers.
- 4.42 Where the Council through the Updated Topic Paper recognises factors contributing to a higher need, including *'identified issues and opportunities in Shropshire'* which relate to economic drivers for example, and providing *'more family and affordable housing'* these are conflated in the application of a 15% uplift and in part at least with reference to the justification for the additional provision to meet unmet housing needs (see Figure 11.1 and paragraphs 7.59 – 7.60).
- 4.43 Miller remain of the view that to ensure that the Draft Plan is positively prepared and therefore sound the Council should re-present its consideration of its evidence base to adequately recognise the individual role and contribution of the factors driving a level of housing need which is higher than the standard method. The Council should then, as it has done, continue to add to this 'need' a justified level of additional provision to accommodate a reasonable agreed level of unmet housing needs to make a more meaningful contribution to address the needs of other authorities within a functional housing market area. On the basis of the evidence previously provided and that set out above Miller believe that this would justify the setting of a more positive housing requirement.

5. Updated Green Belt Topic Paper

- 5.1 It is understood that the “Updated Green Belt Topic Paper” (April 2024) has arisen as a response to Document ID28, whereby the appointed Inspectors acknowledged that providing contributions to the unmet needs of the Black Country would require the release of Green Belt land, given that Shropshire Council has proposed the release of Green Belt land to meet their own needs. Therefore, it was requested that the updated Topic Paper set out the exceptional circumstances for releasing Green Belt to meet Shropshire’s needs and separately the exceptional circumstances for releasing Green Belt to accommodate any proposed contributions to housing and employment needs forecast to arise from the Black Country.
- 5.2 As alluded to in previous sections and repeated here for completeness, the proposed spatial strategy continues to be underpinned by the principle of high growth and urban focus, having also committed to the delivery of 1,500 homes towards the unmet needs forecast to arise from the Black Country. Miller continues to support a contribution to the forecast unmet need of the BCAs and high growth with an urban focus, whereby it is recognised that the Proposed Key Centres, such as Shifnal, have the most extensive range of services, facilities and infrastructure to support new development.
- 5.3 Table 5.1 of the Topic Paper provides a summary of the locations and types of Green Belt release in the Draft Plan, including 1.4ha for housing within one site and the majority identified as safeguarded land (105.9ha). Within Shifnal, considered to be a Key Centre within the proposed settlement hierarchy, 39.0ha within one site is identified as being released from the Green Belt for employment use and 82.4ha across five sites is proposed to be safeguarded land. A further 10.4ha of safeguarded land which was previously removed from the Green Belt is located at Shifnal on the site identified as ‘Land between Revells Rough, Lamledge Lane and the eastern rail line’ which consists of part of SHF023. Therefore, there is no current proposed Green Belt release within this Plan period within Shifnal for housing to meet either Shropshire’s own need, or that arising from the BCAs for early delivery.
- 5.4 Miller note at Paragraph 5.27 of the Topic Paper that “at this time, it is expected that any future development on the “safeguarded” land (which should only occur once it is allocated for development within a future Local Plan) would be to meet the needs of Shropshire.”
- 5.5 Miller consider flexibility should be provided to this position, particularly in the context of South West Shifnal, which has the ability to provide homes now (thus a logical consideration for an additional site allocation in terms of reasonable alternatives) and is also able to meet the needs of Shropshire and/or neighbouring authorities. Miller wishes to draw attention to considerations across all three documents subject to consultation, and addressed within this representation, in terms of the identification of Shifnal as a sustainable location for new development and its relationship with the Black Country. As set out elsewhere within these representations, it is common ground that Shifnal is a sustainable location, as evidenced within the Green Belt Topic Paper at Paragraph 9.1 which states that Shifnal is “located on the M54/A5 corridor, a key road and rail transport corridor, linking Shropshire to the West Midlands” and Paragraph 9.4

reiterating the “functional relationship”. Shifnal also represents the largest of the proposed Key Centres in Shropshire (Paragraph 9.3), thus logically suitable for development. Figure 3.1 inextricably identifies the relationship between Shropshire, the West Midlands and the confinement of the Green Belt. Table 4.1 comprises sites identified to accommodate proposed contributions, of which Green Belt release is required for employment land at Shifnal.

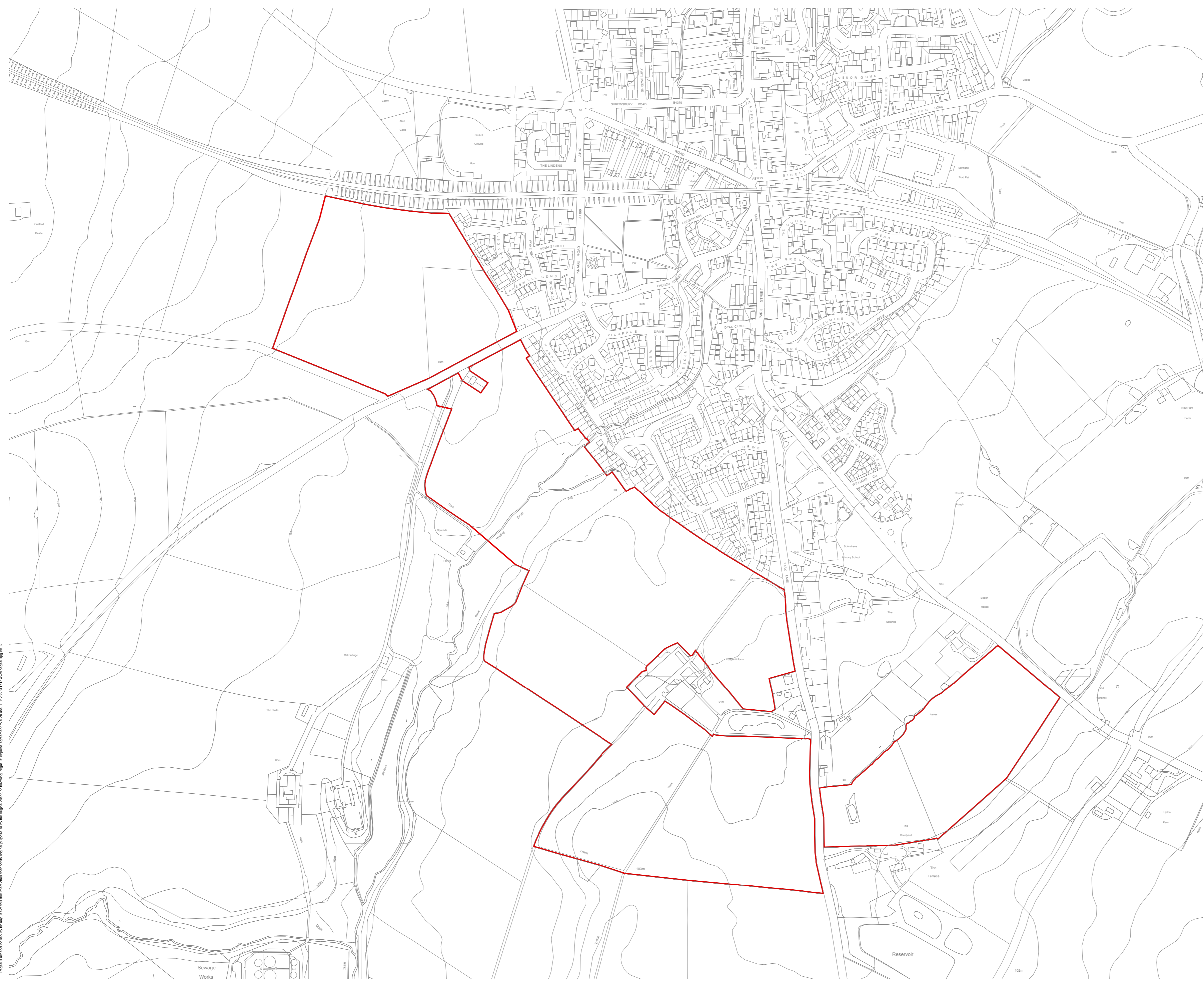
- 5.6 In the context of the above, it is notable that the entirety of the proposed 30ha contribution towards the unmet employment land needs forecast to arise from the Black Country is identified within Shifnal (SHF018b and SHF018d).
- 5.7 It is considered that Table 4.1, which includes Green Belt release to meet the unmet needs forecast to arise from the Black Country, as including employment use only within Shifnal should be reviewed in the context of housing delivery, and should include a site(s) to meet that need.
- 5.8 Given the substantial shortfall of housing arising from the BCAs – and as noted within Paragraph 1.23 of the preceding Additional Duty to Cooperate Hearing Statement prepared by Miller – any reductions in allocations for development within the Green Belt in relevant authorities will only serve to increase the scale of the unmet need on an individual and therefore collective basis. Additional sites in sustainable locations and aligning with the spatial strategy, should therefore be able to be allocated for development, particularly those in Key Centre settlements with established rail links, in close proximity to the Black Country, to accommodate the unmet need arising from that area.
- 5.9 In light of the comments set out within this representation, and as per preceding Additional Duty to Cooperate Hearing Statement, Miller wish to re-state the request that the Council reconsider the level of unmet need allowed for and increases this to make a more meaningful contribution, which would be considered to represent a more positive planning strategy. However, it is also maintained that regardless of whether or not the Plan includes for an increased contribution towards the unmet needs of the Black Country, the addition of an early review mechanism is required at the very least, given there is a clear and strong need that must be met over the plan period.

6. Summary

- 6.1 As expressed in preceding Hearing Statements and Sessions, Miller continue to support the position taken by the Council to plan positively and proactively, including a contribution towards addressing the unmet need forecast within the Black Country.
- 6.2 Notwithstanding this, Miller continue to query the following, in the context of ensuring the soundness and legal compliance of the Plan:
- Miller remain of the view that to ensure that the Draft Plan is positively prepared and therefore sound, the Council should re-present its consideration of its evidence base to adequately recognise the individual role and contribution of the factors driving a level of housing need which is higher than the standard method. The Council should then, as it has done, continue to add to this 'need' a justified level of additional provision to accommodate a reasonable agreed level of unmet housing needs to make a more meaningful contribution to address the needs of other authorities within a functional housing market area. On the basis of the evidence previously provided and that set out above, Miller believe that this would justify the setting of a more positive housing requirement;
 - Miller query the justification for the proposed scale of the contribution to the Black Country, insofar as this is considered to be not adequately justified and that there is a clear justification for Shropshire to make a more substantial contribution to the Black Country's unmet need. Miller therefore consider that there is evidence to demonstrate the need for the allocation of a further site to accommodate a larger proportion of this unmet need. Given the proposed safeguarding status of the Miller site, and its locational advantages and connections to the Black Country it would appear a logical allocation to meet this need;
 - Miller continue to promote the recommendation of the inclusion of an early review mechanism in the Plan.
- 6.3 In light of the above, and in the context of this Representation as a whole, Miller Homes would welcome the opportunity to attend further examination hearing sessions to discuss the issues we have identified above which affect the soundness of the plan, and in due course, the Stage 2 Hearing Sessions.

Appendix 1: Site Location Plan

KEY
Total Site Boundary
64.5 ha / 159.4 acres



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Appendix 2: Turley Falling Even Shorter Report

Falling Even Shorter

an updated review of unmet housing
needs in the Greater Birmingham and
Black Country Housing Market Area

December 2023

Turley

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1. Introduction and purpose

Turley is instructed by a consortium of housebuilders and land promoters to provide an updated assessment of the position relating to housing need and land supply across the Greater Birmingham and Black Country Housing Market Area ('GBBCHMA' or 'HMA') in order to quantify the true scale of unmet need to 2031, and beyond.

It is now more than two years since the Turley 'Falling Short' report was published. That report critiqued the 'third position statement', published by the GBBCHMA authorities in September 2020, which claimed only a 2,597 housing shortfall remained across the HMA up to 2031. The Turley 'Falling Short' report found that there was a minimum shortfall up to 2031 of almost 9,000 homes.

An addendum to the third position statement was published in December 2020 followed 'Falling Short' indicating that the scale of unmet need as of 31 March 2020 was 6,302 homes. Since then a further addendum to the third position statement was published in April 2023, that now claims a shortfall of 2,053 homes across the GBBCHMA as of 31 March 2021.

Given the wider national planning policy context, since 'Falling Short' no GBBCHMA authority has adopted a new local plan and progress has been faltering:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years.
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

That is despite only North Warwickshire having a plan less than five years old, with the four Black Country authorities not having a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities having a plan adopted over ten years ago as of January 2024.

The lack of plan making progress is at risk of significantly impacting a number of the 14 HMA authorities' ability to meet their housing needs, as required by NPPF paragraph 35. This update to 'Falling Short' therefore seeks to quantify the scale of the unmet need across the GBBCHMA as of 31 March 2023. This includes critiquing the GBBCHMA's most recent position statement, published in April 2023, with a base date of 1 April 2021.

Purpose of this report

This report provides the consortium's independent assessment of the overall housing need and supply position so as to identify the true updated scale of unmet need, focusing on the period to 2031.

The focus upon 2011 to 2031 reflects the timeframe covered by the position statements, as well as various other evidence base studies concerning need and supply prepared since 2013. As with 'Falling Short', this report does consider the position beyond 2031 in high level terms up to 2036 and 2040, mindful that NPPF paragraph 22 requires local plan strategic policies to look ahead over a minimum 15 year period from adoption and set a vision that looks further ahead (30 years), and that all emerging plans are considering plan periods beyond 2031.

The consortium

The consortium comprises the following housebuilders and land promoters, all of whom play a key role in the strategic planning of sustainable housing delivery across the HMA and wider West Midlands region:

- **Bellway Homes**
- **Catesby Estates Plc**
- **Gladman Developments Ltd**
- **Hallam Land Management**
- **Harworth Group Plc**
- **Taylor Wimpey**
- **Vistry Group Plc**
- **Wain Estates**
- **William Davis Homes**

Report structure

The report is structured as follows:

- **Section 2** summarises the most up to date GBBCHMA unmet need context.
- **Section 3** assesses the scale of housing need to 2031, and beyond.
- **Section 4** provides an overview of the most up-to-date position in respect to the GBBCHMA's total housing supply for 2011 to 2031.
- **Section 5** draws conclusions on the scale of unmet need to 2031 and beyond, taking into account the HMA's total need and evidenced supply.
- **Section 6** sets out the overall conclusions in respect to the scale of the unmet need.

2. Update to GBBCHMA unmet need context

This section provides an update on the GBBCHMA unmet need context, including the current starting point for calculating the unmet need.

GBBCHMA Position Statement Addendum (April 2023)

The Position Statement Addendum (the 'Addendum'), dated April 2023 and published in October 2023, provides the supply and shortfall position across the GBBCHMA between 2011 and 2031 as of 31 March 2021. The Addendum continues to use the Greater Birmingham HMA Strategic Growth Study ('SGS') (2018) prepared by GL Hearn and Wood as the starting point for calculating the HMA's housing needs. This is reflected on further at section 3 of this report in determining the scale of need for housing across the GBBCHMA.

The Addendum also continues to consider the level of unmet need **up to 2031**, this reflects the timeframes for the SGS, which essentially uses the Birmingham Development Plan's plan period as its starting point.

The Addendum claims the HMA has a housing supply of 205,926 homes for 2011-2031 as of 31 March 2021. Against the SGS' 'baseline' housing need for the same plan period of 205,099 homes, and factoring in a contribution to the Coventry and Warwickshire Housing Market Area ('CWHMA') of 2,880 homes, the Addendum indicates that the remaining shortfall of housing across the HMA has reduced to 2,053 homes.

The Addendum's base date is now more than two years' ago. Firstly, there has been two years' worth of additional monitoring data, and in some cases, updated supply positions, which essentially renders the position in the Addendum out of date (which is explored further at section 4 of this report in terms of how the supply position across the HMA is assessed).

Secondly, in that time there has been limited local plan progress across the entire HMA.

Local plan progress

With circa 43% of the entire GBBCHMA comprising Green Belt, local plans are an absolutely critical tool in ensuring the HMA meets its housing needs. It is clear that brownfield land will not be enough to meet the HMA's needs, as demonstrated by the shortfall that still remains unaccounted for from the Birmingham Development Plan adopted nearly seven years' ago, and the emerging Dudley and Sandwell plans and their associated evidence bases (which are discussed below).

Almost three years have passed since 31 March 2021. In that time there has been limited progress in advancing local plans across the HMA. Even since April 2023, the context has significantly changed and plan making across the HMA has faltered, as summarised below:

- The **Black Country authorities** abandoned preparation of their joint plan in October 2022, despite working on the plan for six years. Following this each local authority is now preparing its own individual plan. So far Sandwell has published a draft plan with a 18,606 housing shortfall (62% of the borough's total need), and Dudley's draft plan proposes a shortfall of 1,078 homes (9% of the borough's total need).
- **Bromsgrove District** has not progressed its emerging plan beyond a supplementary consultation to their issues and options consultation in autumn 2019, despite committing to a full Green Belt Review and adopting a Local Plan Review by 2023 (as per policy BDP3 of the Bromsgrove District Plan adopted in January 2017), as the adopted plan is not capable of meeting Bromsgrove's housing requirement up to 2030 in full.

- **Lichfield District** withdrew its Local Plan, which included a contribution to the GBBCHMA unmet need, from examination in October 2023.
- **Solihull Borough's** Local Plan remains at examination, despite being submitted in May 2021. The examination was paused in June 2023, pending any updates to the NPPF.
- **South Staffordshire** intend to revisit their emerging local plan and undertake a further reg 19 submission plan consultation in spring 2024, over a year since they consulted on a previous reg 19 submission plan.

This is despite national planning policy requiring reviews of plans every five years. Only North Warwickshire have a plan less than five years old, the four Black Country authorities do not have a plan prepared in the context of the National Planning Policy Framework ('NPPF') (2023), and half the GBBCHMA authorities have a plan adopted over ten years ago as of January 2024

Furthermore, it does not appear that this position will change in the short term. Just four authorities have local development schemes committed to submitting a plan before the end of 2024, with a further three committed to submitting before the end of 2025.

With the HMA significantly constrained by Green Belt, local plans are critical to ensuring its housing needs are met in full as brownfield land will not have sufficient capacity alone. Without local plans being advanced reviewing Green Belt boundaries, it is unlikely the GBBCHMA's housing needs can be met in full. This is the critical matter that this report will explore.



3. Scale of need up to 2031 and beyond

Considering the need to 2031

The Addendum continues to reference the ‘baseline’ scenario from the SGS, which suggests a minimum need for 205,099 homes between 2011 and 2031 or 10,255 homes per annum on average.

While this technically remains the last study to have consistently assessed need in all 14 authorities, it is clearly becoming increasingly dated having been finalised almost six years ago in February 2018, and no doubt produced over an extended period prior to that. The extent to which the SGS continues to represent ‘up-to-date evidence’, of the kind that the NPPF at paragraph 31 expects to underpin all planning policies, is therefore open to question. It patently does not allow for the population of the HMA to be some 4% larger than it was then, nor for the area to offer around 8% more jobs, and for the affordability of housing relative to earnings to have worsened in every single authority by an average of 19%¹.

The SGS has undoubtedly had value in providing a consistent assessment of need across the HMA, but circumstances have changed with the introduction of a standard method that has now been required to form the basis of plan-making for almost five years. It was explicitly designed to standardise assessments of housing need, bringing consistency between local authorities and consequently filling at least part of the role formerly played by the SGS. Many of the authorities in the HMA appear to have taken the same view, having commissioned various studies that feature the standard method which generally consider it to provide a reliable indication of their local housing need.

As such, it is highly relevant to note that the standard method suggested a greater need for some **11,868 dwellings per annum** as of April 2021, the base date of the Addendum.

However, this is known to have underestimated the full need as it included a figure for Birmingham that was capped above an existing requirement, but the lifting of the cap in January 2022 – when the Birmingham Development Plan became more than five years old – elevated the need to **at least 13,868 dwellings per annum** and it subsequently rose even further, to at least **14,341 dwellings per annum** in April 2023, when new affordability data was taken into account.

This should not necessarily replace in full the scenario developed in the SGS, which looked back to 2011, but that should equally not take precedence over a standard method that has now been in place for almost five years. The NPPF makes clear at paragraph 61 that it should be used to assess the minimum need for housing in all but exceptional circumstances, which have clearly not been demonstrated by the local authorities in this area.

A sensible and rational approach in these circumstances, which provides a level of consistency with the SGS while adhering to current national policy, would be to align with the SGS ‘baseline’ scenario in the ten years to the base date of the Addendum (2011-21) before aligning with the outcome of the standard method, as of the base date of April 2021, for the second ten-year period² (2021-31). This results in a minimum need for **221,230 homes** over the entire twenty years, some 8% more than suggested by the PSA³.

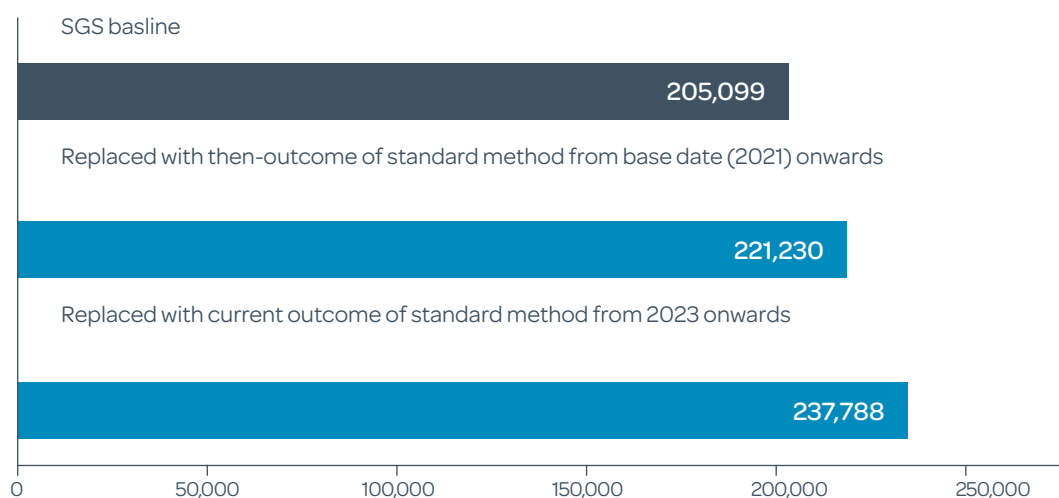
That said, with the outcome of the standard method known to have been an underestimate in April 2021 – rising thereafter, due to worsening affordability and the lifting of the cap in Birmingham – it is arguably also appropriate to consider a scenario based on the current outcome of the standard method (14,341dpa). This would suggest a substantially greater need – for some 237,788 homes in total – even if it was to be applied only from 2023 onwards, reverting to the SGS for the prior two years to avoid using the outcome of the standard method so retrospectively.

¹ Comparing data for 2022 to equivalent figures for 2015, where this appears to have been the latest population data available when the SGS was prepared (according to its paragraph 3.26)

² 11,868 dwellings per annum

³ Excluding the 2,880-home contribution to the Coventry and Warwickshire HMA, which – though included in the Addendum – is considered separately in this report’s section 5

Figure 3.1: Turley Estimates of Overall Housing Need (2011-31)



Source: Turley analysis

Looking beyond 2031

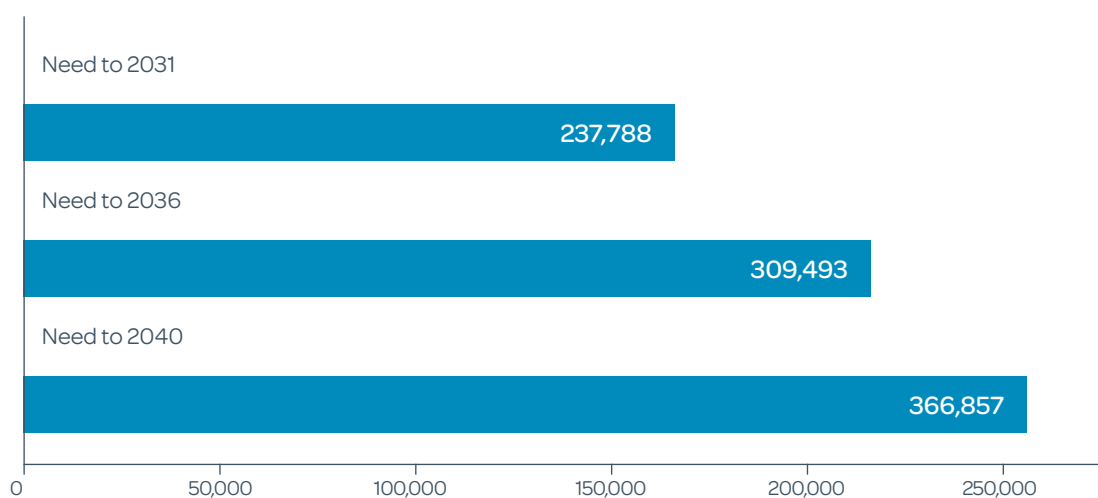
While the above – like the Addendum – provides an estimate of need to 2031, it can be easily extended to cover a longer period to 2036 or 2040.

This is important because NPPF paragraph 22 requires emerging local plans in the HMA to look at least 15 years into the future, such that they are seeking to deliver strategic growth into the late 2030s and even beyond in some cases.

While the standard method technically draws upon a ten-year baseline, the PPG makes clear that its outcome can be extrapolated as necessary to cover any period⁴.

It is not considered appropriate to extrapolate the capped figure in this way but using the current outcome of the standard method from 2023 onwards and using the SGS 'baseline' to that point, suggests that some 309,493 homes are needed throughout the HMA between 2011 and 2036. Circa 366,857 homes are implied to be needed when using the same approach for the period from 2011 to 2040.

Figure 3.2: Estimated Need to 2036 and 2040



⁴PPG Reference ID 2a-012-20190220

4. Establishing the GBBCHMA supply for 2011-2031 (and beyond)

'Falling Short' sets out general observations in respect to the supply identified in the third position statement (September 2020), and the majority of those remain relevant in respect to the Addendum, including:

- It only addresses 2011 to 2031 despite local plan reviews now looking well beyond that.
- The base date then was 31 March 2019 and more than two years had passed at the point of 'Falling Short' being published, with the Addendum having a base date of 31 March 2021 the supply data remains two years out of date.
- The supply is broken down into different categories for all 14 authorities, however the raw data underpinning this is not provided as part of the Addendum, or any previous position statement.
- The supply data has not been independently examined.
- The supply is 'unadjusted' as it does not apply the standardised non-implementation discount rates from the SGS which provided a consistent approach across the HMA. Instead, only local discount rates are applied so several authorities do not apply any discounts for non-delivery (Birmingham, Bromsgrove, Redditch and Stratford).

The 14 authorities' agreed position in respect to the extent of the total supply across the entire GBBCHMA between 2011 and 2031 is **205,926 homes**, as presented at paragraph 3 of the Addendum. The Addendum has a base date of 31 March 2021 and includes all completions up to that point. This represents a total shortfall of 2,053 homes, a significant reduction from 6,302 homes as of 31 March 2020 (as presented in the December 2020 Addendum to the third position statement). Paragraph 3 of the Addendum states that Birmingham is responsible for the majority of the additional capacity identified.

More than two years have passed since then, the Addendum therefore does not reflect any housing completions or additional supply which has come forward in the intervening period. This report therefore seeks to assess the GBBCHMA's supply based on the most up-to-date evidence available.

Method of analysis

A critical factor in any analysis of the shortfall position across the GBBCHMA is an accurate position of the HMA's overall supply.

To understand the 14 authorities' current supply positions this report has reviewed in detail all the most up-to-date evidence, which is summarised in Table 4.1 below.

Table 4.1: Source of evidence for completion and supply data

Authority	Most up-to-date evidence	Base date
Birmingham	2020 SHLAA (March 2022) and Five Year Housing Land Supply Statement 2023-2028	31 March 2023
Bromsgrove	Housing Land Supply in Bromsgrove 2011-2022 (April 2023)	31 March 2023
Cannock Chase	Authority Monitoring Report 2021-22 (undated)	31 March 2021
Dudley	SHLAA 2021/22 Update (undated)	31 March 2022
Lichfield	Five Year Housing Land Supply 2023 (July 2023)	31 March 2023
North Warwickshire	Annual Monitoring Report Up to 31 March 2022 (November 2023)	31 March 2022
Redditch	Housing Land Supply in Redditch 2011-2022 (April 2023)	31 March 2023
Sandwell	SHLAA and 5 Year Housing Land Supply Update as of April 2022 (October 2023)	31 March 2022
Solihull	Examination of Solihull Local Plan – Housing Trajectory and Five Year Housing Land Supply (December 2021) / Draft SHELAA Update 2020 (October 2020)	31 March 2021
South Staffordshire	Housing Monitoring and Five Year Housing Land Supply 2022-2023 (December 2023)	31 March 2023
Stratford	Authority Monitoring Report 2021-22 (December 2022), SHLAA and Five Year Housing Land Supply report Update March 2023	31 March 2023
Tamworth	Draft Housing Delivery Paper (December 2023)	31 March 2023
Walsall	Strategic Housing Land Assessment and Statement of Housing Land Supply 2022 (undated)	31 March 2022
Wolverhampton	SHLAA 2022 (September 2023)	31 March 2022



The majority of the GBBCHMA authorities' most up-to-date evidence available is prepared on the basis of a 31 March 2022 base date, though there are a few exceptions where it is based on an older base date of 31 March 2021 (i.e. Birmingham, Solihull, and Stratford).

This report's independent assessment of the supply position across the GBBCHMA is on the basis of a **31 March 2023 base date**. To complement the 14 authorities' most up-to-date evidence this report uses the DLUHC's net additional dwellings by LPA table (table 122)⁵ so that it reflects the most up-to-date data for completions for 2022-23 (i.e. up to 31 March 2023), and for those authorities who only provide completion data for 2020-21 (i.e. up to 31 March 2021).

As part of this exercise, all 14 authorities were contacted to confirm the data that was used to inform the addendum and the most-up-date source of evidence in respect to housing supply.

Supply position

Based on the above methodology, the most up-to-date evidence demonstrates that the total supply across the GBBCHMA between 2011 and 2031 is **199,992 homes**.

As per paragraph 4 of the Addendum, the Coventry and Warwickshire Housing Market Area (CWHMA) Memorandum of Understanding assumes that a total of 2,880 homes from North Warwickshire and Stratford are to contribute to that HMA's unmet needs. Reflecting the Addendum's approach, the report therefore adds this contribution to the minimum housing requirement, when quantifying the housing need at section 5.

This is even before interrogating the components of supply which make up each authorities' supply. For instance, Birmingham has assumed that the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site. It also does not include a standardised non-implementation discount rate, therefore the individual supply position for at least four of the authorities does not factor in any non-implementation discount.

Reflecting the above, the supply position of **199,992 homes** can therefore be assumed to be a 'best case' scenario.



⁵DLUHC Live tables on housing supply: net additional dwellings by LPA (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>)

5. Quantifying the unmet need to 2031 (and beyond)

Having presented the most up-to-date scenarios in terms of the HMA's needs at section 3 and supply at section 4, this section quantifies the true scale of the HMA's unmet need between 2011 and 2031.

Addendum shortfall position

Set out in Table 5.1 below is the shortfall position based on the Addendum's claimed supply of **205,926 homes**.

Table 5.1: Scale of GBBCHMA shortfall based on Addendum claimed supply

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Addendum claimed supply	205,926	205,926	205,926
Scale of shortfall	2,053	18,184	34,742

Using a base date of 31 March 2021 and not seeking to interrogate the data presented in the Addendum, the claimed shortfall is 2,053 homes based on the SGS baseline.

The Addendum however fails to fully acknowledge that circumstances have changed since the SGS was published with the introduction of the standard method. The starting point for calculating unmet need should therefore be based on using the standard method to calculate housing need from the base date of 31 March 2021.

When applying the then-outcome of the standard method from the base date, the shortfall is 18,184 homes. If the current standard method were to be applied from the current base date of 31 March 2023, the approach advocated by this report for the reasons set out at Section 3, the shortfall is 34,742 homes.

As national planning policy and guidance is clear that standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position alone, the shortfall position across the GBBCHMA stands at 34,742 homes.

Turley shortfall position

The Addendum was based on data with a 31 March 2021 base date. As discussed earlier there is now more up-to-date evidence for the majority of authorities in terms of both completions and proposed supply, as well as national completion data.

Section 4 of this report has therefore calculated a total supply position using a base date of 31 March 2023. Table 5.2 below sets out the Turley supply position against the different need positions.

Table 5.2: Scale of GBBCHMA shortfall based on Turley supply position

	SGS baseline	Replaced with then-outcome of standard method from base date (2021) onwards	Replaced with current outcome of standard method from 2023 onwards (Turley advocated approach)
Need	205,099	221,230	237,788
Minimum need plus CWHMA contribution	207,979	224,110	240,668
Turley supply	199,992	199,992	199,992
Scale of shortfall	7,987	24,118	40,676

Using the most up to date base date, following the Addendum's approach of using the SGS baseline housing need figure, the shortfall is **7,897 homes** across the HMA up to 2031.

Reflecting national planning policy and guidance, the housing need scenarios which incorporate the standard method should be used as a starting point for calculating the HMA's unmet needs, in particular the scenario which uses the current outcome of the standard method from 2023 onwards. When these are applied the shortfall ranges between **24,118** and **40,676 homes**.

The above assumes the supply data in each authorities' evidence base documents is accurate. Given the minimum shortfall position on the council's and government evidence alone is significant, it is not necessary to further interrogate in detail the components of supply. However, a review of the evidence base documents demonstrates that some sites included in supplies do not meet the definition of deliverable for reasons such as still being in another use.

Ambitious delivery rates which are unlikely to be met have also been assumed for some sites. Indeed it has been assumed the Langley SUE will deliver 1,500 homes before 2031, despite no reserved matters submissions being made for the site.

Conclusions on unmet need to 2031

The above analysis reveals that there remains a significant unmet need across the HMA to 2031 with the window to deliver this continuing to narrow.

The 14 authorities should be planning positively to deliver the most recent standard method need and ensuring the unmet need of **40,676 homes** up to 2031 as reflected in the most up-to-date evidence is accommodated in full through emerging local plans.

Looking ahead – an indication of the shortfall to 2036 and 2040

As with 'Falling Short', it is difficult to accurately quantify the unmet needs beyond 2031 because there remains an incomplete picture in terms of the HMA's housing supply beyond this date. This report provides an indication of the potential scale of unmet need between 2011 and 2036, and 2011 and 2040, based on each authorities' most up-to-date evidence.

From reviewing the data it is clear there is no supply information for the majority of authorities post 2031. This report has therefore taken the same approach as 'Falling Short' and therefore sought to extrapolate the Addendum and Turley supply position by annualising the supply figure (10,296 homes and 10,000 homes, respectively rounded up) and applying the annual figure each year beyond 2031.

This has been tested against the 2036 and 2040 need positions which use the standard method from 2023 onwards, the approach this report advocates as presented at section 3.

This approach is relatively simplistic and crude and it is arguable as to whether the urban areas can continue to deliver at rates similar to 2011-2031 and how any changes to national planning policy may impact this. It however provides a useful indicator as to the potential scale of the shortfall post-2031, as summarised below.

Table 5.3: Scale of GBBCHMA shortfall up to 2036 and 2040

	Need to 2036	Need to 2040
Need	309,493	366,857
Need with CWHMA contribution	312,373	369,737
Addendum claimed supply (extrapolated)	257,400	298,584
Shortfall against claimed Addendum supply	54,973	71,153
Turley supply (extrapolated)	250,000	290,000
Shortfall against Turley supply	62,373	79,737

As referred to above, this exercise provides the likely direction of travel in terms of unmet need across the HMA, which will likely be established via emerging local plans with unmet need, such as Birmingham.

6. Conclusions and recommendations

The 14 Greater Birmingham and Black Country Housing Market Area ('GBBCHMA') authorities published in October 2023 (dated April 2023) their updated Position Statement Addendum ('the Addendum'). The headline conclusion was that, as of 31 March 2021, the 2011 to 2031 shortfall across the GBBCHMA is estimated to be 2,053 homes.

In response this report has been commissioned by a consortium of housebuilders and promoters to provide an updated position to the Turley 'Falling Short' report (August 2021) to take stock of the position in order to quantify the true scale of unmet to 2031, and beyond.

As with 'Falling Short', this report has focused on 2011 to 2031 as the timeframe covered by the Addendum. The report has however looked beyond 2031 in high-level terms given emerging plans across the GBBCHMA will go well beyond 2031.

The Addendum, published in October 2023, claims the GBBCHMA's shortfall arising between 2011 to 2031 has now reduced to 2,053 homes. This is however predicated on a base date of 31 March 2021, nearly three years ago. In that time, there is now additional monitoring data, and updated supply positions from the majority of GBBCHMA authorities, which has not been reflected in the Addendum's findings.

Furthermore, the Addendum continues to reference a need for **205,099 homes** over the period from 2011 to 2031, based on the Greater Birmingham HMA Strategic Growth Study (2018) that is increasingly dated having been produced almost eight years ago.

The standard method has since been introduced, offering the consistency that the SGS itself sought to provide. While this cannot be backdated to 2011, it can be reasonably used in place of the SGS scenario as an indicator of future needs.

Applying it from the base date of the Addendum (31 March 2021) suggests that some **221,230 homes** are needed between 2011 and 2031 but this rises to **237,788** when the current outcome is used from 31 March 2023 onwards, allowing for worsening affordability and the removal of the cap for Birmingham. This approach, which best reflects national policy, indicates that some 309,492 homes are needed over the longer period from 2011 to 2036, with 366,857 needed to 2040.

As national planning policy and guidance is clear that the standard method is to be used as the starting point for calculating housing need, reflecting a base date of 31 March 2023 and the 14 authorities' claimed position, the shortfall position across the GBBCHMA stands at **34,742 homes**. Based on the Turley supply this shortfall increases to **40,676 homes**. This is the scale of unmet need that best represents the most up-to-date evidence. This shortfall increases to **62,373 homes** up to 2036, and **79,737 homes** up to 2040, when extrapolating the available supply data.

As required by the duty to cooperate it is critical that this quantified unmet need up to 2031 should be distributed between emerging local plans and delivered. This will require difficult decisions, including reviewing Green Belt boundaries.

As suggested in 'Falling Short', it remains the case that a strategic plan or framework is required to cover long term growth across the GBBCHMA, potentially to 2040 and beyond.



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