

Shropshire Local Plan Examination: Stage 2

Representor Unique Number: A0682

Representor: Miller Homes

Matter: Matter 32 – Monitoring

Relevant Question Numbers: Questions 1 and 2

Matter 32 – Monitoring

Miller Homes (A0682)

1. This Hearing Statement is submitted on behalf of Miller Homes (“Miller”).
2. Miller’s responses to specific Matter 32 Questions 1 and 2 is set out below. To avoid unnecessary duplication, this Hearing Statement should read alongside Miller’s response to Matter 2, 3 and 25 (including Appendices).

1. Does the monitoring framework in appendix 4 contain relevant and measurable indicators and will it be effective?

3. We support the pro-active approach taken in the Draft Plan to include a monitoring framework. We also support commitments made in other Plan policies to capture and report on the outputs of monitoring within an annual Authority Monitoring Report (AMR)¹.
4. In the context of our submissions to Matters 2, 3 and 25, we consider it of critical importance that the effectiveness of local plan policies is clearly monitored and appropriate responses enacted where there is evidence of under-delivery.
5. Our submissions have consistently expressed our opinion that the Draft Plan does not make adequate provision for new housing where the need for housing is under-estimated. The Government’s current consultation on reforms to the National Planning Policy Framework include a proposed update to the Standard Method. This generates a calculated need for 2,059 homes per annum in Shropshire, a figure which is some 52% higher than the current method and some 636 homes higher than the proposed housing requirement (1,423 homes per annum). Where this reflects the Government’s policy direction and its acknowledgement of the important role the planning system must play in addressing the housing crisis it also validates our concern that this Plan significantly underestimates the scale of housing which should be provided for.
6. A specific monitoring indicator should be included with reference to Policy SP2 which records and considers the implications of a changed level of need as calculated under the standard method. A significant change in the calculated scale of need should be identified as a trigger for review.
7. Where we support the identification of a monitoring and reporting on the levels of homes delivered annually, split by geographical area, as we state in our response to Q2 this must include separate monitoring of the delivery of sites identified as providing for unmet housing needs arising from the Black Country.
8. These housing indicators should be clearly referenced as triggers for assessing the effectiveness of Policy SP2. We continue to contend, as set out in our Stage 1 Hearing Statements, that the identification of under-provision of housing delivery should trigger an early review of the Local

¹ This includes, for example a commitment to publish progress on housing delivery in the AMR under Policy SP2

Plan with this realised through the introduction of a policy mechanism, and this should permit delivery and development of safeguarded land during the plan period following adoption.

9. In this regard it is observed that the most recent Chief Planners Newsletter (September 2024) affirms that where the difference between an examined Plan's requirement and the outcome of the updated standard method is more than 200 homes (as is clearly the case in Shropshire) *"authorities will be expected to begin a new plan at the earliest opportunity in the new system."* We note that Examination Document Ref: ID44 recognises the Government's statement of intent through the consultation documents with confirmation of the expectation that in such instances authorities will *"begin a plan immediately in the new system."*
10. Subject to the enactment of proposed reforms to the NPPF, it is therefore the case that the Council will be required to undertake an immediate review of the Plan should it proceed to adoption. Evidence of performance in line with the monitoring framework must be used to inform this review but should not be used to delay the commencement of such a review.
11. Separate to the above changes to the housing delivery and need indicators, it is also recommended that the monitoring indicators for SP12 and SP13 (or as amended via the proposed Main/Minor Modifications submitted to the Examination) include as a specific indicator the number of jobs created / lost on an annual and cumulative basis. This should be benchmarked against the implied average annual figure under the stated plan target to create 21,400 jobs over the plan period. Under or over-performance against based on either annual figures or a rolling 3 year average should be used as an indicator to assess impacts on the adequate provision of employment land and housing (with reference to the size of the labour-force).
12. At present, the proposed monitoring for SP11 (or as SP10 noting the proposed Modifications): Green Belt and Safeguarded Sites is:
 - *"1) Planning consents in the Green Belt, by development type."*
 - *"2) Affordable housing completions in the Green Belt."*
13. It is considered that further clarification is required on how the above indicators will robustly monitor this Policy, specifically in relation to the delivery of safeguarded sites.
14. The direction of travel therefore emphasises the importance of such mechanisms, and Miller reserve the right to discuss this at the identified Hearing Session/s.

2. Will they ensure that the delivery of housing and employment to meet the unmet needs of the Black Country can be effectively monitored

15. Our Stage 2: Matter 2 and 3 Hearing Statements express our view that the Draft Plan makes insufficient provision for unmet housing needs arising from the GBBCHMA. This is expressed on the basis of an evidential significant scale of unmet housing needs, the failure to provide for which will have significant detrimental consequences for the housing market and individual households across the area.
16. The severity of the scale of unmet housing needs and the adverse consequences this has created and will continue to create, underlines the importance of ensuring that the Monitoring

Framework can accurately monitor associated delivery on those sites intended to provide for the need.

17. The current iteration of the monitoring indicators does not provide this framework, with no specific indicators included to specifically record comparative performance.
18. The monitoring indicators under appropriate policies, including but not limited to SP2 (or as amended), must be updated to include specific indicators which record progress in delivery of the sites identified as meeting the unmet housing need component. This should be a key reporting indicator in the AMR.
19. Mechanisms for addressing and mitigating under-delivery must be included, with specific recognition of this being a trigger point for early review, as referenced above in our answer to Q1, if the Council is not automatically required to undertake an immediate review following the enactment of proposed changes to the NPPF.