

# Hearing Statement – Matter 3 Housing Land, Requirement and Supply (Policy SP2).

## Tasley Garden Village.

On behalf of Bloor Homes Ltd and Taylor Wimpey UK Ltd.

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# TASLEY GARDEN VILLAGE





## Document Management.

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# 1. Introduction.

- 1.1. Pegasus Group is instructed by Bloor Homes Ltd ('Bloor') and Taylor Wimpey UK Ltd ('Taylor Wimpey') to prepare Statements in respect of their land interests at Tasley Garden Village, Bridgnorth. Tasley Garden Village is identified as an allocation with the draft Shropshire Local Plan as a comprehensive mixed use sustainable urban extension (BRDO30), identified under Policy S3 – Bridgnorth Place Plan Area.
- 1.2. This Statement deals with Matter 3 Housing Land Need, Requirement and Supply which addresses the following issue:

***Issue – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall need, requirement and supply of housing land.***

## 2. Matter 3 Questions – The Housing Need.

2.1. The following provides a response to some of those questions identified in the Stage 2 Matters, Issues and Questions document (ID40). These are dealt with in the order that they appear within ID40.

**1. In response to previous questions posed by us and discussions at the stage 1 hearing sessions, the Council have provided reasons why they consider the base date of the Plan should remain as 2016 (GC24). We note that the base date of 2016 has been used for the purpose of calculating the requirement for the plan period. Is this correct or should it be when LHN was calculated (s)? If a base date of 2020 is used how would this affect the housing need, requirement and supply?**

2.2. The base date of the plan should be updated to reflect when the local housing need (LHN) was calculated in the 2020 Local Housing Need Assessment EVO69.

2.3. In respect of this specific issue, it is useful to note that a very similar matter was recently considered through the examination of the Dartford Local Plan. Paragraphs 35 and 36 of the Inspectors' Report (February 2024) provide useful discussion on this:

*'35. The plan period on submission was from 2017–2037. However, at the time the Plan was submitted, the standard methodology calculation utilised the 2021 workplace-based affordability ratio. The implication of utilising this workplace-based affordability ratio is that previous housing delivery up to that point is taken into account in the ratio. As a consequence, it would not be appropriate to commence the plan period prior to this date as previous over or under-delivery of housing is already taken into account in the calculation of housing need. As such, the submission plan period is not justified as it has the effect of double-counting past housing delivery between 2017 and 2021. The start date of the Plan therefore requires modification in order to ensure that the overall level of housing provided is justified and in accordance with the PPG.*

*36. Policy S4 is a strategic policy which deals with the overall development levels for the Borough. The Policy does not clearly set out the overall quantum of housing required over the plan period. As a result of the above, the overall plan period would extend to 16 years (2021–2037) and results in an overall housing requirement of 12,640 dwellings. MM01 is therefore required in order to amend the start of the plan period to 2021, as well as to include the total housing required to be delivered over the period.'*

2.4. Clearly a similar situation exists in respect of the Shropshire Local Plan, and in particular, there is an effect of double counting past housing delivery. It should be noted that references to the 2021 affordability ratios within the Inspector's Report are understood to be the affordability ratios available at the time of the 2021 assessment of housing need (i.e. the 2020 affordability ratio) given that the previous year's ratio is not published until March the following year. Applying the same approach to the Shropshire Local Plan, the start of the plan period should be 2020 reflecting the Local Housing Need calculation which relied upon the 2019 affordability ratio.

2.5. Having reviewed the Council's previous response on this matter provided within GC24; it appears that a principal concern of the Council is that amendments could cause confusion and there may be further debate over whether the start of the plan period should be

updated again as the examination process continues<sup>1</sup>. In terms of the latter point, this appears unlikely given that, as we understand it, there are no suggestions that the local housing need (or employment need) are to be recalculated. In terms of the potential for confusion, given that the difference between 2016 and 2020 relates to development that has occurred rather than development planned for through the Local Plan, it is considered that the likelihood of confusion for those engaging and previously engaged in the Local Plan is low.

- 2.6. In considering any update to the plan period, it is imperative that in doing so this is done in the manner envisaged by the Council at para 4.6 and 4.8 of GC24 through the removal of those completions up to 2020 from the proposed housing requirement and within each settlement as set out in draft Policy SP2 and Policy SP20. From our review of the available data, this would not materially alter the distribution of development significantly away from Option B Urban Focus as set out in the Housing and Employment Topic Paper (GC45) with around 76% of housing growth focused on the Strategic Centre, Principal Centres, Key Centres and Strategic Settlements.
- 2.7. The approach should not, and cannot, be the reapportioning of the revised housing need (from 2020) between settlement areas in the same manner as the plan currently uses. Use of the same apportionment of housing (and employment) land after completions are removed would materially impact the planned distribution of growth and overall strategy for the plan. This would result in a markedly different plan than that submitted. Such an approach would also serve to stifle growth and the ability of the plan to meet each settlements development needs by prioritising growth in those areas which have seen significant numbers of completions, including those through SAMDev sites between 2016 and 2020.
- 2.8. Such a change will also need to be reflected and considered in respect of the employment land requirement noting that this will also affect the assessed need, requirement and supply.
- 2.9. In terms of the implications of this proposed change, the following Table 1 calculates the expected revised housing requirement compared with the current draft Local Plan as per the proposed main modifications. This provides a comparison with the supply data contained within the Snapshot Housing Trajectory for Shropshire (GC50).

*Table 1 – Implications of amended plan period on housing supply vs requirement.*

	<b>Draft Local Plan 2016–2038</b>	<b>Updated Local Plan period 2020–2038</b>
Local Plan Requirement	31,300	25,608
Dwellings Completed	11,761	4,587
Potential Future Residential Completions	21,720	21,720
Total Supply	33,481	26,298
<b>Supply vs Potential Completions</b>	<b>107.0%</b>	<b>102.7%</b>

- 2.10. As seen in Table 1, the main implication in the amendment to the plan period is a notable reduction in supply when compared against the housing requirement. This is due to the high levels of net housing completions between 2016/17 and 2019/20 of around 7,183

<sup>1</sup> Examination ref. GC24 paragraph 4.4.



dwellings (1,796 dwellings per annum). It should be noted that the supply figures are provided by GC50 which does assume a 6% non-delivery in supply.

### 3. Matter 3 Questions – The Housing Requirement

**1. Is the approach to calculating the housing growth and the housing requirement set out in the Council’s Updated Housing and Employment Topic Paper – April 2024 (GC45) of a minimum of 31,300 dwellings over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?**

3.1. Notwithstanding the comments in respect of the plan period, the approach to calculating the housing requirement is considered justified, positively prepared and consistent with national policy.

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

3.2. The draft Local Plan identifies a number of sites appropriate to meeting those unmet housing needs of the Black Country. This is supported. However, as we set out in more detail in respect of Matter 27 and as set out in our most recent representations; it will be important that the residential mix delivered on these sites appropriately respond to the Black Country housing needs.



## 4. Matter 3 Questions – The Overall Supply of Housing

**1. Paragraph 74 of the Framework says strategic policies should include a trajectory illustrating the expected rate of housing delivery over the Plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Does the Council have an up to date trajectory and if so where can this be found? Is the housing trajectory realistic?**

- 4.1. Whilst we do not to comment on the assumed housing trajectories in general; as set out in our most recent representations and in the Statement of Common Ground (SoCG13) it is considered that the trajectories assumed for our client's land interests at Tasley Garden Village (BRDO30) are considered overly cautious.

**4. How will the supply and delivery of housing to meet the identified unmet needs of the Black Country be undertaken? Does this need identifying separately in a trajectory i.e. the expected delivery on the sites (BRDO30, SHRO60 and IRNO01), identified to meet the unmet needs on a yearly basis.**

- 4.2. This provision will no doubt be delivered as part of the wider allocations and given that there will, and cannot be, any control over the final occupants of the units or phases it is not considered appropriate to identify this separately in a trajectory. Instead the overall delivery on these sites should be monitored as part of the wider site delivery.

**5. Does the Plan identify a developable supply and/or broad locations in years 6–10 and, where possible, years 11–15 necessary to maintain continuity of deliverable supply, including an appropriate buffer for changing circumstances?**

- 4.3. Whilst evidencing this is a matter for the Council, it should be noted that in the event that the start of the plan period is altered to accord with the calculation of local housing need, then any buffer as previously calculated will be reduced as set out in to Question 1 relating to housing need.

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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