

Shropshire Local Plan Examination

Shropshire Council Response to:

**ID40: Stage 2 Matters, Issues and
Questions**

Matter 3



Matter 3 – Housing Land Need, Requirement and Supply (policy SP2) – see MMs 001-004

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 and supply of housing land.

Questions: The Housing Need

Question 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 (2020)? If a base date of 2020 is used how would this affect the housing need, requirement and supply?*

Shropshire Council Response:

- 1.1. Shropshire Council considers it is correct and appropriate that the base date for the housing requirement should align with the base date for the plan period (2016) of the draft Shropshire Local Plan.
- 1.2. The 2021 National Planning Policy Framework (NPPF) addresses the calculation of Local Housing Need at paragraph 61. This includes *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance..."*
- 1.3. The NPPF then addresses the housing requirement at paragraph 66. This includes *"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period."*
- 1.4. Shropshire Council considers the approach utilised is entirely consistent with these expectations. It has calculated Local Housing Need using the standard method. This calculation has then formed the starting point for identification of an appropriate housing requirement over the proposed plan period.
- 1.5. The National Planning Practice Guidance (NPPG) on Housing and Economic Needs Assessment (ID2a) provides more detail on the standard method for calculating Local Housing Need. It specifies as paragraph 8 that: *"Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and*

revised where appropriate. The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities...”

- 1.6. As such, it is apparent from ID2a that there is an expectation that the Local Housing Need assessment is kept under review and revised where appropriate during the plan making process. However, ID2a **does not** specify that such a review of Local Housing Need would result in the need to revise the plan period addressed within a draft Shropshire Local Plan.
- 1.7. This is entirely logical, as such an expectation would have the potential to significantly delay the plan making process; cause unnecessary confusion, due to changes to proposals to reflect the implications of years removed from the proposed plan period; cause unnecessary tension with local communities, due to perception of changing parameters; and impact upon (without necessarily invalidating) wider evidence, which may align with the initial plan period.
- 1.8. Paragraph 12 of ID2a then explains *“The method provides authorities with an annual number, based on a 10 year base line, which can be applied to the whole plan period.”*
- 1.9. As such, it is apparent from ID2a that it is entirely appropriate to apply the assessment of Local Housing Need to the entirety of the proposed plan period, irrespective of whether this includes years before the base date for the assessment of Local Housing Need. Again, this approach is entirely logical, for the reasons documented above.
- 1.10. If a 2020 base date was utilised when calculating the housing requirement, Shropshire Council can see only two ways this could potentially be achieved. However, both scenarios have significant issues and are not supported by the Council.
- 1.11. The start of the plan period could be aligned with the 2020 base date. The Council has already documented in GC24 why it would not support such an approach.
- 1.12. In summary, this is because there would be numerous disadvantages resulting from such a change to the plan period, which could lead to unnecessary delays to the examination and undermine implementation of the draft Shropshire Local Plan.
- 1.13. These disadvantages include:
 - a. Consultations and discussions with communities undertaken during the preparation of the draft Shropshire Local Plan were predicated on a 2016 start date for the plan period. Changing this date now may cause unnecessary confusion.

- b. Evidence base prepared to inform the draft Shropshire Local Plan is predicated on a 2016 start date for the plan period. Whilst a change would not invalidate the evidence, it could again cause some unnecessary confusion.
 - c. Such a change would have 'knock-on' implications for settlement housing and employment land guidelines, which could also cause unnecessary confusion.
 - d. Such a change could also lead to further debate over whether the start of the plan period should be updated again as the examination process continues.
- 1.14. Furthermore, a range of further Main Modifications would be required to the draft Shropshire Local Plan in order to reflect such a change. In particular:
- a. If the start of the plan period is aligned with the base date for the Local Housing Needs Assessment, the housing and employment land requirements within draft Policy SP2 would need to be reduced to exclude the housing and employment land completed prior to 2020. This is because these proposed requirements were directly informed by the supply at 2016, as this represented the start of the plan period when the draft Shropshire Local Plan was being prepared.
 - b. Similarly, the housing and employment land guidelines for all settlements within draft Policies S1-S20 would need to be amended to exclude the housing and employment land completed prior to 2020. This is again because these proposed guidelines were directly informed by the supply at 2016, as this represented the start of the plan period when the draft Shropshire Local Plan was being prepared and this formed the basis for discussions with communities.
- 1.15. Alternatively, the start of the plan period could remain 2016, with annual requirements aligning with local housing need until 2019 and the currently proposed housing requirement then commencing in 2020. This would continue to ensure local housing need is achieved, but result in a reduction to the overall housing requirement for the proposed plan period (as the proposed housing requirement exceeds local housing need). With regard to housing land supply, it would increase available 'headroom' across the proposed plan period.
- 1.16. The Council would not support such an approach, as it would create similar confusion to the first option. It would also conflict with ID2a.
- 1.17. In conclusion, Shropshire Council considers it is correct and appropriate that the base date for the housing requirement should align with the base date for the plan period (2016). **Shropshire Council would not support an amendment to the start of the proposed plan period.**

Question 2. *What is the identified affordable housing need?*

Shropshire Council Response:

- 2.1. To inform the draft Shropshire Local Plan, Shropshire Council assessed the housing needs of different groups in our communities, including those who require affordable housing. These assessments are summarised within the Strategic Housing Market Assessment (SHMA) (EV097.01 and EV097.02).
- 2.2. EV097.02 summarises the assessment of the need for affordable housing. This assessment concludes that during the period from 2016 to 2038, an estimated 799 households per annum will require affordable housing.
- 2.3. However, it is important to note that the definition of 'need' applied in this calculation of affordable housing need is different to the definition of 'need' applied within the calculation of Local Housing Need using Government's standard method.
- 2.4. This distinction is recognised within paragraph 1 of the National Planning Practice Guidance (NPPG) on Housing Needs of Different Groups (ID67), which with regard to calculating affordable housing need states "*This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.*"
- 2.5. Given this distinction, the mechanisms for meeting this need extend beyond provision of net additional affordable dwellings. This is because the calculated affordable housing 'need' can be met through a combination of both new and existing dwellings – as the identified need is for appropriate dwellings.
- 2.6. Therefore, where existing households in unsuitable dwellings are transferred to suitable dwellings, resultant vacant dwellings can be re-occupied by other households for which they are suitable. This therefore meets the needs of both households which at the base date were in inappropriate dwellings and in affordable housing need. As a result, a single new dwelling (net) can meet the need of one, two or even more households in a chain.
- 2.7. The Council would also note that affordable housing need is intrinsically considered in the calculation of Local Housing Need. ID67 states "*The household projections that form the baseline of the standard method are inclusive of all households including travellers as defined in Planning policy for traveller sites.*" Furthermore, the calculation of Local Housing Need also includes a specific market signals adjustment in response to the affordability ratio for an area.

Questions: The Housing Requirement

Question 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?*

Shropshire Council Response:

- 1.1. Yes. Shropshire Council considers that the approach to calculating and assessing housing growth options (summarised within the updated additional Sustainability Appraisal Report GC44) and identifying the proposed housing requirement (summarised in the updated Housing and Employment Topic Paper GC45) is justified, positively prepared and consistent with national policy.
- 1.2. The Council considers that through the updated additional Sustainability Appraisal assessment, it has identified and assessed all reasonable options for proposed contributions to the Black Country (summarised within Chapter 6 of GC44); and identified and assessed all reasonable options for the level of housing growth – which constitute the reasonable options for the housing requirement (summarised within Chapter 8 of GC44).
- 1.3. The methodology employed to identify these reasonable options is consistent with that employed earlier in the plan making and Sustainability Appraisal processes. The methodology is also considered to be consistent with the expectations of the Inspectors documented in ID28, ID36 and ID37.
- 1.4. In particular, Shropshire Council would note that paragraph 5.7 of ID37 specified *"What the SA should do is test options based on the 2020 baseline with 2 extra years, but only look at the growth options tested in the original SA, so a 5, 10 and 15% uplift and look at this with the Black Country unmet needs of 1,500 homes and without it. The results of the SA should then be used to assess what is an appropriate housing requirement in the Plan. The Plan should then make clear what the housing requirement for Shropshire is and how much of the Black Country unmet needs are being accommodated in the Plan. This should be included in Policy SP2 as well as the explanatory text which will need modifying accordingly."*
- 1.5. The methodology employed to assess the reasonable options for proposed contributions to the Black Country and for the level of housing growth is also considered to be consistent with that utilised throughout the plan making and Sustainability Appraisal process. This methodology was informed by a Scoping Report, refined through consultation, and is considered appropriate and consistent with relevant legislation and policy requirements.

- 1.6. The assessment methodology is also considered consistent with the expectations of the Planning Inspectors in ID28, ID36 and ID37.
- 1.7. GC44 clearly summarises the methodology used to identify and assess reasonable options for proposed contributions to the Black Country and the level of housing growth, and reaches clear conclusions on the sustainability of each option and the options overall.
- 1.8. As such, Shropshire Council considers GC44 clearly demonstrates that the approach to calculating and assessing the reasonable options for proposed contributions to the Black Country and for the level of housing growth is justified, positively prepared and consistent with national policy.
- 1.9. Identification of the proposed housing requirement is ultimately a matter of planning judgement, as summarised within Chapter 7 of GC45. The Council considers this planning judgement exercise was proportionate and appropriately considered all reasonable options and all relevant information. This included, but was not limited to, the updated additional Sustainability Appraisal work summarised in GC44.
- 1.10. GC45 clearly and unambiguously summarises the planning judgement exercise undertaken and the reasons for the conclusions reached. As such, Shropshire Council considers GC45 demonstrates that the approach to identifying the proposed housing requirement is justified, positively prepared and consistent with national policy.
- 1.11. Shropshire Council also considers the proposed housing requirement of a minimum of 31,300 dwellings over the period from 2016 to 2038 (see proposed main modifications in GC4m), is justified, positively prepared and consistent with national policy.
- 1.12. Importantly, this proposed housing requirement:
 - a. Will meet Local Housing Need (as calculated in EV069, which utilises a 2020 base date) and has been found sound by the Inspectors (ID28, ID36 and ID37).
 - b. Represents a continuation of the 'high growth' option for the housing requirement previously identified and contained in the submission version of the draft Shropshire Local Plan (15% uplift to local housing need). As such, it provides an opportunity to support achievement of identified issues and opportunities in Shropshire.
 - c. Represents a continuation of the specific contribution of 1,500 dwellings as requested by our neighbours towards the unmet housing need forecast to arise in the Black Country proposed within the submission version of the draft Shropshire Local Plan. This is however now achieved through a further specific uplift of 1,500 dwellings.

Question 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?*

Shropshire Council Response:

- 2.1. Shropshire Council has proposed a contribution of 1,500 dwellings towards the unmet housing needs forecast to arise within the Black Country. This is captured within draft Policy SP2 of the draft Shropshire Local Plan (see proposed main modifications in GC4m).
- 2.2. This proposed contribution has been informed by proactive duty to co-operate discussions with the Black Country Authorities (as summarised within the Housing Topic Paper GC4i); and Sustainability Appraisal, during which all reasonable options were considered (as summarised within the additional Sustainability Appraisal GC44).
- 2.3. The proposed contribution has also been specifically agreed within a Statement of Common Ground (SoCG) signed by Shropshire Council and the four Black Country Authorities (EV041).
- 2.4. The Council would note that within Paragraph 2 of ID28, the Planning Inspectors concluded *"we are satisfied that the Council has met the legal duty set out in Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), in so far as it imposes a duty on a local planning authority to co-operate with other local planning authorities, the County Council and prescribed bodies or other persons by engaging constructively, actively and on an ongoing basis in relation to the preparation of a development plan document so far as relating to a strategic matter to maximise the effectiveness of the activity of plan preparation."*
- 2.5. Furthermore, in paragraph 13 of ID28, the Planning Inspectors concluded: *"In principle, the Council’s intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire’s housing need to meet some of this externally derived unmet need."*
- 2.6. The Council consider the proposed approach to accommodating this contribution within the draft Shropshire Local Plan will be effective and consistent with national policy – ensuring it is accommodated sustainably within the plan period.

- 2.7. In positively responding to ID28, ID36 and ID37, this approach now entails identification of specific sites to accommodate this proposed contribution for monitoring purposes (see proposed main modifications in GC4m).
- 2.8. Identification of these sites has been informed by a proportionate and robust site assessment process, as detailed in GC44.
- 2.9. In summary, an appropriate geography within which reasonable options to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country was first identified. As explained within paragraph 12.16 of GC44, this involved consideration of:
 - a. Geographic proximity and the location and quality of main road and rail transport links between Shropshire and the Black Country.
 - b. Migration patterns between sub-geographies (Place Plan Areas) within Shropshire and the entirety of the Black Country.
 - c. Commuting patterns between sub-geographies (Place Plan Areas) within Shropshire and the entirety of the Black Country.
 - d. The extent to which Travel to Work Areas (TTWA's) associated with the Black Country penetrate into Shropshire and vice versa.
- 2.10. Notably, within paragraph 7.1 of ID37 the Inspectors identified that they were content with the approach taken to identify an appropriate assessment geography within ID37.
- 2.11. Subsequently, a robust and proportionate site assessment process was undertaken, which involved consideration of all reasonable site options within the identified assessment geography.
- 2.12. This process identified appropriate sites to sustainably accommodate the proposed contribution to the unmet needs forecast to arise in the Black Country within the proposed plan period. The Council considers this process is entirely consistent with national policy. This additional assessment work is summarised within Chapter 12 and Appendices 1-10 of GC44.
- 2.13. The sites identified through this process to accommodate the proposed contribution to the unmet housing need forecast to arise in the Black Country (see proposed main modifications in GC4m) are:
 - a. BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings.
 - b. SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings.
 - c. IRN001 - Former Ironbridge Power Station: 600 dwellings.
- 2.14. These sites are existing proposed allocations, which is perhaps unsurprising as these proposed allocations were themselves

informed by a proportionate and robust site assessment process, which was reviewed and updated as part of this process.

- 2.15. However, this is considered entirely consistent with the submission version of the draft Shropshire Local Plan, given that it included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan – including the proposed allocations within the submission version of the draft Shropshire Local Plan.
- 2.16. These contributions are reflected in relevant site guidelines and Appendix 4 of the draft Shropshire Local Plan, which summarises the proposed monitoring framework (see proposed main modifications in GC4m).
- 2.17. In conclusion, Shropshire Council considers an appropriate contribution to the unmet housing needs forecast to arise in the Black Country has been proposed. The Council also considers that the approach proposed to accommodate this contribution in the draft Shropshire Local Plan will be effective and consistent with national policy – ensuring it is accommodated sustainably within the plan period.

Question 3. *Has there been significant under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 74 of the NPPF?*

Shropshire Council Response:

- 3.1. There has **not** been significant under delivery of housing in Shropshire.
- 3.2. The latest housing delivery test measurement (2022 measurement) concluded in Shropshire, over the relevant three years (2019/20, 2020/21 and 2021/22), housing delivery exceeded housing required, with delivery at 152%. It also confirmed that as a result there is no 'consequence' in Shropshire.
- 3.3. Furthermore, the Council's latest Five Year Housing Land Supply Statement (2022 base date) (GC33) demonstrates that throughout the proposed plan period, housing completions have exceeded the proposed housing requirement (see proposed main modifications in GC4m).
- 3.4. As a result, Shropshire Council considers that it is appropriate for a 5% buffer to be applied to the Five Year Housing Land Supply, in the context of this examination.

- 3.5. For the avoidance of doubt, following changes to the National Planning Policy Framework (NPPF) in 2023, no buffer of the Five Year Housing Land Supply would be required in the context of decision-making.

Question 4. *Regarding paragraph 69 of the Framework, would at least 10% of the housing requirement be from sites no larger than a hectare?*

Shropshire Council Response:

- 4.1. Yes, at least 10% of the proposed housing requirement of 31,300 dwellings for the period 2016 to 2038 (see proposed main modifications in GC4m) will be achieved on sites no larger than 1ha.
- 4.2. Within the plan period thus far (2016/17-2022/23), some 4,747 dwellings have been completed on sites no larger than 1ha. This equates to around 15.17% of the proposed housing requirement of 31,300 dwellings.
- 4.3. Furthermore, commitments on sites with Planning Permission or Prior Approval; 'saved' allocations; and proposed allocations demonstrate further capacity on sites no larger than 1ha, equating to around 8.97% of the proposed housing requirement of 31,300. This consists of:
- a. 2,584 dwellings on sites with planning permission or prior approval at 31st March 2023
 - b. 98 dwellings on 'saved' allocations without Planning Permission at 31st March 2023.
 - c. 126 dwellings on proposed allocations without Planning Permission at 31st March 2023.
- 4.4. The draft Shropshire Local Plan also facilitates appropriate forms of windfall development, a significant component of which will be sites no larger than 1ha in size.

Question 5. *Is the updated housing requirement in the Plan appropriately aligned with forecasts for jobs growth?*

Shropshire Council Response:

- 5.1. Shropshire Council considers that the proposed, updated housing requirement for a minimum of 31,300 dwellings from 2016 to 2038 (see proposed main modifications in GC4m) will continue to meet the objectives of the Local Plan strategy set out in Policy SP2.
- 5.2. The updated minimum housing requirement of 31,300 dwellings, which exceeds the submitted housing requirement of 30,800 dwellings by 500 dwellings, will further increase the capacity of the

Local Plan strategy to "...meet housing need and support the long-term sustainability of the County [and] provide some flexibility to respond to changes to LHN over the plan period and an opportunity to:

- a. Respond positively to specific sustainable development opportunities;
- b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;
- c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;
- d. Support the diversification of our labour force; and
- e. Support wider aspirations, including increased economic growth and productivity."

- 5.3. The Economic Development Needs Assessment (EDNA) (EV043) considered the submitted housing requirement of 30,800 dwellings as a growth scenario which would inform the preparation of the draft Shropshire Local Plan. The EDNA forecast that the submitted housing requirement would be likely to supply a labour force of around 12,145 persons.
- 5.4. The Updated Housing and Employment Topic Paper – April 2024 (GC45) considers that the updated housing requirement of 31,300 dwellings in Table 17.4, would be likely to increase this labour supply to around 12,615 persons. This would contribute 60% of the labour supply required to support the anticipated jobs growth of around 21,400 jobs for which are expected to be provided by the updated employment land requirement of 320ha. Shropshire Council considers that this meets the objective of the strategy in Policy SP2 to support the diversification of our labour force through the provision of housing to meet needs and support the long-term sustainability of the County.
- 5.5. Policy SP2 also intends that the updated labour force growth of 12,615 persons will help to support the diversification of an ageing labour force in the County by encouraging the migration of younger people into Shropshire to work and live. This will contribute towards the objective of Policy SP2 to help deliver the growth and productivity which is planned for within the economic strategy of the draft Shropshire Local Plan.
- 5.6. The draft Shropshire Local Plan does not anticipate that the growth and productivity provided by the economic strategy will be delivered by growth in new housing alone. The objectives of the strategy in Policy SP2 clearly identify that housing provision must meet a range

of housing needs. Indeed, this Examination has sought to strengthen the provision of housing for the elderly and those with special needs through the provision of a new Policy inserted after DP1 (GC25) and presented in Main Modification MM033 (GC4M).

- 5.7. Shropshire has a significant ageing demography compared with the population of the West Midlands region and the UK. The anticipated population growth to 2038, largely comprising migration into the County, is also expected to add a significant number of older people into this ageing population. The housing strategy seeks to balance these needs with the provision of housing for younger people to help increase the supply of labour coming into the County, but a significant need for elderly and specialist housing will remain a key part of the housing strategy to 2038.
- 5.8. In response, the aspiration behind the economic strategy seeks to ensure that the forecast jobs growth also meets the needs of the existing population of Shropshire. This intends that, in part, the age profile of the working population can be 'refreshed' by younger Shropshire residents entering the local labour force and helping to improve the productivity of the local economy of the County.
- 5.9. This will be further supported by contributing towards unmet employment land needs in the Black Country and through employment in the County being available to neighbouring areas. This reflects Shropshire's position as the largest Local Authority area in the West Midlands.
- 5.10. These underlying objectives are identified in the Employment Requirement Topic Paper (EV112) in relation to achieving Shropshire's economic potential and building the spatial strategy for the County, in the draft Shropshire Local Plan.
- 5.11. The jobs growth forecast of 21,400 jobs for the economic strategy will largely be met from the projected labour force growth of 12,615 persons (at 60%) from new housing leaving just 8,785 jobs (at 40%) to be met from other sources.
- 5.12. Shropshire Council identifies in the Updated Housing and Employment Topic Paper – April 2024 (GC45) the opportunities within the existing population of Shropshire to increase the supply of labour to fully meet the jobs growth forecast. The Updated Topic Paper (GC45) also considers the need to manage Shropshire's commuting relationships with its neighbouring areas, as the largest Local Authority area in the region and in its strategic position on the English border with Wales.

- 5.13. Opportunities to meet this balance of 8,785 jobs in the jobs growth forecast from the existing population of the County, will be:
- a. Economic Activity – Unemployment: Census 2021 records unemployment at 5,743 persons or 3.72% of the resident working age population of 154,421 people. These people are actively seeking work and intend to enter the workforce of the County or beyond. This is a low rate of unemployment but is still higher than the 3.0% recorded in the NOMIS Labour Market Profile (2021). This rate of 3.72% is expected to fall to 3.0% at 4,633 persons as the local economy recovers stability. This fall in the rate would release a further 1,110 resident workers into the local labour supply. This additional labour would reduce the balance of the jobs growth forecast from 8,785 jobs to 7,675 jobs.
 - b. Economic Inactivity – Mature Students: Census 2021 records a significant student population totalling 9,687 persons in Shropshire. This comprises a range of age cohorts including 1,050 mature students aged between 25 to 64 years. Mature students are largely retraining to seek better employment opportunities and to return to the labour market. In Shropshire, this would reduce the balance of the jobs growth forecast by 1,050 people from 7,675 jobs to 6,625 jobs.
 - c. Economic Inactivity – Early Retirees: Census 2021 records that 8,556 persons aged between 50 – 64 years have taken early retirement in Shropshire at the Census date. Whilst early retirement arises from a range of opportunities or challenges, Shropshire offers the opportunity to continue working but in a different business sector or occupation. Where 10% of these early retirees return to work, 850 persons would re-enter the Shropshire labour force to reduce the balance of the jobs growth forecast from 6,625 jobs to 5,775 jobs.
 - d. Economic Inactivity – Young Carers: Census 2021 records an extensive resident ‘carer’ population of 9,814 persons from 16 to 65+ years. In later life, many people adopt caring roles in the home or for dependents as a lifecycle choice or a family responsibility. For young carers, the role of caring must be a temporary life choice, leading on to employment in due course. Young carers from 16 to 34 years would be expected to follow this pathway in the period to 2038. This would return 2,250 people to the Shropshire labour force to reduce the balance of the jobs growth forecast from 5,775 jobs to 3,525 jobs.
 - e. Economic Inactivity – Deferred Retirement: Census 2021 records a significant retired population of 68,868 persons 65+ years in Shropshire. For those people in younger, retired age cohorts from 65 - 74 years, opportunities still exist to seek alternative occupations and to remain economically active into later life. It

is expected this will be an increasingly popular choice to 2038, combined with the fiscal incentives of deferring pension incomes. The current population in these younger, retired age cohorts includes 1,880 people or 2.73% who worked during the last 12 months. This indicates the potential for deferred retirements in Shropshire. This would return 1,880 people to the Shropshire labour force to reduce the balance of the jobs growth forecast from 3,525 jobs to 1,645 jobs.

- 5.14. Shropshire, as the largest Local Authority area in the West Midlands has a significant number of functional relationships. These also include relationships across the English border with Wales, as part of The Marches sub-region. These functional relationships create significant commuting relationships with the potential to bring a significant working population into the County. These will be:
- a. Black Country Authorities: In assisting the Black Country Authorities with their unmet employment land needs, Shropshire wishes to sustain the capacity of the Black Country Authorities to continue to meet their own labour needs in accordance with NPPF, paragraph 81. Shropshire therefore seeks to achieve an equilibrium in commuting between Shropshire and the Black Country through the provision of sufficient employment land to provide a further +2,400 jobs in Shropshire. The provision of this additional labour from the Black Country, without the need for further housing, would reduce the balance of the jobs growth forecast from 1,645 jobs to a potential labour surplus of 755 people.
 - b. The Marches Authorities: Shropshire has strong relationships with those Welsh Authorities bordering with England. This relationship is based, in part on the availability of employment in Shropshire and the availability of labour in these neighbouring areas. The aspiration in the economic strategy will further support this functional relationship. The commuting relationship across The Marches takes 4,651 persons from Shropshire to work in Wales and 6,883 persons from Wales work in Shropshire. Where this commuting relationship from Wales was adjusted upwards by +15% in response to available employment in Shropshire, this would bring a further 1,030 persons into Shropshire to increase the potential labour surplus from 755 people to 1,785 people.
 - c. Other Neighbouring Areas: Shropshire has around 12 neighbouring areas adjoining the County where the availability of employment has the potential to impact the commuting relationship either by drawing labour into the County or by employing residents who currently commuting to other area for work. Where these commuting relationships were to achieve an overall balance of net-commuting flows between Shropshire and

its neighbours, this would deliver a further 2,335 persons into Shropshire to increase the potential labour surplus from 1,785 people to 4,120 people.

- 5.15. The Updated Housing and Employment Topic Paper – April 2024 (GC45) considers that Shropshire’s future labour force will be derived from more than one source to 2038. Housing growth will be the principal source of labour, but this will be complemented by structural changes in the economic activity of the county’s existing resident population and by continuing trends towards the ‘equilibrium’ of commuting between Shropshire and its many neighbouring areas. The management of Shropshire’s commuting patterns will be complemented by a 30ha contribution towards unmet employment land needs in the Black Country Authorities.
- 5.16. The Updated Housing and Employment Topic Paper summarises this position in Table 7.4. This presents the reasonable adjustments outlined above which identify a potential future labour supply of around 25,400 people to meet an adjusted jobs growth forecast of 21,400 jobs, including 8,440 jobs in Class B and business and industrial Class E(g) uses.

Question 6. *What is the requirement for affordable housing and is this likely to meet the identified need?*

Shropshire Council Response:

- 6.1. Provision of affordable housing is a key priority for Shropshire Council. Indeed, delivery of additional affordable housing was one of the factors that informed the decision to pursue ‘high-growth’ in the proposed spatial strategy (as reflected within paragraph 3.6 of the explanation to draft Policy SP2).
- 6.2. The proposed affordable housing provision target in the draft Shropshire Local Plan is identified in draft Policy SP2 (see proposed main modifications in GC4m). This target is around 7,825 dwellings (around 356 dwellings per annum), between 2016 and 2038. This equates to around 25% of the proposed housing requirement.
- 6.3. The Council addressed the matter of whether this target is likely to meet identified affordable housing need within Chapter 4 of the Housing Topic Paper (GC4i).
- 6.4. In summary, it is acknowledged that the proposed affordable housing provision target is less than estimated affordable housing need (summarised in the response to Matter 3 – Housing Need Question 2). However, it is crucial to understand that the definition of need in this calculation differs from that applied in the calculation of Local Housing Need.

- 6.5. As such, the approach to meeting this need is not simply through provision of an equivalent number of net additional affordable dwellings (as summarised in the response to Matter 3 – Housing Need Question 2).
- 6.6. Paragraph 62 of the 2021 National Planning Policy Framework (NPPF) outlines the approach to the needs of different groups in the community, stating *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies..."*
- 6.7. National Planning Practice Guidance (NPPG) on Housing Needs of Different Groups (ID67) recognises at paragraph 1 that *"Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account: • the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered); • the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and • the anticipated deliverability of different forms of provision, having regard to viability."*
- 6.8. Paragraph 1 of ID67 also includes *"Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies."*
- 6.9. Shropshire Council considers that the proposed affordable housing target positively responds to identified affordable housing need; is consistent with the expectations of paragraph 62 of the NPPF; and aligns with the approach in paragraph 1 of ID67.
- 6.10. To support the achievement of the proposed affordable housing target, the Council:
 - a. Has identified a range of policy mechanisms to support the delivery of affordable housing within draft Policies DP3-DP7.
 - b. Operates a number of wider mechanisms and initiatives to positively influence and facilitate affordable housing delivery in Shropshire.

Questions: The Overall Supply of Housing

Question 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?*

Shropshire Council Response:

- 1.1. Shropshire Council has undertaken an up-to-date 'snapshot' housing trajectory, as summarised within document GC50. This 'snapshot' utilises data at 31st March 2023 and provides an indicative forecast of future levels of development over the proposed Plan period.
- 1.2. The 'snapshot' is based on careful consideration of likely timescales for the delivery of the various components of the housing land supply, taking into account lead-in times and expected build-out rates; past rates of delivery/past trends within the market; and known factors which may influence the housing market and housing delivery rates in the short, medium and long-term.
- 1.3. However, it is recognised that there will inevitably be a range of wider issues which this assessment cannot reasonably take into account, such as individual decisions of developers and the myriad of unknown factors that can emerge and affect the housing market and housing delivery.
- 1.4. It is for this reason that the Council considers the average annual housing requirement of around 1,423 dwellings is the most robust trajectory of future housing delivery in Shropshire for inclusion in the draft Shropshire Local Plan.
- 1.5. Despite this, Shropshire Council does consider this 'snapshot' housing trajectory which is based on current best available information to be realistic and robust.

Question 2. *Is the housing trajectory and information required by the tables appended to our initial questions (ID1) showing the expected rate of delivery of housing land up to date?*

Shropshire Council Response:

- 2.1. With regard to the housing trajectory, see response to Matter 3, Question 1 - Overall Supply of Housing.
- 2.2. With regards to the information requested in the tables appended to ID1, Shropshire Council has undertaken an up-to-date assessment of the housing land supply in Shropshire, as summarised within document GC47. This assessment has a base date of the 31st March

2023. Within Appendices A-J of GC47 delivery forecasting for all sites that form part of the identified housing land supply is provided. These Appendices are considered comparable to the tables appended to ID1.

Question 3. *Should a trajectory illustrating the expected rate of housing delivery over the Plan period be included in the Plan?*

Shropshire Council Response:

- 3.1. Having considered the various components of the housing land supply and reviewed past delivery rates and trends within the local market, the expected rate of housing delivery is considered to be consistent with the proposed average annual housing requirement of 1,423 dwellings (see proposed main modifications in GC4m).
- 3.2. It is recognised that there will inevitably be a range of known and unknown factors that emerge and affect the housing market and housing delivery. These factors will inevitably lead to fluctuations in housing delivery over time and result in annual rates of delivery falling below or exceeding this level. However, over the proposed plan period, it is expected that this will 'balance out', to ensure the proposed housing requirement is achieved.
- 3.3. Reflecting on the available information and the range of known and unknown factors that emerge and affect the housing market and housing delivery, it is considered that the annual average housing requirement of around 1,423 dwellings forms the most robust trajectory of future housing delivery in Shropshire. It is also proposed that this figure will be used to assess annual housing delivery.
- 3.4. This is considered a reasonable and precautionary approach to preparing a housing trajectory. As this position is documented within the explanation to draft Policy SP2, the Council considers the draft Shropshire Local Plan does include an appropriate housing trajectory.
- 3.5. However, the Council is committed to keeping this trajectory of future housing delivery up-to-date through the Shropshire Authority Monitoring Report (AMR).

Question 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 (BRD030, SHR060 and IRN001), identified to meet the unmet needs on a yearly basis.*

Shropshire Council Response:

- 4.1. In seeking to positively respond to ID28, ID36 and ID37, the proposed contribution of 1,500 dwellings towards the sites unmet housing need forecast to arise in the Black Country is proposed to be accommodated on three proposed allocations (see proposed main modifications in GC4m). These are:
 - a. BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings.
 - b. SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings.
 - c. IRN001 - Former Ironbridge Power Station: 600 dwellings.
- 4.2. These sites are existing proposed allocations, which is perhaps unsurprising as these proposed allocations were themselves informed by a proportionate and robust site assessment process, which was reviewed and updated as part of this process.
- 4.3. However, this is considered entirely consistent with the submission version of the draft Shropshire Local Plan, given that it included proposed contributions of 1,500 dwelling and 30ha of employment land to the Black Country, to be accommodated in accordance with the wider strategy within the draft Shropshire Local Plan – including the proposed allocations within the submission version of the draft Shropshire Local Plan.
- 4.4. Appendix 7 of the draft Shropshire Local Plan includes a schedule summarising the forecasting of when delivery is expected to occur on all proposed allocations (including these three sites).
- 4.5. Within this schedule, delivery is 'grouped' to 5 year periods, which is considered entirely appropriate given this forecast is inevitably a 'snapshot' based on best available information at the time of the assessment, and cannot be updated outside of a Local Plan Review. More detail and updates will be provided through the Shropshire Housing Land Supply Statements / Authority Monitoring Reports.
- 4.6. Shropshire Council strongly considers that this consistent approach to site allocations is the most appropriate approach to summarising the forecast of when delivery is expected to occur on sites identified to accommodate proposed contributions to the Black Country.

Question 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?*

Shropshire Council Response:

- 5.1. The draft Shropshire Local Plan identifies a sufficient deliverable supply of housing in years 1-5 and a sufficient developable supply of housing in years 6-10 and 11+ to achieve the proposed housing requirement of a minimum of 31,300 dwellings (see proposed main modifications in GC4m) and allow for around 10% flexibility for changing circumstances.
- 5.2. As recognised within the explanation to draft Policy SP2, the types of site available to achieve the proposed housing requirement are varied and extensive. They include small, medium and large:
 - a. Sites with planning permission or prior approval.
 - b. Sites with a 'resolution to grant' planning permission.
 - c. 'Saved' SAMDev Plan allocations.
 - d. Local Plan allocations.
 - e. Windfall opportunities, where sites comply with the requirements of this Local Plan.
- 5.3. Further detail on the components of the identified housing land supply is provided within the document GC47.

Question 6. *The Council relies on sites allocated in the SAMDev Plan to meet the overall need as well as to provide a 5 year supply of housing land on adoption of the Plan. What evidence is there to show that these sites will come forward now when they have failed to do so since the SAMDev Plan was adopted in 2015 to cover the period 2006 to 2026.*

Shropshire Council Response:

- 6.1. Considerable progress has been made towards the delivery of the allocations within the SAMDev Plan. As such, it would be incorrect to suggest these sites have failed to come forwards since adoption of this plan in 2015.
- 6.2. Information on the status of proposed 'saved' SAMDev Plan allocations is provided within the document GC51. In summary, of the 112 residential or residential-led mixed use site allocations in the SAMDev Plan:
 - a. 47 sites had been fully completed at 31st March 2023 (these are not proposed to be saved).
 - b. 35 sites benefit from planning permission that addresses the entirety of the site.

- c. 2 sites benefit from planning permission that addresses the majority of the site and are currently the subject of planning applications for the remainder of the site.
 - d. 6 sites benefit from planning permission on significant components of the site.
 - e. 22 sites do not currently benefit from planning permission.
- 6.3. The 22 sites which do not currently benefit from Planning Permission include 10 sites for less than 10 dwellings each; and 7 sites located within the Clun catchment where development is currently constrained due to issues related to the Habitats Regulations. *Please note: 4 of the sites for less than 10 dwellings are also located within the Clun catchment.*
- 6.4. Where proposed 'saved' SAMDev Plan allocations are located in the Clun catchment, this has been cautiously reflected in conclusions on delivery timescales.
- 6.5. Shropshire Council's assessment of the housing land supply in Shropshire is summarised within the document GC47. Appendix E of this assessment includes further evidence regarding the deliverability of proposed 'saved' SAMDev Plan allocations.
- 6.6. Importantly, when undertaking the assessment summarised in GC47, only dwellings considered deliverable or developable in the proposed plan period are included as part of the identified supply to achieve the proposed housing requirement in the draft Shropshire Local Plan. This is irrespective of whether they are proposed 'saved' SAMDev Plan allocations.

Question 7. *The Council's Housing and Employment Topic Paper (GC45) at Table 10.1 includes SLAA sites as part of the housing land supply. What are these sites and why were they not allocated in the Plan? Are they different to windfall sites?*

Shropshire Council Response:

- 7.1. The 2021 National Planning Policy Framework (NPPF) defines windfall sites in Annex 2, as those "*not specifically identified in the development plan.*"
- 7.2. Sites identified through the Strategic Land Availability Assessment (SLAA) and included within Table 10.1 of the Housing and Employment Topic Paper (GC45) are therefore potential windfall sites which are considered sustainable; likely suitable for development; available or will likely become available for development during the proposed plan period; and considered likely to be achievable (including viable) for development at the point envisaged.

- 7.3. These sites are not proposed for allocation, as this is considered unnecessary to facilitate their development. They are in locations considered consistent with the policies of the draft Shropshire Local Plan – generally infill / brownfield sites within proposed development boundaries.
- 7.4. Importantly, the spatial strategy and draft policies within the draft Shropshire Local Plan anticipate and facilitate appropriate windfall development.
- 7.5. Further information on these sites is provided within Chapter 5 and Appendix G of document GC47, which summarises the housing land supply in Shropshire.

Question 8. *Should windfalls be counted as part of the housing supply for years 1-5 and years 11-15?*

Shropshire Council Response:

- 8.1. Shropshire Council considers that it is entirely appropriate for windfall sites to form part of the identified housing land supply in years 1-5, 6-10 and 11-15.
- 8.2. Paragraph 71 of the 2021 National Planning Policy Framework (NPPF) addresses windfall sites, stating *"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends..."*
- 8.3. As such, it is apparent that subject to compelling evidence, the NPPF considers it is appropriate for windfall sites to form part of the housing land supply in years 1-5, 6-10 and 11-15.

Question 9. *With regard to paragraph 71 of the Framework, is there compelling evidence that the windfall allowances for large and small sites would represent a reliable source of housing supply? Does the approach to windfall sites avoid double counting?*

Shropshire Council Response:

- 9.1. Shropshire Council considers compelling evidence exists which demonstrates windfall development has and will continue to form a key component of the housing land supply in Shropshire. This compelling evidence fully endorses the approach to windfall development within the housing land supply (summarised in GC47) identified to achieve the proposed housing requirement within the draft Shropshire Local Plan.

- 9.2. In determining whether compelling evidence existed to justify a windfall allowance with the housing land supply, Shropshire Council considered a range of relevant information, including the strategic land availability assessment (SLAA), historic windfall delivery rates, and expected future trends – consistent with paragraph 71 of the 2021 National Planning Policy Framework (NPPF).
- 9.3. This process is summarised within the Housing Topic Paper (GC4i) and Chapter 5 and Appendix I of document GC47. Further information on windfall development is also provided within Chapter 8 of the Housing and Employment Topic Paper (GC45).
- 9.4. In summary:
- a. Windfall development has traditionally constituted a considerable proportion of total residential development occurring in Shropshire. This is perhaps unsurprising, given the characteristics of Shropshire.
 - b. The SLAA concluded that it was appropriate to include a windfall allowance as part of the housing land supply.
 - c. Past completions continue to support the importance of windfall sites as a significant and appropriate source of supply for residential development in Shropshire. Specifically, over the last five years (2018/19-2022/23), some 4,683 dwellings (net) have been completed on windfall sites in Shropshire (1,669 dwellings on small scale windfall sites of less than 5 dwellings and 3,014 dwellings on medium and large scale windfall sites of 5 or more dwellings).
 - d. Existing commitments on sites with Planning Permission or Prior Approval provide further endorsement of the importance of windfall sites in Shropshire. Specifically, at 31st March 2023, 3,971 net dwellings were committed on windfall sites with Planning Permission or Prior Approval (consisting of 1,272 dwellings on small scale windfall sites of less than 5 dwellings and 2,699 dwellings on medium and large scale windfall sites of 5 or more dwellings).
 - e. The spatial strategy proposed within the draft Shropshire Local Plan both anticipates and facilitates appropriate windfall development.
 - f. Draft strategic policies (particularly SP2, SP7-11); draft development management policies (particularly DP4-DP7); and draft settlement policies (S1-S18) identify a range of mechanisms and/or opportunities for appropriate windfall development.
- 9.5. Shropshire Council considers this constitutes compelling evidence that windfall development has and will continue to form an important component of the housing land supply in Shropshire. The

Council also considers this evidence fully justifies the windfall allowance in years 1-5, 6-10 and 11-15 of the housing land supply identified to achieve the proposed housing requirement in the draft Shropshire Local Plan.

- 9.6. Shropshire Council also considers the approach to windfall development in the housing land supply (summarised in GC47) ensures that there is no double counting.
- 9.7. No general windfall allowance is made in years 1-3 of the period considered within the housing land supply assessment, to allow for such windfall opportunities to come forwards for development. This also avoids double-counting of sites that have already come forwards for development.
- 9.8. The specific windfall allowance identified is for sites of less than 5 dwellings, whilst other components of the identified housing land supply that also constitute windfall sites without planning permission / prior approval or a 'Resolution to Grant' planning permission are on sites of 5 or more dwellings.

Question 10. *Table 8.5 (page 59) of the Council's Housing and Employment Topic Paper (GC45) contains information described as 'Known Significant Potential Windfall Development Opportunities'. Can they be classed as 'windfalls' if they are already known? Should these sites be allocated in the Plan? How likely are they to come forward during the Plan period as some have had planning permission in the past which has now lapsed?*

Shropshire Council Response:

- 10.1. The 2021 National Planning Policy Framework (NPPF) defines windfall sites in Annex 2. It states they are sites "*not specifically identified in the development plan.*" Shropshire Council considers the sites documented in Table 8.5 of the Housing and Employment Topic Paper (GC45) are consistent with this definition and represent windfall sites.
- 10.2. Shropshire Council considers it is unnecessary to allocate these sites for development. This is because:
 - a. They are in locations considered consistent with the policies of the draft Shropshire Local Plan – generally infill / brownfield sites within proposed development boundaries.
 - b. It is not considered necessary to allocate them in order to facilitate their development.
 - c. The proposed spatial strategy and draft policies within the draft Shropshire Local Plan anticipate and facilitate appropriate windfall development.

- d. Paragraph 71 of the 2021 NPPF addresses windfall sites, and recognises that an allowance for them can be made in the housing land supply where compelling evidence exists.
 - e. Identification of potential windfall sites within GC45 forms part of the compelling evidence that windfall is an appropriate component of the housing land supply in Shropshire.
- 10.3. When undertaking the assessment of housing land supply (summarised in GC47), only dwellings considered deliverable or developable in the proposed plan period are included. As such, Shropshire Council is confident that the sites included in Table 8.5 of GC45 are deliverable / developable and as such can contribute towards the achievement of the proposed housing requirement for Shropshire.
- 10.4. The Council would emphasise that Table 8.5 of GC45 is not an exhaustive list of windfall opportunities within the relevant settlements. This is because it is often difficult or even impossible to identify potential windfall development opportunities before they arise.

Question 11. *How is specialist housing factored into supply?*

Shropshire Council Response:

- 11.1. There are a range of mechanisms available to facilitate the delivery of specialist housing.
- 11.2. Specialist housing to be delivered as a component of proposed allocations and other identified development sites for 50 or more dwellings without planning permission (in accordance with the new draft Policy referenced in the MIQ's as DP1A), forms part of the identified capacity of these sites within the identified housing land supply.
- 11.3. Specialist housing to be delivered on sites with planning permission at 31st March 2023; prior approval at 31st March 2023; 'resolution to grant' planning permission at 31st March 2023; and emerging affordable housing sites identified at 31st March 2023, also form part of the identified housing land supply.
- 11.4. Specialist housing delivered through other mechanisms proposed within the draft Shropshire Local Plan would constitute future windfall development.
 - a. Where such provision occurs on sites of less than 5 dwellings, this would form part of the small-scale sites windfall allowance.
 - b. Where such provision occurs on sites of more than 5 dwellings (often the case, due to requirements for economies of scale in

their operation), no specific allowance is made in the housing land supply.

11.5. This approach is consisted with other small-scale and larger-scale windfall sites that will emerge during the proposed plan period. It demonstrates the cautious approach to the assessment of the housing land supply identified in support of the draft Shropshire Local Plan (summarised within GC47).

Question 12. *What flexibility does the Plan provide if some of the larger sites do not come forward to the Council's estimated timescales?*

Shropshire Council Response:

12.1. The Council has taken a cautious approach to lead-in times and delivery rate assumptions within its assessment of the housing land supply available to achieve the proposed housing requirement in the draft Shropshire Local Plan (summarised in GC47). As such, the Council is confident that the majority of larger sites will come forward in accordance with estimated timescales.

12.2. However, to add robustness to the assessment of housing land supply summarised in GC47, the Council has applied a very cautious assumption that 10% of deliverable / developable dwellings in many components of the identified housing land supply will not be delivered in the five year period that it is estimated they will be developed.

12.3. This approach is applied to all:

- a. Sites with Planning Permission or Prior Approval.
- b. Sites with a 'resolution to grant' Planning Permission.
- c. Proposed 'saved' site allocations within the SAMDev Plan.
- d. Proposed allocations within the draft Shropshire Local Plan.
- e. Sites identified within the SLAA.
- f. Emerging Affordable Housing Sites.

12.4. This allows 'flexibility' for any 'slippage' to delivery of sites in these components of the supply, including larger sites. However, as these dwellings continue to be considered deliverable / developable, they are re-considered within subsequent 5 year periods.

12.5. In circumstances where 'slippage' does occur to delivery timescales on larger sites, Shropshire Council considers the majority of such sites would still deliver anticipated rates of development within the proposed plan period. This is because the majority of larger sites are envisaged to be built out several years before the end of the proposed plan period, and any 'slippage' would not extend the development beyond the proposed plan period.

- 12.6. Furthermore, given the cautious approach to delivery rates employed by the Council, even if 'slippage' occurs on larger sites where development is anticipated to occur up to (and in some instances beyond) the end of the proposed plan period, there is potential that higher delivery rates may occur, reducing any implications of 'slippage'.
- 12.7. Finally, the Council would note that in GC47, the identified housing land supply is sufficient to achieve the proposed housing requirement of a minimum of 31,300 dwellings and allow for around 10% flexibility in the overall housing land supply.
- 12.8. This flexibility is of course available to offset any 'slippage' on larger sites which takes development beyond the proposed plan period.

Question 13. *What are the targets for the provision of affordable housing? What has been achieved in recent years?*

Shropshire Council Response:

- 13.1. The proposed affordable housing provision target in the draft Shropshire Local Plan is identified in draft Policy SP2 (see proposed main modifications in GC4m). This target is around 7,825 dwellings (around 356 dwellings per annum), between 2016 and 2038. This equates to around 25% of the proposed housing requirement.
- 13.2. Consistent with the proposed housing requirement, it is proposed that the annual target for affordable housing provision aligns with the annual average of the affordable housing target – 356 dwellings per annum.
- 13.3. It is recognised there will inevitably be a range of known and unknown factors that emerge and affect the housing market and affordable housing delivery. These factors will inevitably lead to fluctuations in affordable housing delivery over time and result in annual rates of delivery falling below or exceeding this level. However, over the proposed plan period, it is expected that this will 'balance out', to ensure the proposed affordable housing target is achieved.
- 13.4. It is also recognised that achieving this aspirational proposed annual affordable housing target will inevitably be challenging. However, it is considered to be deliverable – as detailed within Chapter 4 of the Housing Topic Paper (GC4i). In summary, to support achievement of the proposed affordable housing target, the Council:
 - a. Has identified a range of policy mechanisms to support the delivery of affordable housing, within draft Policies DP3-DP7.

- b. Operates a number of wider mechanisms and initiatives to positively influence and facilitate affordable housing delivery in Shropshire.
- 13.5. As such, the proposed affordable housing target is considered consistent with Paragraph 16(b) of the 2021 National Planning Policy Framework (NPPF), which states that Local Plans should *"be prepared positively, in a way that is aspirational but deliverable"*.
- 13.6. The following table summarises affordable housing delivery in Shropshire during the proposed plan period thus far:

Figure 13.1: Affordable Housing Completions during the Proposed Plan Period

Year	Affordable Housing Completions
2016/17	445
2017/18	459
2018/19	260
2019/20	223
2020/21	276
2021/22	239
2022/23	317
2023/24	337

- 13.7. Over the proposed plan period, an average of 320 affordable dwellings have been completed per annum. Whilst somewhat less than, it is comparable to, the annual average affordable housing target. The Council considers the mechanisms in the draft Shropshire Local Plan and wider mechanisms and initiatives undertaken will support achievement of the proposed affordable housing target.
- 13.8. Shropshire Council would note that in 2023/24, the Council was one of the best performing Local Planning Authorities in the Country for delivery of affordable housing on rural exception sites.

Question 14. *Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?*

Shropshire Council Response:

- 14.1. Paragraph 62 of the 2021 National Planning Policy Framework (NPPF) outlines the approach to the needs of different groups in the community, stating *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies..."*
- 14.2. National Planning Practice Guidance (NPPG) on Housing Needs of Different Groups (ID67) recognises at paragraph 1 that *"Plan-*

making authorities should assess the need for housing of different groups and reflect this in planning policies.”

- 14.3. Shropshire Council considers the draft policies in the draft Shropshire Local Plan are consistent with the expectations of paragraph 62 of the NPPF and paragraph 1 of ID67 – they ensure the type and size of housing provided positively respond to our understanding of the needs of all groups within our communities.
- 14.4. Draft policies of particular relevance are SP5-SP6, DP1-DP8, the new draft policy on specialist housing for older people and those with disabilities and special needs; and settlement policies S1-S20.

Question 15. *Is there sufficient variety in terms of the location and type of site allocated?*

Shropshire Council Response:

- 15.1. Yes. Shropshire Council considers that the proposed spatial strategy for the level and distribution of development ensures the locations of proposed site allocations positively respond to the geography, characteristics and demographics of Shropshire. This approach ensures appropriate variety in terms of the location of site allocations.
- 15.2. Shropshire Council also considers there is appropriate variety in terms of the type of site allocations and importantly that these allocations positively respond to the characteristics, constraints, and opportunities of the associated settlement.
- 15.3. Shropshire Council considers proposed allocations have been informed by a proportionate and robust site assessment process and is confident that proposed allocations are deliverable.
- 15.4. Finally, it is important to recognise that the proposed spatial strategy and associated settlement strategies also facilitate appropriate windfall development opportunities, which add further variety in terms of the location and type of appropriate development sites.