

## **Shropshire Council Local Plan Examination**

### **Matters, Issues and Questions (MIQs)**

**Representor name: Bruton Knowles on behalf of Shifnal Matters, Shifnal town council and Tong Parish Council**

**Name of participant: Richard Brogden on behalf of Bruton Knowles**



### **Introduction**

- This Statement is being submitted in response to the Inspectors Matters, Issues and Questions related to the Stage 2 proceedings of the Shropshire Local Plan Examination.
- This statement has been prepared by Bruton Knowles on behalf of Shifnal Matters, Shifnal town Council and Tong Parish Council.
- The Inspectors have stated that comments made in earlier hearings or submissions will still be taken into account and this I do not intend to repeat previous statements made.
- Additionally it is noted that the Council will produce a statement in response to the MIQ and thus we reserve the right to respond to those at the Hearings

### **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, requirement and supply of housing land. Questions NB. 5 year housing land supply will be dealt with following the consideration of site allocations

#### **The Housing Need**

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?

2. What is the identified affordable housing need?

#### **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?
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. 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?
4. Regarding paragraph 69 of the Framework, would at least 10% of the housing requirement be from sites no larger than a hectare?
5. Is the updated housing requirement in the Plan appropriately aligned with forecasts for jobs growth?
6. What is the requirement for affordable housing and is this likely to meet the identified need?

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

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?

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

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?

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?

11. How is specialist housing factored into supply?

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

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

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

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



