

Shropshire Local Plan Examination: Stage 2

Representor Unique Number: A0682

Representor: Miller Homes

Matter: Matter 3 – Housing Land Need, Requirement and Supply (Policy SP2)

Relevant Question Numbers: The Housing Need (Question 1), The Housing Requirement (Questions 1, 2, 3, 5, 6), The Overall Supply of Housing (Questions 1-15)

Matter 3 – Housing Land Need, Requirement and Supply (Policy SP2)

1. This Hearing Statement is submitted on behalf of Miller Homes (“Miller”).
2. Miller has submitted representations, including technical evidence, on the matter of housing needs consistently through the plan-making process. These representations have generally supported the Council’s identification of a housing requirement higher than suggested by the current standard method, but they have also consistently argued that there is evidence of a greater housing need and challenged the evidential justification for the Council’s chosen housing requirement.
3. Where references are made to the National Planning Policy Framework (NPPF), these are made in relation to the July 2021 version, as confirmed by the Inspectors’ Note dated 19 August 2024 (Examination Document Ref: ID44).

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?**
4. We welcome the request for clearer consideration of the consequences for the housing need, requirement and supply – where no quantified metrics were provided in Examination Document Ref: GC24 – in order to fully evaluate the validity, and thus soundness, of this approach. There is already a lack of clarity around how the requirement has been evidentially justified, and its relationship with the need calculated using the standard method. We reserve the right to input our views upon receipt of this information at the Hearing Session.

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?**
5. As set out in our previous Stage 1: Matter 4 Hearing Statement, we strongly support the approach taken in the Plan to provide for a level of housing need which is higher than suggested as only a minimum by the current standard method.
6. As set out in our Stage 2: Matter 1 Statement, we consider the plan period must be extended and therefore the total planned provision increased. Further to the extrapolation of need over a

longer period, our technical submissions¹ have consistently affirmed the justification for an evidentially based higher assessment of housing need.

7. Our additional representation submitted in June 2024 (Examination Document Ref: A211 - Miller Homes) included critique of the “Updated Housing and Employment Topic Paper.” It observed that the Topic Paper presented relatively little new evidence, nor substantively rebutted the challenges previously expressed on the approach taken by the Council to calculate housing need.
8. It therefore remains the case that we do not consider the calculation of housing growth to have been adequately justified, where it fails to account for:
 - Evidence of stronger recent demand, as demonstrated by recent rates of delivery which are higher than the proposed requirement. Our June 2024 consultation response identified that in eight of the last nine years delivery has exceeded the proposed requirement, with average delivery over this period some 15% higher;
 - The imbalance between housing need and forecast/planned job growth. See our response to ‘The Housing Requirement’ Q5;
 - The substantial unmet needs of the Black County, and the wider GBBCHMA. See our response to ‘The Housing Requirement’ Q4;
 - The potential to meet a greater proportion of the calculated need for affordable housing. See our response to ‘The Housing Requirement’ Q6
9. We acknowledge the view clearly expressed in Examination Document Ref: ID44 that the higher housing need figure generated by the newly proposed standard method will be dealt with by a future Local Plan. Whilst this is not challenged, as responding to the Government’s objectives, we consider that the scale of the potential need – for some 2,059 homes per annum – and the 52% uplift that it represents, further substantiates our repeatedly stated concerns that the proposed housing requirement is too low. It also further emphasises the importance of this Plan building in a policy-led approach to transition ensuring that a much higher level of need can be both planned for and delivered.
10. The allocation of additional land should be an important component of this response, with land at “South West Shifnal” the most appropriate site to accommodate an elevated level of need. As such, Miller’s representations have consistently argued for the site’s allocation rather than safeguarding.
11. The addition of an early review mechanism is similarly a required response. We strongly challenge the Council’s suggestion that the statutory five-year review process will be sufficient in this context². Indeed, ID44 recognises the Government’s statement of intent that where there is a significant gap between the proposed housing requirement and the new standard method figure, the expectation will be that authorities will ‘*begin a plan immediately in the new system*’. The most recent Chief Planners Newsletter, issued in September 2024, reaffirms that where the

¹ The latest being the ‘*Update to the Technical Review of Sustainable Growth Plans for Shifnal*’ (September 2020) – referenced in our Stage 1 Matter 4 statement and included as Appendix 2 to the Representations submitted by Turley on behalf of Miller Homes to the Regulation 19 Consultation on the Draft Plan in February 2021

² GC28 – paragraph 7.35

difference is more than 200 homes – as it is in Shropshire – ‘authorities will be expected to begin a new plan at the earliest opportunity in the new system.’³

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 the sustainability within the plan period, in accordance with national policy?

12. Miller has consistently supported the Council’s positive approach of accommodating a proportion of the unmet needs of the Black Country in its housing requirement.
13. Our June 2024 consultation response highlighted, however, that the proposed provision for 1,500 homes represents a very small fraction of the totality of the unmet needs which exists across the GBBCHMA. The scale of this unmet need was set out within our appended report, which revealed a shortfall of at least 34,742 homes up to 2031 and 62,373 up to 2036 (noting the Shropshire Plan is currently proposed to 2038).
14. Further, as discussed in our response to ‘The Housing Requirement’ Q1, the higher housing need figure generated by the newly proposed standard method will only further increase this shortfall. With the overall annual requirement for the GBBCHMA increasing by 2,639 homes per year (from 14,377 to 17,016 homes per year).
15. Where our response to ‘The Housing Requirement’ Q5 highlights a risk that the Plan does not adequately support Shropshire’s economic growth potential, and where it is recognised that the area has been recently successful in accommodating additional residents, a more positive contribution to unmet needs presents the opportunity for the sustainable relocation and accommodation of labour.

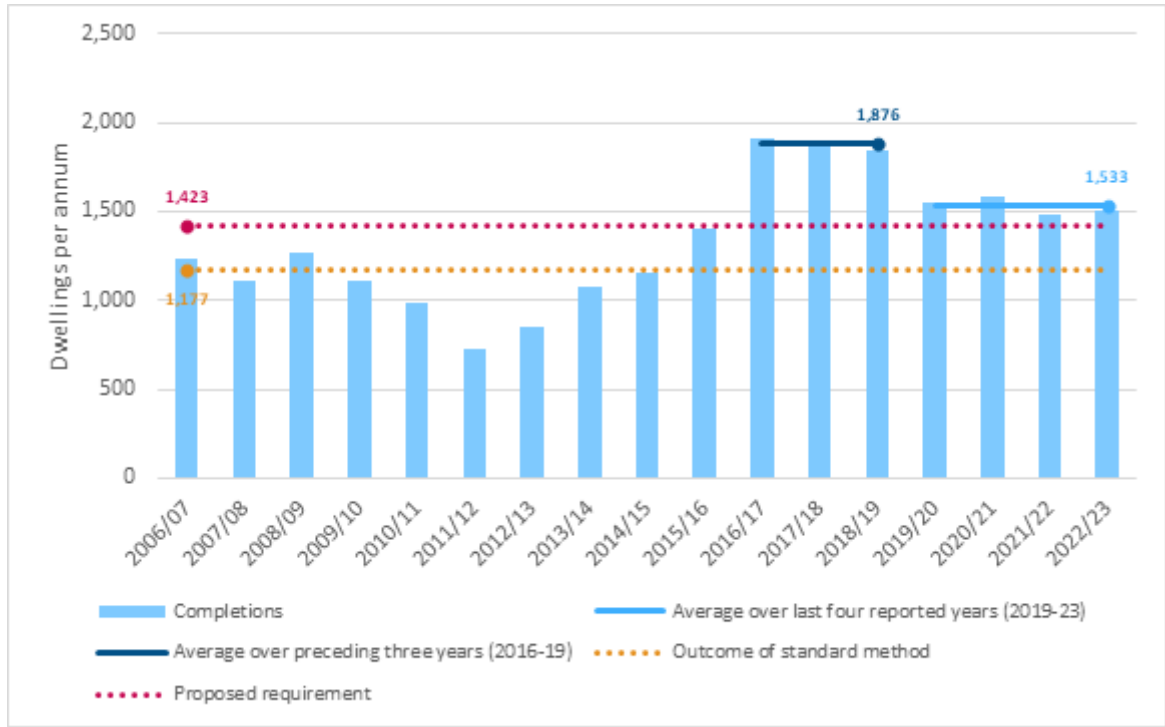
3. Has there been significant under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 74 of the NPPF?

16. Our response to ‘The Housing Requirement’ Q1 highlights relatively strong rates of recent delivery compared to the proposed housing requirement, with these illustrated at Figure 1. We acknowledge the Council’s calculation of the Housing Delivery Test, which indicates that housing delivery has exceeded the requirement⁴. As a result, **a 5% buffer is therefore required**, based on the Council’s current performance. This is on the basis that the Plan is being examined against the July 2021 NPPF which retained a 5% buffer for choice and competition in the market. It is also relevant to note that, whilst the December 2023 NPPF removed the need to include a 5% buffer, this requirement will likely be reinserted in a new NPPF expected at the end of this year.

³ Chief Planners Newsletter September 2024 (MHCLG), page 3

⁴ GC47, Five Year Housing Land Supply Statement (April 2024), Paragraphs 4.10 – 4.14

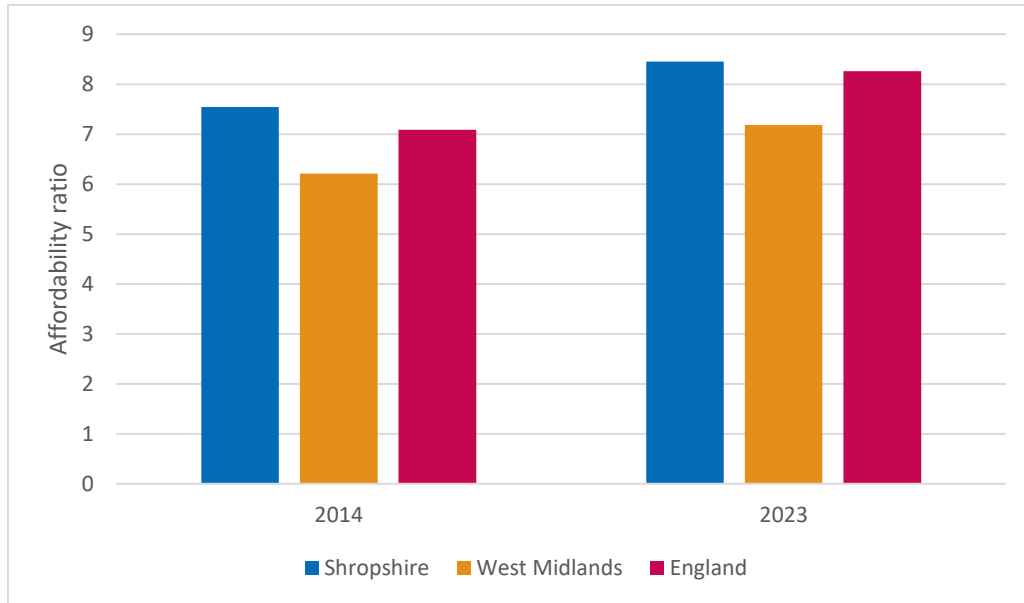
Figure 1: Annual completions vs proposed annual average housing requirement



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

- Despite the positive delivery shown above, our consultation response highlighted that the latest affordability ratios – a key indicator of the balance between supply and demand as proven by their use in both the current and proposed standard method – show that Shropshire remains relatively unaffordable when compared to both the West Midlands and national averages. Figure 2 shows that this has been consistent since stronger completions were recorded, such that the level of housing has not been sufficient to fully meet needs.

Figure 2: Affordability ratios in 2014 and 2023



Source: ONS

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

18. Our previous submissions have identified that these two important policy strands are not adequately aligned. The evidence presented in Examination Document Ref: GC45 does not address the concerns we have raised through submissions and our Stage 1: Matter 4 Hearing Statement.
19. The Council has once again failed to adequately justify how the scale of population growth – and resulting labour-force – facilitated by the housing requirement will support its target of creating 21,400 jobs, through the Plan’s economic policies and the provision of 320ha of employment land. GC45 explicitly recognises the scale of the gap where it identifies that provision in line with the proposed housing requirement would grow the labour force by only 12,615 persons⁵.
20. The reconsideration of the factors the Council points to as necessary to bridge this gap in GC45 continues to rely on unsubstantiated assertions that are largely beyond the control of policy.
21. In this context, and in light of the strong economic and demographic performance of Shropshire in recent years⁶, providing for a higher housing requirement would mitigate the risk of constraining economic performance and investment.

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

22. The Council’s Housing Topic Paper (Examination Document Ref: GC4i) explains that the Plan provides for the delivery of around 7,700 affordable dwellings, or 350 per annum over the plan period. This falls considerably short of the need of 799 per annum evidenced in the SHMA (EV097.02).

⁵ GC45 – paragraph 17.19 and informed by Table 7.4 (on page 162)

⁶ Within our June 2024 consultation response we observe that Shropshire has created 11,069 jobs over the 7 year period 2015 – 2022 while also seeing its population grow strongly over the same period (Figure 4.4)

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?

23. The Council's latest trajectory can be found at Examination Document Ref: GC50 'Updated Housing Trajectory for Shropshire (data to March 2023)' (although once opened, the document is entitled "Snapshot' Housing Trajectory for Shropshire (data to March 2023)". The document is undated and so it is not clear when it was published.

24. The trajectory is also supported by two further Examination Documents, as follows:

- **GC47 Five Year Supply Statement (2023) Draft Shropshire Local Plan (published in April 2024)** - which provides a trajectory for individual sites across both the five year period, the 6-11 year period and across the plan period as a whole; and
- **GC51 Update on Status of 'Saved' and Proposed Allocations - July 2024.**

25. Whilst the trajectory is based on completions to March 2023, and we are now into the 2024/25 monitoring year, it remains 'up-to-date' being based on the latest available completions data.

26. Turley has undertaken an assessment of the Council's latest housing trajectory (GC50) and the sites included in it which make up the total expected completions in the plan period to 2038 (as evidenced by Examination Documents GC47 and GC51). Our assessment is provided at **Appendix 1** to this Hearing Statement. This review has focussed on all sites of 50 dwellings or more in the trajectory and has considered the current planning status of those sites (and is also considerate of the evidence provided by the Council to support each sites inclusion as a deliverable or developable site in the trajectory).

27. Our Assessment finds that there are sites that, at the current time, do not have sufficient evidence to support their delivery in the plan period to 2038 and so should be removed entirely from the Council's plan period trajectory. This includes:

- **'Land between Watling Street and Brook Road, Craven Arms' (Ref: CRAV003 and CRAV009)** – where 235 homes should be removed – this is a historic allocation which is proposed to be carried forward; there is no planning application to date; there are clear issues bringing forward the site; and, no evidence that these are capable of being resolved or the site coming forward within the plan period; and
- **'Clive Barracks, Tern Hill' (Ref: BNT 002)** – where 350 dwellings should be removed in the plan period – the Barracks are not expected to close until 2029. The time required to bring forward and determine applications on the site means that first delivery would realistically only be seen beyond the current plan period.

28. There are also sites that our Assessment identifies where, whilst homes will be delivered in the plan period to 2038, reductions to the overall level of supply should be adjusted based on the current planning status of the site, and applying realistic lead in times for first delivery. Of particular relevance, this includes reductions **totalling 1,363 homes** at the following sites:

- **Ironbridge Power Station, Buildwas Road, Ironbridge, Telford (Ref. IRN001)** – removal of 235 homes in the plan period;
- **Tasley Garden Village, Bridgnorth (Ref. BRD030)** – removal of 554 homes in the plan period; and
- **Land between Mytton Oak Road and Hanwood Road, Shrewsbury (Ref. SHR060, SHR158 and SHR161)** – removal of 574 in the plan period.

29. In total (including the site referenced above), our Assessment finds that **2,523 homes should be removed from the Council’s plan period supply to 2038.**
30. That would result in 32,351 homes coming forward in total in the plan period. Whilst this remains above the Council’s overall housing requirement (as currently being planned for) of 31,300 homes, it now only represents a 3.4% surplus which, in our view, provides insufficient flexibility in the Plan should allocations not come forward as expected. As such, it is our view that additional allocation sites should be identified to reinstate previous planned levels of contingency, including available and deliverable sites such as land at South West Shifnal. To maintain the same levels of contingency as currently planned for, our assessment shows that sites capable of delivering over 2,000 homes (i.e. would require multiple sites) in the plan period to 2038 will need to be identified.
31. It is important that these additional sites be identified prior to the adoption of the Plan. As we have seen in the Examination of the Solihull Local Plan, the Planning Inspectorate⁷ are sending a clear statement that these matters can be dealt with during Examination and should be completed as quickly as possible.

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?

32. Please see our response to ‘The Overall Supply of Housing’ Q1.
33. Whilst “up-to-date” in terms of reflecting completions data to March 2023, with evidence provided on the latest planning status of the allocation sites, the Council’s assumptions on delivery from a number of sites in the plan period are unrealistic and need to be adjusted.

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

34. Yes. Paragraph 74 of the Framework states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the Plan period.
35. This is important because anyone reading the Council’s Local Plan should be able to easily understand, firstly, what level of overall homes the Council needs to deliver and, secondly, when and at what overall level the Council expects those homes to be delivered based on its housing delivery strategy and the sites it has allocated. Whilst any trajectory will never be followed exactly, it will allow for the performance of the Plan to be effectively monitored (as per Stage 2: Matter 32 Hearing Statement). If the trajectory is not being met as expected and there is significant deviation from the delivery expected, then this will provide an early warning and

⁷ Planning Inspector’s letter to Solihull Metropolitan Borough Council, 4 September 2024, <https://www.solihull.gov.uk/sites/default/files/2024-09/SMB011.pdf>

should allow the Council to consider any actions that may be required. This may include actions to help unlock allocation sites or actions to identify further appropriate sites for development.

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.

36. The Council has (based on its submitted Plan) an overall housing requirement of 31,300 homes to meet (including unmet needs of the Black Country) and the trajectory should include all sites and sources of supply to meet that overall combined requirement.
37. We have already set out our view that the overall quantum of unmet needs to be met in Shropshire is a small fraction of the overall level of unmet need and so the Plan should take a more positive approach to meeting unmet needs where it can.
38. Whatever level of unmet needs is finally planned for, the specific performance of sites allocated to meet the Black Country's unmet need should also be monitored to understand what level of delivery is being achieved towards meeting those unmet needs. We advocate the same in our Matter 32 Statement.
39. Such monitoring (beyond the monitoring of delivery against the overall annual housing requirement and housing trajectory) will enable the Council to understand where any particular shortfalls in delivery may be occurring, allowing it to make sensible and positive decisions on where permissions for more homes may be required.
40. Indeed, through our assessment work, we have identified particular concerns regarding the expected rate of delivery of homes on sites BRD030, SHR060 and IRN001 (sites intended to meet unmet need of the Black Country). This shows that there will be particular issues achieving the current planned contribution to the Black Country's needs (let alone the higher levels, as we are advocating) unless further sites capable of contributing towards such needs are identified. Further commentary is provided in our Matter 2 Hearing Statement.

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?

41. Please see our response to 'The Overall Supply of Housing' Q1.
42. Whilst the Council's trajectory (supported by Examination Document Ref: GC47 and GC51) does identify developable supply in years 6-10 and in years 11-15 of the plan period, the Council's delivery expectations on a number of those sites is unrealistic. This results in reductions to the overall delivery that can reasonably be expected in the plan period, and an insufficient contingency to enable it to maintain its supply and deliver its planned requirements should some sites not come forward as expected.

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.

43. The Council's overall reliance on this source of supply is of concern. Currently, Examination Document Ref: GC45 (Table 10.1) shows that circa 10% of the overall supply in the plan period will be from saved allocations. These sites were intended to contribute to a 2006-2026 plan

period, yet several sites are still to deliver any homes, or in some cases even yet to obtain planning permission.

44. Despite being previous allocations that are proposed to be saved/carried forward, there are clearly issues that have prevented many of those sites from coming forward to date and the availability, suitability and deliverability of these sites should be considered afresh.
45. Considerable cautions should be placed on sites from this source of supply, particular those that have no permission or indeed no application submitted. Evidence demonstrates that such sites have not been able to deliver, thus queries as to whether they are now.

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?

46. Appendix G to Examination Document Ref: GC47 provides a breakdown of SLAA sites. If the Council is to rely on specific (identified) SLAA sites to deliver its housing requirements, then these should be proposed as site allocations. However, these SLAA sites should only be included as allocations if there is sufficient evidence to support their availability, suitability and deliverability.
47. Our understanding is that the SLAA sites are those of 5 or more dwellings⁸ and that the Council's windfall allowance is based on evidence of homes coming forward on small sites of fewer than 5 homes. However, caution needs to be taken to ensure that any SLAA sites and windfall allowance do not result in any double counting.

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

48. As the Inspectors will be aware, the 2021 NPPF (Paragraph 71) confirms that 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.
49. The Council does provide some evidence on windfalls on Pages 40 and 41 of GC47, and we have no further comments to add at this stage.

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?

50. Please see our response to 'The Overall Supply of Housing' Q7 and Q8. Our understanding is that the Council's windfall allowance is based on evidence of homes coming forward on small sites of fewer than 5 homes and that no large site windfall allowance is proposed.
51. Any large sites that would have previously come forward as a windfall site is now included in the supply as 'Dwellings on SLAA sites'. Those SLAA sites should be included as allocations (provided there is sufficient evidence on their availability, suitability and deliverability) and no large site windfall allowance should be included.

⁸ Although we note that there are sites of 2 units (CLU003) 'land adjacent to the Hall, Vicarage Road, Clun) and 3 units (ONY005 'Land at the Quarry) that are included in the trajectory at Appendix G to Examination Document G47

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?

52. With cross reference to Examination Document Ref: GC47, these sites appear to be included by the Council within its list of SLAA sites, and are included in the supply. As per our response to ‘The Overall Supply of Housing’ Q7, if the Council is to rely on specific (identified) SLAA sites to deliver its housing requirements, then these should be proposed as site allocations. However, these SLAA sites should only be included as allocations if there is sufficient evidence to support their availability, suitability and deliverability (our assessment of Plan Period Supply discounts delivery from sites with lapsed permissions as these sites are discussed in a separate category to SLAA sites, it is assumed that the sites were not submitted to the call for sites exercise in 2017 and no clear evidence is given to suggest that the sites actually do remain available or that the landowners/promoters will be pursuing any revised permissions). As the Inspectors note, some of the sites identified have lapsed permissions and so considerable caution should be placed on any reliance from such sites to meet the overall housing requirement.

11. How is specialist housing factored into supply?

53. We note that the Council sets out its approach to specialist housing on Pages 19-23 of Examination Document Ref: GC47. We have no further comment to make on the Council's approach at this stage

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

54. Please see our response to ‘The Overall Supply of Housing’ Q1. Based on a realistic assessment of the number of homes large sites can be expected to deliver in the plan period, it is clear that the Plan provides insufficient flexibility should allocations not come forward, and so additional allocation sites should be identified.

55. In order to maintain the same levels of contingency as currently planned for, our assessment shows that sites capable of delivering over 2,000 homes (i.e. would require multiple sites) in the plan period to 2038 should be identified.

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

56. The Council’s Housing Strategy (Examination Document Ref: GC4h – EV063.01) states that the number of new affordable homes over the last five years has averaged around 350 per annum.

57. This broadly aligns with the stated expected outcome of the policy requirement, but the Council has conceded that this would require a quarter (25%) of all planned homes to be affordable⁹, something that has not been achieved in recent years when these homes have accounted for only around 21% of total provision¹⁰.

⁹ Regulation 19 Consultation Response Summary Schedule 1a (2021), page 3

¹⁰ Shropshire Council: Strategic Housing Market Assessment Report: Part 2 (2020), Table 37

- 58. Where the Housing Strategy also recognises that there are more than 5,000 households on the housing register, sustaining the recent level of provision will be inadequate in positively addressing growing need.
- 59. Providing for a higher housing requirement through the allocation of sites, including 'South West Shifnal' will enable a greater number of households currently in need of appropriate housing to have their needs met.

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

- 60. We support the Plan's flexibility to changing needs in Policy DP1 through the referencing of the up-to-date SHMA and other local need evidence. Ensuring an up-to-date evidence base, and accepting evidence from applicants, will as a result be important in providing clarity for applicants and ensuring the homes sought respond to needs.
- 61. We have also previously expressed broad support for the Plan's positive assertion that part of the justification for the housing requirement is that it will enable an increase in the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire.
- 62. As per our response to Q13 providing for a higher housing requirement would more positively aim to ensure that the full breadth of housing needs are met. "South West Shifnal" will provide family and affordable housing.

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

- 63. Whilst there appears to be a sufficient variety in terms of the location and type of site allocation in the Plan. As set out in our responses above, it is considered that additional allocations are required to meet the Plans housing requirement. These additional allocations should be located areas which have a functional relationship with the Black Country, such as Shifnal, and specifically South West Shifnal.

Appendix 1: Housing Land Supply Forecasting Report

Housing Land Supply Forecasting Report
Review of Local Plan Delivery
Shropshire Council

On behalf of Miller Homes

September 2024

Turley

Contents

1.	Introduction and Context	3
2.	Planning Policy Context	4
3.	Delivery Approach and Supply Assumptions	6
4.	Assessment of Supply	10
5.	Implications and Conclusions	21
Appendix 1: Table setting out a summary of all adjustments to Plan Period Supply		23

1. Introduction and Context

1.0 This report has been prepared by Turley on behalf of Miller Homes. We have undertaken a review and assessment of the Council’s housing deliverability assumptions set out in the emerging Draft Shropshire Local Plan and associated evidence base, and this report provides a summary of our findings. The work undertaken to inform this report has fed into formal representations that have been made to Stage 2 Hearings for the emerging Shropshire Local Plan examination.

1.1 The latest information on Shropshire’s housing trajectory and land supply (with a base date of 1 March 2023) was published to the Local Plan Examination by the Council as part of the Examination Stage Documents in April 2024. It is this information which forms the basis of this Report. Several Council documents have been reviewed in order to undertake this assessment of supply, for reference, the key documents are as follows;

- GC47 Five Year Supply Statement (2023) Draft Shropshire Local Plan;
- GC50 Updated Housing Trajectory for Shropshire (data to March 2023);
- GC51 Update on the Status of: Proposed ‘Saved’ SAMDev Plan Allocations and Proposed Draft Shropshire Local Plan Allocations; and
- SD002 - Draft Shropshire Local Plan.

Structure of the Report

1.2 The report is structured as follows;

- **Section 2** – sets out the planning policy context for housing delivery within Shropshire;
- **Section 3** – reviews the Council’s delivery approach, and comments on the assumptions applied, including average lead in times and delivery rates;
- **Section 4** – provides commentary on key elements of the plan period supply where we consider there is scope to make reductions; and
- **Section 5** – sets out the implications and initial conclusions on the overall deliverability as set out in the emerging Local Plan.

2. Planning Policy Context

- 2.1 In this section we provide a brief summary of the Development Plan position in Shropshire and its relevance to the assessment of housing delivery over the Plan period.
- 2.2 We also consider other material considerations for determining housing supply and delivery, including the National Planning Policy Framework (NPPF).

The Emerging Local Plan

- 2.3 The emerging Development Plan, which is the subject of this Report, comprises the Local Plan Review. This covers the plan period 2016-2038 and is at an advanced stage of preparation. The Plan was submitted to the Planning Inspectorate (PINS) in September 2021 and is at examination, with Stage 1 Hearing Sessions having been progressed in July 2022 and Stage 2 Hearing Sessions programmed in Q4 2024.
- 2.4 Draft Policy SP2 ‘Strategic Approach’ identified a proposed housing requirement of around 30,800 dwellings over the period from 2016 to 2038. This is around 1,400 dwellings per annum (dpa). As part of the response to comments from the Inspectors (ID28, ID36 and ID37) the Council has now updated the proposed housing requirement and now proposes a minimum of 31,300 homes between 2016 and 2038 (circa 1,423 per annum). The proposed requirement figure is higher than the Local Housing Need figure as calculated by the standard method (which is currently 1,070 dpa). A higher figure has been used in order to provide some flexibility¹, to boost the supply of affordable homes and to make a contribution to meeting the unmet housing need of the Black Country authorities.

National Planning Policy Framework (NPPF)

- 2.5 The Council’s emerging Local Plan is being examined against the July 2021 NPPF. Relevant to the consideration of housing need and housing supply across the plan period, the follow paragraphs from the 2021 NPPF are of relevance:
- 2.6 **Paragraph 11** sets out the presumption in favour of sustainable development.
- 2.7 **Paragraph 60** advises that to support objectives of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes forward where it is needed; needs of groups with specific housing requirements are addressed; and land with permission is developed without unnecessary delay.
- 2.8 **Paragraph 66** confirms that 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 Para 1.6 – of GC50 Five Year Supply Statement 2021

2.9 **Paragraph 68** states:

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period; and

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.10 **Paragraph 71** confirms that, 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.

2.11 **Paragraph 74** states that 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. Local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies.

3. Delivery Approach and Supply Assumptions

3.1 The emerging Local Plan was submitted for examination in September 2021. Since this date, an updated evidence base has emerged and this sets out the Council’s approach to the objectively assessed housing need, emerging site allocations, the plan period housing trajectory and five year housing land supply. These new documents are summarised and discussed below, the primary reference document is GC47 Draft Shropshire Local Plan Five Year Housing Land Supply Statement Published April 2024 (the ‘Supply Statement’).

Plan Period Housing Requirement

3.2 As explained in Section 2, the submission version of Policy SP2 of the draft Local Plan identified a proposed housing requirement of 30,800 dwellings over the plan period 2016 to 2038, an average annual rate of 1,400 homes. During the examination the Council has sought to respond to comments from the Inspectors and now increased the proposed requirement to minimum of 31,300 dwellings over the period from 2016 to 2038. This equates to around 1,423 dwelling per annum, as an annual average.

3.3 To date in the plan period, the Council have delivered more homes than the new proposed annual requirement in each of the monitoring years. The total level of completions to date against the emerging requirement is as follows;

Table 1 – Completions to date in the Emerging Plan Period				
Year	Req.	Completions	Surplus	Cumulative Surplus
2016/17	1,423	1,910	487	487
2017/18	1,423	1,876	453	940
2018/19	1,423	1,843	420	1,360
2019/20	1,423	1,554	131	1,491
2020/21	1,423	1,586	163	1,654
2021/22	1,423	1485	62	1,716
2022/23	1,423	1507	84	1,800
Total	9,961	11,761	1,800	

The total residual requirement for the remaining 15 years of the plan period based on completions to date is 19,539 homes. Sources of Supply

3.4 The Plan Period Supply Report includes an assessment of the deliverable and developable sites across the plan period. In summary, the Council suggest that the following number of homes will be applied in each section of the plan period;

Timeframe	Dwellings
<i>Completions 2016/17 – 2022/23</i>	<i>11,761</i>
Years 1-5	9,761
Years 6-10	8,409
Years 11-15	4,943
Total	34,874
Total 2023 – 2038 (i.e. minus completions to date)	23,113

3.5 There are 10 appendices to the plan period Supply Statement that set out the annualised trajectory for various components of the claimed supply. There is also some deliverability evidence provided within these appendices. An overview of each element of supply and the total contribution it makes to the plan period trajectory is set out in the following paragraphs.

3.6 The Council adjusts the projected trajectory based on the assumption that 10% of dwellings on sites with Planning Permission; Prior Approval; Resolution to Grant; 'Saved' Site Allocations, Proposed Allocations; SLAA sites and an Emerging Affordable Housing Sites will not be delivered in each five year period. This contingency is included with the justification that it builds some caution into the supply figures, albeit that the units deducted from each five year time period are then added to the subsequent five year period. The supply figures listed in the table above (i.e. those that total 23,113 from 2023 to 2038) includes this 10% interim adjustment figure.

Source	2023/24 – 2027/28	2028/29 – 2032/33	2033/34 – 2037/38	Total
Sites with Planning Permission as at 31st March 2021	5,958	1,428	628	8,009²
Sites with a Prior Approval decision as at 31st March 2021	72	7	1	80
Sites with a 'resolution to grant' as at 31st March 2021	10	1	0	11
Sites allocated for development within the adopted Local Plan ('saved' allocations)	1,274	1,478	510	3,262

² This row in the Council's Table 4 actually sums to 8,014, but the total the LPA use has been kept here

Sites proposed for allocation within the draft Shropshire Local Plan	1,491	3,294	2,145	6,930
Sites from the Strategic Land Availability Assessment (SLAA)	111	379	132	622
Affordable Housing Sites Including Those Seeking Homes England (HE) Funding	247	25	2	274
Windfall Sites	598	1,495	1,495	3,588
Lapsed Permissions	0	302	30	332

- 3.7 The largest single source of supply (8,009 homes) is from sites that already have planning permission, and the majority of these units are projected to deliver in the next five years.
- 3.8 The next largest source of supply (6,930 homes) is sites proposed to be allocated in the emerging plan. Appendix F of the report sets out some high level assessment around the suitability, availability, achievability and viability of each of the proposed allocations.
- 3.9 Windfalls make up the next largest source of supply at 3,588, and 3,262 homes are included from sites that are currently allocated in the adopted local plan.
- 3.10 We have undertaken a review of all of the sites of 50 units or more from the above sources that are included within the Council's trajectory. We provide our observations and commentary on where we consider the Council's assumptions on delivery to be unrealistic and where subsequent reductions should be made. Those are set out in Section 4 of this report.

Build out Rates

- 3.11 The Council present some local evidence on anticipated build out rates. Paragraph 5.45 of the Supply Statement explains that Shropshire Council has identified 'standard' build rates, based on its own monitoring of development activity and feedback from a Developer Panel (consisting of representatives of the various scales of the development industry operating in Shropshire), which indicated that build rates on sites in Shropshire are around 30-40 units/year.
- 3.12 Reference is also made to the approach to build out rates on large sites; suggesting that for some sites the delivery rates should be multiplied to take into account consideration that two or more developers may be delivering from outlets on a site at the same time.
- 3.13 The Council's 'standard' rates across the authority area are as follows:
- North Shropshire – 25 dwellings per year;

- Central Shropshire – 38 dwellings per year; and
- South Shropshire – 36 dwellings per year.

3.14 There is limited data to support the above assumptions, and there are some instances within the supply where the Council appear to have deviated from these averages. Commentary on a site specific basis as to how these rates have been applied and whether we consider it appropriate is covered in Section 4 of this report.

Lead-in Times

3.15 The Council set out what they consider to be ‘standard’ lead in times in Shropshire. The timescales they use are as follows;

Table 6: 'Standard' Lead-in Times in Shropshire

Action	Months as a range		
	Start	End	Range
Preparation of Application	1	6	8-21
Local Planning Authority Consideration of Application	2	3	
Completion of S.106 Legal Agreement	1	6	
Preparation of Reserved Matters Application (if applicable) & Discharging of Conditions	2	3	
Local Planning Authority Consideration of Reserved Matters Application(s) (if applicable)	2	3	
Site Mobilisation	2	6	2-6
Infrastructure Implementation			
Build First Dwelling			
Totals:	10	27	10-27

Figure 1 – Extract from Draft Shropshire Local Plan Five Year Housing Land Supply Statement (GC-47)

3.16 The lead in times for various elements of the supply are discussed on a site specific basis in Section 4 of this report. However, we are of the view that the timescale assumptions are, for many sites, overly optimistic. We consider that these assumptions should be treated with significant caution, as many look to be wholly unrealistic . Furthermore, the above standard lead in times give no consideration to the timescales required for different scales of site, particularly as many of the sites that will deliver in the plan period are of a significant scale and will take time to prepare and progress.

3.17 As a comparison we have considered the Council’s claimed lead in times against those assumed in the Lichfields Start to Finish Report³ and applied our judgement based on experience of lead in times for applications across the country. The sites where we consider delivery should be adjusted on the basis of lead in times are covered in the site specific assessments at Section 4 of this report.

³ Start to Finish, Third Edition, Lichfields, March 2024

4. Assessment of Supply

- 4.1 The following sub sections consider the Council’s position and projected delivery for a number of sites and sources of supply included in the plan period trajectory. We consider these sites within the context of the evidence on realistic delivery assumptions set out in the previous section in relation to average delivery rates and lead in times.
- 4.2 We consider that there are several sites within the trajectory which have overly optimistic deliverability assumptions. In some instances we consider that there is insufficient evidence that the site will come forward for housing at all within the Plan Period, and for several site we consider that either the lead in time has been underestimated, or the projected delivery rates are overly ambitious.

Review of Site Specific Deliverability in Plan Period

BRD030 Tasley Garden Village – 1,050 homes

- 4.3 This site is an emerging allocation in the new Plan. Taylor Wimpey are the developer involved and have prepared a Development Statement (dated December 2020) setting out the vision for the new Garden Village. The site is allocated to deliver a comprehensive mixed use development based on Garden Village principles. The Local Plan (Schedule S3.1(i) of the Submission Plan) explains that a vision, design code and masterplan will be prepared in consultation with the public and adopted as a Supplementary Planning Document by Shropshire Council, and that this must be completed before any planning application for development of the site.
- 4.4 At present, there is no application submitted for this development. Major strategic sites such as this typically take several years to deliver homes even once an application has been submitted for development. This site also needs an SPD to be in place before an application can come forward, which will add further complexity and lead in time.
- 4.5 Whilst there is a good chance homes will be delivered from this site in the plan period, a more reasonable lead in time should be applied. Assuming the plan is adopted promptly, an SPD for this site then prepared, consulted on and adopted swiftly thereafter and a planning application for the development then progressed in short order we would suggest it would still be circa 7 years from submission of any such application before units will begin completing on the site.

BRD030	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
Council (Local Plan)	0	0	38	70	70	70	70	90	90	90	90	90	100	94	0	962
Turley (Local Plan)	0	0	0	0	0	0	0	0	0	38	70	70	70	90		408

- 4.6 The Council suggest 38 units will deliver from this site within the first five years of the plan. We do not consider that there is clear evidence that homes will come forward within these first five years as there is no application in place for this development, and

no indication yet that a draft of the SPD (which is needed before any development can progress on the site) has come forward. Instead a commencement date of 2032/33 is considered more reasonable.

BUR004 Land adjoining Boraston Drive on A456, Burford – 100 homes

4.7 This site is proposed to be allocated for 100 units in the emerging plan. There is no record of any application to date for the proposed development. It is not clear whether there is developer interest in this site and there is limited commentary from the Council on the deliverability of the site and assumptions that underpin the timescales assumed.

4.8 Based on what we would consider more reasonable lead in times for sites of this size, we would assume circa 4 years from submission of an application before first completions on the site. Assuming the Local Plan is adopted in this monitoring year and an application for this development submitted in the upcoming monitoring year it may be more reasonable to push development on this site back to allow for application(s) to be submitted, determined and for development to commence.

BUR004	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30	30/ 31	31/ 32	32/ 33	33/ 34	34/ 35	35/ 36	36/ 37	37/ 38	Total
Council (Local Plan)	0	0	15	26	36	23	0	0	0	0	0	0	0	0	0	100
Turley (Local Plan)	0	0	0	0	0	0	15	26	36	23	0	0	0	0	0	100

SHR057 & SHR177 Land North of Mytton Oak Road, Shrewsbury – 400 homes

4.9 There is no record of any planning application on this site for residential development. The draft plan explains that development on this site needs to come forward in accordance with a masterplan, and that this should be subject to public consultation and will then need to be adopted by the Council. We have not identified any progress on this masterplan to date.

4.10 In our view, the Council do not allow sufficient time in the trajectory for the plan to be adopted, a masterplan progressed and agreed, an application prepared submitted and determined before completion will materialise on site. At least 4 years should be allowed following adoption of the plan before units are likely to come forward on this site.

SHR057 & SHR177	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30	30/ 31	31/ 32	32/ 33	33/ 34	34/ 35	35/ 36	36/ 37	37/ 38	Total
Council (Local Plan)	0	0	20	38	38	38	38	38	38	38	38	38	38	0	0	400
Turley (Local Plan)	0	0	0	0	0	20	38	38	38	38	38	38	38	38	38	362

SHR60, SHR158 & SHR161 Land between Mytton Oak Road and Hanwood Road, Shrewsbury – 1,500 homes

- 4.11 This site is allocated to deliver a comprehensive Sustainable Urban Extension of around 1,500 homes along with 5ha of employment land and a local centre. A masterplan is required for the site as a whole before development can come forward, and the intention is that this will need to be consulted on with the public and formally adopted by the Council. The draft plan states that a decision on any planning application on the site will not be made until the masterplan has been approved.
- 4.12 There is no record online of any application having been submitted to date for development on this site. Clearly this is a major strategic development location and significant work is required to inform any upcoming application, and to inform the comprehensive masterplan that needs to be progressed and agreed prior to the determination of any application on the site.
- 4.13 The Council sets out very limited information in the supply report with regard to the delivery of this site and the assumptions underpinning the timescales set out in the trajectory. Reference is made to involvement with CEG as site promoters, at Appendix F to the Supply Statement the Council quote CEG as having ‘queries about some of the broad-brush assumptions and conclusions reached in the Council’s current evidence base on viability’. There is a possibility that these concerns around viability could cause a delay to the delivery of the site.
- 4.14 Our view is that strategic sites such as this can take a significant amount of time to come forward given the complexities involved in a site this size. Our view is that expecting development to commence in the next monitoring year when there is as yet no application submitted for this site is wholly unrealistic. The projected commencement date for development on this site should be pushed back to reflect a more typical lead in time for a site such as this.

SHR060 SHR158 & SHR161	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
Council (Local Plan)	0	0	95	95	95	95	95	114	114	114	114	114	114	118	0	1277
Turley (Local Plan)	0	0	0	0	0	0	0	0	95	95	95	95	95	114	114	703

BAY039 Land off Lyth Hill Road, Bayston Hill – 100 homes

- 4.15 An application for residential development was submitted on the site in 2017 and refused in October of that year. It does not appear that an appeal was progressed and there is no record of any further applications since.
- 4.16 Our view is that a site of this size would typically take circa 4 years between the submission of an application and the delivery of homes, assuming an application were to follow on from the local plan adoption, and come forward in 2025/26, first completions would more likely be achieved 2029/30.

BAY039	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
Council (Local Plan)	0	0	0	38	38	24	0	0	0	0	0	0	0	0	0	100
Turley (Local Plan)	0	0	0	0	0	0	38	38	24	0	0	0	0	0	0	100

BNT002 Clive Barracks, Tern Hill – 750 homes

4.17 This site is currently in use as an army base. The intention is that following the relocation of its main occupiers, Clive Barracks, the site will be redeveloped to form a new strategic settlement which will contribute towards strategic growth aspirations in the north-east of the County. Before development can come forward on this site a comprehensive masterplan is required (as is set out in draft Policy S19 of the local plan) for the site to inform the development. Alongside new homes, the allocation is for a local centre, school facilities and various associated development including highways improvements to both the local and strategic highways network.

4.18 Appendix F of the Supply Statement makes reference to viability issues on this site and the potential need for a reduced level of affordable housing provision.

4.19 The Council's Supply Statement suggests circa 350 homes from this site may come forward in the plan period. This estimate has been revised down from the submission version of the plan which suggested 550 homes may be delivered before 2037/38. The rationale behind this is explained in the Topic Paper on Housing (gc4i) as follows;

Shropshire Council understands that a recent announcement has been made (25th November 2021) confirming that as a result of the Future Soldiers Project, which represents the most radical transformation of the British Army in 20 years, the timescales for the release of Clive Barracks, Tern Hill have moved from 2025 to 2029. The implications of this change on the level of residential delivery expected on the site during the proposed Plan period (2016-2038) and the implications for the distribution of residential development between the various settlement categories is captured in the above table. This announcement has required further proposed minor (additional) modifications to the draft Shropshire Local Plan.

4.20 Originally it was anticipated that the barracks on site would close in 2022, so the timescales for the release of this site for development have already slipped twice. The Council allow a fairly substantial lead in time before they anticipate development would come forward on the site, however, we consider that there may be scope to question relying on any development at all coming forward until there is more certainty around when the site would become available.

Given the viability issues referenced, the fact the site does not appear available for development at the current time (as it is occupied) and given that any application for development on the site may take some for be prepared and is reliant on a masterplan before any permission can be issued, we suggest there is some uncertainty as to whether any homes will be delivered from this site in the plan period.

BNT002	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
Council (Local Plan)	0	0	0	0	0	0	0	25	25	50	50	50	50	50	50	350
Turley (Local Plan)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

IRN001 Former Ironbridge Power Station – 1,000 homes

4.21 The Former Ironbridge Power Station ceased operation in 2015. The partly brownfield site is around 140ha and comprises the former Power Station, associated uses and agricultural land. Before any application for development can be approved a comprehensive masterplan for the redevelopment of the site needs to be approved. Draft policy S20 also states that the site will need to be remediated before development can progress.

4.22 An outline application (ref. 19/05560/OUT) submitted by Harworth Group plc was permitted in September 2022 for the following development:

Outline application (access for consideration comprising formation of two vehicular accesses off A4169 road) for the development of (up to) 1,000 dwellings; retirement village; employment land comprising classes B1(A), B1(C), B2 and B8; retail and other uses comprising classes A1, A2, A3, A4, A5, D1 and D2; allotments, sports pitches, a railway link, leisure uses, primary/nursery school, a park and ride facility, walking and cycling routes, and associated landscaping, drainage and infrastructure works.

4.23 The landowner's (Harworth Group) website explains that before development can commence on the site various remediation works will need to be undertaken to remove existing materials. Discussions are also ongoing with National Rail to bring the existing rail sidings on the site back into operation in addition to strengthening the rail bridge that crosses the river. The site confirms that once construction commences, the scheme is likely to take between 10 and 15 years to fully develop.

4.24 Demolition on the site has started with various consents in place for the removal of the former power station buildings and structures. A full application (20/05301/FUL) for Phase 1 earthworks (enabling works to commence on grant of the outline permission for the wider site) was approved in March 2021.

4.25 There are reserved matters applications pending determination on the site (ref: 24/01661/REM and 24/02873/REM) but not yet any detailed planning permission in place for development. As we are already well into the 2024/25 monitoring year and the site remains without a decision notice for detailed consent, clearly there is no likelihood that 70 homes will be completed on the site in the current year. Expected delivery should be pushed back to allow for permission to be issued, conditions discharged and work on the homes on the site to commence.

IRN001	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
Council (Local Plan)	0	70	70	70	70	80	80	80	80	80	80	80	80	80	75	1075

Turley (Local Plan)	0	0	0	0	70	70	70	70	80	80	80	80	80	80	80	840
----------------------------	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	------------

4.26 Whilst an outline application is pending determination on the site, clear evidence is needed that homes will deliver within five years if units are to be included in the supply calculation. At this time we consider there to be a lack of such evidence and no units should be included at this time.

WHT037 & WHT044 Land North of Chester Road, Whitchurch – 200 homes

4.27 There is no record of any application for development on this site. Given the scale of the site, it is not unreasonable to assume that, once allocated at the point of adoption of the plan, an application will come forward for the development and this could feasibly be built out within the plan period. However, with no application even submitted to date, we consider that leaving just 2 years before completions commence is likely to be too short a lead in time.

4.28 Commencement on the site should be pushed back to allow the necessary applications to be progressed and determined, and for conditions to be discharged before development commences.

WHT037 & WHT044	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
Council (Local Plan)	0	0	0	25	25	25	25	25	25	25	25	0	0	0	0	200
Turley (Local Plan)	0	0	0	0	0	0	0	0	25	25	25	25	25	25	25	175

BRID001, BRID020a and BRID020b Land north of Wenlock Rd – 500 units

4.29 This site was allocated for development in the SAMDev. A hybrid planning application (21/05023/OUT) submitted by Tasley Estates Ltd for *up to 550 dwellings, a neighbourhood centre, B2/B8 employment uses, sui-generis uses, relocation of the livestock market, and associated infrastructure* was approved in March 2024. The full element of the planning application relates to enabling infrastructure works, the residential element is outline only. A reserved matters submission for part of the residential element of the site (ref: 24/01598/REM) was submitted in April 2024 and remains pending determination. As yet there is no detailed consent for homes on the site.

4.30 The Council’s lead in times appear very overly optimistic, with delivery of 20 homes suggested in the current monitoring year. Assuming a more realistic timescale to allow for the reserved matters applications to be approved, for conditions discharged and for homes to commence on site, would mean delivery is more likely to be achieved from 2028/29, albeit still likely the site can deliver in the plan period.

BRID001, BRID020a and BRID020b	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
Council (Local Plan)	20	63	63	63	63	63	63	63	63	63	0	0	0	0	0	587

Turley (Local Plan)	0	0	0	0	0	20	63	63	63	63	63	63	63	63	63	63	63	63	587
----------------------------	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	-----

CRAV003 CRAV009 Land between Watling St and Brook Road - 235 homes

4.31 It appears there is no application submitted for this development. The Council commentary at Appendix E to Local Plan Supply report states the site has ‘significant constraints’, that there is no developer involved at present, and that the development is subject to widening of Watling Street and provision of new junction before it can come forward.

4.32 The site has been allocated for development since the adoption of the SAMDev in 2015. Based on the constraints identified and given the lack of any application or mention of any developer involvement we consider there is some considerable uncertainty around the deliverability of this site at all in the plan period.

CRAV003 & CRAV009	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30	30/ 31	31/ 32	32/ 33	33/ 34	34/ 35	35/ 36	36/ 37	37/ 38	Total
Council (Local Plan)	0	20	36	36	36	36	36	35	0	0	0	0	0	0	0	235
Turley (Local Plan)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

BUCK001 Timber/Station Yard, Bucknell – 70 dwellings

4.33 This site is a ‘Saved’ allocation from the adopted development plan. The brownfield site obtained outline consent in 2011 (ref. 09/03091/OUT) for 30 homes but no reserved matters were ever submitted and this consent does not appear to have been implemented. A further application (ref. 13/03241/FUL) for circa 50 homes on the site was submitted in August 2013, the online pages for this on the LPA website are no longer available and it appears the application was never determined. There are active industrial uses on the site (with recent associated planning activity; planning activity ref: 24/02857/VAR to vary conditions relating to noise, opening hours) that would need to conclude to allow site to come forward.

4.34 This site has been allocated for development for nearly a decade and no new housing has come forward. In addition, the site information in the supply statement explains that the site is in an area where any development will need to demonstrate either nutrient neutrality or nutrient betterment.

4.35 Based on the constraints identified and given the lack of any current application or mention of recent developer involvement we consider there is some considerable uncertainty around the deliverability of this site at all in the plan period.

BUCK001	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30	30/ 31	31/ 32	32/ 33	33/ 34	34/ 35	35/ 36	36/ 37	37/ 38	Total
Council (Local Plan)	0	0	0	0	0	0	0	0	0	0	0	0	20	25	25	70
Turley (Local Plan)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

CLUN002 Land at Turnpike Meadow, Clun – 60 dwellings

- 4.36 This site is a ‘Saved’ allocation from the adopted development plan. An outline planning application (13/03440/OUT) was submitted on the site in 2013 but this remains pending determination and is no longer available for viewing. The website states it may have been removed or restricted from public viewing. A historic application was also submitted in 2000 for residential development on the site and subsequently withdrawn (SS/1/00/10850/O).
- 4.37 This site has been allocated for development for nearly a decade and no new housing has come forward. In addition, the site information in the supply statement explains that the site is in an area where any development will need to demonstrate either nutrient neutrality or nutrient betterment.
- 4.38 Based on the constraints identified and given the lack of any current application or mention of recent developer involvement we consider there is some considerable uncertainty around the deliverability of this site at all in the plan period.

CLUN002	21/	22/	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
Council (Local Plan)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	25	25	60
Turley (Local Plan)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 Land at Park Hill – 215 dwellings

- 4.39 The site is a proposed allocation for up for 215 homes. However this site does not have planning permission, nor any application pending for the development. The Council anticipate delivery of homes commencing within just 2 years of the time of writing. This does not allow a reasonable amount of time for the preparation, submission and determine of the requisite consents on the site.
- 4.40 Assuming a more reasonable lead in time for a site of this size we would assume circa 4 years from submission of an application before first completions on the site. Assuming the Local Plan is adopted in this monitoring year and an application for this development submitted in the upcoming monitoring year it may be more reasonable to push development on this site back to allow for application(s) to be submitted, determined and for development to commence.

PKH002, PKH011,	23/	24/	25/	26/	27/	28/	29/	30/	31/	32/	33/	34/	35/	36/	37/	Total
PKH013, PKH029,	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	
PKH031 & PKH032																
Council (Local Plan)	0	0	0	15	25	25	25	25	25	25	25	25	0	0	0	215
Turley (Local Plan)	0	0	0	0	0	0	0	0	15	25	25	25	25	25	25	165

Lapsed Permissions

- 4.41 The Plan Period trajectory includes for 332 homes, to be delivered in years 6-15, from sites with lapsed planning permissions. Many of the applications referenced are from over 10 years ago and relate to outline applications which the Council does not state were ever followed up with any reserved matters submissions. Again, the Council provide a caveat that these units are included on a without prejudice basis, subject to future planning applications for which there is absolutely no evidence provided. We consider this statement is in conflict with the identification of this source of supply as one that should be relied upon as a component of supply in the emerging plan.
- 4.42 The evidence the Council do include on lapsed permissions simply states that many of these sites remain 'suitable for development'. However under 'suitability' the predominant reason given is that the site was previously subject to an application. This argument does not follow and is not a reasonable basis on which to assume that delivery can be relied on from a site in the future.
- 4.43 As these sites are discussed in a separate category to SLAA sites, it is assumed that the sites were not submitted to the call for sites exercise in 2017 and no clear evidence is given to suggest that the sites actually do remain available or that the landowners/promoters will be pursuing any revised permissions. It could be suggested that if sites have historic permission that has now lapsed, that no revised permission/application has been progressed for and that were not submitted to the SLAA then that is a fairly clear indication that it should not be assumed these sites are available for development.

Summary on Plan Period Supply

- 4.44 Based on the assumptions detailed above, we consider that there are several elements of the Council's claimed sources of supply over the plan period for which overly optimistic assumptions have been made, and where it is not likely they will deliver as anticipated by the Council. A key theme identified is that very short lead in times are typically applied to several sites, along with continuing to allocate sites which have been identified for development before but on which nothing has come forward due to various constraints, or where permissions have lapsed a significant time ago.
- 4.45 In terms of overall reductions to the plan period supply, our conclusions are that the following deductions should be made to the plan period trajectory in order to reflect more reasonable assumptions about the number of homes actually likely to come forward;

Ref.	Name	Council Plan Period Total	Turley Plan Period Total	Difference
BRD030	Tasley Garden Village, Bridgnorth	962	408	-554

SHR057 & SHR177	Land North of Mytton Oak Road, Shrewsbury	400	362	-38
SHR060, SHR158 & SHR161	Land between Mytton Oak Road and Hanwood Road, Shrewsbury	1,277	703	-574
BNT002	Clive Barracks, Tern Hill	350	0	-350
IRN001	Former Ironbridge Power Station	1,075	840	-235
WHT037 & WHT044	Land North of Chester Road, Whitchurch	200	175	-25
CRAV003 & CRAV009	Land between Watling Street and Brook Road, Craven Arms	235	0	-235
BUCK001	Timber/Station Yard, Bucknell	70	0	-70
CLUN002	Land at Turnpike Meadow, Clun	60	0	-60
PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032	Land at Park Hall	215	165	-50
	Lapsed sites	332	0	-332
	Total	5,176	2653	-2523

- 4.46 A table setting out a summary of all adjustments outlined in this section of the report is provided at Appendix 1. Our calculations find remaining total plan period delivery is likely to be 20,590 (2023/24 to 2037/28) against a residual housing requirement of 19,539. This is a surplus of just 3.4% and is significantly less surplus than the Council currently claim they can demonstrate.
- 4.47 Whilst this exercise has yielded a small surplus in supply over the plan period (rather than demonstrating there is a shortfall), more sites should be identified in order to ensure that the housing requirement is reached in the plan period. Indeed, in order to maintain the same levels of contingency as currently planned for, our assessment shows that sites capable of delivering over 2,000 homes in the plan period to 2038 should be identified.
- 4.48 Furthermore, this small surplus is on the basis that the majority of the sites within the projected supply (beyond the 10 [plus lapsed sites] identified in table 4 above) deliver

at the rate anticipated by the Council. In reality a modest surplus such as this could easily slip into a deficit in the plan period overall. This is clearly evidenced by the continued identification of sites to deliver over 3,000 homes in the current plan period that are 'saved' site allocations from the exiting development plan that have not delivered as expected.

5. Implications and Conclusions

- 5.1 This Report has assessed Shropshire’s delivery assumptions on a number of proposed sites listed in the trajectory table for the emerging Local Plan. The purpose of this assessment has been to sensitivity test the claimed supply over the plan period as a whole.
- 5.2 Draft Policy SP2 ‘Strategic Approach’ identified a proposed housing requirement of around 30,800 dwellings over the period from 2016 to 2038. This is around 1,400 dwellings per annum (dpa). As part of the response to comments from the Inspectors (ID28, ID36 and ID37) the Council has now updated the proposed housing requirement and now proposes a minimum of 31,300 homes between 2016 and 2038 (circa 1,423 per annum). The proposed requirement figure is higher than the Local Housing Need figure as calculated by the standard method (which is currently 1,070 dpa). A higher figure has been used in order to provide some flexibility⁴, to boost the supply of affordable homes and to make a contribution to meeting the unmet housing need of the Black Country authorities.
- 5.3 Since the start of the plan period in 2016, the Council has over delivered against its emerging requirement, resulting in a plan period surplus to date of 1,800 homes. The total residual requirement for the remaining 15 years of the plan period based on completions to date is 19,539 homes. The Council’s Supply Statement suggests that a total of 34,874 homes will be delivered over the plan period, and identifies a supply of 23,113 homes from 2023/24 to 2037/38.
- 5.4 The Council claim to have a total plan period supply of 34,874 homes, which is 3,574 homes (12%) more than the basic requirement. From 2023/24 onwards (i.e. minus completions to date) the Council claim a supply of 25,820 homes up to 2037/38.
- 5.5 We consider that there are several elements of the Council’s claimed sources of supply over the plan period for which overly optimistic assumptions have been made, and where it is not likely they will deliver as anticipated by the Council. A key theme identified is that very short lead in times are typically applied to several sites, and this is the primary area which we consider undermines some of the Council’s figures. However, aside from a few major schemes, most of the sites included in the plan period are likely to deliver by 2037/38, albeit probably later than expected.
- 5.6 Based on the adjusted lead in times for the sites identified above, we have calculated a revised total delivery figure for the plan period. Whilst we consider that less homes than predicted by the Council will actually deliver in the plan period, there is clearly significant contingency built into the supply. Our calculations find remaining total plan period delivery is likely to be 20,590 homes (2023/24 to 2037/28) against a residual housing requirement of 19,539. This is a surplus of just 3.4% and is significantly less surplus than the Council currently claim they can demonstrate.
- 5.7 Whilst the overall deductions identified do not result in a shortfall in the context of the overall requirement, this exercise has demonstrated that the Council’s supply is likely

⁴ Para 1.6 – of GC50 Five Year Supply Statement 2021

to be much more marginal than they have stated. On the face of it the Council claim a significant surplus in supply and categorise the plan period trajectory as evidence of a robust supply going forwards. In reality we consider that several sites are not likely to deliver as many homes as anticipated over all, and that many sites are likely to come forward somewhat later than predicted.

Appendix 1: Table setting out a summary of all adjustments to Plan Period Supply

IRN001	Ironbridge Power Station, Buildwas Road, Ironbridge, Telford, Shropshire, TF8 7BL	1075	19/05560/OUT	Y		70	70	70	70	280	80	80	80	80	80	400	80	80	80	80	75	0	1075	0	0	0	70	70	70	70	80	80	370	80	80	80	80	80	0	840	-235
	Brogntyn Hall, Brogntyn, Oswestry, SY10 7DA	69	14/03184/EUL	Y		1	25	25	18	69						0						0	69	1	25	25	18	69										0	69	0	
	Proposed Development Land To The North Of Shrewsbury Road, Oswestry	314	16/02594/OUT	Y						0						191	75	50				0	316																0	316	0
	Proposed Residential Development Land At Rhosyllan Farm St Martins Shropshire	49	19/03995/EUL	Y		25	24			49												49	49	25	24															49	0
OSW024	Proposed Residential Development Land To The South Of Middleton Road, Oswestry, Shropshire	120	21/03584/REM	Y		50	50	20		120						0						0	120	50	50	20													0	120	0
	Proposed Development Land To The North Of, Shrewsbury Road, Oswestry, Shropshire	284	21/04449/REM	Y		25	50	50	50	175	50	50	9			109						0	284	25	50	50	50	175	50	50	9								0	284	0
	Land Between Preston Street & London Road, Shrewsbury, Shropshire	53	17/01612/OUT	Y		53				53						0						0	53	53														0	53	0	
	Land Off Station Road Baschurch Shropshire	34	18/05447/REM	Y		25	9			34												34	34	25	9														34	0	
	Former Copthorne Barracks, Copthorne Road, Shrewsbury, Shropshire, SY3 8LZ	150	19/01288/REM	Y		50	18			68						0						68	68	50	18													68	0		
	Development Land To The South Of Oteley Road Shrewsbury Shropshire	30	17/06149/REM	Y		30				30												30	30																30	0	
	Development Land To The South Of Oteley Road Shrewsbury SY2 6FT	28	19/04460/REM	Y		28				28												28	28																28	0	
	Land Between Preston Street & London Road, Shrewsbury, Shropshire	247	19/05564/REM	Y		37	90	90	30	247						0						0	247	37	90	90	30	247										0	247	0	
	Development Land At Churncote Off Welshpool Road, Bicton Heath, Shrewsbury, Shropshire	316	20/01957/EUL	Y		60	60	60	60	300	16					16						0	316	60	60	60	60	300	16								16		0	316	0

ELL003a & ELL003b	Land South of Ellesmere	250		Y		15	37	56	108	56	56	30							0	250			15	37	56	108	56	56	30					0	250	0	
MD030, MD010 & MD028	Land off Rush Lane; and Land between Croft Way and Greenfields Lane, Market Drayton	64	21/01142/REM	Y		30	34		64										0	64			30	34		64							0	64	0		
GOB012	Land between A5 and Shrewsbury railway line, Gobowen	90	24/01475/EUL	Y		25	25	40	90										0	90			25	25	40	90						0	90	0			
OSW004	Land off Whittington Road, Oswestry	83	23/00225/EUL	Y		25	25	33	83										0	83			25	25	33	83						0	83	0			
OSW024	Eastern Gateway Sustainable Urban Extension, Oswestry	50	21/03584/REM	Y					0	5	25	25							0	55						0	5	25	25			55	0	55	0		
OSW034, OSW035 & OSW045	Land South of the Cemetery, Oswestry	80		Y					0	25	25	25	5						0	80						0	25	25	25	5		80	0	80	0		
OSW042	Richard Burbidge, Oswestry	130		Y					0			25	25	50	25	25	25	5	80	130						0		25	25	50	25	25	25	5	80	130	0
WRN016	Land at the Sawmills, Rhoswiel	59	22/03924/EUL	Y		25	25	9	59										0	59			25	25	9	59						0	59	0			

SHREW002, SHREW035, SHREW083, SHREW128, ELR64, ELR67 & ELR68	Shrewsbury West Sustainable Urban Extension	410		Y	38	38	38	38	152	38	38	38	46	72	232	26		26	410	38	38	38	38	152	38	38	38	46	72	232	26		26	410	0
SHREW028, SHREW029, SHREW075, SHREW107, SHREW114, SHREW127, ELR02 & ELR66	Shrewsbury South Sustainable Urban Extension, Shrewsbury	57		Y			57		57						0			0	57			57										0	57	0	
WHIT009	Land at Tilstock Road, Whitchurch	561	22/04360/FUL	Y	50	75	75	75	275	75	75	75	61		286			0	561	50	75	75	75	275	75	75	75	61		286		0	561	0	
ALB017 & ALB021	Land north of Kingswood Road and Beamish Lane, Albrighton	180	24/02662/OUT	Y			36	36	72	36	36	36			108			0	180			36	36	72	36	36	36			108		0	180	0	
BRD030	Tasley Garden Village, Bridgnorth	1050		Y		38	70	70	178	70	70	90	90	90	410	90	90	100	94				0	0	0	0	0	0	0	0	38	370	408	-554	
HNN016	Land South of Oak Street, Highley	100		Y			36	36	72	28					28			0	100			36	36	72	28				28		0	100	0		
BUR002	Land adjoining Lineage Farm on A456, Burford	40	23/02796/FUL	Y					0			15	25		40			0	40				0			15	25		40		0	40	0		

Turley Office
40 Queen Square
Bristol
BS1 4QP

T 0117 989 7000