

# Shropshire Local Plan Examination

## Stage 2 Matters, Issues and Questions

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



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**Shropshire Local Plan Examination, Stage 2 Matters, Issues and Options**  
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Acronyms / Abbreviations

## **Acronyms / Abbreviations**

DPA	Dwellings per annum
LHN	Local Housing Need
SA	Sustainability Appraisal
SHMA	Strategic Housing Market Assessment



Introduction

# 1 Introduction

## 1.1 Context

This Matter 3 Statement has been prepared by Stantec on behalf of Yareal Llandforda Limited (our Client) who are promoting Land to the north of Market Drayton at Longslow Farm (the 'site'), and Land to the north of Trefonen, for residential development.

Representations have previously been submitted on behalf of our Client to the 'Strategic Sites Consultation' (2019), 'Preferred Sites Consultation (2019), the Regulation 18 Pre-Submission Draft Shropshire Local Plan (2020), and Regulation 19 Pre-Submission Draft Local Plan (2021) in relation to the Local Plan Review process. These representations have been prepared by Stantec (formerly Barton Willmore – representor ID **A0387**) and David Parker Planning Associates (representor ID **A0430**). Stantec is now representing Yareal Llanforda in respect of both responses.

It is submitted that our Client's sites are suitable for meeting the housing needs of Market Drayton/ Trefonen and the wider County in the Plan period and should be identified as residential allocations in the Shropshire Local Plan.

Outlined in Section 2 of this Statement are responses to a select number of the Inspectors' questions which set out why we consider changes to the Local Plan are necessary to ensure the soundness of the Plan.

Reference to supporting documents are contained within bold square brackets e.g **[SD001]**.

This Statement has been prepared in line with the Guidance Note **[ID41]** for the Examination.

## 1.2 Yareal Llanforda

Yareal Llanforda Ltd is a subsidiary of Yareal UK Ltd; a farming and property business with two hubs: Lincolnshire in the East and Shropshire in the West. The business was established in 2015 as a vehicle to invest in the sector and develop a modern and sustainable agricultural, property and food business based on owned and rented land with diversity in location and activity. The Shropshire farms have livestock as their focus in the main. However, at the farm in Longslow, the activities are now mainly arable as the previous dairy was old-fashioned and uneconomical to run. The long-term dairy use at the farm is under consideration and various options are being explored to understand what is feasible, including the possibility of building a new dairy elsewhere within the estate. The development of Land at Longslow Farm would undoubtedly help to facilitate a new dairy as well as bringing a range of associated benefits to the local economy.

In the meantime, the crops grown on the estate provide feed for the cattle and other animals at their other farms in Shropshire.



Housing Need

## 2 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?**

In Document [GC24]<sup>1</sup>, the Council seeks to justify maintaining the base date of the Plan at 2016, despite the Local Housing Need ('LHN') being calculated with a base date of 2020<sup>2</sup>. The LHN figure for Shropshire as at March 2020 is 1,117 dwellings per annum ('dpa'). This is the LHN figure upon which the overall housing requirement of the Local Plan (31,300 dwellings<sup>3</sup>) is based over the 22-year plan period from 2016-2038.

Section 4 (page 10) of the Local Housing Need Assessment (August 2020) [EV069] presents comparisons of the LHN calculations for each of the four years 2016 - 2020 inclusive. The Assessment identifies that the 2016-based LHN figure is 1,270 dpa i.e 93 dpa greater than the March 2020 LHN figure.

In Section 4 of Document [GC24], the Council presents various reasons why aligning the start of the plan period with the base date for the Local Housing Needs Assessment is not necessary, predominantly due to the consideration that it would "cause unnecessary confusion", "would have 'knock-on' implications" for the Plan and the evidence base, and that the Council considers it "unnecessary to change the plan period to ensure the plan is 'sound'". We disagree, it appears that the Council simply does not wish to amend the Plan period due to the inconvenience the additional associated work would cause the cause them.

The discussion from both the Council and the Inspectors appears to be in respect of aligning the start of the plan period with the base date for the LHN Assessment, rather than the other way around.

It is contended that the alternative of maintaining the base date of the plan period as 2016 and bringing forward the base date for the LHN Assessment to 2016 should be considered. This would allow the Council to retain its preference in respect of the Plan period but would require an additional 372 dwellings<sup>4</sup> to be planned for. This approach would be consistent with local plan examinations elsewhere.

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<sup>1</sup> *Shropshire Council Response to ID28: Inspectors' Interim Findings Following Stage 1 Hearings Sessions (July 2023)*

<sup>2</sup> Derived from the *Local Housing Need Assessment (August 2020)* [EV069] which utilises the Standard Method figure published March 2020.

<sup>3</sup> 29,778 dwellings to meet Shropshire's housing needs (LHN of 25,894) with a 15% uplift), plus an additional 1,500 dwelling contribution towards meeting unmet need arising from the Black Country, rounded.

<sup>4</sup> 93dpa x four years (2016/2017, 2017/2018, 2018/2019 and 2019/2020).



Housing Need

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

The Strategic Housing Market Assessment (SHMA) (2020) [EV097.01 and EV097.02] for Shropshire concludes that during the Local Plan period from 2016 to 2038 an estimated **799 households per year** will require affordable housing. This is based on a total net need of 17,574 dwellings over a 22-year Plan period (Table 35 of [EV097.02]). This net need is calculated based upon a consideration of current gross need (5,144 dwellings) and supply (1,562 dwellings), in conjunction with future gross need (32,362 dwellings) and supply (18,370 dwellings).

The SHMA [EV097.02] also presents data for open market and affordable housing completions in Shropshire for the five-year period 2015/16 – 2018/19 (Table 37). This demonstrates that during this period, 8,186 market dwellings were delivered, alongside 1,715 affordable dwellings. This amounts to 1,637 market dwellings and 343 affordable dwelling per year (on average). As a percentage of market housing delivery, affordable housing was delivered at 21%.

It is evident from this monitoring period that historic affordable housing delivery is less than half the identified net need (42.93%).

Regarding future delivery, the emerging Local Plan seeks to deliver 10% affordable housing in the northern part of the of the County and 20% in the southern part through Policy DP4<sup>5</sup>. In the simplest possible terms, if 20% of the total housing requirement (31,300 dwellings) was delivered as affordable housing, 6,260 affordable dwellings would be delivered, at a rate of 284.54 dwellings per year. This is again significantly less than the 799dpa identified by the SHMA (35.61%) and actually represents an overly optimistic view of affordable housing delivery given that, in reality, development delivered in the northern part of the County would be delivered at 10%, rather than 20%.

Moreover, we disagree with the conclusion to not recommend an uplift to the housing requirement based on acute affordable housing need, which states that *“to deliver the aspirations for affordable housing as identified through the assessment of affordable housing need... total housing development would have to be approximately 83,686 dwellings over the Local Plan period from 2016 to 2038 or 3,804 dwellings per annum, more than 3 times the calculated LHN... This significantly exceeds expected demand and crucially is considered undeliverable and inappropriate within the Shropshire housing market.”* (Paragraph 4.152 of [EV097.02]).

It goes on to state that *“...the extent to which the housing requirement would need to exceed the LHN in order to meet aspirations for affordable housing would be undeliverable and inappropriate in a Shropshire context.”* (Paragraph 4.154 of [EV097.02]) and that *“If an adjustment cannot be made that would help to deliver the required number of affordable dwellings, there is a need to consider whether any adjustment is appropriate. Ultimately any such adjustment must not result in the housing requirement becoming undeliverable and be delivered through a plan led approach. As such any decision regarding the housing requirement is a policy consideration.”* (Paragraph 4.155 of [EV097.02]).

This approach is considered unjustified as it is pre-determinative in disregarding an uplift to the LHN before assessing whether an increased housing requirement would be deliverable. The purpose of the

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<sup>5</sup> Formerly DP3, as amended by the proposed main modifications [GC4m]





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Housing Need

SHMA is to present evidence of the housing need, the deliverability of which should be tested through other documents such as the SA.

It is evident that the Council's proposed strategy will not meet its identified affordable housing needs. This can only be rectified by allocating additional sites for housing development, such as Land at Longslow Farm and Land North of Trefonen.



The Housing Requirement

### **3 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?**

No, the preferred approach is not considered justified or effective.

*The Housing and Employment Topic Paper (April 2024) [GC45]* summarises that, of the options tested, the Sustainability Appraisal (‘SA’) process concluded “*Option 3b: High Growth*” was the most sustainable option (31,300 dwellings between 2016 and 2038, plus 1,500 dwellings towards the unmet housing need arising from within the Black Country. The subsequent planning judgement exercise summarised within the Topic Paper also concluded that this was the most appropriate option for inclusion within the draft Shropshire Local Plan.

We applaud the Council’s choice to pursue a ‘higher growth option’. However, it remains that this level of housing provision is insufficient. As set out in our response to Question 2 concerning Housing Need, where the SHMA [EV097.01 and EV097.02] identifies a need for 799 affordable dwellings per annum. Evidenced delivery for the period 2015/16 – 2018/19 demonstrates that, on average, 343 affordable dwellings per annum were delivered (42.93% of the identified need). Similarly, the Local Plan seeks to deliver, at best, 20% affordable housing, resulting in a best-case delivery of 6,260 dwellings, or 284.54dpa (35.61% of the identified need. This point has been made within the previous Section of this Statement and is not repeated further here.

The submission version of the draft Shropshire Local Plan proposed a housing requirement of 30,800 dwellings between 2016 and 2038. This equates to an annual average of around 1,400 dwellings.

Following the Stage 1 Hearings and the various evidence base updates that followed, the Council is proposing that the housing requirement within the draft Shropshire Local Plan increases to some 31,300 dwellings between 2016 and 2038. This equates to an annual average of around 1,423 dwellings.

This would result in an increase to the housing requirement of some 500 dwellings over the period from 2016 to 2038. This equates to an annual average increase of around 23 dwellings.

Section 7 of the Topic Paper seeks to explain and justify the proposed housing requirement and, in particular, the 15% uplift as supporting economic growth and providing flexibility. However, it is not apparent how this 15% uplift has been arrived at.

As described above, the submission version of the draft Shropshire Local Plan proposed a housing requirement of 30,800 dwellings, comprised of the 25,894 dwelling LHN figure, a 1,500-dwelling contribution towards unmet need from the Black Country, and a seemingly arbitrary 3,406 dwelling uplift to provide flexibility. This uplift amounted to 13.15% of the LHN.

In reality, it appears the revised housing requirement has simply rounded this flexibility provision to 15% resulting in the provision of an additional 500 dwellings across the Plan period. It remains unclear



## The Housing Requirement

exactly how this figure has been justified, including why the Council feels it is even required. For example:

- A. No evidence is provided to suggest that a 15% uplift is sufficient to mitigate any lapses in planning permissions.
- B. No justification is provided to suggest that the uplift is intended to meet the identified affordable housing need.
- C. A 1,500-dwelling contribution towards unmet housing need arising from the Black Country is included within the Plan, with three specific sites now named as directly meeting this need. These sites sum to exactly 1,500 dwellings – what happens if one or more of them does not deliver?

### **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?**

The submission version of the draft Shropshire Local Plan [SD002] included a proposed contribution of 1,500 dwellings to the Black Country, but proposed that this would be achieved through the overall spatial strategy for the quantum and distribution of development across Shropshire; no specific sites were identified as meeting his need.

In responding to the Inspector’s Interim Findings [ID28], specific sites have now been identified at Tasley Garden Village, Bridgnorth (600 dwellings), Land between Mytton Oak Road and Hanwood Road, Shrewsbury (300 dwellings) and Former Ironbridge Power Station (600 dwellings). They represent existing allocations within the Plan that have now been specifically earmarked for the purpose of meeting unmet housing need.

We support the provision made within the Plan to accommodate unmet needs from the Black Country but consider that it should not limit to contributing only 1,500 homes. This represents only a small proportion of the full calculated unmet need in the Black Country<sup>6</sup>. The increasing scale of unmet need arising within the GBBCHMA confirms that options to meet this unmet need are not currently apparent, thereby placing greater importance on the contribution Shropshire can make.

Furthermore, it is considered that significant risk exists in seeking to meet the unmet housing need across only three sites. There appears to have been little consideration as to how the unmet need would be accommodated if one or more of these sites failed to deliver homes, or failed to do so in a timely manner. It is submitted that this could be mitigated in a number ways, including:

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<sup>6</sup> Wolverhampton City Council consulted on a Regulation 18 Plan (February 2024) which identified a potential 11,413 dwellings shortfall. Sandwell Council held a Regulation 18 consultation in December 2023 which estimated around a 18,000 dwellings shortfall. Dudley Council also held a Regulation 18 consultation in December 2023 which estimated around a shortfall of 1,078 dwellings. It is Walsall Council’s intention to proceed under new arrangements of plan making. It is expected a shortfall will also arise from Walsall.



## The Housing Requirement

- Accommodating the unmet need across a larger number of medium sized sites.
- Allocating additional sites to meet a greater level of unmet need to provide a 'buffer' to the 1,500 dwellings, should one or more sites not come forward.
- As a last resort, include a mandatory early review mechanism within the Plan, to allow for flexibility in meeting the needs of the Black Country, should the sites not come forward or the need itself change.

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

The Council's *The Housing and Employment Topic Paper (April 2024)* [GC45] identifies at Table 17.2 that the planned provision of 320 hectares of employment land<sup>7</sup> will result in a projected jobs growth of 21,400.

Paragraphs 7.12 – 7.15 of document [GC45] then goes on to argue that, of this growth, only 39.46% would be provided in Class B equivalent jobs, although no evidence is provided to justify this figure.

This would equate to around 8,440 jobs over the Plan period.

Paragraphs 17.16 – 17.18 and Table 17.4 then presents the position that the proposed housing requirement (31,300 dwellings) would result in a projected labour force growth of 12,615 people. On the face of it, this would appear to be in excess of the 8,440 jobs generated by the employment land provision.

However, we would question the robustness of the 39.46% figure presented within the *Housing and Employment Topic Paper* described above. No justification is provided for how this figure has been derived. It is considered likely that a far greater number of Class B equivalent jobs would be created. Housing provision does not match jobs growth, a labour shortage will occur in these industries.

The Council seemingly also then contradicts itself at Paragraph 17.19 of the Topic Paper, stating:

*“The proposed employment land requirement for 320ha would now seek to deliver a jobs growth forecast for 21,400 jobs to 2038. This reflects the aspirations in the (EV044) Shropshire Economic Growth Strategy to deliver a ‘step change’ in the performance and productivity of the local economy, as set out in (GC4n) Employment Strategy Topic Paper. These objectives are important, **although projected labour force growth at +12,615 persons would not entirely support the jobs growth forecast at 21,400 jobs**”.* [Emphasis added].

However, it goes on to state that the Economic Development Needs Assessment ('EDNA') [EV043] recognised the challenge of aligning job growth and projected labour force growth. The EDNA recognised that in-migration would largely drive population growth in Shropshire and that this would

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<sup>7</sup> Comprising 249 hectares of baseline growth, a 15% uplift of 40 hectares plus a 30-hectare contribution towards the Black Country



## The Housing Requirement

attract significant numbers in the 65+ age cohorts. This would mean that increasing the housing supply would offer “*limited returns*” to the size of the working-age population in Shropshire.

As a proposed solution, Paragraphs 17.34 – 17.46 of Table 7.4 of the Topic Paper describes how the Council intends to “manage” Shropshire’s commuting relationships and encourage migration of a working-age population from the Black Country and Wales, in conjunction with supporting its existing economically inactive population in order to meet the identified labour force gap.

We have serious concerns with this approach. Not only is encouraging out-commuting from the Black Country and Wales unsustainable in terms of commuting patterns, but no evidence is provided to demonstrate that these measures would be successful or effective.

Whilst it may be true that the provision of additional housing may attract additional non-working age population, it will equally attract a population of a working age, including those who the Council is instead seeking to encourage to commute to Shropshire.

The Council should accordingly revisit its housing requirement in order to ensure that sufficient housing growth is provided in order to support the projected employment growth.

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

See response to Question 2 in respect of Affordable Housing Need.



The Overall Supply of Housing

## 4 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?**

The Council produced a ‘Snapshot’ Housing Trajectory for Shropshire (March 2022) [GC4p], which was followed by an updated trajectory dated March 2023 [GC50]. This trajectory considers the updated housing requirement of 31,300 dwellings and summarises that this would be delivered at an equalised average rate of around 1,423 dwellings per annum.

A site-specific trajectory is included within the appendices of the *Five-Year Supply Statement (data to 31<sup>st</sup> March 2023, published April 2024)* [GC47].

As set out in our Matter 25 Statement in respect of Five Year Housing Land Supply, the Council has considered many sites to be deliverable without robust evidence to support this assertion, as is required by the NPPF and supported through various appeals and case law.

Similarly, as set out in our Matter 17 Statement in respect of the Market Drayton Place Plan Area, we highlight that none of the allocations in the Area currently have planning permission, despite the Council relying on three of these sites delivering homes within its five-year supply.

Lastly, as per our Matter 6 Statement, we have concerns regarding the delivery of the Strategic Allocation at Clive Barracks.

We accordingly believe that the housing trajectory is overly optimistic in respect of housing delivery and that this should be remedied by allocation additional sites for development, to ensure that growth can be delivered in a timely manner, including ensuring the Council can demonstrate a five year supply as required by national policy.

**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?**

The *Five-Year Supply Statement* [GC47] uses data up to the end of the monitoring period to March 2023. It follows that data up to March 2024 should be available. It would be useful if the Council could update its housing trajectory to utilise the most recent data to present the most accurate position at the point of adopting the Local Plan.

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

Yes, it is submitted that the trajectory showing the expected rate of housing delivery should be included in the Plan (as an appendix, if necessary) to ensure that the Plan is clear and effective in respect of housing delivery. Appendix 7 of the Plan provides high level information on expected delivery timescales



## The Overall Supply of Housing

for Local Plan allocations. However, the trajectory fails to set out quantified rates of anticipated delivery on a yearly basis and therefore it is unclear in assessing how each specific site will realistically deliver over the plan period. This data is instead currently contained within the *Five-Year Supply Statement [GC47]* on a site specific yearly basis.

**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.**

Yes, the housing trajectory for the unmet needs of the Black Country should be separated into a separate assessment to ensure that housing delivery is not double counted across the Plan period.

**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.**

The allocated sites in the SAMDev comprise approximately 10% of the overall housing supply between 21/22 and 37/38. Appendix E of the *Five-Year Supply Statement [GC47]* presents a trajectory for the delivery of these sites.

The extent to which the Council is relying upon these sites is concerning. The Evidence Base for these sites dates from 2014. They 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. In order to determine whether the Council will be able to demonstrate a sufficient supply of deliverable sites on adoption, it will be necessary to consider the deliverability of all sites relied upon from this source in the five year period (as well as their general deliverability during the plan period). This point is explored further in respect of Market Drayton in our Matter 17 Statement.

**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?**

Consideration of SLAA sites is included within Section 5 of the Council’s *Five-Year Supply Statement [GC47]* (Paragraph 5.101 onwards). The Council attempts to justify the inclusion of SLAA sites in its housing supply at Paragraph 5.103, stating:

*“As the SLAA assessment includes consideration of both sustainability; and the suitability, availability and achievability (including viability) of sites in a manner consistent with the NPPF, it is considered reasonable to include the accepted sites which have and [sic] expected yield in the proposed plan period, within the housing land supply.”*

Yareal Llanforda shares the concern intimated by the Inspectors that this appears to be effectively double-counting windfall sites.



The Council suggests that these sites have been robustly assessed, and only the 11 which are considered deliverable within the next five years are included within the supply. However, this raises the question that, if these sites are suitable and available, why are they not allocated within the Plan?

The Council then casts doubt over the delivery of these sites, stating at Paragraph 109:

*“Please Note: Inclusion of the SLAA site within this assessment of housing land supply is without prejudice to the Plan making process or determination of any planning application for that site.”*

It is submitted that these sites should be excluded from the five-year housing land supply for the avoidance of doubt.

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

Our response to this question is provided within our Matter 6 Statement concerning Clive Barracks.

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

See response to Question 2 in respect of Affordable Housing Need.







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