

Matter 3: Housing Land Need Requirement and Supply

Representor A0137 / B-A119



SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 2 Hearing Statement

Representor unique Part A Ref	A0137 / B-A119
Matter	3 – Housing Land Need Requirement and Supply
Relevant questions nos	Housing Requirement 1, 2 Overall Supply of Housing 3, 4

Housing Requirement

1. Q1. 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?

- 1.1.1. BRE's representations to GC45 address this question directly. The pre-action protocol letter OD04 pre-dates GC45, but nonetheless identifies the same point of legal failure of the Council's approach in GC45. That is that under Planning and Compulsory Purchase Act 2004 s20(7C) the Inspector has the power to recommend modifications to make the plan sound. There is no provision for the Inspector to make recommendation to improve or change an otherwise sound plan or part of a plan, and there is no suggestion that the Inspectors have done so here.
- 1.1.2. The Examination Procedure Guide states that main modifications must relate directly to the reasons why the Inspector has found the Plan unsound or legally non-compliant. There is no such basis here which affords the Council the opportunity to make the changes it proposes to the housing requirement for Shropshire (OAN + Shropshire growth).
- 1.1.3. Please refer to BRE representations to GC45 and BRE Matter 1 Statement.

2. Q2. 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?

2.1.1. Please refer to BRE's representations to GC44, GC45 and GC46 and BRE's Matter 1 and Matter 2 Statements.

Overall Supply of Housing

3. Q3. Should a trajectory illustrating the expected rate of housing delivery over the Plan period be included in the Plan?

- 3.1.1. Yes, this is necessary in order to be able to monitor the effectiveness of the plan in meeting its objectives and in particular delivering housing to meet the Black Country need.

4. Q4. 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.

4.1.1. There should be a clear and effective way of monitoring the housing delivery to meet the agreed provision to be made for the Black Country. The current proposals of the Council do not allow such monitoring to be carried out. Please refer to BRE objections to GC44 and GC45 and BRE Matter Statement 32.

Paul Rouse
Director

