

Shropshire Local Plan Examination Stage 2

Matter 3

# Bridgnorth Town Council Shropshire Local Plan Examination Stage 2 Hearing statements



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

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall need, requirement and supply of housing land.

NB. 5 year housing land supply will be dealt with following the consideration of site allocations

# **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?

# **Bridgnorth Town Council response:**

1. We note that the housing need figure, derived under standard methodology is 25,894 as set out in the 2020 housing need assessment. This comprises 943 homes p.a. to meet the expected annual growth in number of households in Shropshire over the period 2020 to 2030 (as per the National Statistics 2014 based sub-national household projections) and an uplift of 24.8% to take account of market signals, based on house price to workplace earnings ratio in 2019. The uplift takes the figure to 1,177 homes per year, amounting to 25,984 over 22 years. The housing requirement is set above this level. The updated sustainability appraisal considered 5%, 10% and 15% over and above the calculated need, and with or without a contribution to meeting the prospective unmet housing need of authorities in the Black Country. Effectively the



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sustainability appraisal reached the conclusion that additional economic growth justified a level of development towards the top end of the range and that adverse impacts could be mitigated. The percentage uplifts used were the same as those considered at earlier stages of the draft plan's development. The appraisal did not derive an upper boundary of what might be considered sustainably achievable.

- 2. However, what is being assessed differs from what was being considered at earlier stages of the plan making process. Previously, the housing requirement was expressed as "around" a number of homes, what is now being sought is a target number of homes for Shropshire which can be considered a minimum number to be achieved during the plan period and against which delivery can be assessed. The sustainability appraisal seems to be identifying a desirable number of growth in homes which could sustainably be achieved, not the minimum. As such, there is an argument for setting the minimum level slightly lower.
- 3. The minimum requirement (currently expressed as 31,300 homes over the plan period) includes an allowance for meeting Black Country needs of 1,500 homes. There is no documented rationale for choosing this number. It represents 5.8% of Shropshire's need, calculated using the standard methodology, and as such need not be considered disproportionate, providing allocations to meet it do not place a requirement on settlements within Shropshire which is disproportionate to local needs and infrastructure capacity. However, it is a contribution to need so it may be better to consider it alongside Shropshire's need of 25,894 to give a total "need" of 27,394 homes.
- 4. Whilst accepting that there may reasonably be an aspiration for 31,300 homes to be developed in Shropshire over the plan period, we are uncomfortable with the suggestion that this is a minimum requirement. We note that the individual settlement strategies refer to a level of development of "around". We would prefer to set a minimum level of housing development required at a lower figure say 10% above the combined Shropshire Need and that proposed to be accepted from Black Country authorities. This would amount to 30,133 say 1,370 homes per year, 30,140 overall.



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# The Overall Supply of Housing

### 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.

# **Bridgnorth Town Council response:**

5. The contribution to meeting "Black Country Need" is a number of homes within a specific geography in Shropshire, rather than identifiably separate ones, over the plan period. As such we do not consider it necessary to measure the rate of delivery at specific sites, separately from monitoring of progress for the plan as a whole, to provide reassurance that the contribution is being provided.