

Shropshire Local Plan

Examination

Hearing Statement: Matter 3

Morris & Company Limited

September 2024

Shropshire Local Plan Examination
Stage 2: Matter 3
Land to the South of Stanton Road, Shifnal

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1. Housing Requirement - 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?

Introduction

- 1.1. This hearing statement is submitted on behalf of Morris & Company Limited in relation to their land interests at Site SHF018a in Shifnal.
- 1.2. The Shropshire Local Plan proposes to make a contribution of 1,500 dwellings towards meeting the unmet housing needs arising from the Black Country. While we welcome the recognition that Shropshire has a role to play in addressing these cross-boundary needs, we do not consider that the proposed contribution is sufficient or that the Plan's approach is effective in addressing this issue sustainably, in accordance with national policy.

National Policy Context

- 1.3. The National Planning Policy Framework (NPPF) is clear that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (para 11b). The NPPF also requires plans to be based on effective joint working on cross-boundary strategic matters, as evidenced by statements of common ground (para 35c).

Scale of Unmet Need

- 1.4. The evidence indicates that the unmet housing need arising from the Black Country is significantly higher than the 1,500 dwellings proposed to be accommodated in Shropshire:
 - The Black Country Urban Capacity Review (2019) identified a shortfall of around 26,920 dwellings up to 2038.
 - This shortfall has likely increased further due to the 35% uplift applied to Wolverhampton's housing need figure as one of the 20 largest cities.
 - The Wolverhampton Local Plan Issues and Preferred Options document identifies a housing need of 21,720 homes for Wolverhampton over the period 2022-2042 (para 5.11).
 - The total identified housing supply in Wolverhampton is only 9,722 homes (para 5.13).
 - This results in a significant unmet need of 11,998 homes over the Plan period (para 5.14).

Need for Increased Contribution

- 1.5. Given the scale of unmet need, and Shropshire's strong functional relationship with the Black Country, we consider that a larger contribution of at least 3,000

dwelling would be more appropriate and justified. This aligns with previous correspondence from the Black Country authorities suggesting this scale of contribution would "make significant quantitative headway in addressing unmet needs".

Sustainable Development Opportunities

- 1.6. The current approach fails to maximise opportunities to sustainably meet housing needs in accordance with NPPF para 119. Additional housing growth should be directed to sustainable locations with good accessibility to the Black Country. Shifnal is one such location that could accommodate further growth.

Proposed Site Allocation - SHF018a

- 1.7. We propose that land at Site SHF018a in Shifnal should be allocated for housing development to help address unmet needs from the Black Country. This site:
 - Is in a highly sustainable location on the edge of Shifnal with excellent transport links to the Black Country
 - Adjoins proposed employment allocations SHF018b and SHF018d which are intended to meet Black Country employment needs
 - Is proposed to be removed from the Green Belt and safeguarded for future development needs
 - Is available and deliverable within the plan period
- 1.8. Allocating this site would provide a logical extension to Shifnal, helping to create a more sustainable pattern of development by locating homes close to new employment opportunities. It would make a valuable contribution to addressing unmet housing needs from the Black Country in a location with strong functional links.

Conclusion

- 1.9. In conclusion, we consider the Plan's current approach to addressing unmet needs from the Black Country to be ineffective and inconsistent with national policy. A larger housing contribution should be made, including through the allocation of additional sustainable sites such as SHF018a in Shifnal. This would ensure the Plan takes a more proactive approach to addressing cross-boundary housing needs in accordance with the NPPF and the significant level of unmet need identified in the emerging Black Country Local Plan.

2. The Overall Supply of Housing – Q9

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?

- 2.1. There is not compelling evidence that windfall sites would provide a reliable source of housing supply for Shropshire, contrary to the requirements of paragraph 71 of the National Planning Policy Framework (NPPF).
- 2.2. The Updated Housing and Employment Topic Paper (April 2024) provides data on historic windfall completions in Figure 8.1. This shows a clear downward trend in overall windfall completions over the past 5 years:
 - - 2018/19: 1,283 completions
 - - 2019/20: 1,154 completions
 - - 2020/21: 1,019 completions
 - - 2021/22: 884 completions
 - - 2022/23: 766 completions
- 2.3. While small windfall sites (<5 dwellings) have remained relatively consistent, medium and large windfall site completions have reduced significantly over time. This indicates that the ability of windfalls to sustain a consistent level of delivery is diminishing.
- 2.4. Paragraph 71 of the NPPF states that where an allowance is made for windfall sites as part of anticipated supply, there should be "compelling evidence that they will provide a reliable source of supply". The declining trend does not provide such compelling evidence of reliability.
- 2.5. Furthermore, the NPPF requires in paragraph 15 that the planning system should be "genuinely plan-led". An over-reliance on windfall sites to meet housing requirements does not align with this plan-led approach.
- 2.6. Instead of relying heavily on windfall allowances, the Local Plan should identify and allocate a sufficient supply and mix of sites in suitable locations to meet the identified housing requirement, as per paragraph 68 of the NPPF.
- 2.7. This is particularly important for meeting the forecast unmet needs of the Black Country. The plan should allocate additional sites, especially in areas with proximity and good connectivity to the Black Country, rather than relying on unpredictable windfall development.
- 2.8. In conclusion, the evidence presented does not compellingly demonstrate that windfall allowances would represent a reliable source of housing supply. To ensure a positively prepared and effective plan, additional sites should be allocated to meet the full housing requirement.

3. The Overall Supply of Housing – Q12

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

- 3.1. The Local Plan does not provide sufficient flexibility to address potential delays or non-delivery of larger allocated sites. This lack of flexibility poses a risk to the overall effectiveness and deliverability of the plan.
- 3.2. While the plan includes a buffer in its housing supply, this alone does not provide adequate flexibility to respond to changing circumstances or potential delays in site delivery.
- 3.3. To enhance the plan's flexibility and effectiveness, it should incorporate a mechanism to allow 'Plan B' sites to be brought forward for development if larger sites do not come forward according to the Council's timescales. This approach would:
 - Provide a proactive strategy to address potential shortfalls in housing delivery
 - Ensure the plan remains effective throughout its lifetime
 - Align with the NPPF's requirement for flexibility in plan-making
- 3.4. The identification of 'Plan B' sites could be achieved through:
 - Allocating reserve sites in the plan, with clear triggers for their release
 - Identifying broad areas for future growth, with criteria-based policies to guide their development
 - Including a policy mechanism to allow for the early review of site allocations if delivery falls behind schedule
- 3.5. This approach has been successfully implemented in other local plans. For example, the Hart Local Plan 2032 includes a specific policy (SS3) which identifies reserve sites that can be brought forward if the Council's Housing Delivery Test results fall below specified levels.
- 3.6. The inclusion of 'Plan B' sites would also provide greater certainty to both the development industry and local communities about where future development might occur if allocated sites face delays.
- 3.7. Furthermore, this approach would support the plan's ability to meet the housing needs of the area, including any contribution to the unmet needs of the Black Country, by providing alternative options if delivery on larger sites falters.
- 3.8. In conclusion, to enhance the plan's effectiveness and ensure it is positively prepared, we recommend that the Council incorporates a clear mechanism for bringing forward 'Plan B' sites in the event that larger allocated sites do not deliver according to anticipated timescales. This would provide the necessary flexibility to respond to changing circumstances and maintain a robust housing

land supply throughout the plan period.

