

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage Two Hearing Statement

Representor unique Part A Ref *	A122
Matter	3 - Housing Land Need, Requirement and Supply (Policy SP2)
Relevant questions	Housing requirement 1, 2 Overall supply of housing 1, 3, 4
Comments as attached	

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

Reference: A122

Date: 17/09/2024

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 of 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?*

CEG supports the high growth scenario contained in the Updated Housing and Employment Topic Paper, with its minimum target of 31,300 houses to be provided between 2016 and 2038. We also support the use of the 2020 Local Housing Need Assessment to calculate this figure.

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?*

CEG does not consider the Plan's approach to accommodating unmet housing need from the Black Country to be effective. We consider that additional sites should be allocated to meet this need rather than relying on a higher contribution from windfall sites or the repurposing of existing housing allocations which were allocated to meet housing need arising from within Shropshire.

As set out in previous representations, we do not consider that windfall sites provide the certainty needed to ensure the required volume of housing will be delivered or that it will be delivered where it is most needed. In particular, we would question whether a raised windfall total will be achievable given the need to accommodate additional land for biodiversity net gain.

CEG does not agree that the additional 1,500 dwellings proposed to accommodate unmet need from the Black Country should be accounted for in the totals of sites already allocated to meet need arising from within Shropshire. Specifically, we do not agree it is appropriate to identify 300 dwellings from the Shrewsbury South West urban extension to meet this need, as proposed in

paragraphs 2.14 and 9.10 of the Housing and Employment Topic Paper. This raises the question as to whether further housing should be sought through the Local Plan process to meet the Black Country need.

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 that 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?*

CEG supports the target of 31,300 homes put forward in the Updated Housing and Employment Topic Paper but would wish to point out that this is a minimum figure. While the Council's most recent housing trajectory (using data up to the end of March 2023) does show how a slightly higher figure of 33,481 could be achieved, the trajectory seeks to balance a higher rate of development in the period up to 2028 with a lower rate of development after 2028, to give an average of 1423 units per year.

Having established that a higher than average rate of development is not only possible up to 2028 but has already been achieved in the years leading up to 2023 (including throughout the lockdown), we would question why the number of completions towards the end of the plan period is expected to be so much lower.

We do not consider it is appropriate for the Local Plan to set an anticipated rate of development for specific sites. This would introduce unnecessary inflexibility into the process.

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

CEG does not consider that a trajectory should be included in the Local Plan.

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?*

As set out elsewhere and previously, CEG has concerns over the approach taken by the Council to identify sites which could accommodate unmet need arising from the Black Country. As a result of this, we do not consider a separate Black Country housing trajectory should be included in the Local Plan as this would introduce inflexibility to the development process.