



SHROPSHIRE LOCAL PLAN EXAMINATION: STAGE 2 MATTERS, ISSUES AND QUESTIONS

**Stage 2 Hearings – Matter 3 (Housing Land Need,
Requirement and Supply)**

Nurton Developments Limited

Representor No. B-A044

SLR Project No. 416.065703.00001

Client Reference No: 02395

20 September 2024

Revision: FINAL

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
V1	23 August 2024	PT		
V2	30 August 2024	PT		
V3	13 September 2024	PT / EB		
V4	17 September 2024	PT / EB	EC	
FINAL	20 September 2024	PT / EB	EC	NDL

Basis of Report

This document has been prepared by SLR Consulting Ltd (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Nurton Developments (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.



Table of Contents

1.0 Introduction	1
2.0 The Housing Need.....	1
Question 1	1
3.0 The Housing Requirement.....	2
Question 1	2
Question 2	3
Question 3	5
Question 5	6
4.0 The Overall Supply of Housing	7
Question 4	7
Question 7	7
Question 15	8



1.0 Introduction

- 1.1 Please treat this as a formal representation by Nurton Developments Limited (NDL) in response to the Stage 2 Matters, Issues and Questions; namely Matter 3 – Housing Land Need, Requirement and Supply.
- 1.2 The 'Issue' identified by the inspector as part of the Stage 2 Matters is '*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*'.
- 1.3 Within this Matter, NDL wish to raise comments regarding the following sub-topics and questions:
 - The Housing Need: Question 1
 - The Housing Requirement: Questions 1, 2, 3 and 5
 - The Overall Supply of Housing: Questions 4, 7 and 15
- 1.4 These sub-topics and questions are dealt with, in turn, below.

2.0 The 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?

- 2.1 NDL considers that the base date for **the plan should be updated to 2020 to accord with the Local Housing Need calculations**. This would likely necessitate extending the end date of the plan and potentially increasing the number of housing allocations beyond those current identified within the plan.
- 2.2 This approach would result in approximately 7,200 completions between 2016 and 2020 being discounted from the housing land supply (Table 10.1); thereby necessitating that **further housing allocations be identified beyond those currently proposed**.
- 2.3 It is also noted that the Housing Need has been calculated using the standard methodology identified within the 'Housing and Economic Needs Assessment' element of the National Planning Practice Guidance (NPPG). However, the standard methodology and guidance associated therein utilised by Shropshire Council within the Local Housing Need Assessment (2020) was a previous 2019 iteration of the NPPG.



- 2.4 The NPPG was updated in December 2020, including the content of Paragraph 4 which relates to the approach to the standard methodology for calculating housing need. These changes should be reflected within the evidence base documents.
- 2.5 It is also noted that the affordability ratio applied in calculating the housing need utilises a workplace-based median house price to median earnings ratio from 2019 (a ratio of 7.97). These data sets are updated annually and Shropshire should have sought to update this assumption as part of the local plan process. Indeed, within the most recent data set (March 2024) the ratio for 2019 was 8.02 and for 2020 it was 8.03. These ratios have increased further since 2019/2020, with the ratios rising to 8.31 and 8.45 for 2022 and 2023 respectively.
- 2.6 **This would likely increase the levels of housing need for Shropshire** prior to identifying the necessary housing requirement for the local authority area through accommodating a growth uplift, any appropriate buffer, and the unmet housing needs of the Black Country.
- 2.7 Notwithstanding, there are recent proposed changes to the NPPF and standard methodology. Should these be formally published by the government in advance of the plan being adopted, it is noted that the Council would be subject to transitional arrangements and would need to begin updating its local plan immediately following adoption.
- 2.8 It is understood that the revised methodology, if adopted, would place significant pressures upon Shropshire to identify further housing land supply to satisfy the increased housing needs. Whilst no change may be required to the plan currently being taken through examination, **there is a risk that insufficient sites have been identified for either adoption or safeguarding for subsequent plan periods.**

3.0 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?

- 3.1 NDL is of the opinion that the use of the standard methodology to calculating the housing need is appropriate, albeit there are **areas of concern regarding some of the baseline assumptions utilised.** These could alter the minimum annual local housing need figure.
- 3.2 NDL agrees with utilising the high growth scenario to establish the housing requirement, albeit this will need updating with any increase in the annual local housing need figure established under the standard methodology. Furthermore, **Shropshire should re-assess whether the contribution towards meeting the unmet housing need of the Black Country (1,500 dwellings) is sufficient or should sought to be exceeded.**



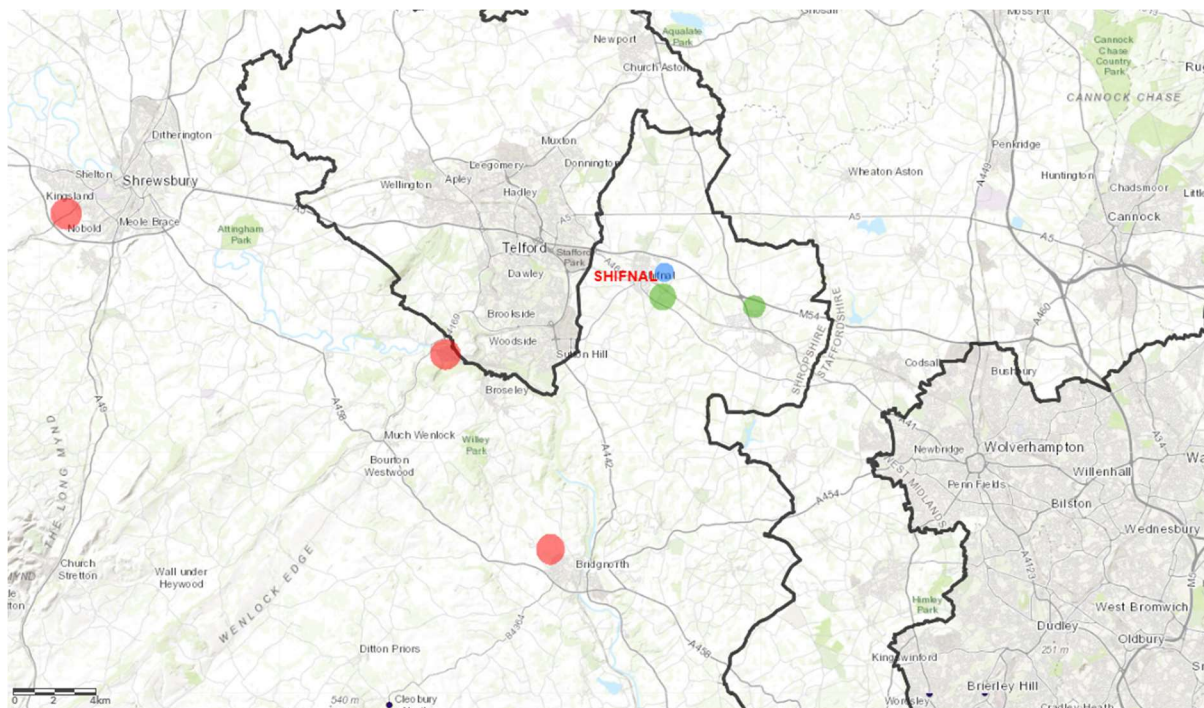
- 3.3 However, as outlined above, should changes to the NPPF and the changes to the standard methodology be formally published by the government in advance of the plan being adopted, the Council would be subject to transitional arrangements and would need to begin updating its local plan immediately following adoption.
- 3.4 It is understood that the revised methodology, if adopted, would place significant pressures upon Shropshire to identify further housing land supply to satisfy the increased housing needs. Whilst no change may be required to the plan currently being taken through examination, there is a risk that insufficient sites have been identified for either adoption or safeguarding for subsequent plan periods.
- 3.5 Notwithstanding the above, **NDL has raised significant concerns regarding the sites identified for allocation and/or safeguarding**, especially with regard to those seeking to satisfy the unmet housing needs of the Black Country.

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?

- 3.6 As identified within the Updated Housing and Employment Topic Paper (GC45), as well as the content of the Additional Sustainability Appraisal Report (GC44), Shropshire Council has identified the following sites to accommodate the unmet housing need of the Black Country:
- BRD030 – Tasley Garden Village, Bridgnorth: 600 dwellings;
 - SHR060, SHR158 & SHR161 – Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings; and
 - IRN001 – Former Ironbridge Power Station: 600 dwellings (of a wider 1,000 dwelling allocation).
- 3.7 An employment land allocation to meet the Black Country needs has also been identified at land east of Shifnal Industrial Estate, Upton Lane, Shifnal which would provide a total of 39 hectares gross (16 hectares developable)(SHF018b and 018d).
- 3.8 The sites identified to accommodate the unmet housing and employment land needs of the Black Country are illustrated on the figure below.





- 3.9 The red dots represent the three sites allocated to meet the housing needs of the Black Country (at Shrewsbury, Ironbridge and Bridgnorth). The blue dot is the proposed employment allocation to meet the Black Country's needs at Shifnal (SHF018b and 018d). The green dots are the two sites which are being promoted by NDL for housing at Shifnal and Cosford; neither of which are allocated nor safeguarded.
- 3.10 As can be noted, the employment land provision has been located at Shifnal in relative proximity to the Black Country. However, **NDL is of the opinion that there has been a failure to appropriately locate the housing allocations (particularly at Shrewsbury and Ironbridge) so as to have a clear relationship with the Black Country.**
- 3.11 Justification of the housing sites identified for the unmet Black Country need has been based on migration and commuting data which, whilst of merit, **fails to consider the need to co-locate housing and employment uses from a demand and sustainable transport perspective.** It is also noted that the migration and commuting data utilised has not been updated from that contained within the Housing Topic Paper (2022) which utilises 2011 Census data rather than the more recent 2021 Census data.
- 3.12 **NDL has also raised concerns with regard to the Stage 2a and 3 assessments contained within the Additional Sustainability Appraisal** which is being dealt with under Matter 1 of Stage 2 of the examination. On this basis, NDL does not agree with the assessment and recommendations regarding the strategic distribution of this provision across Shropshire given that the Sustainability Appraisal has failed to consider the need to co-locate the additional housing and employment land provision within the authority area.



- 3.13 NDL is of the opinion that there is a **clear misalignment of strategies in meeting housing and employment land needs for the Black Country**. There is a disconnection between the three proposed housing locations, the Black Country and the proposed employment allocation at Shifnal (SHF018b and 018d). This will lead to unnecessary travel, particularly car-related journeys. As the Inspector will be aware, it is far more sustainable to co-locate housing and employment allocations to minimise travel and ensure growth is not disparate in its approach.
- 3.14 Conversely, Shifnal and Cosford are much better placed to meet the unmet housing needs of the Black Country. Both are closely aligned with the allocation of employment land at Shifnal (SHF018b and 018d) to meet the employment land needs of the Black Country. However, the new housing allocations at these two centres are restricted to just 230 homes (all located at Shifnal).
- 3.15 It should be recognised that the housing allocations (and associated safeguarded land) within Shifnal are identified to meet the housing need of Shropshire alone and are in response to the Housing Market Assessment that has been produced. Having Identified Shifnal as the location for employment land to meet the Black Country's unmet needs, it would be much more sustainable that **further housing allocations come forward in this location to accommodate the unmet housing need of the Black Country**, beyond that currently identified for allocation to meet the needs of Shropshire.
- 3.16 As such, it is NDL's contention that additional housing allocations within Shifnal, Cosford, or both, would present many more opportunities for sustainable travel, such as walking and cycling to work, as well as a regular train service to Wolverhampton from the existing railway stations at Shifnal and Cosford.

Question 3

Has there been significant under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 74 of the NPPF?

- 3.17 There does not appear to have been an annual under delivery of housing in the the authority area since 2013. As such, NDL is satisfied that only a 5% buffer need be applied in relation to paragraph 74 of the NPPF.
- 3.18 Notwithstanding, it is noted that the authority has historically relied on significant numbers of windfall sites to achieve or exceed its annual housing completions. Whilst windfall sites are clearly of benefit to an authority area, **these should not be relied upon as an 'expected' supply of housing given that they are circumstance dependent (i.e. availability and/or location) and there is no guarantee that past trends would continue into the next plan period.**
- 3.19 NDL has already raised comments with regard to the allowances made for both SLAA and windfall sites within the housing land supply estimate. **These should be either removed or lowered to ensure that there is not an overreliance on their delivery and sufficient housing allocations are brought forward within the plan period.**



Question 5

Is the updated housing requirement in the Plan appropriately aligned with forecasts for jobs growth?

- 3.20 Whilst the updated housing requirement has sought to consider jobs growth within the authority area, NDL does not agree with the assessment and recommendations regarding the strategic distribution of the housing land supply identified given that **the Sustainability Appraisal has failed to consider the need to co-locate the additional housing and employment land provision within the authority area.**
- 3.21 Justification of the housing sites identified for the unmet Black Country need has been based on migration and commuting data which, whilst of merit, fails to consider the need to co-locate housing and employment uses from a demand and sustainable transport perspective. It is also noted that the migration and commuting data utilised has not been updated from that contained within the Housing Topic Paper (2022) which utilises 2011 Census data rather than the more recent 2021 Census data.
- 3.22 NDL is of the opinion that there is **a clear misalignment of strategies in meeting housing and employment land needs for the Black Country.** There is a disconnection between the three proposed housing locations, the Black Country and the proposed employment allocation at Shifnal (SHF018b and 018d). This will lead to unnecessary travel, particularly car-related journeys. As the Inspector will be aware, it is far more sustainable to co-locate housing and employment allocations to minimise travel and ensure growth is not disparate in its approach.
- 3.23 Conversely, Shifnal and Cosford are much better placed to meet the unmet housing needs of the Black Country. Both are closely aligned with the allocation of employment land at Shifnal (SHF018b and 018d) to meet the employment land needs of the Black Country. However, the new housing allocations at these two centres are restricted to just 230 homes (all located at Shifnal).
- 3.24 It should be recognised that the housing allocations (and associated safeguarded land) within Shifnal are identified to meet the housing need of Shropshire alone and are in response to the Housing Market Assessment that has been produced. Having identified Shifnal as the location for employment land to meet the Black Country's unmet needs, **it would be much more sustainable if further housing allocations come forward in this location to accommodate the unmet housing need of the Black Country,** beyond that currently identified for allocation to meet the needs of Shropshire.
- 3.25 As such, it is NDL's contention that additional housing allocations within Shifnal, Cosford, or both, would present many more opportunities for sustainable travel, such as walking and cycling to work, as well as a regular train service to Wolverhampton from the existing railway stations at Shifnal and Cosford.



4.0 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.

- 4.1 The Ironbridge site already benefits from an outline consent for 1,075 units, whilst reserved matters applications are currently being determined. Nevertheless, all three sites have been anticipated for a phased delivery across the entire plan period (2016-2038). **It is unclear whether this aligns with the requirements for delivery in terms of the Black Country itself.**
- 4.2 NDL still maintain that there is a clear misalignment of strategies in meeting housing and employment land needs for the Black Country. Justification of the housing sites identified for the unmet Black Country need has been based on migration and commuting data which, whilst of merit, fails to consider the need to co-locate housing and employment uses from a demand and sustainable transport perspective. It is also noted that the migration and commuting data utilised has not been updated from that contained within the Housing Topic Paper (2022) which utilises 2011 Census data rather than the more recent 2021 Census data.
- 4.3 The Sustainability Appraisal has identified that neither the Shrewsbury nor Ironbridge sites are especially sustainable from a transport perspective given their distance from the Black Country conurbation. These sites are also a significant distance from the proposed employment land allocation for meeting the Black Country's unmet need within Shifnal. This disparity in approach has not been adequately considered or assessed within the Sustainability Appraisal.

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?

- 4.4 It is assumed that the reference to 'SLAA sites' relates to those which have been assessed for suitability, availability and viability within the 2023 SLAA but would be below the threshold for allocation and/or are located within the settlement boundaries and therefore benefit from a presumption in favour of development.
- 4.5 If this assumption is correct, these are essentially further windfall sites which have been previously promoted through the Call for Sites process. **NDL would recommend these are not individually identified or assumed to be part of the wider housing land supply given that they should technically fall within the allowance made for windfall sites.**



- 4.6 On this basis, it is likely that the 622 dwelling identified to be delivered under SLAA sites would need to be excluded from the housing land supply; potentially resulting in the need for further land to be allocated for the plan period.

Question 15

Is there sufficient variety in terms of the location and type of site allocated?

- 4.7 It is noted that priority has been given to an urban focus with the following distribution identified within the Additional Housing and Employment Topic Paper (2024):
- Strategic Centre – 8,975 dwellings / 29%
 - Principal Centres – 7,575 dwellings / 24%
 - Key Centres – 5,150 dwellings / 16.5%
 - Strategic Settlements – 1,425 dwellings / 4.5%
 - Community Hubs – 4,988 dwellings / 16%
 - Community Clusters & Wider Rural Area – unspecified / 10%
- 4.8 Whilst this appears to be a relatively sensible approach to the distribution of housing sites, **NDL raises concerns that insufficient consideration has been given to the sub-regional need and affordability ratios identified within the Housing Market Assessment.** This is especially pertinent to the housing allocations identified to meet the needs of the Black Country.
- 4.9 The three sites identified to meet the Black Country housing need are all large (or part of large) allocations for housing. Consideration should have been given to providing some of the Black Country unmet housing need at smaller housing sites in proximity to the Black Country or the employment allocation seeking to meet its unmet employment land need.
- 4.10 The Sustainability Appraisal has identified that neither the Shrewsbury nor Ironbridge sites are especially sustainable from a transport perspective given their distance from the Black Country conurbation. These sites are also a significant distance from the proposed employment land allocation for meeting the Black Country's unmet need within Shifnal. This disparity in approach has not been adequately considered or assessed within the Sustainability Appraisal.
- 4.11 In this regard, it is noted that the proposed allocation of the Ironbridge site (IRN001) would take part of the Black Country need; namely 600 of the 1,000 units proposed on this site. It is unclear as to the reasoning to part utilise this site for the unmet Black Country need rather than retain the full 1,000 units to meet the existing need for Shropshire. **A new alternate site(s), in a more appropriate location in proximity to the proposed employment land allocation at Shifnal, should have been identified.**
- 4.12 Finally, it is evident that the housing allocations identified to meet the unmet needs of the Black Country (as detailed in para 2.1 above) have, in part, been selected due to their location outside of the Green Belt. As previously identified above, this fails to



appropriately locate these housing allocations (particularly at Shrewsbury and Ironbridge) in proximity to either the employment allocation (SHF018b and 018d) or to the Black Country itself.





Making Sustainability Happen