

Shropshire Council

Housing Topic Paper

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APPENDICES

Appendix 1: ABCA Regulation 18: Pre-Submission Draft Consultation Response

1. Introduction

- 1.1. On the 3rd November 2021, the Planning Inspectors appointed to undertake the examination of the draft Shropshire Local Plan issued their Initial Questions (ID1).
- 1.2. A series of these initial questions related to housing matters (paragraphs 12-16 of ID1), including a request that some of these questions be addressed through preparation of a Housing Topic Paper.
- 1.3. Shropshire Council has prepared this Housing Topic Paper in order to positively respond to this request. Aligning with the initial questions within ID1, this Topic Paper covers the following housing matters:
 - a. Arriving at the Spatial Strategy for Shropshire – level and distribution of residential development;
 - b. The approach to unmet housing need forecast to arise within the Black Country;
 - c. The approach to providing affordable housing;
 - d. The approach to providing small and medium sites for residential development; and
 - e. Reliance on windfall sites for residential development.

2. Proposed Spatial Strategy: Level and Distribution of Residential Development in Shropshire

Introduction

- 2.1. The spatial strategy provides a spatial framework for achieving the vision and spatial objectives of an area. It therefore underpins and is in turn achieved by the policies of the Local Plan. Two key components of any spatial strategy are the level and distribution of residential development.¹
- 2.2. Paragraph 35 of the National Planning Policy Framework (NPPF) identifies four tests of ‘soundness’ for Local Plans. All of these four tests of soundness are applicable when considering an appropriate spatial strategy for an area. These tests are:
- “a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”²*
- 2.3. Paragraph 20 of the NPPF relates to the distribution of development. It states: “Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:
- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
 - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
 - c) community facilities (such as health, education and cultural infrastructure); and*
 - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*
- 2.4. Paragraph 23 of the NPPF relates to the residential element of the wider spatial strategy, it states “Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be

¹ The level and distribution of employment development generally aligns with the level and distribution of residential development. This is addressed within the second Employment Topic Paper.

² MHCLG now DLUHC, (2021), National Planning Policy Framework (NPPF)

demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or nonstrategic policies).²² This is expanded on within Paragraphs 60-63 of the NPPF, whilst wider Paragraphs of the NPPF provide similar details with relation to other forms of development (employment, retail etc).

- 2.5. Paragraph 36 of the NPPF relates to effective cooperation. It states *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.”*
- 2.6. As such, it is apparent that the residential component of a spatial strategy should seek to facilitate the delivery of sufficient housing to meet identified local housing need in a sustainable manner. However, it is ultimately the responsibility of Shropshire Council, as the Local Planning Authority, to identify an appropriate strategy to achieve this, taking into account the reasonable alternatives, and based on proportionate evidence.

What is the Proposed Spatial Strategy for the level and distribution of residential development across Shropshire?

- 2.7. The proposed spatial strategy for the level and distribution of residential development across Shropshire is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan, which is then expanded upon within wider draft Policies. Dealing with ‘level’ and ‘distribution’ in turn:

Level of Residential Development

- 2.8. The level of residential development (known as the housing requirement) proposed within the spatial strategy is some 30,800 dwellings over the period from 2016 to 2038. This equates to around 1,400 dwellings per annum.
- 2.9. Paragraph 3.6 of the explanation to draft Policy SP2 explains that this proposed housing requirement will *“support the long-term sustainability of the County”* and *“meet housing need”* as calculated using Government’s standard methodology – this calculation is summarised within the document **Local Housing Need Assessment 2020 – EV069**, which was submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.10. Paragraph 3.6 of the explanation to draft Policy SP2 explains that the proposed housing requirement will provide *“some flexibility to respond to changes to LHN over the plan period and an opportunity to:*
- a. Respond positively to specific sustainable development opportunities;*
 - b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;*
 - c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;*
 - d. Support the diversification of our labour force; and*
 - e. Support wider aspirations, including increased economic growth and productivity.”*

2.11. Paragraph 3.7 of the explanation to draft Policy SP2 specifies that the proposed housing requirement includes a contribution of up to 1,500 dwellings towards the unmet housing need forecast to arise within the Black Country. This contribution has been agreed within a Statement of Common Ground (**EV041**) signed by representatives of Shropshire Council and the four Black Country Authorities. Further information on this matter is provided within **Chapter 3 of this Housing Topic Paper: Association of Black Country Authorities: Unmet Housing Need.**

Distribution of Development

2.12. A core principle of the spatial distribution of development (including residential development) proposed within this spatial strategy is 'urban focus', by which the majority of residential development will be directed into identified 'urban' areas. These urban areas are:

- a. Shrewsbury, the proposed Strategic Centre of Shropshire;
- b. The five proposed Principal Centres and 11 proposed Key Centres of Shropshire;
- c. The two new proposed Strategic Settlements in Shropshire; and
- d. The proposed Strategic Site of RAF Cosford in Shropshire.

2.13. However, recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of our rural communities, development in urban areas will be positively complemented by appropriate new development within the proposed Community Hubs and Community Clusters³. Development within the wider rural area will consist of affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification.

2.14. It is considered that this proposed strategic approach to the distribution of development positively responds to such factors as:

- a. The proportionate and robust evidence base prepared to inform the draft Shropshire Local Plan;
- b. The responses received in response to the various consultation's undertaken to inform the draft Shropshire Local Plan;
- c. The requirements of the NPPF;
- d. The principles of sustainable development – this included providing connectivity to services and facilities by sustainable means, whilst also recognising the needs of our rural communities;
- e. The geographic size, diversity, demographics and characteristics of Shropshire (including presence of area of land within the Shropshire Hills Area of Outstanding Natural Beauty (AONB) and the West Midlands Green Belt);
- f. Past housing delivery trends and existing housing commitments;
- g. The various policy objectives and opportunity areas identified; and
- h. Cross-boundary relationships and interactions with adjacent areas.

2.15. Development within urban areas also positively responds to the 'strategic corridors' identified within Shropshire.

³ Community Clusters reflect Shropshire Council's positive approach to localism. As communities with aspirations maintain or enhance their sustainability can 'opt-in' to take an appropriate proportion of development, managed through a proposed policy mechanism (draft Policy SP9).

Overview

- 2.16. It is considered that this proposed spatial strategy positively responds to and expands on the content of the NPPF whilst also providing appropriate local specificity. It is also considered that the proposed spatial strategy will positively contribute towards achieving a sustainable and appropriate pattern and level of residential development in Shropshire.
- 2.17. The proposed spatial strategy was also considered to effectively underpin the wider draft policies within the draft Shropshire Local Plan. These policies will in turn implement the proposed spatial strategy and as such provide the framework for achieving sustainable development.
- 2.18. As such, the proposed spatial strategy will effectively contribute towards achieving the **proposed Spatial Vision for Shropshire** and the **proposed spatial objectives for Shropshire** (as identified within **draft Policy SP1**) of the draft Shropshire Local Plan.

How was the Spatial Strategy for Shropshire arrived at?

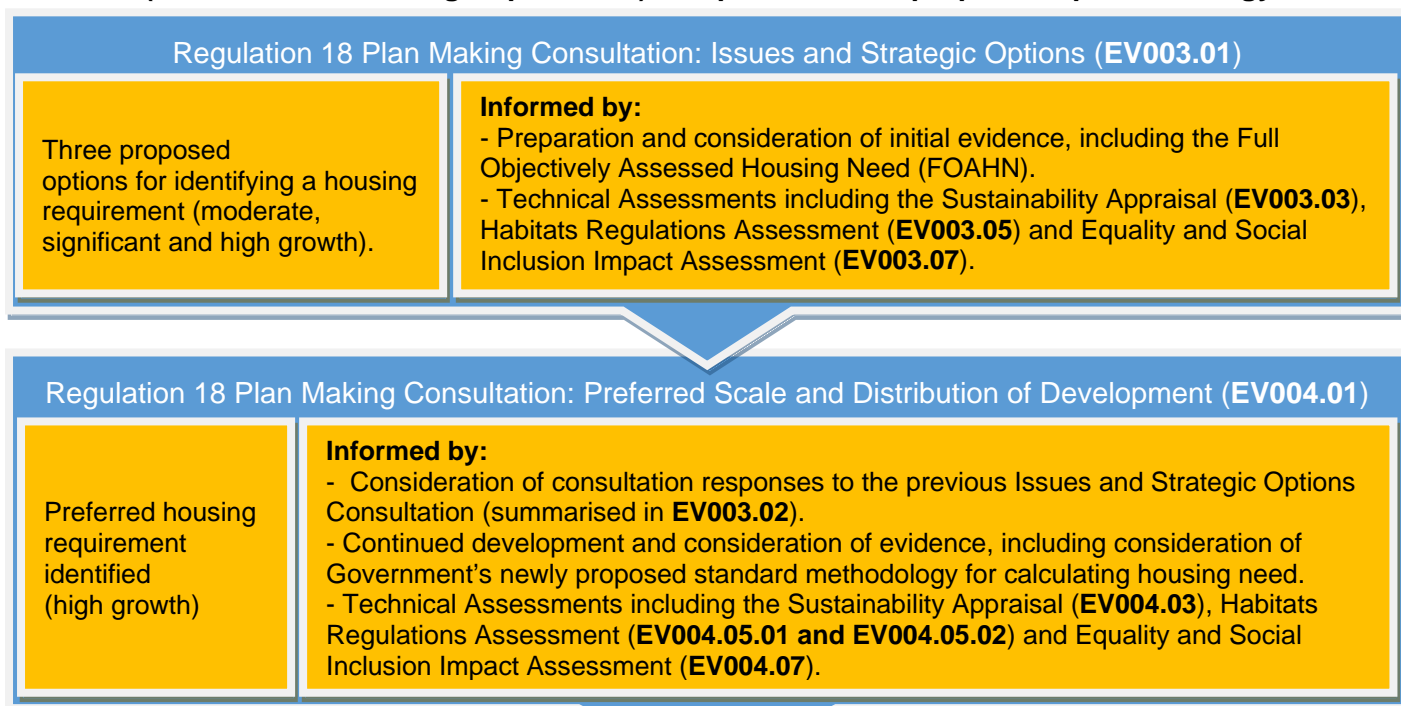
Introduction

- 2.19. The identification of the proposed spatial strategy for Shropshire was informed by an iterative process, involving careful consideration of the proportionate evidence base prepared to inform the Shropshire Local Plan Review and extensive consultation undertaken to inform the Shropshire Local Plan Review. Dealing with 'level' and 'distribution' in turn:

Level of Residential Development

- 2.20. The proposed level of residential development was identified through an iterative process, informed by careful consideration of best available evidence, technical assessments and extensive consultation.
- 2.21. Figure 1 provides a summary of the key stages in this process (structured around stages of consultation):

Figure 1: Summary of the Process of Developing the proposed level of residential development (known as the housing requirement) component of the proposed Spatial Strategy



Regulation 18 Plan Making Consultation: Preferred Sites (EV005.01)

Focused on the detailed distribution of development to achieve the proposed spatial strategy, including the proposed housing requirement.

Regulation 18 Plan Making Consultation: Strategic Sites (EV006.01)

Focused on the detailed distribution of development to achieve the proposed spatial strategy, including the proposed housing requirement.

Proposed plan period extended to 2038.

Regulation 18 Plan Making Consultation: Pre-Submission (EV007.01)

Proposed housing requirement identified

Informed by:

- Consideration of all previous consultation responses (summarised in **EV003.02, EV004.02, EV005.02 (and EV005.02.01-EV005.02.18) and EV006.02**).
- Continued development and consideration of evidence, including a Local Housing Need Assessment (**EV069**) using Government's Standard Methodology and a Strategic Housing Market Assessment (**EV097.01 and EV097.02**).
- Technical Assessments including the Sustainability Appraisal (**EV007.04.01-EV007.04.21**), Habitats Regulations Assessment (**EV007.06.01-EV007.06.03**) and Equality and Social Inclusion Impact Assessment (**EV007.08**).

Regulation 19 Pre-Submission Consultation on the draft Shropshire Local Plan (SD002)

Proposed housing requirement identified

Informed by:

- Consideration of all previous consultation responses (summarised in **EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), EV006.02 and EV007.03**).
- Consideration of evidence, including a Local Housing Need Assessment (**EV069**) using Government's Standard Methodology and a Strategic Housing Market Assessment (**EV097.01 and EV097.02**).
- Technical Assessments including the Sustainability Appraisal (**SD006.01-SD006.21**), Habitats Regulations Assessment (**SD008.01-SD008.03**) and Equality and Social Inclusion Impact Assessment (**SD010**).

Submission of the draft Shropshire Local Plan (SD002)

Proposed housing requirement identified

Informed by:

- Consideration of all previous consultation responses (summarised in **EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), EV006.02, and EV007.03**).
- Consideration of the representations to the Regulation 19 consultation (summarised in **SD014.01 and SD014.02**).
- Consideration of evidence and technical assessments previously prepared.

2.22. The following sub-sections provide further information on each of these key stages structured around stages of consultation.

The Starting Point – Regulation 18: Issues and Strategic Options

- 2.23. The starting point for the proposed level of residential development (known as the housing requirement) within the draft Shropshire Local Plan was the identification of the Full Objectively Assessed Housing Need (FOAHN) for Shropshire (assessment published in July 2016)⁴.
- 2.24. As this assessment pre-dated the publication of Government's 'Standard Methodology' for assessing Local Housing Need, it applied a locally devised methodology which was considered proportionate and robust. It was also considered to be consistent with the NPPF and National Planning Practice Guidance (NPPG) as at that time.
- 2.25. In summary, this assessment concluded that the FOAHN for Shropshire equated to some 1,259 dwellings per annum.
- 2.26. Recognising that the FOAHN is only the starting point when seeking to establish an appropriate housing requirement for an area, Shropshire Council also contemplated wider available evidence, and considered whether there were any wider policy objectives that were relevant. Such considerations included the delivery of affordable housing, which is a key priority in Shropshire; the housing needs of other groups within the community, particularly older people given the demographics of Shropshire; the potential to enable the growth of the local economy; and the potential to respond to specific development opportunities that have or may arise as part of the Local Plan Review process.
- 2.27. Furthermore, a Sustainability Appraisal (**EV003.03**), Habitats Regulations Assessment (**EV003.05**) and Equality and Social Inclusion Impact Assessment (**EV003.07**) were also undertaken to both inform the identification of proposals and appraise the options ultimately proposed. These assessments also informed subsequent proposals and have been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.28. As a result, three potential housing requirement options⁵ were identified. These reasonable options were termed 'Moderate Growth' (equating to around 1,325 dwellings per annum), 'Significant Growth' (equating to around 1,375 dwellings per annum) and 'High Growth' (equating to around 1,437 dwellings per annum).
- 2.29. These different options were the subject of an 8-week 'Regulation 18' Plan-Making Consultation as part of the 'Issues and Strategic Options Document' (**EV003.01**), which commenced on the 23rd January 2017. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.30. A total of 412 respondents, including individuals, businesses, landowners, Town and Parish Councils, representatives of the development industry, organisations, neighbouring Authorities, and statutory consultees responded to this consultation. Careful consideration was given to all these responses and a summary prepared (**EV003.02**), which has been submitted as part of the evidence base for the draft Shropshire Local Plan.

⁴ As this has since been superseded, this document has not been submitted as part of the evidence base for the draft Shropshire Local Plan.

⁵ The proposed Plan period at this stage of consultation was 2016-2036. The proposed Plan period was later extended primarily to ensure a 15 year Plan period at the point of adoption.

Regulation 18: Preferred Scale and Distribution of Development

- 2.31. To inform the identification of a preferred option for the proposed housing requirement, a variety of factors were considered. This included careful consideration of responses to the Issues and Strategic Options Consultation, best available evidence, and wider policy objectives.
- 2.32. Further Sustainability Appraisal (**EV004.03**), Habitats Regulations Assessment (**EV004.05.01 and EV004.05.02**), and Equality and Social Inclusion Impact Assessment (**EV004.07**) were also undertaken to both inform identification and appraise the preferred option for the proposed housing requirement ultimately proposed. These assessments also informed subsequent proposals and have been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.33. With regard to available evidence, we would note that prior to identifying the preferred option for the proposed housing requirement, Government commenced consultation on a proposed 'Standard Methodology' for calculating Local Housing Need. As such, Shropshire Council undertook further work to determine whether the Local Housing Need resulting from the proposed 'Standard Methodology' was comparable to the FOAHN already identified.
- 2.34. This assessment concluded that the Local Housing Need resulting from Government's proposed 'Standard Methodology' was generally comparable with the FOAHN previously calculated. Specifically, the FOAHN equated to 1,259 dwellings per annum whilst the Local Housing Need equated to 1,270 dwellings per annum. A summary of this assessment was published in October 2017⁶.
- 2.35. A proposed housing requirement⁵ was ultimately identified, equating to around 1,430 dwellings per annum. This proposed housing requirement was the subject of an 8-week 'Regulation 18' Plan-Making Consultation within the 'Preferred Scale and Distribution of Development Document' (**EV004.01**), which commenced on the 27th October 2017. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.36. A total of 591 unique respondents, including individuals, businesses, landowners, Town and Parish Councils, representatives of the development industry, organisations, neighbouring Authorities, and statutory consultees responded to this consultation. Careful consideration was given to all these responses and a summary prepared (**EV004.02**), which has been submitted as part of the evidence base for the draft Shropshire Local Plan.

Regulation 18: Preferred Sites and subsequent Regulation 18: Strategic Sites

- 2.37. Following the completion of the Preferred Scale and Distribution of Development Consultation, careful consideration was given to all consultation responses from this and previous stages of consultation. Consideration was also given to a variety of other factors, including best available evidence, and wider policy objectives.
- 2.38. Ultimately it was concluded that the proposed housing requirement represented an appropriate basis upon which to continue progression of the Local Plan Review.
- 2.39. As such, further evidence was prepared and further Sustainability Appraisal, Habitats Regulations Assessment, and Equality and Social Inclusion Impact Assessment

⁶ As this has since been superseded, this document has not been submitted as part of the evidence base for the draft Shropshire Local Plan.

undertaken (**EV005.03.01 to 02**, **EV005.05.01 to 04**, **EV005.07**, **EV006.03**, **EV006.05**, and **EV006.07** respectively), to inform identification and appraise the wider proposals within the Local Plan Review. These assessments also informed subsequent proposals and have been submitted as part of the evidence base for the draft Shropshire Local Plan.

- 2.40. Two subsequent 'Regulation 18' Plan-Making Consultations were also undertaken, focusing on the detailed distribution of development to achieve the proposed spatial strategy, including the proposed housing requirement. These are discussed further under the following sub-heading 'Distribution of Development'.

Regulation 18: Pre-Submission Consultation

- 2.41. Following the completion of the Preferred Sites and Strategic Sites consultations, the decision was made by Shropshire Council's Cabinet on the 12th February 2020 to extend the proposed Plan period to 2038, primarily to ensure that there were 15 years remaining within the Plan period at the point of adoption. Specifically, Cabinet resolved to approve *"an amendment to the period covered by the new Local Plan so that (once adopted) it will cover the period 2016-2038."*
- 2.42. The preparation of the evidence base to inform the Local Plan Review continued. Key documents in the context of the development of the proposed Housing Requirement included:
- a. The Local Housing Need Assessment - Following the introduction of Governments 'Standard Methodology' for calculating Local Housing Need, Shropshire Council continued to monitor the Local Housing Need resulting from the application of this 'Standard Methodology'. In August 2020 an updated Local Housing Need Assessment was published, which applied Government's 'Standard Methodology' within the document **Local Housing Need Assessment 2020 – EV069**, which was submitted as part of the evidence base for the draft Shropshire Local Plan. This assessment concluded that the Local Housing Need for Shropshire equated to 1,177 dwellings, somewhat less than that previously calculated.
 - b. A Strategic Housing Market Assessment (SHMA), undertaken in two stages, published in March 2020 and September 2020 respectively, to provide further information on the housing need of specific groups within the community. These documents have been submitted as part of the evidence base for the draft Shropshire Local Plan (documents **EV097.01** and **EV097.02**).
- 2.43. This and other evidence prepared to inform the Local Plan Review; the consultation responses received in response to all previous stages of consultation and wider policy objectives were considered.
- 2.44. Duty to cooperate discussions with adjoining and closely related Local Planning Authorities were also considered, in particular those with the Black Country Authorities, with which a potential contribution of up to 1,500 dwellings toward unmet housing need was agreed⁷.
- 2.45. Further Sustainability Appraisal (**EV007.04.01-EV007.04.21**), Habitats Regulations Assessment (**EV007.06.01-EV007.06.03**), and Equality and Social Inclusion Impact Assessment (**EV007.08**) work was also undertaken to inform the identification of and

⁷ Further information on this subject is provided within Chapter 3. Association of Black Country Authorities Unmet Housing Need of this Housing Topic Paper.

appraise the suitability of proposals and draft policies. These assessments also informed subsequent proposals and have been submitted as part of the evidence base for the draft Shropshire Local Plan.

- 2.46. This informed the preparation of the final 'Regulation 18' Pre-Submission Consultation document (**EV007.01**). This document included a proposed housing requirement⁸ equating to around 1,400 dwellings per annum. This proposed housing requirement was the subject of an 8-week consultation, which commenced on the 3rd August 2020. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.47. Around 2,500 unique respondents, including local residents, businesses, town and parish councils, neighbouring Authorities, statutory consultees and a range of other organisations responded to this consultation. Careful consideration was given to all these responses and a summary prepared (**EV007.03**), which has been submitted as part of the evidence base for the draft Shropshire Local Plan.

Regulation 19: Pre-Submission Consultation

- 2.48. To inform the preparation of the Regulation 19: Pre-Submission Draft Shropshire Local Plan, careful consideration was given to the responses to all previous stages of consultation, the evidence base prepared to inform the Local Plan Review and the wider policy objectives and other relevant information available.
- 2.49. Further Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations Assessment (**SD008.01-SC008.03**), and Equality and Social Inclusion Impact Assessment (**SD010**) were also undertaken to both inform identification of and appraise the suitability of proposals and draft policies.
- 2.50. It was ultimately concluded that the proposed housing requirement (equating to 1,400 dwellings per annum) that was consulted upon during the last Regulation 18 consultation remained appropriate.
- 2.51. As such, the proposed housing requirement remained the same in the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (**SD002**). Formal consultation on this document ran for 10-weeks⁹, commencing on the 18th December 2020. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.52. Following the completion of this consultation, representations received were carefully considered and a summary of them prepared (**SD014.01 and SD014.02**). These documents and the actual representations (appropriately redacted) have been submitted as core documents for the examination of the draft Shropshire Local Plan.

Submission

- 2.53. Following consideration of all previous consultation responses, the representations received to the Regulation 19 consultation and evidence and technical assessments previously prepared, it was ultimately considered that the proposed housing requirement was legally compliant, compliant with the duty to cooperate and sound.

⁸ For the proposed Plan period 2016-2038.

⁹ The consultation period was extended in response to the current lockdown restrictions, which came into force on the 5th January 2021.

Distribution of Development

2.54. The proposed strategy for the distribution of development was identified through an iterative process, informed by careful consideration of best available evidence, technical assessments and extensive consultation.

2.55. Figure 2 provides a summary of the key stages in this process (structured around stages of consultation):

Figure 2: Summary of the Process of Developing the proposed level of residential development (known as the housing requirement) component of the proposed Spatial Strategy

Stage of Consultation	Proposals relating to the distribution of development	Key considerations
Regulation 18: Issues and Strategic Options	<ul style="list-style-type: none"> - Three potential options for the distribution of development within three general categories of settlement. - Initial methodology for the 'Hierarchy of Settlements' Assessment. 	<ul style="list-style-type: none"> - The adopted Local Plan. - Initial evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, national policy and guidance, the principles of sustainable development, and potential policy objectives. - Technical assessments including the Sustainability Appraisal (EV003.03), Habitats Regulations Assessment (EV003.05) and Equality and Social Inclusion Impact Assessment (EV003.07).
Regulation 18: Preferred Scale and Distribution of Development	<ul style="list-style-type: none"> - Preferred option for the distribution of development within three general categories of settlement. - Proposed settlement hierarchy. - Proposed residential development guideline for each of the proposed Strategic, Principal and Key Centres. - Proposed approach to managing development within proposed Community Hubs, proposed Community Clusters and the wider rural area. 	<ul style="list-style-type: none"> - Consultation responses to the previous Issues and Strategic Options Consultation (summarised in EV003.02). - Evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, data for specific settlements, characteristics/constraints/opportunities of specific settlements, our understanding of the importance of ensuring the long term vitality and sustainability of communities, the initial Hierarchy of Settlements Assessment, national policy and guidance, the principles of sustainable development, and potential policy objectives. - Technical Assessments including the Sustainability Appraisal (EV004.03), Habitats Regulations Assessment (EV004.05.01 and EV004.05.02) and Equality and Social Inclusion Impact Assessment (EV004.07).
Regulation 18: Preferred Sites	<ul style="list-style-type: none"> - Refinement of the proposed settlement hierarchy. - Proposed strategy (including where appropriate, proposed allocations) for achieving proposed residential development guidelines for proposed Strategic, Principal and Key Centres. - Proposed residential development guidelines for updated proposed Community Hubs. - Proposed strategy (including where appropriate, proposed allocations) for achieving the proposed residential 	<ul style="list-style-type: none"> - All previous consultation responses (summarised in EV003.02 and EV004.02). - Evidence including an updated Hierarchy of Settlements Assessment, data for specific settlements, characteristics/constraints/opportunities of specific settlements, our understanding of the importance of ensuring the long term vitality and sustainability of communities, and comprehensive site assessments. - Technical Assessments including the Sustainability Appraisal (EV004.03),

Stage of Consultation	Proposals relating to the distribution of development	Key considerations
	development guidelines for the updated proposed Community Hubs.	Habitats Regulations Assessment (EV004.05.01 and EV004.05.02) and Equality and Social Inclusion Impact Assessment (EV004.07).
Regulation 18: Strategic Sites	- Potential strategic sites that could complement strategies for existing settlements.	- All previous consultation responses (summarised in EV003.02, EV004.02 and EV005.02 (including EV005.02.01-EV005.02.18)). - Available evidence, including comprehensive site assessments. - Technical Assessments including the Sustainability Appraisal (EV004.03), Habitats Regulations Assessment (EV004.05.01 and EV004.05.02) and Equality and Social Inclusion Impact Assessment (EV004.07).
Regulation 18: Pre-Submission Draft of the Shropshire Local Plan	-Proposed strategy for the distribution of development. -Refinement of the proposed settlement hierarchy. - Refinement of the proposed residential development guidelines, strategies for achieving them (including where appropriate, proposed allocations) for Strategic, Principal and Key Centres and updated proposed Community Hubs. -Refinement of the proposed approach to managing development within proposed Community Clusters and the wider rural area.	- All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), and EV006.02). - Evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, data for specific settlements, characteristics/constraints/opportunities of specific settlements, a further updated Hierarchy of Settlements Assessment, comprehensive site assessments, national policy and guidance, the principles of sustainable development, and potential policy objectives. - Technical Assessments including the Sustainability Appraisal (EV007.04.01-EV007.04.21), Habitats Regulations Assessment (EV007.06.01-EV007.06.03) and Equality and Social Inclusion Impact Assessment (EV007.08).
Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	- Proposed strategy for the distribution of development. -Refinement of the proposed settlement hierarchy. - Refinement of the proposed residential development guidelines, strategies for achieving them (including where appropriate, proposed allocations) for Strategic, Principal and Key Centres and updated proposed Community Hubs. -Refinement of the proposed approach to managing development within proposed Community Clusters and the wider rural area.	- All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), EV006.02 and EV007.03). - Evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, data for specific settlements, characteristics/constraints/opportunities of specific settlements, a further updated Hierarchy of Settlements Assessment, comprehensive site assessments, national policy and guidance, the principles of sustainable development, and potential policy objectives. - Technical Assessments including the Sustainability Appraisal (SD006.01-SD006.21), Habitats Regulations Assessment (SD008.01-SD008.03) and Equality and Social Inclusion Impact Assessment (SD010).
Submission		- All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), EV006.02, EV007.03). - The representations to the Regulation 19 consultation (summarised in SD014.01 and SD014.02).

2.56. The following sub-sections provide further information on each of these key stages structured around stages of consultation).

The Starting Point – Regulation 18: Issues and Strategic Options

2.57. Shropshire is a large and diverse rural county containing 100's of settlements of varying sizes and an extensive rural area. As such it was considered important that a 'high level structure' is provided to any discussion about an appropriate strategy for the distribution of development. Within the adopted Local Plan this structure is provided through the identification of three 'broad categories' for settlements and land. These categories are:

- a. Shrewsbury;
- b. Market towns and key centres; and
- c. The rural area.

2.58. Having carefully reflected on the demographics and characteristics of Shropshire and the effectiveness of the adopted Local Plan it was ultimately concluded that these three general categories remained an appropriate starting point for the consideration of the distribution of development.

2.59. To inform the distribution of development between the categories of settlement, careful consideration was then given to a range of factors including:

- a. All available evidence base;
- b. The requirements of the NPPF;
- c. The principles of sustainable development – this included providing connectivity to services and facilities by sustainable means, whilst also recognising the needs of our rural communities;
- d. The characteristics and demographics of Shropshire (including presence of area of land within the Shropshire Hills Area of Outstanding Natural Beauty (AONB) and the West Midlands Green Belt);
- e. Past housing delivery trends and existing housing commitments;
- f. Potential policy objectives such as:
 - The delivery of affordable housing, which is a key priority in Shropshire;
 - The housing needs of other groups within the community, particularly older people given the demographics of Shropshire;
 - The potential to enable the growth of the local economy;
 - The potential to positively respond to the aspirations of the Economic Growth Strategy in the context of prioritising investment in strategic locations and growth zones along strategic corridors; and
 - The potential to respond to specific development opportunities that have or may arise as part of the Local Plan Review process.

2.60. Furthermore, a Sustainability Appraisal (**EV003.03**), Habitats Regulations Assessment (**EV003.05**) and Equality and Social Inclusion Impact Assessment (**EV003.07**) were also undertaken to both inform the identification of proposals for the distribution of development and appraise the options ultimately proposed. These documents have been submitted as part of the evidence base for the draft Shropshire Local Plan.

- 2.61. As a result, three reasonable options for the distribution of development within these three general categories were identified. These options were termed:
- a. 'Option A: Current Policy - Rural Rebalance', which in effect sought to carry on the spatial strategy within the adopted Local Plan, with a relatively large proportion of development in rural areas. As such it allowed for around 35% of development in rural areas, around 40% of development in market towns and key centres; and around 25% of development in Shrewsbury.
 - b. 'Option B: Urban Focus' which sought to focus more development within Shrewsbury and the market towns and key centres and as such proportionally less within the rural areas. As such it allowed for around 25% of development in rural areas, around 45% of development in market towns and key centres; and around 30% of development in Shrewsbury.
 - c. 'Option C: Balanced Growth', which was effectively a middle ground, allowing for balanced levels of growth between Shrewsbury and the rural areas, whilst maintaining similar levels of growth in the market towns and key centres. As such it allowed for around 30% of growth in rural areas, around 40% of growth in market towns and key centres; and around 30% of development in Shrewsbury.
- 2.62. Furthermore, to inform decisions on the role of settlements across Shropshire, an initial methodology for undertaking a 'Hierarchy of Settlements' Assessment was prepared. It was considered that the evidence resulting from this 'Hierarchy of Settlements' Assessment would provide an understanding of settlements and their function, particularly rural settlements. As such, its conclusions would inform and support the approach to distribution of development.
- 2.63. These different options and the initial methodology for the 'Hierarchy of Settlements' Assessment were the subject of an 8-week 'Regulation 18' Plan-Making Consultation as part of the 'Issues and Strategic Options Document' (**EV003.01**), which commenced on the 23rd January 2017. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.64. A total of 412 respondents, including individuals, businesses, landowners, Town and Parish Councils, representatives of the development industry, organisations, neighbouring Authorities, and statutory consultees responded to this consultation. Careful consideration was given to all these responses and a summary prepared (**EV003.02**), which has been submitted as part of the evidence base for the draft Shropshire Local Plan.

Regulation 18: Preferred Scale and Distribution of Development

- 2.65. To inform the identification of a preferred option for the proposed distribution of development between the three general categories, careful consideration of responses to the Issues and Strategic Options Consultation was undertaken. Available evidence and wider policy objectives were also again carefully considered.
- 2.66. Additionally, further technical assessments - Sustainability Appraisal (**EV004.03**), Habitats Regulations Assessment (**EV004.05.01 and EV004.05.02**), and Equality and Social Inclusion Impact Assessment (**EV004.07**) were undertaken to both inform and assess proposals. These documents have been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.67. Careful consideration of responses to the Issues and Strategic Options Consultation also informed the process of finalising the methodology for the Hierarchy of

Settlements Assessment. An assessment using this finalised methodology was subsequently undertaken¹⁰.

- 2.68. Using the results of this assessment a series of settlement categories were identified, these categories were Strategic Centre, Principal Centre, Key Centre, Community Hub and Other Rural Settlement. We would note that the aforementioned technical assessments also informed and appraised the application of the settlement hierarchy.
- 2.69. A proposed 'settlement hierarchy', informed by the Hierarchy of Settlements Assessment and the proposed 'high level structure' to the distribution of development were ultimately identified.
- 2.70. The proposed 'settlement hierarchy' included the proposed 'Strategic Centre' of Shrewsbury; five proposed Principal Centres (Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch); 11 proposed Key Centres (Albrighton, Bishop's Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem); rural settlements identified as Community Hubs and Community Clusters; hundreds of other rural villages and hamlets; and a significant rural hinterland.
- 2.71. The proposed 'high level structure' to the distribution of development was underpinned by the principle of urban focus, by which the majority of development was directed towards urban areas. This included around 30% of development in Shrewsbury (the proposed Strategic Centre); around 24.5% of development within proposed Principal Centres; around 18% of development within proposed Key Centres; and around 27.5% of development in rural areas (including proposed Community Hubs and proposed Community Clusters).
- 2.72. These proposals were the subject of an 8-week 'Regulation 18' Plan-Making Consultation within the 'Preferred Scale and Distribution of Development Document' (**EV004.01**), which commenced on the 27th October 2017. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.73. This consultation also included a proposed residential development guideline for each of the Strategic, Principal and Key Centres, which generally aligned with the proposed 'high level structure' to the distribution of development. These proposed residential development guidelines were informed by consideration of responses to previous stages of consultation, the aforementioned technical assessments and available evidence. It was also informed by careful consideration of each settlement's role within the settlement hierarchy; national policy; existing commitments (including sites with Planning Permission, Prior Approval or allocated within the adopted Local Plan without Planning Permission) and completions already achieved within the proposed Plan period; each settlement's specific characteristics, constraints and opportunities; and our understanding of the importance of ensuring the long term vitality and sustainability of communities.
- 2.74. In addition, the consultation included a proposed approach to managing development within proposed Community Hubs, proposed Community Clusters and the wider rural area. This was an important element of the consultation because of the potential role

¹⁰ As this has since been superseded, this document has not been submitted as part of the evidence base for the draft Shropshire Local Plan.

of these settlements in delivering sustainable rural development¹¹. These proposals were informed by consideration of responses to previous stages of consultation, the aforementioned technical assessments and available evidence. It was also particularly informed by consideration of the role of the rural area within the proposed 'high level structure' to the distribution of development; national policy; existing commitments in the rural settlements/wider rural area (including sites with Planning Permission, Prior Approval or allocated within the adopted Local Plan without Planning Permission) and completions already achieved within the proposed Plan period; the unique and varied characteristics, constraints and opportunities that exist within rural settlements across Shropshire and the wider rural area; and our understanding of the importance of ensuring the long term vitality and sustainability of communities.

- 2.75. A total of 591 unique respondents, including individuals, businesses, landowners, Town and Parish Councils, representatives of the development industry, organisations, neighbouring Authorities, and statutory consultees responded to this consultation. Careful consideration was given to all these responses and a summary prepared (**EV004.02**), which has been submitted as part of the evidence base for the draft Shropshire Local Plan.

Regulation 18: Preferred Sites

- 2.76. Following the completion of the Preferred Scale and Distribution of Development consultation, careful consideration was given to both the responses to this and other previous stages of consultation. Further evidence was also prepared and carefully considered, as were the wider policy objectives and other relevant information available.
- 2.77. Further technical assessments - Sustainability Appraisal (**EV005.03.01 and EV005.03.02**), Habitats Regulations Assessment (**EV005.05.01-EV005.05.04**), and Equality and Social Inclusion Impact Assessment (**EV005.07**) were also undertaken and given careful consideration. These documents have been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.78. Ultimately it was concluded that the proposed 'high level structure' to the distribution of development was an appropriate basis upon which to continue progression of the Local Plan Review. It was also concluded that the proposed residential development guidelines for the Strategic, Principal and Key Centres and the general approach to managing development within the rural area were an appropriate basis upon which to continue progression of the Local Plan Review.
- 2.79. With regard to the settlement hierarchy, it was ultimately concluded that the methodology employed within the Hierarchy of Settlements was proportionate and robust. However, the consultation responses to the 'Preferred Scale and Distribution of Development Document' provided further data on the services and facilities available across Shropshire, as such the data within the Hierarchy of Settlements Assessment was updated to reflect this new information and any other available evidence¹².

¹¹ Shropshire is a large and diverse County, predominantly rural in nature, covering around 320,000 hectares of which around 98% is classified as rural. Around 65% of those living in Shropshire live within the proposed Strategic, Principal and Key Centres, whilst the other 35% live in the rural area.

¹² As this has since been superseded, this document has not been submitted as part of the evidence base for the draft Shropshire Local Plan.

- 2.80. Building on the proposals within the 'Preferred Scale and Distribution of Development' consultation document and informed by consideration of responses to all previous stages of consultation, the aforementioned technical assessments, best available evidence (including extensive site assessments¹³ undertaken to inform the identification of proposed allocations to contribute towards achieving proposed residential development guidelines), the wider policy objectives and other relevant information available:
- a. A proposed strategy (including proposed allocations, where considered appropriate) for achieving the proposed residential development guidelines for the proposed Strategic, Principal and Key Centres was identified.
 - b. Proposed residential development guidelines for updated proposed Community Hubs was identified.
 - c. A proposed strategy (including proposed allocations, where considered appropriate) for achieving the proposed residential development guidelines for the updated proposed Community Hubs was identified.
- 2.81. These proposals, which effectively translated the higher level strategic approach into geographically specific proposals, were the subject of a 10-week 'Regulation 18' Plan-Making Consultation within the 'Preferred Sites Document' (**EV005.01**), which commenced on the 29th November 2018. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.82. It should be noted that the information within this consultation document was presented by Place Plan Area. Place Plan areas generally consist of a main Market Town and its surrounding hinterland. They represent areas with functional relationships that are used to capture the infrastructure needs of Shropshire and have been consistently used for the presentation of material as part of the Local Plan Review. However, in and of themselves, Place Plan areas have no planning status.
- 2.83. This consultation also again sought views on the proposed residential development guidelines for the proposed Strategic, Principal and Key Centres and the settlements proposed to be identified as Community Hubs or part of a Community Cluster.
- 2.84. More than 3,600 unique respondents, including individuals, businesses, landowners, Town and Parish Councils, representatives of the development industry, organisations, neighbouring Authorities, and statutory consultees responded to this consultation. Careful consideration was given to all these responses and a summary prepared (**EV005.02 and EV005.02.01-EV005.02.18**), which have been submitted as part of the evidence base for the draft Shropshire Local Plan.

Regulation 18: Strategic Sites

- 2.85. Following the completion of the Preferred Sites consultation, a complementary 10-week Regulation 18' Plan-Making Consultation (commencing on the 1st July 2019) on potential strategic sites, development of which could complement proposals within existing settlements across Shropshire, was then undertaken within the 'Strategic Sites Document' (**EV005.01**). This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.

¹³ As these have since been superseded, they have not been submitted as part of the evidence base for the draft Shropshire Local Plan.

- 2.86. Proposals within this document were informed by careful consideration of all the consultation responses received to previous stages of consultation, best available evidence (including strategic site assessments¹⁴), the wider policy objectives, and other relevant information available.
- 2.87. Additionally, further Sustainability Appraisal (**EV006.03**), Habitats Regulations Assessment (**EV006.05**), and Equality and Social Inclusion Impact Assessment (**EV006.07**) was also undertaken to both inform and appraise proposals. These documents have been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.88. More than 2,300 unique respondents, including individuals, businesses, landowners, Town and Parish Councils, representatives of the development industry, organisations, neighbouring Authorities, and statutory consultees responded to this consultation. Careful consideration was given to all these responses and a summary prepared (**EV006.02**), which has been submitted as part of the evidence base for the draft Shropshire Local Plan.

Regulation 18: Pre-Submission Consultation

- 2.89. Subsequently, on the 12th February 2020, Shropshire Council's Cabinet determined to extend the proposed Plan period to 2038, primarily to ensure that there were 15 years remaining within the Plan period at the point of adoption. Specifically, Cabinet resolved to approve *"an amendment to the period covered by the new Local Plan so that (once adopted) it will cover the period 2016-2038."*
- 2.90. Following this decision, the preparation of the evidence base continued, including through an update to:
- a. The site assessments undertaken to inform proposed allocations and proposed strategic allocations. Whilst these assessments have since been superseded, they formed Appendices to the Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan. As such, there were submitted as part of this Sustainability Appraisal (**EV007.04.01-EV007.004.21**), which forms part of the evidence base for the draft Shropshire Local Plan.
 - b. The Hierarchy of Settlements Assessment. This updated assessment retained the same methodology and was applied in a consistent manner to the previous. However, data on services and facilities was updated to reflect additional information including from previous stages of consultation. This assessment (**EV060**) was submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.91. All the evidence prepared to inform the Local Plan Review, responses received in response to all previous stages of consultation, wider policy objectives and other information was carefully considered.
- 2.92. Further Sustainability Appraisal (**EV007.04.01-EV007.04.21**), Habitats Regulations Assessment (**EV007.06.01-EV007.06.03**), and Equality and Social Inclusion Impact Assessment (**EV007.08**) work was also undertaken to inform and appraise proposals. These documents have been submitted as part of the evidence base for the draft Shropshire Local Plan.

¹⁴ As this has since been superseded, this document has not been submitted as part of the evidence base for the draft Shropshire Local Plan.

2.93. These various considerations informed the preparation of the final ‘Regulation 18’ Pre-Submission Consultation document (**EV007.01**).

2.94. This consultation was intended to focus on a ‘fully formed’ version of the draft Shropshire Local Plan, as such it included a fully formed proposed ‘spatial strategy’. It also had wider draft strategic, development management and settlement policies which supplement and support the delivery of the proposed ‘spatial strategy’.

2.95. The principles underpinning this proposed spatial strategy included:

- a. An ‘urban focus’ within which the majority of development would be directed towards urban areas. This ‘urban focus’ included the proposed Strategic, Principal and Key Centres. It also included the proposed Strategic Settlements and Strategic Sites (particularly informed by the earlier ‘Strategic Sites’ consultation).

It should be noted that to provide an appropriate level of flexibility in order to facilitate appropriate opportunities for sustainable residential development that is consistent with the draft Shropshire Local Plan, a specific percentage mix for the general categories of settlement is not identified.

However, when proposed residential development guidelines for settlements are considered in the context of the proposed housing requirement (30,800 dwellings between 2016 and 2038), the levels of development proposed within each category are considered generally comparable to those proposed within earlier stages of consultation (with an allowance for the Strategic Settlements identified through the Regulation 18 ‘Plan Making Consultation on Strategic Sites’). This is summarised within the table below:

Figure 3: Distribution of Residential Development Across Shropshire

Settlement	Settlement Category	Proposed Residential Development Guideline
Shrewsbury	Strategic Centre	8,625
Strategic Centre:		8,625 (around 28.0% of the proposed Housing Requirement)
Bridgnorth	Principal Centre	1,800
Ludlow	Principal Centre	1,000
Market Drayton	Principal Centre	1,200
Oswestry	Principal Centre	1,900
Whitchurch	Principal Centre	1,600
Principal Centres:		7,500 (around 24.5% of the proposed Housing Requirement)
Albrighton	Key Centre	500
Bishops Castle	Key Centre	150
Broseley	Key Centre	250
Church Stretton	Key Centre	200
Cleobury Mortimer	Key Centre	200
Craven Arms	Key Centre	500
Ellesmere	Key Centre	800
Highley	Key Centre	250
Much Wenlock	Key Centre	200
Shifnal	Key Centre	1,500
Wem	Key Centre	600

Settlement	Settlement Category	Proposed Residential Development Guideline
Key Centres:		5,150 (around 17.0% of the proposed Housing Requirement)
Former Ironbridge Power Station	Strategic Settlement	1,000
Clive Barracks, Tern Hill	Strategic Settlement	350*
Strategic Settlements:		1,350 (around 4.5% of the proposed Housing Requirement)
Bucknell (Bishop's Castle)	Community Hub	110
Chirbury (Bishop's Castle)	Community Hub	45
Clun (Bishop's Castle)	Community Hub	95
Worthen and Brockton (Bishop's Castle)	Community Hub	55
Alveley (Bridgnorth)	Community Hub	130
Ditton Priors (Bridgnorth)	Community Hub	65
Dudleston Heath (Ellesmere)	Community Hub	60
Burford (Ludlow)	Community Hub	190
Clee Hill (Ludlow)	Community Hub	75
Hinstock (Market Drayton)	Community Hub	155
Hodnet (Market Drayton)	Community Hub	105
Woore, Irelands Cross and Pipe Gate (Market Drayton)	Community Hub	88
Minsterley (Minsterley and Pontesbury)	Community Hub	155
Pontesbury (Minsterley and Pontesbury)	Community Hub	175
Cressage (Much Wenlock)	Community Hub	80
Gobowen (Oswestry)	Community Hub	360
Kinnerley (Oswestry)	Community Hub	60
Knockin (Oswestry)	Community Hub	55
Llanymynech (Oswestry)	Community Hub	125
Pant (Oswestry)	Community Hub	50
Ruyton XI Towns (Oswestry)	Community Hub	125
St Martins (Oswestry)	Community Hub	355
Trefonen (Oswestry)	Community Hub	35
West Felton (Oswestry)	Community Hub	130
Weston Rhyn (Oswestry)	Community Hub	155
Whittington (Oswestry)	Community Hub	200
Baschurch (Shrewsbury)	Community Hub	360
Bayston Hill (Shrewsbury)	Community Hub	200
Bicton (Shrewsbury)	Community Hub	30
Bomere Heath (Shrewsbury)	Community Hub	110
Cross Houses (Shrewsbury)	Community Hub	90
Dorrington (Shrewsbury)	Community Hub	150
Ford (Shrewsbury)	Community Hub	125

Settlement	Settlement Category	Proposed Residential Development Guideline
Hanwood (Shrewsbury)	Community Hub	50
Longden (Shrewsbury)	Community Hub	50
Nesscliffe (Shrewsbury)	Community Hub	115
Clive (Wem)	Community Hub	30
Hadnall (Wem)	Community Hub	125
Shawbury (Wem)	Community Hub	150
Prees (Whitchurch)	Community Hub	170
Community Hubs**		4,988 (around 16.0% of the proposed Housing Requirement)
Community Clusters and the Wider Rural Area		No specific guidelines (around 10.0% of the proposed Housing Requirement)

Please Note: Percentages are rounded to one decimal place.

*Shropshire Council understands that a recent announcement has been made (25th November 2021) confirming that as a result of the Future Soldiers Project, which represents the most radical transformation of the British Army in 20 years, the timescales for the release of Clive Barracks, Tern Hill have moved from 2025 to 2029. The implications of this change on the level of residential delivery expected on the site during the proposed Plan period (2016-2038) and the implications for the distribution of residential development between the various settlement categories is captured in the above table. This announcement has required further proposed minor (additional) modifications to the draft Shropshire Local Plan.

*For proposed Community Hubs, the relevant Place Plan Area is shown in brackets.

- b. Identification of the proposed Strategic, Principal and Key Centres; proposed residential development guidelines for these settlements; and a proposed strategy (including proposed allocations, where considered appropriate) for each of these settlements, including to achieve the proposed residential development guidelines.¹⁵

*It should be noted that proposed draft Policies (particularly what was draft Policy SP6 within **EV007.01** - draft Policy SP7 within the draft Shropshire Local Plan) provide for an appropriate level of flexibility in circumstances where proposed residential development guidelines for Strategic, Principal and Key Centres could be exceeded. This approach is considered to balance the issues of allowing for sustainable development to occur whilst recognising that proposed residential development guidelines are significant policy considerations.*

- c. Identification of proposed Community Hubs; proposed residential development guidelines for these settlements; and a proposed strategy (including proposed allocations, where considered appropriate) for each of these settlements, including to achieve the proposed residential development guidelines.¹⁵

*As per Strategic, Principal and Key Centres, proposed draft Policies (particularly what was draft Policy SP6 within **EV007.01** - draft Policy SP7 within the draft Shropshire Local Plan) provide for an appropriate level of flexibility in circumstances where proposed residential development guidelines for settlements could be exceeded.*

- d. Identification of proposed Community Clusters; and a proposed policy mechanism for managing development in Community Clusters.¹⁵
- e. Identification of a proposed policy mechanism for managing development within the wider rural area.¹⁵

¹⁵ These proposals were considered to generally align with the proposed 'urban focus'.

- 2.96. An 8-week consultation was undertaken, commencing on the 3rd August 2020. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.97. Around 2,500 unique respondents, including local residents, businesses, town and parish councils, neighbouring Authorities, statutory consultees and a range of other organisations responded to this consultation. Careful consideration was given to all these responses and a summary prepared (**EV007.03**), which has been submitted as part of the evidence base for the draft Shropshire Local Plan.

Regulation 19: Pre-Submission Consultation

- 2.98. Careful consideration was given to the responses to all previous stages of consultation, the evidence base prepared to inform the Local Plan Review, the wider policy objectives and other relevant information available.
- 2.99. Further Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations Assessment (**SD008.01-SC008.03**), and Equality and Social Inclusion Impact Assessment (**SD010**) were also undertaken to inform and appraise proposals.
- 2.100. As a result, it was ultimately concluded that the proposed 'spatial strategy' was appropriate and effective. However, informed by consideration of the above, the proposed strategies for a limited number of settlements were amended and the list of proposed Community Clusters updated. For example:
- a. The strategy for achieving the proposed residential development guideline for Church Stretton was amended, resulting in the removal of a proposed allocation.
 - b. The strategy for achieving the proposed residential development guideline for Oswestry was amended, resulting in the removal of a proposed allocation.
 - c. The strategy for achieving the proposed residential development guideline for Weston Rhyn was amended, resulting in parts of two previously proposed allocations being jointly proposed for allocation.
- 2.101. The proposed 'spatial strategy' was then included within in the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (**SD002**). Formal consultation on this document ran for 10-weeks¹⁶, commencing on the 18th December 2020. This document has been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 2.102. Following the completion of this consultation, representations received were carefully considered and a summary of them prepared (**SD014.01 and SD014.02**). These documents and the actual representations (appropriately redacted) have been submitted as core documents for the examination of the draft Shropshire Local Plan.

Submission

- 2.103. Following consideration of all previous consultation responses, the representations received to the Regulation 19 consultation and evidence and technical assessments previously prepared, it was ultimately considered that the proposed spatial strategy for the distribution of development was legally compliant, compliant with the duty to cooperate and sound.

¹⁶ The consultation period was extended in response to the current lockdown restrictions, which came into force on the 5th January 2021.

3.Association of Black Country Authorities: Unmet Housing Need

Introduction

- 3.1. Within the draft Shropshire Local Plan, Shropshire Council is proposing to support the development capacity of the Black Country Authorities (consisting of Dudley, Sandwell, Walsall and Wolverhampton Local Planning Authorities) by accommodating part of the 'unmet' housing and employment needs forecast to arise between 2020 and 2039 within their administrative areas.
- 3.2. Specifically, it is proposed that around 1,500 dwellings and around 30ha of employment land will be accommodated in Shropshire during the proposed Plan period to 2038, as contributions to these forecast unmet needs.
- 3.3. It is proposed that no specific sites are to be identified to accommodate these contributions, rather they will be integrated into the wider housing and employment land requirements for Shropshire and be delivered in accordance with the proposed spatial strategy for the level and distribution of development in the draft Shropshire Local Plan.
- 3.4. This proposed spatial strategy is principally contained in the strategic policy SP2 (Spatial Approach). Wider strategic, development management and settlement policies expand upon and support the achievement of this proposed spatial strategy.

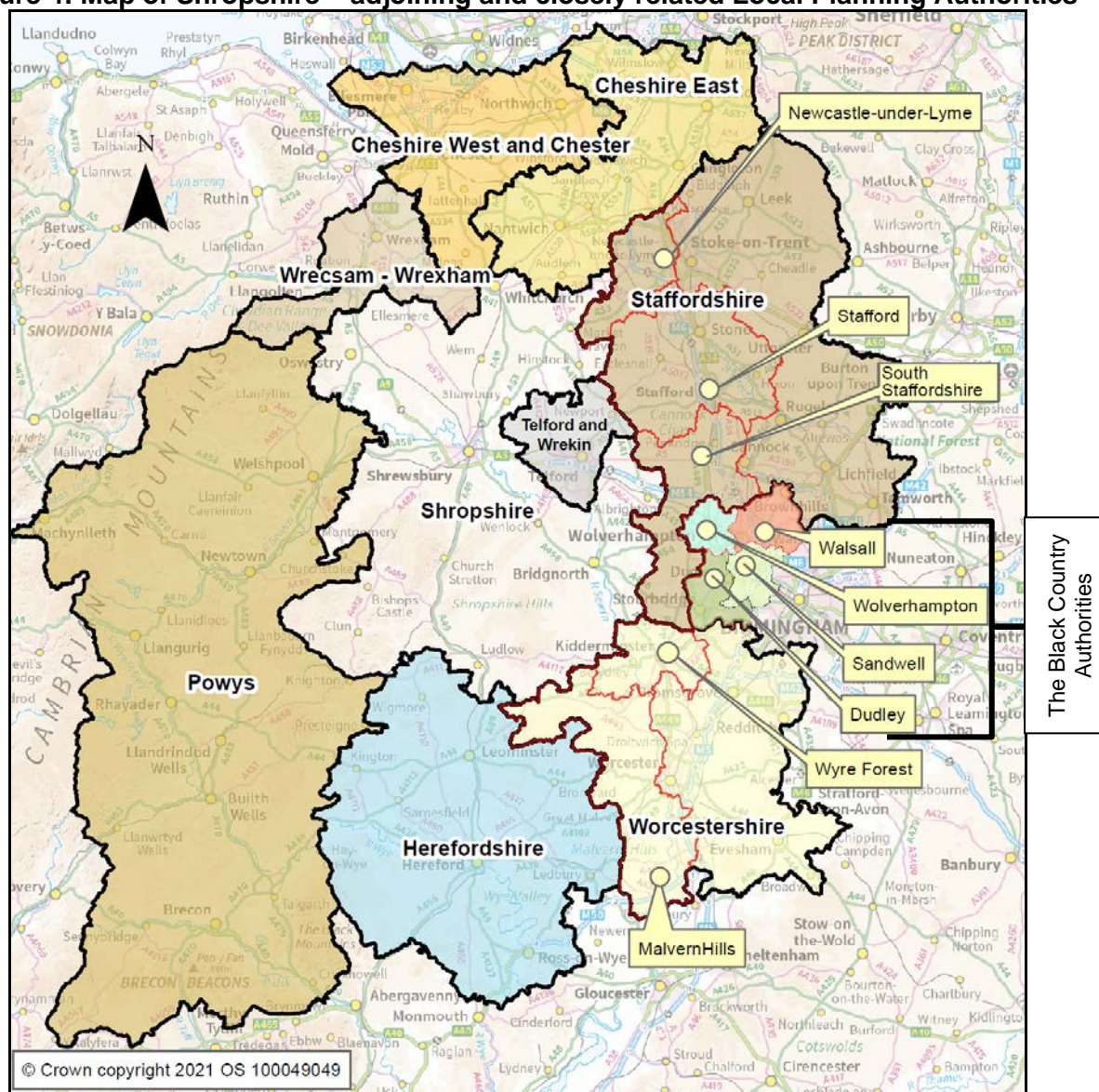
Context

- 3.5. The purpose of this chapter of the Housing Topic Paper is to:
 - a. Confirm the Black Country evidence which forecasts the existence and level of unmet housing need has not been tested through an Examination of the Black Country Plan or any other Local Plans prepared by Local Planning Authorities seeking to accommodate part of the unmet housing need forecast to arise within the Black Country.
 - b. Provide an overview of how the decision to propose a contribution in Shropshire towards unmet housing need forecast to arise within the Black Country Authorities was arrived at.
 - c. Provide an overview of how the specific contribution of 1,500 dwellings towards unmet housing need forecast to arise within the Black Country Authorities was determined.

Geography

3.6. Figure 4 illustrates the geographical relationship of Shropshire to adjoining and closely related Local Planning Authorities and adjoining County Councils.

Figure 4: Map of Shropshire – adjoining and closely related Local Planning Authorities



Housing Need

3.7. In the context of achieving sustainable development, Paragraph 11b of the National Planning Policy Framework (NPPF) states “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 (in Footnote 6...As established through statements of common ground), unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*¹⁷

- 3.8. Paragraph 61 of the NPPF states *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*¹⁷
- 3.9. National policy therefore requires housing need to be appropriately assessed and wherever possible met wholly within the Local Planning Authority area where the needs arises. Where it appears that a Local Planning Authority may not be able to meet the entirety of its identified housing need, they should advise relevant Local Planning Authorities of this circumstance as early as possible, so that this can be appropriately ‘taken into account’.
- 3.10. Shropshire Council has undertaken an assessment of the Local Housing Need for Shropshire using the Government’s standard methodology outlined in the National Planning Practice Guidance (NPPG). This assessment is summarised within the document **Local Housing Need Assessment 2020 – EV069**, which was submitted as part of the evidence base for the draft Shropshire Local Plan. The draft Shropshire Local Plan proposes to accommodate the entirety of this housing need.
- 3.11. The Black Country Authorities have similarly undertaken an assessment of the Local Housing Need for their administrative areas using the Government’s standard methodology outlined in the NPPG. However, early in their Local Plan Review process they determined that they were likely to be unable to accommodate the entirety of this housing need. As a closely related Local Planning Authority, (as indicated on Figure 4), Shropshire Council has been informed of these circumstances. Shropshire Council considers that it has responded to these circumstances in accordance with Paragraphs 11 and 61 of the National Planning Policy Framework (NPPF).

Duty to Cooperate

- 3.12. The ‘duty to cooperate’ was introduced by section 33A of the Planning and Compulsory Purchase Act (2004)¹⁸ and the Localism Act (2011)¹⁹. It places a legal duty on Local Planning Authorities, County Councils and prescribed public bodies to maintain effective co-operation and to work together on strategic cross boundary matters.
- 3.13. The Localism Act states that in particular the ‘duty’ requires that engagement should occur constructively, actively and on an on-going basis during the plan making process. This requires that each Local Planning Authority should have regard to the activities of other authorities where these are relevant to the preparation of their own Local Plan.

¹⁷ MHCLG now DLUHC, (2021), National Planning Policy Framework (NPPF)

¹⁸ ODPM now DLUHC, (2004), Planning and Compulsory Purchase Act,

www.legislation.gov.uk/ukpga/2004/5/section/33A

¹⁹ DCLG now DLUHC, (2011), Localism Act, www.legislation.gov.uk/ukpga/2011/20/section/110

3.14. Paragraphs 24-27 of the NPPF specifically address the need for such effective cooperation, specifying that:

“24. Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).

26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

27. In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.”²⁰

3.15. Furthermore, two of the four ‘tests of soundness’ of Local Plans in Paragraph 35 of the NPPF directly relate to the ‘duty to cooperate’. Specifically:

- a. *“Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;”*
- c. *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.”*

3.16. Shropshire Council has proactively engaged and undertaken the ‘duty to cooperate’ throughout the Local Plan Review process with neighbouring and closely related Local Planning Authorities, County Councils and other key partners. This has been summarised within the document **Duty to Cooperate Statement of Compliance - EV042**, which was submitted as part of the evidence base for the draft Shropshire Local Plan.

3.17. Where appropriate, Shropshire Council has also prepared Statements of Common Ground with neighbouring and closely related Local Planning Authorities, County Councils and other key partners. These documents have been submitted as part of the evidence base for the draft Shropshire Local Plan (documents **EV021-EV041**).

3.18. One outcome of this process is the proposed contribution to unmet housing and employment needs forecast to arise within the Black Country. This is documented within the Statement of Common Ground prepared by Shropshire Council and the

²⁰ MHCLG now DLUHC, (2021), National Planning Policy Framework (NPPF)

Association of Black Country Authorities (ABCA) (document **EV041**). Within this Statement of Common Ground, the parties agreed:

- a. Shropshire Council has accepted the principle of meeting a proportion of the 'unmet' housing need forecast to arise within the Black Country in a way which recognises the functional relationship between the areas and which respects the character of Shropshire.
- b. A contribution in Shropshire of around 1,500 dwellings towards meeting the unmet housing need forecast to arise within the Black Country.
- c. That this contribution would not be met on a specific site allocation or within a specific settlement, but rather this unmet housing need would be simply incorporated within the Shropshire Local Housing Need and met in accordance with the proposed strategy for the distribution of development across Shropshire.

3.19. This Statement of Common Ground was signed by representatives of Shropshire Council and each of the four Black Country Authorities.

Our Understanding of Unmet Housing Need Forecast to Arise in Neighbouring Areas

3.20. The positive engagement and 'duty to cooperate' discussions that were undertaken to inform the draft Shropshire Local Plan did not identify any unmet cross-boundary housing need within adjoining Local Planning Authorities which would be appropriately and sustainably met within Shropshire. This is summarised within the relevant Statements of Common Ground with these adjoining Local Planning Authorities (documents **EV028-EV040**). This is also summarised within the Duty to Cooperate Statement of Compliance (**EV042**).

3.21. However, Shropshire Council was informed about the unmet housing and employment need forecast to arise within the Black Country.

3.22. The Shropshire administrative area does not adjoin any of the Black Country Authorities administrative areas. Furthermore, Shropshire is a self-contained Housing Market Area (HMA)²¹ and ²² rather than being a part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) containing the Black Country Authorities.

3.23. However, the information provided regarding forecast unmet housing and employment need in the Black Country was considered in relation to the wider relationship of Shropshire and the Black Country, including road and rail links and the pattern of movements between these two areas, particularly between the central and eastern areas of Shropshire and with the areas of Wolverhampton and Dudley.

3.24. Shropshire Council considered the forecast unmet housing need in the Black Country to be a relevant strategic matter for the preparation of the draft Shropshire Local

²¹ As documented within Part 1 of the Strategic Housing Market Assessment - **EV097.01** submitted as part of the evidence base of the draft Shropshire Local Plan, Shropshire is considered to represent a self-contained housing market area (HMA). A HMA is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.

²² As documented within the Economic Development Needs Assessment – **EV043** submitted as part of the evidence base of the draft Shropshire Local Plan, Shropshire Council is also considered to represent a self-contained Functional Economic Market Area (FEMA). FEMA's are the spatial level at which local economies and markets actually operate.

Plan. It was determined through duty to co-operate discussions with the Black Country Authorities that part of their unmet housing need could be appropriately and sustainably met within Shropshire.

Our Understanding of the Unmet Housing Need Forecast to Arise in the Black Country

- 3.25. During the early stages of the review of the joint Local Plan for the Black Country, the Association of Black Country Authorities (ABCA) contacted neighbouring and closely related Local Planning Authorities (including Shropshire Council), regarding strategic housing issues. This correspondence, dated 12th July 2018, has been submitted as part of the evidence base for the draft Shropshire Local Plan (Duty to Cooperate Correspondence 1 - Association of Black Country Authorities with Shropshire Council - **EV041.01**).
- 3.26. Within this correspondence, ABCA specified:
- a. That their most recent housing evidence indicated that their housing need could not be accommodated within the urban area;
 - b. Work was ongoing to determine how much could be accommodated within their urban area (in line with their current strategy) before considering other locations in the Black Country or beyond; and
 - c. That they were querying the status of Local Plan Reviews and whether such reviews would identify capacity to accommodate any unmet need arising within the Black Country or specific sites that could contribute towards accommodating any unmet housing need arising within the Black Country.
- 3.27. As part of the Shropshire Local Plan Review process, positive engagement and ‘duty to cooperate’ discussions were undertaken with ABCA. This is summarised within **EV041**.
- 3.28. As a result of this engagement, Shropshire Council understands that ABCA’s position with regard to housing need has further crystallised since its initial correspondence (**EV041.01**).
- 3.29. Indeed, Shropshire Council understands the best available evidence, prepared by ABCA to inform their ongoing review of the joint Black Country Local Plan, forecasts a significant housing need and that a significant element of this total housing need is unlikely to be accommodated within the Black Country Local Authority area in a sustainable manner. This is summarised within Figure 5:

Figure 5: Black Country Housing Needs 2020 - 2039

Category	Housing Numbers
Total Housing Need: (calculated using Government’s Standard Methodology)	76,076
Forecast Housing Capacity:	47,837
Forecast Unmet Housing Need:	28,239

Please note these figures are also summarised within the Statement of Common Ground between Shropshire and the Black Country Authorities (EV041**) and the Regulation 18 draft Black Country Plan recently the subject of consultation (between the 16th August and 11th October 2021).*

- 3.30. As this evidence is associated with the ongoing review of the joint Black Country Local Plan, rather than the adopted joint Black Country Local Plan, the forecast level of unmet housing has not been tested through the examination of the joint Black Country Plan or through any other Local Plans prepared by Local Authorities seeking to accommodate part of the unmet need arising in the Black Country.
- 3.31. However, Paragraph 35(c) of the NPPF is very clear that to be effective, strategic cross-boundary matters should be *“dealt with rather than deferred”*²³. This is the approach being taken by Shropshire Council.
- 3.32. It is also the approach being taken by a number of other West Midlands Local Planning Authorities that are progressing Local Plan Reviews and, based on the information provided by ABCA, also proposing to include what they consider to be an appropriate and sustainable contribution towards the latter’s forecast unmet housing need. This includes:
- a. Cannock Chase District Council undertook a ‘Regulation 18’ Preferred Options Consultation between 19th March 2021 and 30th April 2021. Within this consultation they specified that *“Cannock Chase District forms part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) and has resolved to contribute 500 dwellings where infrastructure permits, to meet a shortfall arising from the GBBCHMA which sets a Local Housing need of 6,016 dwellings at 301 dwellings per annum.”*²⁴ The GBBCHMA is the HMA containing the Black Country.
 - b. South Staffordshire District Council which undertook a ‘Regulation 18’ Preferred Options Consultation between 1st November 2021 and 13th December 2021. As documented within the completed Statement of Common Ground between Shropshire Council and South Staffordshire District Council (**EV033**) they are proposing *“a proportionate contribution of some 4,000 dwellings towards unmet housing needs arising in the GBBCHMA up to 2038.”*
 - c. Lichfield District Council undertook a ‘Regulation 19’ Publication Draft Consultation between 5th July 2021 and 30th August 2021. Within this consultation document they proposed a contribution to the GBBCHMA and specifically towards the unmet housing need forecast to arise within the Black Country. Lichfield District Council recently deferred the decision on whether to submit the draft Local Plan for examination.

Specifically, draft Strategic Policy SP1: The Spatial Strategy includes *“By 2040 a minimum of 9,727 dwellings will be planned for. This consists of 7,062 to meet our local housing need and 2,665 homes towards meeting the unmet housing needs arising from the Greater Birmingham and Black Country housing market area (GBBCHMA).”*²⁵ Paragraph 4.22 of the Explanation to this draft Policy states *“Therefore, of the 2,665 homes to be made available to the housing market area to meet their need, a capped contribution of 2,000 is to be made for the Black Country authorities’ needs starting after 2027 to assist with their identified shortfall up to 2040.”*²⁵

²³ MHCLG now DLUHC, (2021), National Planning Policy Framework (NPPF)

²⁴ Cannock Chase District Council (2021), Cannock Chase Local Plan Review - Regulation 18’ Preferred Options Consultation,
https://www.cannockchasedc.gov.uk/sites/default/files/cannock_chase_local_plan_review_preferred_options_consultation_document_21.03.21_0.pdf

²⁵ Lichfield District Council (2021), Lichfield District Local Plan 2040 Regulation 19 Consultation,
<https://www.lichfielddc.gov.uk/downloads/file/1928/local-plan-2040-publication-document>

- 3.33. There are also examples from elsewhere in the Country of Local Authorities being expected to take a positive approach to unmet housing need forecast to arise within their area by providing early notification to their neighbouring Authorities to permit them to address the unmet need when preparing their own Local Plans.
- 3.34. For instance, within the examination of the Sevenoaks District Local Plan, Paragraph 37 of the Inspectors Report states *“The full extent of unmet need only became apparent to the Council following the consideration of the responses to the Regulation 18 consultation, after the DtC meeting on 11 September 2018, and during the preparation of the Regulation 19 Plan. Under the DtC, it is reasonable to expect the Council to have contacted its neighbours as soon as it became clear that it would not be able to accommodate its own needs. This would have allowed the authorities to engage constructively in an attempt to resolve this issue prior to the publication of the Plan at the Regulation 19 stage....”*²⁶ Paragraph 39 of the Inspectors Report then states *“However, in my view, earlier and fuller proactive engagement on this crucial issue, in accordance with national policy, would have been significantly more likely to result in an effective strategy for meeting Sevenoaks’ unmet need.”*²⁶

Determining Whether it was Appropriate to Take Unmet Housing Need Forecast to Arise in the Black Country into Account

Overview

- 3.35. As documented above, Shropshire Council has been aware of the potential for unmet housing need to arise within the Black Country for some time. As the Shropshire Local Plan Review progressed, evidence prepared by ABCA has continued to forecast that there is likely to be unmet housing need arising within the Black Country.
- 3.36. It is understood that the best available evidence prepared by ABCA forecasts an unmet housing need of some 28,239 dwellings to 2039. Whilst this forecast of unmet housing need is not established within the adopted Black Country Local Plan, paragraph 35(c) of the NPPF is clear that to be effective, strategic cross-boundary matters should be *“dealt with rather than deferred”*²³.
- 3.37. Nationally, the preference is of course for housing need to be met within the Local Planning Authority within which it arises – this is apparent in both Paragraphs 11b and 61 of the NPPF²⁷ (quoted above).
- 3.38. Where this is not possible, the preference is for it to be accommodated within the wider HMA and to a lesser extent the FEMA which contains that Local Planning Authority within which the need arises. This is because HMA’s represent geographical areas which illustrate household demand and preferences for all types of housing whilst FEMA’s represent the spatial level at which local economies and markets actually operate. As such housing provision within the same HMA is more likely to appropriately and sustainably meet unmet housing need arising within a Local Planning Authority, whilst housing provision within the same FEMA as the Local Planning Authority is more likely to provide access to the same employment opportunities.

²⁶ Planning Inspectorate (Inspector Karen L Baker), (2020), Report on the Examination of the Sevenoaks District Local Plan, file:///C:/Users/cc140648/Downloads/Sevenoaks_Final_Report.pdf

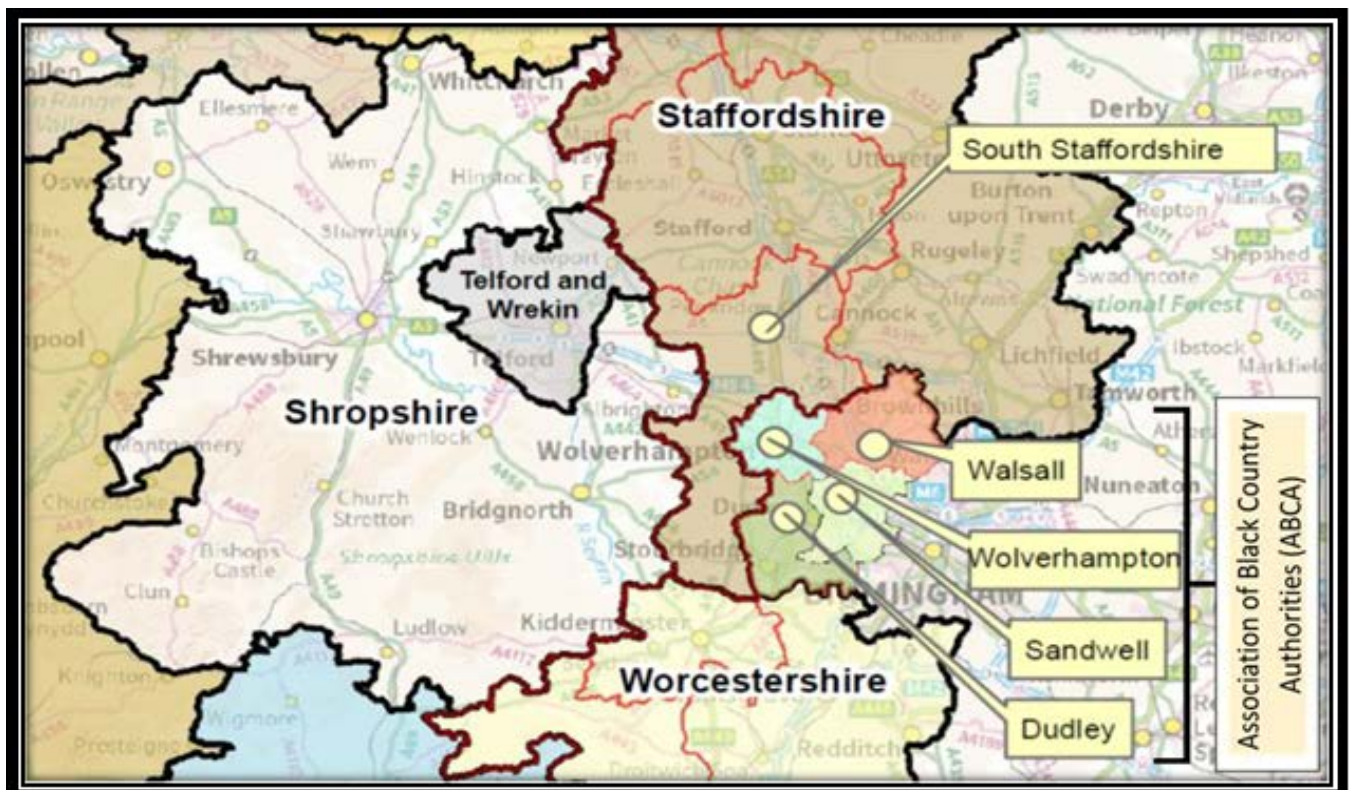
²⁷ MHCLG now DLUHC, (2021), National Planning Policy Framework (NPPF)

- 3.39. However, whilst it is understood from the information provided by ABCA that positive discussions have occurred with a number of Local Planning Authorities within their HMA and FEMA, it is also understood from the information provided by ABCA, that these discussions have not identified sufficient capacity to accommodate the entirety of the forecast unmet housing need.
- 3.40. As a result, it is ultimately considered appropriate to determine whether any of the forecast unmet housing need from the Black Country could be appropriately and sustainably met within Shropshire.

The Relationship Between Shropshire and the Black Country

- 3.41. To determine whether it was appropriate for unmet housing need forecast to arise within the Black Country to be accommodated within Shropshire, available data illustrating the relationship between these two areas was carefully considered. This included data on migration patterns, commuting patterns, travel to work areas, and rail and road links.
- 3.42. This is because the most appropriate locations for accommodating forecast unmet housing need beyond the HMA and FEMA are considered to be those with good road and rail links, with established migration and commuting patterns, and that are within the same Travel to Work Area (TTWA).
- 3.43. Figure 6 illustrates the geographic relationship between Shropshire and the Black Country Authorities.

Figure 6: Geographic Relationship Between Shropshire and the Black Country Authorities



- 3.44. **Migration patterns:** Migration patterns provide an indication of the movement of people from one area to live in another. It should be noted that in the context of migration there will be movements **in and out** of an area. Net migration is the difference between these in and out movements, as such it does not actually indicate the volume of movements from one area into another. Net migration may be influenced by changes in levels of in or out migration (or indeed both), but as it is not a migration flow it cannot be directly changed.
- 3.45. Information on migration patterns was sourced from the Office for National Statistics (ONS) data on Internal Migration (matrices of moves between English and Welsh local authorities, Scotland and Northern Ireland)²⁸. This data represent the most up to date information available. Clearly, the larger the levels of migration movements (and the larger the proportion of total movements) the greater the relationship between areas.
- 3.46. Figure 7 provides a summary of the internal migration movements from each of the Black Country Authorities into Shropshire over the last five years for which data is available (2016-2020). It also identifies the proportion of total internal migration originating in each of the Black Country Authorities with Shropshire as the destination, and conversely the proportion of total internal migration with Shropshire as the destination that originated in each of the Black Country Authorities. Finally, it provides combined figures for all of the Black Country Authorities. Please note for the purpose of the combined figure, movements between the Black Country Authorities are excluded.

Figure 7: Internal Migration Flows from the Black Country Authorities into Shropshire²⁸

Year	Dudley to Shropshire			Sandwell to Shropshire			Walsall to Shropshire			Wolverhampton to Shropshire			Black Country Authorities to Shropshire*		
	Total Number	% of total from Dudley	% of total to Shropshire	Total Number	% of total from Sandwell	% of total to Shropshire	Total Number	% of total from Walsall	% of total to Shropshire	Total Number	% of total from Wolverhampton	% of total to Shropshire	Total Number	% of total from The Black County Authorities*	% of total to Shropshire
2020	321	3.35	2.46	163	1.07	1.25	166	1.52	1.27	437	3.89	3.35	1,087	3.18	8.33
2019	390	3.29	2.59	233	1.32	1.54	194	1.53	1.29	560	4.37	3.71	1,377	3.49	9.13
2018	375	3.33	2.55	217	1.28	1.48	182	1.50	1.24	506	4.19	3.44	1,280	3.47	8.70
2017	360	3.22	2.41	170	1.04	1.14	200	1.68	1.34	510	4.20	3.41	1,240	3.46	8.30
2016	290	3.18	2.40	140	1.04	1.16	120	1.28	1.00	340	3.31	2.82	890	3.01	7.38
Average	347	3.27	2.48	185	1.16	1.32	172	1.51	1.23	471	4.02	3.37	1,175	3.34	8.41

Please note flows between the Black Country Authorities are excluded.

²⁸ ONS, (most recent data released in 2021), Internal migration: matrices of moves by local authority and region (countries of the UK), www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/matricesofinternalmigrationmovesbetweenlocalauthoritiesandregionsincludingthecountriesofwalesscotlandandnorthernireland

- 3.47. It is apparent from Figure 7 that whilst there are internal migration movements from all four Black Country Authorities into Shropshire, these movements are more significant from Dudley and Wolverhampton. This is apparent when considering the actual amount of internal migration that occurred in each of the five years, the average amount of internal migration per annum over this five year period and the proportion that these movements into Shropshire represent of total internal migration movements from each of the Black Country Authorities and into Shropshire.
- 3.48. The migration flows data for the Black Country Authorities combined, shows the extent of the relationship between the Black Country Authorities and Shropshire, with the average annual internal migration movements over the five year period equating to some 1,175 people per annum. This also equates to an average of 3.34% of the total internal migration flows out of the Black Country Authorities (flows between the Black Country Authorities are excluded) over the five years. Conversely, the average internal migration flows over the five years out of the Black Country Authorities combined into Shropshire, equates to 8.41% of total internal migration flows into Shropshire.
- 3.49. Figure 8 provides a summary of the internal migration movements from Shropshire into each of the Black Country Authorities over the last five years. It also identifies the proportion of total internal migrant moves originating in Shropshire with each of the Black Country Authorities as the destination, and conversely the proportion of total internal migrants with each of the Black Country Authorities as the destination, that originated in Shropshire. Finally, it also provides a combined figure for all of the Black Country Authorities. Please note for the purpose of the combined figure, movements between the Black Country Authorities are excluded.

Figure 8: Internal Migration Flows from Shropshire into the Black Country Authorities²⁸

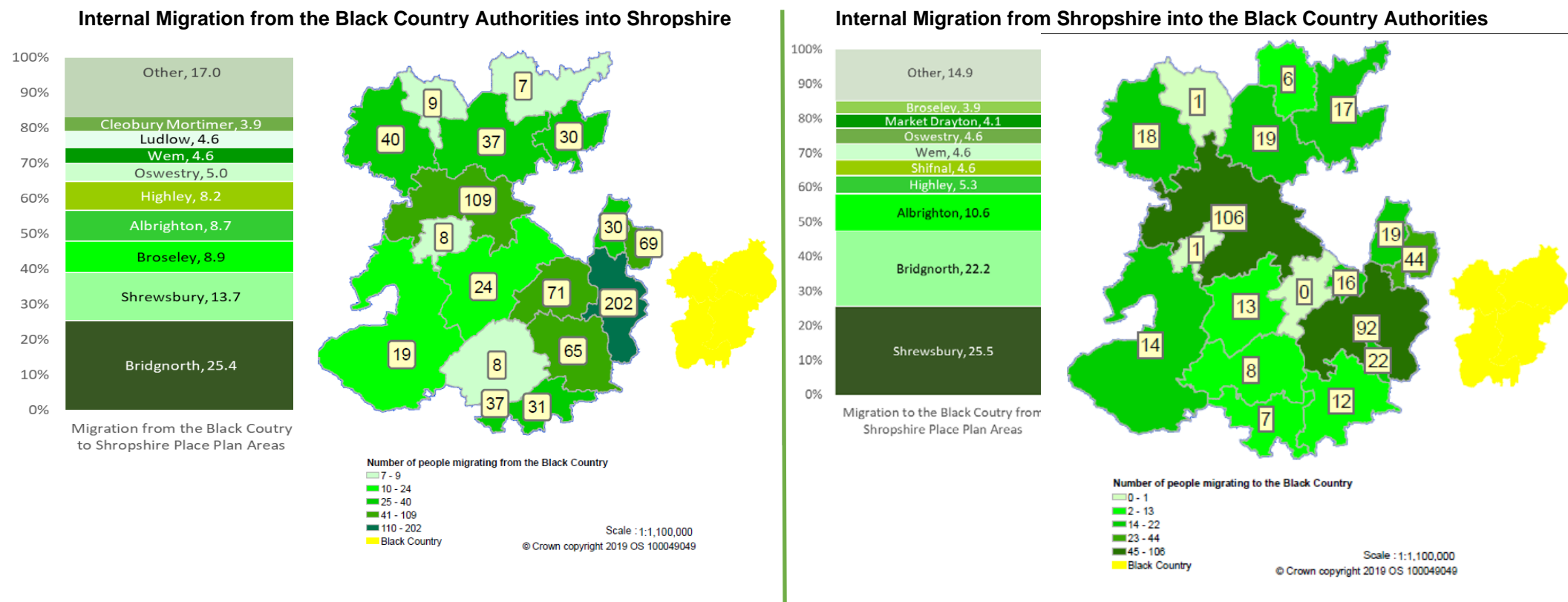
Year	Shropshire to Dudley			Shropshire to Sandwell			Shropshire to Walsall			Shropshire to Wolverhampton			Shropshire to The Black Country Authorities*		
	Total Number	% of total to Dudley	% of total from Shropshire	Total Number	% of total to Sandwell	% of total from Shropshire	Total Number	% of total to Walsall	% of total from Shropshire	Total Number	% of total to Wolverhampton	% of total from Shropshire	Total Number	% of total to The Black County Authorities*	% of total from Shropshire
2020	114	1.13	1.12	53	0.40	0.52	44	0.41	0.43	160	1.57	1.57	371	1.18	3.65
2019	115	0.95	0.98	72	0.47	0.62	56	0.43	0.48	159	1.38	1.36	402	1.10	3.44
2018	128	1.09	1.12	54	0.35	0.47	66	0.52	0.58	162	1.38	1.42	410	1.14	3.59
2017	170	1.44	1.47	50	0.32	0.43	70	0.56	0.61	230	2.06	1.99	520	1.48	4.50
2016	100	1.12	1.00	40	0.33	0.40	60	0.59	0.60	200	2.14	2.00	400	1.43	4.00
Average	125	1.14	1.14	54	0.38	0.49	59	0.50	0.54	182	1.69	1.66	421	1.26	3.84

Please note flows between the Black Country Authorities are excluded.

- 3.50. It is apparent from Figure 8 that whilst there are migration movements from Shropshire into all four Black Country Authorities, these movements are larger into Dudley and Wolverhampton.
- 3.51. The data for the Black Country Authorities combined, illustrates the extent of internal migration movements from Shropshire into the Black Country Authorities, with the average annual internal migration movements over the five year period equating to some 421 people per annum. This also equates to an average of 1.26% of the total internal migration movements into the Black Country Authorities (flows between the Black Country Authorities are excluded) over the five years. Conversely, the combined average internal migration movements over the five years out of Shropshire into the Black Country Authorities, equates to 3.84% of total internal migration movements into Shropshire.
- 3.52. **Migration patterns (sub-Shropshire level):** Given the geographical coverage of Shropshire, it was also considered of value to review internal migration movements from the Black Country Authorities into Shropshire and from Shropshire into the Black Country Authorities at a sub-Shropshire Local Authority level.
- 3.53. Specifically, analysis was undertaken of internal migration movements at a Shropshire Place Plan area level. Place Plan areas generally consist of a main Market Town and its surrounding hinterland. They represent areas with functional relationships that are used to capture the infrastructure needs of Shropshire and for the organisation of draft Settlement Policies within the draft Shropshire Local Plan²⁹.
- 3.54. It is apparent from this data, summarised in Figure 9, that Bridgnorth Place Plan Area (25.4%) was by far the most popular destination for people leaving the Black Country for Shropshire, closely followed by Shrewsbury (13.7%), Broseley (8.9%) and Albrighton (8.7%) Place Plan Areas.
- 3.55. In terms of people moving from Shropshire to the Black Country, the largest proportion originated in Shrewsbury Place Plan Area (25.5%), followed by Bridgnorth (22.2%), and Albrighton (10.6%) Place Plan Areas.

²⁹ Please Note: Best available data source for this exercise is migration - origin destination data from the 2011 Census which provided data to middle layer super output areas (MSOAs). These have been applied to Place Plan Areas using a 'best fit' approach. Unfortunately, this results in the Much Wenlock Place Plan Area being split between the Broseley and Church Stretton Place Plan Areas. The Census recorded people who had changed residence in the year leading up to Census Day on the 27th March 2011.

Figure 9: Internal Migration Between Shropshire and the Black Country Authorities at a Sub-Shropshire Level³⁰



3.56. **Commuting patterns**³¹: Commuting patterns provide an indication of the amount of people travelling **into and out of** an area for the purpose of employment. Net commuting is the difference between in and out commuting, as such it does not actually indicate the volume of commuting from one area and into another. Net commuting may be influenced by changes in levels of in or out commuting (or indeed both), but as it is not a commuting flow it cannot be directly changed.

³⁰ ONS, 2011 Census, Migration - Origin Destination, Crown Copyright

³¹ ONS, 2011 Census, Crown Copyright, Nomis – Official Labour Market Data, <https://www.nomisweb.co.uk/>

3.57. Clearly, the larger the number of commuters (and the proportion of total commuters into and out of an area) the greater the relationship between areas. The best available data on commuting is from the 2011 Census (all usual residents aged 16 and over in employment the week before the census).

3.58. Commuting data is summarised within Figure 10 below, which illustrates that as at the 2011 Census, the four Black Country Authorities, particularly Dudley and Wolverhampton, represented important commuting destinations for residents of Shropshire. Figure 10 also demonstrates that Shropshire was an important destination for residents of Wolverhampton and to a lesser extent Dudley.³²

Figure 10: Commuting from the Black Country Authorities to Shropshire³¹

Dudley to Shropshire			Sandwell to Shropshire			Walsall to Shropshire			Wolverhampton to Shropshire			The Black Country Authorities to Shropshire		
Total	% of total from Dudley	% of total to Shropshire	Total	% of total from Sandwell	% of total to Shropshire	Total	% of total from Walsall	% of total to Shropshire	Total	% of total from Wolverhampton	% of total to Shropshire	Total	% of total from The Black County Authorities	% of total to Shropshire
658	0.54	0.59	237	0.21	0.21	227	0.24	0.20	1,085	1.21	0.97	2,207	0.53	1.98
Shropshire to Dudley			Shropshire to Sandwell			Shropshire to Walsall			Shropshire to Wolverhampton			Shropshire to The Black Country Authorities		
Total	% of Total to Dudley	% of total from Shropshire	Total	% of total to Sandwell	% of total from Shropshire	Total	% of total to Walsall	% of total to Shropshire	Total	% of total to Wolverhampton	% of total from Shropshire	Total	% of total to The Black County Authorities	% of total from Shropshire
1,143	1.11	0.98	622	0.57	0.53	504	0.57	0.43	2,346	2.50	2.01	4,615	1.17	3.95

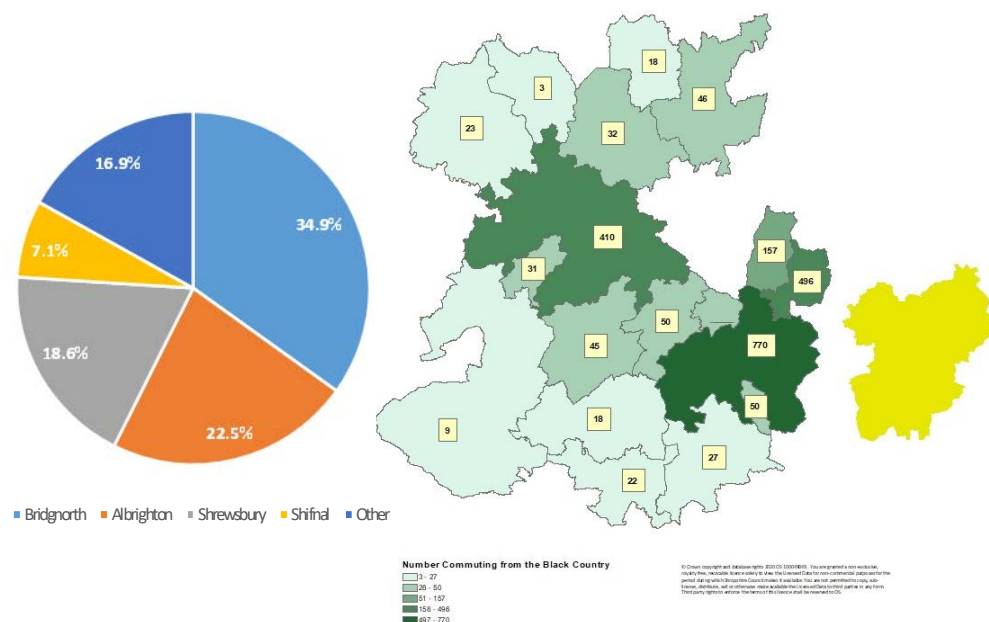
³² It should be noted that with regard to commuting patterns, Shropshire has a high level of self-containment with people both living and working in the area. This is summarised more extensively within the SHMA Part 1 (EV097.01).

3.59. **Commuting patterns (sub-Shropshire level):** Again, given the geographical coverage of Shropshire, it was also considered of value to review commuting patterns from the Black Country Authorities into Shropshire and from Shropshire into the Black Country Authorities at a sub-Shropshire Local Authority level (Place Plans were again used for this exercise)³³.

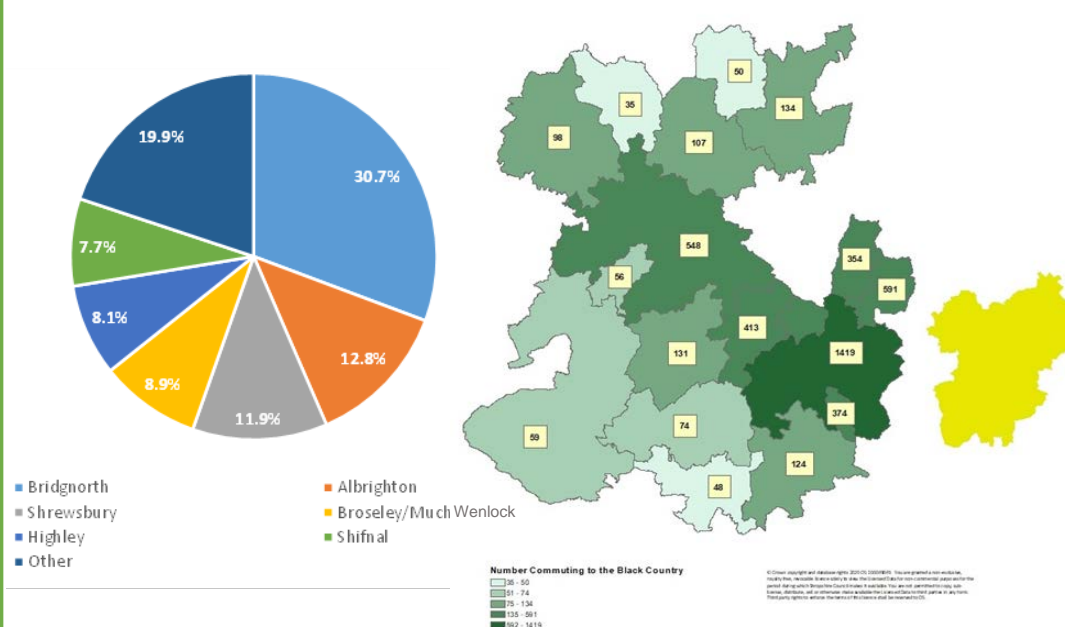
3.60. It is apparent from this data, summarised in Figure 11, that the majority of commuters from the Black Country into Shropshire were employed within the Bridgnorth Place Plan Area (34.9%), followed by Albrighton (22.5%) and Shrewsbury (18.6%) Place Plan Areas. In terms of people commuting from Shropshire to work in the Black Country, the largest proportion originated in Bridgnorth Place Plan Area (30.7%), followed by Albrighton (12.8%) and Shrewsbury (11.9%) Place Plan Areas.

Figure 11: Commuting Between Shropshire and the Black Country Authorities at a Sub-Shropshire Level³⁴

Commuting from the Black Country Authorities into Shropshire



Commuting from Shropshire into the Black Country Authorities



³³ Please Note: Best available data source for this exercise is sourced from the 2011 Census which provided data to middle layer super output areas (MSOAs). These have been applied to Place Plan Areas using a 'best fit' approach. Unfortunately, this results in the Much Wenlock Place Plan Area being split between the Broseley and Church Stretton Place Plan Areas.

³⁴ ONS, 2011 Census, Migration - Origin Destination, Crown Copyright

- 3.61. **Travel to Work Areas (TTWA's)**³⁵: TTWA's are a geography created to approximate labour market areas. In other words, they are derived to reflect self-contained areas in which most people both live and work. Therefore, the greater the extent of any overlap within these TTWA's the stronger the relationship between Local Authorities.
- 3.62. The most recently defined TTWA's are derived from the data collected as part of the 2011 Census³⁶. According to this data, there are six TTWA's covering Shropshire. These are Ludlow (covering 14.3% of the population of Shropshire); Oswestry (covering 15.8% of the population of Shropshire); Shrewsbury (covering 51.0% of the population of Shropshire); Stoke-on-Trent (covering 0.6% of the population of Shropshire); Telford (covering 15.6% of the population of Shropshire); and Wolverhampton and Walsall (covering 2.7% of the population of Shropshire).
- 3.63. Of these TTWA's, only one (Wolverhampton and Walsall, representing 2.7% of the population of Shropshire) also applies to any of the four Black Country Authorities. Specifically:
- a. 3.6% of the population of Dudley is located within the Wolverhampton and Walsall TTWA (the remaining 96.4% of the population is within the Dudley TTWA).
 - b. The Wolverhampton and Walsall TTWA does not contain any of the population of Sandwell (30.6% of the population of Sandwell is located within the Birmingham TTWA and the remaining 69.4% of the population is within the Dudley TTWA).
 - c. 88.1% of the population of Walsall is located within the Wolverhampton and Walsall TTWA (the remaining 11.9% is located within the Birmingham TTWA).
 - d. 100% of the population of Wolverhampton is located within the Wolverhampton and Walsall TTWA.
- 3.64. **Road and rail links**: Shropshire and the Black Country Authorities (particularly the central and eastern portions of Shropshire and Wolverhampton and Dudley) are generally well connected by road and rail infrastructure. The A5 / M54 Corridor runs from Shrewsbury to Wolverhampton (via Shifnal and Albrighton), the A41 corridor runs from Albrighton to Wolverhampton (and also extending north into Shropshire linking with Shifnal, Market Drayton and Whitchurch), and the A454 and A458 corridors link Bridgnorth to Wolverhampton and Dudley respectively. These routes allow access to the rest of Shropshire and also to Sandwell and Walsall.
- 3.65. Rail links are provided via the Shrewsbury to Wolverhampton railway line (with regular stops at Shifnal and Albrighton in Shropshire and Coseley and Tipton in Dudley), which then allows for onward connections in Shropshire and local connections on the urban rail network in the Black Country and Birmingham areas.

Conclusion

- 3.66. Following consideration of the above information on migration patterns, commuting patterns, TTWA's, road and rail links, it was concluded that there is a clear relationship between Shropshire and the Black Country Authorities.

³⁵ ONS, (2021), Listing of 2021 UK local authorities by component 2011 travel to work areas based on mid-2019 Small Area Population Estimates, www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/13386listingof2021uklocalauthoritiesbycomponent2011traveltoworkareasbasedonmid2019smallareapopulationestimates

³⁶ ONS, 2011 Census, TTWA's, Crown Copyright

- 3.67. This is perhaps unsurprising as the two areas are in relatively close proximity to each other, benefit from strong road and rail links (particularly linking central and eastern Shropshire to Dudley and Wolverhampton), have complementary housing market characteristics (Shropshire represents an attractive rural area and the Black Country Authorities a successful urban area), and provide diverse but complementary employment opportunities.
- 3.68. However, it was also apparent that the extent of the relationship between Shropshire and each of the four Black Country Authorities varies. Specifically, migration, commuting, and road/rail links were considered stronger to Dudley and Wolverhampton and relatively less so to Sandwell and Walsall.
- 3.69. It was also apparent from the migration and commuting data at a sub-Shropshire level, that the extent of the relationship with the Black Country Authorities also varies across Shropshire. Specifically, it was considered that there are relatively stronger links to the Black Country from the eastern and central areas of Shropshire compared to the rest of Shropshire. The variance in the extent of the relationship across Shropshire with each of the Black County Authorities is perhaps inevitable given the large size of Shropshire and of course is one of the factors which supports the conclusion that they are located within differing HMA's.
- 3.70. However, having carefully reflected on this information it was ultimately concluded that the relationship between Shropshire and the Black Country Authorities was sufficiently strong that it was appropriate to determine whether any of the unmet housing need forecast to arise within the Black Country could be appropriately and sustainably met within Shropshire.
- 3.71. Having accepted this, it was then concluded that the proposed strategy for the level and distribution of growth in the draft Shropshire Local Plan did offer the potential to accommodate a proportion of the forecast unmet housing need from the Black Country.

Determining the Level of a Proposed Contribution to Unmet Housing Need Arising in the Black Country

Overview

- 3.72. There is no defined methodology for calculating an appropriate contribution to unmet housing need arising within another Local Planning Authority area, other than a general expectation that it is '*taken into account*'. This is particularly pertinent in this instance, given that whilst Shropshire Council considers there is a relationship between Shropshire and the Black Country Authorities, Shropshire does not adjoin and is not within the same HMA/FEMA as any of the Black Country Authorities.
- 3.73. Therefore, it is the responsibility of the relevant Local Planning Authority³⁷ to determine what is considered an appropriate contribution to unmet housing need arising within another Local Planning Authority area. Any such decision should of course be informed by constructive discussions with the Local Planning Authority for the area within which the unmet housing need is forecast to arise (through the duty to cooperate process).

³⁷ It is agreed by Shropshire Council and ABCA that it is inappropriate and beyond the powers of the adjoining and closely related Local Planning Authorities to establish the limits of sustainable development in neighbouring and closely related Local Planning Authority areas.

Initial Considerations

- 3.74. In order to identify a suitable starting point for determining an appropriate contribution in Shropshire to the unmet housing need forecast to arise within the Black Country, the potential implications of housing need not being met within the Black Country Authorities was considered.
- 3.75. Ultimately it was concluded that whilst these implications are likely to be diverse, the most obvious effect is changes to migration patterns - whether this is increased levels of migration out of the Black Country Authorities, reduced levels of migration into the Black Country Authorities, or a combination of the two.
- 3.76. There are numerous factors that influence the distribution of households resulting from such changes to migration patterns.
- 3.77. The most obvious solution for those households whose needs are not met within the Black Country Authorities is to find accommodation within the same HMA and/or FEMA. This is because these areas are likely to already form part of the 'area of search' for these households, given that they are within the same housing market and/or provide access to the same employment areas.
- 3.78. It has already been explained within this Housing Topic Paper that Shropshire is not within the same HMA or FEMA as the Black Country Authorities. However, ABCA have indicated that their HMA and FEMA are unlikely to be able to accommodate all their unmet housing needs, so those households whose needs are not met will then extend their area of search for suitable / affordable housing beyond the HMA and/or FEMA.
- 3.79. As such, past migration patterns between Shropshire and the Black Country Authorities were considered as a way of identifying a suitable starting point for determining an appropriate contribution in Shropshire to the unmet housing need forecast to arise within the Black Country was past migration trends.

Migration Patterns

- 3.80. Migration patterns provide an indication of the movement of people from one area to live in another. Existing migration movements between Shropshire and the Black Country already inform the preparation of the sub-national population projections and associated sub-national household projections which underpin Government's standard methodology for calculating housing need. As such existing migration movements (forecast forward) are explicitly considered within the Local Housing Need assessment undertaken by Shropshire Council and summarised within **EV069**.
- 3.81. However, existing internal migration movements between Shropshire and the Black Country, as a proportion of the total internal migration movements in or out of the Black Country, were also considered a useful starting point for determining an appropriate contribution in Shropshire to the unmet housing need forecast to arise within the Black Country. This is because existing trends are often used as a starting point for forecasting future trends (indeed this is how future levels of migration are forecast within the sub-national population projection and sub-national household projections).³⁸

³⁸ *It should be noted that in the context of migration there are movements in and out of an area. Net migration is the difference between these levels of movement is not in and of itself a migration flow. Net migration would be influenced by changes to the levels of in or out migration (or indeed both), but as it is not in and of itself a migration flow it cannot be directly changed.*

3.82. Figure 12 displays annual migration movements from the Black Country Authorities into Shropshire during the five year period from 2016 to 2020. These flows equate to an average of 1,175 people moving into Shropshire annually from the Black Country Authorities. This number of internal migrants represents 3.34% of average annual total internal migration (2016 to 2020) from the Black Country Authorities to the rest of the UK.

3.83. From the final column in Figure 12, it is apparent that annually between 2016 and 2020, the proportion of total internal migrants from the Black Country Authorities that move into Shropshire remained relatively stable at between 3.00% and 3.50%.

Figure 12: Internal Migration Flows out of the Black Country Authorities (2016-2020)³⁹

Year	Total Internal Migration Moves from the Black Country Authorities to Other Local Authorities*	Total Internal Migration Moves from the Black Country Authorities to Shropshire	Percentage of Total Internal Migration Moves from the Black Country Authorities* to Shropshire (%)
2020	34,177	1,087	3.18
2019	39,409	1,377	3.49
2018	36,889	1,280	3.47
2017	35,870	1,240	3.46
2016	29,610	890	3.01
Average	35,191	1,175	3.34

* Please note flows between the Black Country Authorities are excluded.

3.84. Figure 13 displays annual migration movements from Shropshire into the Black Country Authorities during the five year period from 2016 to 2020. These movements equate to an average of 421 people moving into the Black Country Authorities annually from Shropshire. This number of migrants represents 1.26% of average annual total migration (2016 to 2020) into the Black Country Authorities from the rest of the UK.

3.85. From the final column in Figure 13, it is apparent that annually between 2016 and 2020, the proportion of total migrants into the Black Country Authorities that originated in Shropshire remained relatively stable at between 1.10% and 1.50%.

Figure 13: Internal Migration Flows into the Black Country Authorities (2016-2020)³⁹

Year	Total Internal Migration Moves into the Black Country Authorities from Other Local Authorities*	Total Internal Migration Moves from Shropshire into the Black Country Authorities	Percentage of Total Internal Migration Moves into the Black Country Authorities* from Shropshire (%)
2021	31,376	371	1.18
2019	36,499	402	1.10
2018	35,997	410	1.14
2017	35,030	520	1.48
2016	28,060	400	1.43
Average	33,392	421	1.26

* Please note flows between the Black Country Authorities are excluded.

³⁹ ONS, (2021), Internal migration: matrices of moves by local authority and region (countries of the UK), www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/matricesofinternalmigrationmovesbetweenlocalauthoritiesandregionsincludingthecountriesofwalesscotlandandnorthernireland

- 3.86. Taking a pragmatic approach, if it is assumed that the unmet housing need forecast to arise within the Black Country is met purely through increased rates of out migration from the Black Country Authorities, and that this additional out migration follows a similar distribution to that observed in existing migration trends (2016 to 2020), Shropshire would need to meet the accommodation needs of on average 3.34% of additional population. Whilst this data relates to individuals rather than households, if it is assumed that the average number of persons per household is generally consistent given that they would all originate within the Black Country Authorities, then this general distribution could equally be applied to households.
- 3.87. The Black Country Authorities have forecast that there will be an total unmet housing need of 28,239 homes. Taking the above approach, and applying the migration flow of 3.34% to this forecast unmet housing need would result in an initial potential contribution in Shropshire of some 943 dwellings, to meet the need arising from the Black Country authorities.
- 3.88. Conversely, if it is assumed that the unmet housing need forecast to arise within the Black Country is met purely through reduced rates of migration into the Black Country Authorities, and that reduced rates of in migration are proportional to existing in migration trends (2016 to 2020), Shropshire would need to meet the accommodation needs of on average 1.26% of additional population need. Taking the same pragmatic approach of applying this rate to the forecast unmet housing need, would result in an initial potential contribution in Shropshire of some 356 dwellings.
- 3.89. In reality it is recognised that it is more likely that changes to migration patterns will result in both increased levels of out migration from the Black Country Authorities and reduced levels of in migration to the Black Country Authorities. However, it is impossible to predict the level of change to each component.
- 3.90. It should be noted however that the figures above (pragmatic contributions based on in and out migration rates) cannot simply be added together, as they are both predicated on the level of total unmet housing need forecast to arise.
- 3.91. As such, it is the opinion of Shropshire Council that changes to out migration from the Black Country Authorities are likely to be more significant than changes to in migration to the Black Country Authorities in relation to Shropshire.
- 3.92. Furthermore, applying a precautionary approach, it would be sensible to allow for the higher of the two figures (943 dwellings), which in this instance also relates to increased levels of out migration from the Black Country Authorities to Shropshire.
- 3.93. It is acknowledged that there are limitations to this approach, including the aforementioned data limitations; Local Planning Authorities experiencing in and out migration with the Black Country Authorities need to determine whether it is appropriate and sustainable to accommodate a proportion of unmet housing need forecast to arise within the Black Country; and the preference for any unmet housing need forecast to arise within the Black Country to be met within Local Planning Authorities within the same HMA and/or FEMA as the Black Country Authorities as these areas are likely to already form part of their 'area of search' for households, given that they are within the same housing market and/or provide access to the same employment areas (although it is noted that these Local Planning Authorities are also likely to experience significant levels of in and out migration with the Black Country Authorities).

- 3.94. In addition, it is acknowledged that the review of the joint Black Country Local Plan is ongoing and as such it was considered important to incorporate a level of flexibility in order to ensure the robustness of the draft Shropshire Local Plan and minimise any need for a potential early review (outside the ordinarily established review mechanisms).
- 3.95. However, Shropshire Council remained of the opinion that this approach represented the most robust means by which to identify an initial contribution to the unmet housing need forecast to arise in the Black Country.
- 3.96. As such, the figure of 943 dwellings (rounded up to 1,000 dwellings for robustness) was used as a starting point for determining an appropriate contribution in Shropshire to the unmet housing need forecast to arise in the Black Country.
- 3.97. **However, recognising the above limitations it was concluded that it was appropriate and important to consider wider qualitative issues, informed by proactive duty to cooperate discussions with the Black Country Authorities.**

Other Data Considered

- 3.98. It should be noted that for completeness Shropshire Council considered other potential data sources in order to establish an initial contribution in Shropshire to the unmet housing need forecast to arise within the Black Country. Specifically, we also considered both TTWA's and commuting patterns.
- 3.99. However, in both instances it was concluded that there were limitations to the use of each of these potential data sets and that whilst these could provide an indication for future changes to migration patterns, neither were more robust as initial indicators than past migration trends. Therefore, Shropshire Council remained of the view that past migration trends were the most appropriate starting point for determining an appropriate contribution to the unmet housing need forecast to arise within the Black Country.

Travel to Work Areas (TTWA's)

- 3.100. Households seeking to find suitable / affordable housing within the Black Country in order to gain access to employment opportunities, may extend their area of search to include areas beyond the Black Country Authorities, but within the same TTWA (in the same way as they would within the same FEMA), thereby influencing change to migration patterns.
- 3.101. However, as documented within the sub-section of this Topic Paper titled '**The Relationship Between Shropshire and the Black Country**', only one TTWA that contains part of Shropshire also contains any part of the Black Country Authorities, this is the Wolverhampton and Walsall TTWA. As the name suggests this TTWA is focused on Wolverhampton and Walsall's administrative area and includes only a very small portion of the Shropshire population (2.7%).
- 3.102. Furthermore, this is likely reflected within commuting statistics (which pragmatically are easier to analyse in order to establish an initial contribution to unmet housing need) and importantly where this has previously influenced households choice when seeking suitable / affordable housing, will be reflected within past migration statistics.
- 3.103. As such, it was concluded that in the case of Shropshire, past migration trends were better placed to be used to establish a starting point for determining an appropriate

contribution to the unmet housing need forecast to arise within the Black Country Authorities.

3.104. However, TTWA's did form part of the wider qualitative discussion that occurred.

Commuting Patterns

3.105. Commuting patterns provide an indication of the amount of people travelling into and out of an area for the purpose of employment. Where there are significant commuting movements from one area into another it could be concluded that if suitable / affordable housing is provided, this may encourage increased levels of migration amongst these commuters as more choose to 'live and work' in Shropshire.

3.106. According to the 2011 Census, 2,207 people commuted from the Black Country Authorities into Shropshire and 4,615 people commuted from Shropshire into the Black Country Authorities⁴⁰.

3.107. A very simple and basic indicator of the number of dwellings needed to address the demand and pressure from the Black Country (and thereby address part of the forecast unmet housing need) could be identified by applying the average number of persons per dwelling (according to the 2011 Census this was 2.3 in the UK and Shropshire and slightly higher in the Black Country Authorities – 2.4 in Dudley and Wolverhampton and 2.5 in Sandwell and Walsall)⁴¹ to the commuters from the Black Country Authorities into Shropshire (2,207 commuters).

3.108. Specifically, by using the precautionary principle and applying the lower of the average number of persons per dwelling (2.3) to the 2,207 commuters from the Black Country Authorities into Shropshire, a housing provision figure of some 960 dwellings would be identified. However, whilst this approach has some merit, as already noted the factors influencing the choice to commute are numerous. It is also acknowledged that the best available data on commuting patterns is from the 2011 Census.

3.109. However, whilst provision of housing in Shropshire could, over-time, allow more of these in-commuters to live in Shropshire with associated sustainability benefits, it is recognised that the choice to commute is influenced by wider factors than the availability of suitable / affordable housing, e.g. personal preference, access to family and friends, access to services and facilities (particularly schools), and the place of work of family members. The limitations of this approach and the underlying data were also recognised. Furthermore, it was noted that the resultant initial contribution was generally comparable to that calculated using part out migration trends from the Black Country Authorities to Shropshire.

3.110. As such, it was concluded that in the case of Shropshire, past migration trends were better placed to be used to establish a starting point for determining an appropriate contribution to the unmet housing need forecast to arise within the Black Country Authorities.

3.111. However, past commuting patterns did form part of the wider qualitative discussion that occurred.

⁴⁰ ONS, 2011 Census, Crown Copyright, Nomis – Official Labour Market Data, <https://www.nomisweb.co.uk/>

⁴¹ ONS, 2011 Census, <https://www.ons.gov.uk/census>

Wider Considerations

- 3.112. Reflecting upon the above and the principles of the ‘duty to cooperate’, Shropshire Council undertook further proactive discussions with ABCA, focused on the level of unmet housing need forecast to arise within the Black Country that could be appropriately and sustainably accommodated within Shropshire.
- 3.113. These discussions were informed by consideration of the following key matters:
- a. The proposed spatial strategy for the level and distribution of development across Shropshire;
 - b. The interplay between the proposed spatial strategy and any proposal to accept a portion of unmet housing need arising within the Black Country;
 - c. The known constraints that exist in Shropshire, particularly those elements of Shropshire in closest geographical proximity to the Black Country, including Green Belt;
 - d. The known opportunities that exist in Shropshire;
 - e. The relationship between Shropshire and the Black Country (including the component Local Planning Authorities which make up the Black Country) – with particular regard given to such factors as level of proximity, migration patterns, commuting patterns, TTWA’s and transport links;
 - f. The extent of the unmet housing need forecast to arise within the Black Country;
 - g. The potential for other Local Planning Authorities to positively contribute to meeting the unmet housing need forecast to arise within the Black Country, particularly those Local Planning Authorities within the same HMA and/or FEMA as the Black Country Authorities and/or with significant Brownfield Land opportunities; and
 - h. The need to ‘future proof’ any proposed contribution, recognising that the review of the joint Black Country Local Plan is ongoing and that not all Local Planning Authorities which receive internal migrants from the Black Country may be able to make an appropriate contribution.
- 3.114. Following these very positive discussions, Shropshire Council officers proposed a contribution of up to 1,500 dwellings towards meeting the unmet housing need forecast to arise within the Black Country. It was also proposed that this contribution would not be met on a specific site allocation or within a specific settlement, but rather this unmet housing need would be simply incorporated within the Shropshire Local Housing Need and met in accordance with the proposed strategy for the distribution of development.
- 3.115. This contribution and the approach to its delivery was considered to represent an appropriate and sustainable means of ‘*taking into account*’ the unmet housing need forecast to arise within the Black Country. This is because:
- a. It was positively informed by ‘duty to cooperate’ discussions with ABCA;
 - b. It was considered that this level of provision would complement and contribute to the proposed strategic approach to the level and distribution of development which underpins the Shropshire Local Plan Review, therefore contributing towards the achievement of sustainable development in Shropshire;

- c. It was considered that this level of provision could realistically be provided in locations that would contribute to meeting the needs for which it is intended, as part of the aforementioned proposed strategic approach;
 - d. It was sufficient to provide for the 943 dwellings estimated by applying past migration rates from the Black Country into Shropshire to the unmet housing need forecast to arise within the Black Country (incidentally in addition it would also allow for the 356 dwellings estimated by applying past migration rates from Shropshire into the Black Country to the unmet housing need forecast to arise within the Black Country), whilst also positively responding to wider qualitative issues;
 - e. It included a sufficiently healthy buffer to provide flexibility to account for external factors/changing circumstances (as discussed above), therefore ensuring the robustness of the draft Shropshire Local Plan.
- 3.116. This proposed contribution as part of the wider proposed housing requirement was informed by and subject to Sustainability Appraisal (**EV007.04.01-EV007.04.21**), Habitats Regulations Assessment (**EV007.06.01-EV007.06.03**), and Equality and Social Inclusion Impact Assessment (**EV007.08**). These documents have been submitted as part of the evidence base for the draft Shropshire Local Plan.
- 3.117. On the 20th July 2020 Shropshire Council's Cabinet endorsed this proposal. Specifically, Cabinet determined *"that the principle of Shropshire Council accepting up to 1,500 dwellings from the Association of Black Country Authorities (ABCA) as part of the Duty to Cooperate, and for these to be incorporated into Shropshire's overall housing requirement up to 2038 and to be distributed in accordance with the overall Strategic Approach to the distribution of growth be agreed."*
- 3.118. This contribution was therefore included within the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan, which was the subject of consultation (also approved by Cabinet on the 20th July 2020) between the 3rd August 2020 and the 30th September 2020. Shropshire Council carefully considered all responses received in response to this consultation, including that from ABCA (Appendix 1 of this document), and ultimately concluded that the proposed contribution and approach to meeting this contribution remained appropriate.
- 3.119. This conclusion was also informed by and subject to Sustainability Appraisal (**SD006.01-SD006.22**), Habitats Regulations Assessment (**SD008.01-SC008.03**), and Equality and Social Inclusion Impact Assessment (**SD010**). These documents have been submitted as part of the core submission documents supporting the draft Shropshire Local Plan.
- 3.120. It should be noted that ABCA's response to this Regulation 18 Consultation supported both the proposed contribution towards the unmet need forecast to arise within the Black Country and the proposed strategy for meeting this need. Specifically, their response stated they *"strongly support the Local Housing requirement of 30,800 homes as set out in Policy SP2 of the Regulation 18 Local Plan in terms of it incorporating 1,500 dwellings to support the housing needs of the emerging Black Country Plan. We agree that this reflects a positive approach to cross-boundary cooperation and responds to the functional relationship between the two areas."*
- 3.121. *We note that this contribution will be accommodated through the distribution of development proposed in the Regulation 18 Plan, and consider that allocations in the*

principal settlements in the eastern areas of the County closest to the Black Country including Shifnal and Bridgnorth are well placed to meet this need.”

- 3.122. As such, the same approach to the level and distribution of the unmet housing need forecast to arise within the Black Country was included within the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan for consultation. Consultation on this document was agreed by Shropshire Council Cabinet on the 7th December 2020.
- 3.123. Shropshire Council very carefully considered all the representations received in response to this consultation, including that from ABCA (**Representation A0377 – Association of Black Country Authorities**, which was submitted as part of the Core Submission Documents (SD014.03) supporting the draft Shropshire Local Plan), and ultimately concluded that the proposed contribution and approach to meeting this contribution remained appropriate.
- 3.124. It should be noted that the above referenced representation from ABCA to this Regulation 19 Consultation included *“We confirm our support for the Plan provision for up to 1,500 homes attributed to meeting needs arising in the Black Country. The allocation of significant levels of development in both Bridgnorth and Shifnal could credibly meet Black Country needs given existing migrations patterns, geographical proximity and physical links.”*
- 3.125. As such Shropshire Council undertook further constructive discussions with ABCA in order to prepare a Statement of Common Ground on the draft Shropshire Local Plan - **EV041**. These discussions were positively informed by the content of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan and the ABCA representation received in response to this consultation.
- 3.126. Within this Statement of Common Ground, the parties agreed:
- a. Shropshire Council has accepted the principle of meeting a proportion of the ‘unmet’ housing need forecast to arise within the Black Country in a way which recognises the functional relationship between the areas and which respects the character of Shropshire.
 - b. A contribution in Shropshire of around 1,500 dwellings towards meeting the unmet housing need forecast to arise within the Black Country.
 - c. That this contribution would not be met on a specific site allocation or within a specific settlement, but rather this unmet housing need would be simply incorporated within the Shropshire Local Housing Need and met in accordance with the proposed strategy for the distribution of development across Shropshire.
- 3.127. Specifically, Section 8 Matters of Agreement of **EV041** includes: *“Notwithstanding this, as part of its Regulation 19 stage draft Local Plan, Shropshire Council has accepted the principle of meeting a proportion of ABCA’s ‘unmet’ need in a way which recognises the functional relationship between the areas, and which respects the character of the area. It is agreed that the following levels of unmet need are accepted in principle by Shropshire as part of its Local Plan Review: • Housing: up to 1,500 dwellings up to 2038; • Employment: up to 30 hectares up to 2038”.*
- 3.128. The same section of **EV041** also includes *“Having considered migration patterns, geographic proximity and physical links, it is agreed that this unmet need could credibly be accommodated within the already planned development in Shifnal and Bridgnorth over the plan period to 2038. However, it is agreed that no one specific allocation will accommodate unmet need and rather this will be met through the delivery of the overall Shropshire Local Plan housing requirement.”*

- 3.129. **EV041** has been signed by representatives of Shropshire Council and a representative from each of the four Local Planning Authorities which collectively form ABCA.

Summary

- 3.130. The preference is for housing need to be met within the Local Planning Authority within which it arises. However, Shropshire Council understands that the best available evidence prepared by ABCA to inform the ongoing joint review of the Black Country Plan, forecasts an unmet housing need of some 28,239 dwellings to 2039.
- 3.131. Ideally where it is forecast that unmet housing need will arise, this should be accommodated within the HMA and/or FEMA which contains the Black Country Authorities. This is because these represent geographical areas which illustrate household demand and the spatial level at which local economies and markets actually operate. As such housing provision within the same HMA is more likely to appropriately and sustainably meet the unmet housing need, whilst housing provision within the same FEMA is more likely to provide access to the same employment opportunities.
- 3.132. However, whilst it is understood from the information provided by ABCA, that positive discussions have occurred with a number of Local Planning Authorities within their HMA and FEMA, it is also understood from the information provided by ABCA, that these discussions have not identified sufficient capacity to accommodate the entirety of the unmet housing need forecast to arise.
- 3.133. Whilst this forecast of unmet housing need is not established within the adopted Black Country Local Plan, paragraph 35(c) of the NPPF is clear that to be effective, strategic cross-boundary matters should be *“dealt with rather than deferred”*²³.
- 3.134. Given that this is the case, Shropshire Council carefully considered the relationship between Shropshire and the Black Country Authorities, informed by the consideration of migration patterns, commuting patterns, travel to work areas (TTWA's) and road and rail links. Following consideration of this information it was concluded that there is a clear relationship between Shropshire and the Black Country Authorities.
- 3.135. However, it was also apparent that the extent of the relationship between Shropshire and each of the four Black Country Authorities varied. Specifically, data suggested the relationship was strongest between central and eastern parts of Shropshire and Dudley and Wolverhampton.
- 3.136. Having recognised this relationship, it was then concluded that the proposed strategy for the level and distribution of growth in the draft Shropshire Local Plan did offer the potential to accommodate a proportion of the forecast unmet housing need from the Black Country.
- 3.137. There is no defined methodology for calculating an appropriate contribution to unmet housing need arising within another Local Planning Authority area, other than a general expectation that it is *‘taken into account’*.
- 3.138. Therefore, Shropshire Council considered the potential implications of housing need not being met within the Black Country. These implications are likely to be diverse, but the most obvious effect is changes to migration patterns.
- 3.139. As such, various data sources were considered which could provide an insight into potential changes to migration patterns. It was ultimately concluded that past

migration trends were the most appropriate indicator. Specifically, the past trends on migration into Shropshire from the Black Country was applied to the forecast level of unmet housing need in order to identify an initial figure (943 dwellings rounded up to around 1,000 dwellings) for a potential contribution to unmet housing need arising in the Black Country Authorities.

- 3.140. However, in order to identify an appropriate contribution qualitative issues also needed consideration. This process was informed by further proactive 'duty to cooperate' discussions with ABCA.
- 3.141. As a result, Shropshire Council proposed a contribution of up to 1,500 dwellings towards meeting the unmet housing need forecast to arise within the Black Country, which can accommodate the *initial* figure identified as the starting point for the contribution, positively responds to qualitative issues and includes a sufficiently healthy buffer to provide flexibility to account for external factors/changing circumstances.
- 3.142. It was also proposed that this contribution would not be met on a specific site allocation or within a specific settlement, but rather this unmet housing need would be simply incorporated within the Shropshire Local Housing Need and met in accordance with the proposed strategy for the distribution of development.
- 3.143. This was subject to both Regulation 18 and Regulation 19 Consultation. Having considered responses/representations on these consultations, including those from ABCA, it remained the view of Shropshire Council that this was an appropriate and sustainable contribution the unmet housing need forecast to arise within the Black Country.
- 3.144. This contribution has been agreed within a Statement of Common Ground (**EV041**) between Shropshire Council and ABCA (signed by representatives of Shropshire Council and each of the four Black Country Authorities).
- 3.145. As such, it is also considered that the unmet housing need forecast to arise within the Black Country has been appropriately '*taken into account*' within the draft Shropshire Local Plan.

Conclusion

- 3.146. It is considered that the proposed contribution of 1,500 dwellings to the unmet housing need forecast to arise within the Black Country is appropriate and sustainable, having been informed by consideration of proportionate evidence, constructive discussions with ABCA through the 'duty to cooperate' process, and appropriate consultation.
- 3.147. It is also considered that the unmet housing need forecast to arise within the Black Country has been appropriately '*taken into account*' within the draft Shropshire Local Plan.

4. Delivery of Affordable Housing

Introduction

- 4.1. Paragraph 60 of the National Planning Policy Framework (NPPF) states *“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”*⁴²
- 4.2. Paragraph 62 of the NPPF expands on this stating *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers⁴², people who rent their homes and people wishing to commission or build their own homes)”*.⁴³
- 4.3. To inform the draft Shropshire Local Plan, Shropshire Council has assessed the needs of different groups within the community, including those who require affordable housing. These assessments are summarised within the Strategic Housing Market Assessment (SHMA). The SHMA was undertaken in two stages and these documents have been submitted as part of the evidence base for the draft Shropshire Local Plan (documents **EV097.01** and **EV097.02**).
- 4.4. **EV097.02** summarises the assessment of the need for affordable housing. This assessment concludes that during the period from 2016 to 2038, an estimated 799 households per annum will require affordable housing.
- 4.5. This is clearly a significant level of need and is not surprising given the numbers of households on the Council’s choice based housing register (HomePoint), a link to which is provided within evidence base document **EV119**, which is currently in excess of 5,800 (although we would note that of these, around 2,500 (around 43%) are in the bronze band for those with a lower level of housing need). Also, the affordability ratio (calculated by dividing house prices by gross annual workplace-based earning) in Shropshire for 2019 was some 7.79, which is relatively high.
- 4.6. However, we would note that the definition of ‘need’ applied in the calculation of affordable housing need, as summarised within **EV097.02**, is different from the definition of ‘need’ applied within the calculation of Local Housing Need using Government’s standard method (this calculation for Shropshire is summarised within the document **Local Housing Need Assessment 2020 - EV069**, submitted as part of the evidence base for the draft Shropshire Local Plan).
- 4.7. This distinction is recognised within the National Planning Practice Guidance (NPPG) on Housing Needs of Different Groups, which states *“This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be*

⁴² Please Note: The National Planning Policy Framework (NPPF) includes the need for settled travellers, the needs for other travellers meeting the definition in Annex 1 of Planning Policy for Traveller Sites (PPTS) are assessed under the provisions in the PPTS. Additional evidence on the need for all Gypsy and Travellers, including those which are settled, is provided within the GTAA - Gypsy and Traveller accommodation assessment 2017- EV053.01 and GTAA update – Gypsy and Traveller accommodation assessment update 2019 – EV053.02

⁴³ MHCLG now DLUHC, (2021), National Planning Policy Framework (NPPF)

calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.”⁴⁴

- 4.8. Given this distinction, the mechanisms for meeting this need extend beyond provision of net additional affordable dwellings. This is because the ‘need’ underpinning the assessment of affordable housing need within **EV097.02** can be met through a combination of both new and existing dwellings – as the identified need if for appropriate dwellings. Therefore, when existing households in unsuitable dwellings are transferred to suitable dwellings the resultant vacant dwelling can be re-occupied by other households for which they are suitable. This therefore meets the needs of both additional households and existing households who at the base date for the assessment are in inappropriate dwellings and therefore in affordable housing need. As a result, a single new dwelling (net) can meet the need of one, two or even more households in a chain.
- 4.9. We would also note that affordable housing need is intrinsically considered within the calculation of Local Housing Need undertaken. Indeed, the NPPG on Housing Needs of Different Groups states *“The household projections that form the baseline of the standard method are inclusive of all households including travellers as defined in Planning policy for traveller sites.”*⁴⁴ Furthermore, the calculation of Local Housing Need also includes a specific market signals adjustment in response to the affordability ratio for an area.
- 4.10. Appendix 1 of **EV097.02** addresses this matter in greater detail.

The Affordable Housing Target

- 4.11. Provision of affordable housing is a key priority in Shropshire.
- 4.12. As documented within draft Policy SP2 of the draft Shropshire Local Plan, the proposed housing requirement for Shropshire over the period from 2016 to 2038 is around 30,800 new dwellings. This equates to around 1,400 dwellings per annum.
- 4.13. Paragraph 3.6 of the explanation to draft Policy SP2 of the draft Shropshire Local Plan explains that the proposed housing requirement meets local housing need, as calculated within **EV069**, but also *“provides some flexibility to respond to changes to LHN over the plan period and an opportunity to:*
- a. Respond positively to specific sustainable development opportunities;*
 - b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;***
 - c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;*
 - d. Support the diversification of our labour force; and*
 - e. Support wider aspirations, including increased economic growth and productivity.”*
(my emphasis).
- 4.14. Paragraph 3.6 of the explanation to draft Policy SP2 of the draft Shropshire Local Plan explains that the proposed housing requirement also *“incorporates 1,500*

⁴⁴ MHCLG now DLUHC, (2021), Housing Needs of Different Groups, Paragraph: 001 Reference ID: 67-001-20190722, www.gov.uk/guidance/housing-needs-of-different-groups

dwellings to support the housing needs of the emerging Black Country Plan, where evidence indicates housing delivery opportunities are constrained.”

- 4.15. In addition to establishing the proposed housing requirement for Shropshire, draft Policy SP2 of the draft Shropshire Local Plan also addresses the proposed affordable housing target. Specifically, it explains that the delivery of affordable housing remains a key priority in Shropshire, as such around 7,700 affordable dwellings between 2016 and 2038, which equates to around 350 affordable dwellings per annum. This also equates to around 25% of the total housing requirement during the proposed plan period from 2016 to 2038.
- 4.16. This proposed affordable housing target has been informed by consideration of a number of factors, including:
- Affordable housing need and the overall local housing need;
 - The overall proposed housing requirement;
 - Sources of affordable housing;
 - Past affordable housing delivery trends;
 - Development viability in Shropshire;
 - The planning mechanisms currently available to deliver affordable housing that meets identified needs and the opportunities to enhance these mechanisms through the draft Shropshire Local Plan;
 - The opportunities to introduce new mechanisms to deliver affordable housing that meets identified needs through the draft Shropshire Local Plan; and
 - The wider mechanisms and initiatives implemented by Shropshire Council, outside the scope of the draft Shropshire Local Plan, that can support the delivery of affordable housing that meets identified needs and the opportunities that exist to enhance and these mechanisms and initiatives.
- 4.17. As such it is considered that the proposed affordable housing target is consistent with Paragraphs 60 and 62 of the NPPF. It is also considered to be consistent with the NPPG on Housing Needs of Different Groups which recognises that *“Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:*
- *the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);*
 - *the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and*
 - *the anticipated deliverability of different forms of provision, having regard to viability.”*⁴⁵
- 4.18. It is acknowledged that this proposed affordable housing provision target is less than the estimated affordable housing need calculated within **EV097.02**. However, as specified above, in paragraphs 4.6 to 4.8, the definition of ‘need’ in this calculation is different from that applied within the calculation of Local Housing Need and as such the approach to meeting this need is not simply through the provision of an equivalent number of net additional affordable dwellings, but also through providing the right types of affordable housing for existing households in ‘need’ – the resultant

⁴⁵ MHCLG now DLUHC, (2021), Housing Needs of Different Groups, Paragraph: 001 Reference ID: 67-001-20190722, www.gov.uk/guidance/housing-needs-of-different-groups

vacant dwellings can in turn be re-occupied by other households for which they are suitable. As a result, a single new dwelling (net) can meet the need of one, two or even more households in a chain.

- 4.19. As also documented above, in paragraph 4.9, the need for affordable housing is already considered within the Local Housing Need calculation (both within the household projections that form the demographic baseline).
- 4.20. Furthermore, a consideration in establishing the proposed housing requirement was providing a reasonable opportunity to increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire.
- 4.21. As such, it is considered that the proposed housing requirement and proposed affordable housing target positively respond to identified affordable housing need.
- 4.22. It is also recognised that achieving this aspirational proposed affordable housing target will inevitably be challenging. However, it is considered to be deliverable having considered best available information, in the context of the wider strategy and policies proposed within the draft Shropshire Local Plan and given the wider mechanisms and initiatives being progressed by Shropshire Council. As such, the proposed affordable housing target is considered consistent with Paragraph 16(b) of the NPPF, which states that Local Plans should *“be prepared positively, in a way that is aspirational but deliverable”*.

Sources of Affordable Housing

- 4.23. Affordable housing supply can be primarily grouped into two main categories, these are:
- Affordable dwellings within open market development schemes, secured via a S106 legal agreement or similar (S106 Sites); and
 - Affordable dwellings on the various forms of exception site or other forms of registered social landlord (RSL) progressed schemes (Exception Sites).
- 4.24. Delivery of affordable housing through S106 Sites is directly linked to the amount of open market development that is brought forward within an area (where an affordable housing contribution is required). Whilst the draft Shropshire Local Plan presents an opportunity to change the specific percentage of affordable dwellings on an open market site, it cannot alter this relationship.
- 4.25. It should be noted that when establishing the appropriate percentage of affordable dwellings on an open market site, development viability is an important consideration.
- 4.26. It is for this reason that the draft Shropshire Local Plan has been informed by a **Viability Study - (2020) - EV115.01** and Shropshire Council has prepared the **Topic Paper – Viability and Deliverability - EV113**, both of which have been submitted as part of the evidence base for the draft Shropshire Local Plan. Ultimately, it is considered that these documents support the proposed affordable housing percentages on S106 Sites within the draft Shropshire Local Plan.
- 4.27. Delivery of affordable housing through Exception Sites however is not considered to be directly linked to the amount of open market development that is brought forward and as such can be influenced by other factors, including new or enhanced policy mechanisms introduced through the draft Shropshire Local Plan and wider mechanisms and initiatives being implemented by Shropshire Council.

Past Trends – Affordable Housing Completions and Permissions

- 4.28. Past trends of affordable housing completions and permissions are a useful consideration when seeking to establish an appropriate affordable housing target for the proposed plan period.
- 4.29. Over the last five years (2016/17-2020/21), which also aligns with the first five years of the proposed plan period, the average annual number of affordable dwellings completed was some 332 dwellings. This average is comparable to the proposed affordable housing target and was achieved through approximately equal levels of delivery on S106 Sites and Exception Sites.
- 4.30. Figure 14 below provides a summary of affordable housing completions (by source) in Shropshire between 2016/17 and 2020/21:

Figure 14: Affordable Housing Completions (By Source) 2016/17-2020/21

Year	Affordable housing completions within open market development schemes (secured via a S106 legal agreement or similar) (S106 Sites)		Affordable housing completions on exception sites or other registered social landlord sites (Exception Sites)		Total affordable housing completions
	Completions	Percentage of total affordable housing completions	Completions	Percentage of total affordable housing completions	
16/17	227	51.47	214	48.53	441
17/18	156	33.99	303	66.01	459
18/19	166	63.85	94	36.15	260
19/20	172	77.13	51	22.87	223
20/21	122	44.20	154	55.80	276
Average*	169	50.81	163	49.19	332

*Average completions are rounded to the nearest whole number.

- 4.31. Over the same time period (2016/17-2020/21), the average number of permissions was some 272 dwellings per annum, somewhat less than the average completion rate. This is likely to have been influenced by a number of factors including changes to the threshold for affordable housing contributions from open market residential development introduced within a written ministerial statement (November 2014) and subsequent changes to the NPPF (July 2018) – a significant volume of housing development in Shropshire occurs on small sites which are no longer subject to affordable housing contributions. Shropshire Council is positively responding to this by proactively working to introduce new and enhance existing mechanisms for the delivery of affordable housing and wider initiatives to support the delivery of affordable housing (both through the draft Shropshire Local Plan and wider Council activities). This is summarised within subsequent sub-sections of this Topic Paper.
- 4.32. Interestingly this average included a significantly higher proportion of affordable dwelling permissions on Exception Sites than on S106 Sites. Furthermore, the number of permissions and the proportion of overall permissions on Exception Sites has increased in each of the last 3 years. It is considered that there are opportunities to continue this trend through enhancement of existing and provision of new affordable housing delivery mechanisms within the draft Shropshire Local Plan. Similarly, it is considered that this trend can be continued through the enhancement and expansion of wider mechanisms and initiatives being implemented by Shropshire Council.

4.33. This is summarised within Figure 15 below:

Figure 15: Affordable Housing Permissions (By Source) 2016-2021

Year	Affordable housing permissions within open market development schemes (secured via a S106 legal agreement or similar) (S106 Sites)		Affordable housing permissions on exception sites or other registered social landlord sites (Exception Sites)		Total affordable housing permissions
	Permissions	Percentage of total affordable housing permissions	Permissions	Percentage of total affordable housing permissions	
16/17	257	57.49	190	42.51	447
17/18	54	25.96	154	74.04	208
18/19	58	37.66	96	62.34	154
19/20	91	35.00	169	65.00	260
20/21	85	29.41	204	70.59	289
Average*	109	37.11	163	62.89	272

*Average permissions are rounded to the nearest whole number.

Policy Mechanisms

4.34. The draft Shropshire Local Plan proposes to provide a 'toolbox' of policy mechanisms to support the continued and increased delivery of affordable housing in Shropshire. These mechanisms are considered to represent either an enhancement or new complementary mechanisms to those currently available in Shropshire.

4.35. Specifically, draft Policies DP3-DP7 of the draft Shropshire Local Plan each address a particular mechanism for delivering affordable housing.

4.36. Dealing with each of these draft policies in turn:

Draft Policy DP3

4.37. Draft Policy DP3 addresses provision of affordable housing within open market development schemes. Specifically, it requires all sites of 0.5 ha or more; sites of 5 or more dwellings in designated rural areas; and sites of 10 or more dwellings elsewhere, to provide on-site affordable housing. The specific percentage provision of affordable housing is illustrated within draft Figure DP3.1 of the draft Shropshire Local Plan, which in summary equates to 10% provision in the north and 20% provision in the South (including Shrewsbury). These rates have been directly informed by and considered within **EV115.01**.

4.38. The general expectation within draft Policy DP3 is that this affordable housing provision will occur on-site unless there are exceptional circumstances. Although where the specific level of provision results in a fraction (for instance on a site of 12 dwellings in the north, affordable housing provision is 1.2 dwellings), the general expectation is that the full dwelling(s) will be provided on-site and any fraction will be met through a financial contribution, a Housing Supplementary Planning Document (SPD) will be prepared to provide further explanation of this approach. These financial contributions will be used to facilitate the delivery of affordable housing off-site.

4.39. Draft Policy DP3 also provides further policy requirements to ensure that the affordable housing provided through this mechanism best meets local needs. These requirements include:

- Recognising the significant need for affordable rent products, the expected tenure split of affordable housing provision is 70% social or affordable rent and 30% intermediate or other affordable housing (unless evidence of local needs indicates otherwise);
- Ensuring affordable housing is indistinguishable for open market housing; and
- Ensuring affordable housing is appropriately distributed through the site, that future residents benefit from access to services and facilities by walking, cycling or public transport, and that future residents exposure to sources of noise or reduced air quality are minimised.

4.40. This draft policy will apply to S106 Sites. It is considered that it will refine and enhance the current approach to affordable housing provision within open market residential development sites by providing greater certainty to all – developers, RSL's, communities and the decision maker. It also responds to available evidence on development viability and affordable housing need.

Draft Policy DP4

4.41. Draft Policy DP4 addresses affordable housing exception sites for the provision of 100% affordable housing. The draft policy explains that the development of affordable housing exception schemes of a suitable scale, design, tenure and include appropriate prioritisation to people demonstrating a local connection to the area that they are located, will be positively considered, where they meet the criteria within the draft Policy and other relevant policy requirements within the draft Shropshire Local Plan.

4.42. The initial requirements within draft Policy DP4 define the locations where affordable housing exception schemes are appropriate. Specifically, within or immediately adjoining the built form of a Strategic, Principal or Key Centre; a Community Hub or Community Cluster Settlement; or another settlement with a school or the ability to access a school by public transport (any such development must not result in development in an isolated location). This ensures that the locations for affordable housing exception sites are consistent with the wider strategy for Shropshire as captured within draft Policy SP2 of the draft Shropshire Local Plan.

4.43. Subsequent requirements within Draft Policy DP4 ensure that the affordable housing provided through this mechanism best meets local needs. For instance, it requires that affordable housing provision is informed by and aligns with an identified local need (informed by an up-to-date and robust local housing needs survey) and benefits from reasonable access to local services by walking, cycling or public transport.

4.44. This draft policy is considered to refine and enhance the current approach to exception sites, providing greater certainty to all – developers, RSL's, communities and the decision maker.

Draft Policy DP5

4.45. Draft Policy DP5 addresses entry level exception sites for the provision of 100% affordable housing, suitable for first time buyers (or those looking to rent their first home). Such sites must be of no more than 1ha, provision must not exceed evidenced need, and the number of dwellings provided must represent no more than 5% of the number of homes in the existing settlement. The draft policy explains that such schemes will be positively considered where they meet the requirements within the draft policy and other relevant policy requirements within the draft Shropshire

Local Plan. Green Belt & AONB are identified as inappropriate locations in line with NPPF.

- 4.46. Subsequent requirements within Draft Policy DP5 are generally consistent with those of draft Policy DP4.
- 4.47. There is currently no local policy specifically addressing entry level exception sites. Therefore, this draft policy provides greater certainty to all about its application – developers, RSL's, communities and the decision maker.
- 4.48. We would note that since the draft Shropshire Local Plan was prepared, Government has introduced a new category of affordable housing called 'First Homes' through a Written Ministerial Statement⁴⁶ published on the 24th May 2021 and accompanying changes to the NPPG⁴⁷. 'First Homes' are a specific kind of discounted market sale housing and replace entry level housing.
- 4.49. However, due to the transitional arrangements within the aforementioned Written Ministerial Statement and reiterated within the NPPF (Local plans and neighbourhood plans submitted for examination before 28 June 2021, or that have reached publication stage by 28 June 2021 and subsequently submitted for examination by 28 December 2021, will not be required to reflect the First Homes policy requirement), 'First Homes' are not applicable to the draft Shropshire Local Plan.
- 4.50. In any event, the adopted Type and Affordability of Housing SPD (Supplementary Planning Document (SPD) which identifies a range of acceptable affordable housing tenures in Shropshire, already include a model which is not dissimilar to 'First Homes', known as Discounted Market Sale (DMS) Affordable Housing. This type of low-cost home ownership will act in the interim of the First Homes Policy being introduced in Shropshire.
- 4.51. At this stage it is considered that including both the Entry-Level Exception Sites Policy (draft Policy DP4) and continuing the positive approach to appropriate provision of DMS Affordable Housing is appropriate and that these mechanisms are complementary and as such will facilitate the delivery of affordable low cost home ownership housing in Shropshire.

Draft Policy DP6

- 4.52. Draft Policy DP6 addresses single plot exception sites, which are for the delivery of single affordable dwellings for applicants. Eligible applicants must demonstrate that:
- They require affordable housing, have a strong local connection, and need to be located within the relevant settlement;
 - There are no alternative options/mechanisms available for meeting their housing needs; and
 - Proposals comply with the draft policy and other relevant policy requirements within the draft Shropshire Local Plan.
- 4.53. Subsequent requirements within draft Policy DP6 seek to ensure that the affordable housing provided through this mechanism best meets current and potential future local needs.

⁴⁶ Rt Hon Christopher Pincher MP - Minister of State for Housing, (2021), <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hlws48>

⁴⁷ MHCLG now DLUHC (2021), NPPG – First Homes, <https://www.gov.uk/guidance/first-homes>

4.54. This policy is considered to refine and enhance the current approach to single plot exception sites, providing greater certainty to all – developers, RSL's, communities and the decision maker. It will also provide greater certainty that the dwellings provided under this mechanism meet affordable housing needs now and in the future.

Draft Policy DP7

4.55. Draft Policy DP7 addresses cross-subsidy exception sites. These are developments consisting of a proportion of open market housing to facilitate the delivery of a significant proportion of local needs affordable housing (at least 70% of the total dwellings provided), where it is demonstrated that no public grant is available and that an affordable exception scheme is unviable. Proposals must comply with the draft policy and other relevant policy requirements within the draft Shropshire Local Plan.

4.56. Other specific requirements in draft Policy DP7 include:

- The level of housing provision must reflect identified local needs (informed by an up-to-date and robust local housing needs survey), but not normally exceed 10 dwellings;
- The type of provision must also accurately reflect these local needs;
- Proposed must be informed by meaningful community engagement;
- There must be adequate access and infrastructure provided;
- Sites must have reasonable access to local services by walking, cycling or public transport; and
- The locational requirements are generally consistent with that of draft Policy DP4 (documented above).

4.57. There is currently no local policy specifically addressing cross-subsidy exception sites which incorporate an element of open market housing to facilitate the delivery of a significant proportion of local needs affordable housing (at least 70% of the total dwelling provided). It is considered that this proposed policy mechanism would complement the wider proposed policy mechanisms associated with more traditional affordable housing sites and effectively 'extending the reach' of these mechanisms. It would therefore supplement the affordable housing delivery secured through the other complementary mechanisms.

Relationship with Wider Draft Policies

4.58. Of course, the proposed policy mechanisms for the delivery of affordable housing do not sit in isolation. Indeed, it is considered that the application of the various mechanisms for the delivery of affordable housing in draft Policies DP3-DP7 would be directly supported by the wider draft policies within the draft Shropshire Local Plan and that their implementation will also directly support the delivery of these wider draft policies.

4.59. In this way, the draft policies of the draft Shropshire Local Plan are fully aligned with regard to delivery of affordable housing. For instance:

- a. Draft Policy SP2 introduces the settlement hierarchy which supports the appropriate application of draft Policies DP3-DP7 and also recognises that affordable housing to meet evidenced local needs is a form of development appropriate within the countryside, subject to compliance with relevant policy requirements. In turn, delivery of affordable housing will support the achievement

of the proposed housing requirement and the affordable housing delivery target for Shropshire.

- b. Draft settlement Policies S1-S18 recognise and support the appropriate application of one or more of the various affordable housing delivery mechanisms within the Strategic, Principal and Key Centres; Community Hubs; and Community Clusters, where they meet evidenced local needs and comply with relevant policy requirements. In turn, these mechanisms will support the achievement of the proposed housing guidelines (where a housing guideline is proposed); and meeting the needs of the various communities addressed within these settlement policies.
- c. Draft Policy SP9 recognises that appropriate affordable housing exception sites, entry-level exception sites, cross-subsidy exceptions sites and single-plot exception sites can represent an appropriate form of development at Community Clusters, where they meet evidenced local needs and meet evidenced need and the other requirements of draft policies. In turn, the application of these mechanisms will contribute to meeting the needs of the diverse Community Cluster settlements.
- d. Draft Policy SP10 recognises that affordable housing exception sites, entry-level exception sites, single-plot exception sites and cross-subsidy exceptions sites can represent appropriate forms of development in the countryside, where they meet evidenced local needs and comply with relevant policy requirements. In turn, the application of these mechanisms will contribute to meeting the needs of the diverse rural communities. Draft Policy SP8 directly references draft Policy SP10. Managing Development in the Countryside in the context of development beyond proposed development boundaries.
- e. Draft Policy SP11 recognises that limited affordable housing exception sites and single-plot exception sites that meet evidenced local needs and comply with relevant policy requirements may be appropriate within the Green Belt. As with communities within the countryside, the application of these mechanisms will contribute to meeting the needs of the diverse rural communities in the Green Belt.

Wider Mechanisms and Shropshire Council Initiatives

4.60. In addition to the mechanisms captured within the draft Shropshire Local Plan, there are numerous wider mechanisms and Shropshire Council initiatives that can positively influence and facilitate affordable housing delivery in Shropshire. These include:

- a. The continued roll-out of the 'Right Home – Right Place'. This is a Shropshire Council-led initiative where the Housing Enablement Team help identify housing needs in the communities across Shropshire, by undertaking Right Home – Right Place Local Housing Need Surveys. It is considered that this detailed information on the housing needs that exist within our communities will support those seeking to submit planning applications for Exception Sites by identifying where there is a need for such provision and also identifying in more detail what these needs are, so ensuring that any provision better aligns with local needs.
- b. Preparation of a Housing SPD which will provide detailed information to support the delivery of all forms of affordable housing and ensure that affordable housing provision is better aligned with local needs.

- c. The continued roll-out of the community led housing initiative. This is a Shropshire initiative where the Housing Enablement Team proactively support and facilitate communities who wish to pursue a community led affordable housing project. A community led affordable housing project is one by which local communities come together in response to a local housing need and/or opportunity to collectively design and/or manage their own affordable housing development. Such schemes are increasingly becoming an important means of delivering affordable housing in Shropshire, as they inherently benefit from community support and ensure provision is better aligned with local needs. To date 196 dwellings have been completed using this mechanism, but further permissions have already been granted for another 67 dwellings.
- d. Continuation and refinement of the Housing Enablement Teams strong and proactive working with RSL's, to facilitate the continued and increased delivery of appropriate affordable housing developments. Including providing necessary support for Home England funding applications.
- e. Continuation and refinement of the Housing Enablement Teams proactive working with estates and other large landowners in Shropshire to release appropriate land for affordable housing schemes.
- f. Application of Shropshire Council grant funding, including that secured via S106 financial contributions for affordable housing and components of the New Homes Bonus, to facilitate and support the delivery of affordable housing sites.
- g. Application of Shropshire Council grant funding to 'convert' open market sites to affordable housing sites. In addition to delivering fully affordable housing schemes, this approach is also being successfully used to facilitate the early delivery of sites that had either the benefit of Planning Permission for open market residential development or that were allocated for open market residential development within the adopted Local Plan.
- h. Shropshire Councils new housing company, Cornovii Homes, has been established to provide high-quality housing in Shropshire. Having a housing company wholly owned by the Council provides an opportunity to secure additional on-site affordable housing as part of their development schemes, above the standard affordable housing requirements in draft Policy DP3.
- i. Continuation and refinement of the Housing Enablement Team engagement with other open market housing providers and RSL's to identify where opportunities exist to negotiate additional affordable housing provision on open market residential development sites.
- j. Continuation of the Housing Enablement Team proactive working with social services and wider housing services in order to identify households with specialist housing needs in Shropshire. This informs subsequent direct engagement with RSL's that are bringing forward schemes in appropriate locations (either on Exception Sites or S106 Sites) to secure the on-site provision of specialised affordable housing to meet these identified needs. Whilst this may not result in specific additional provision of affordable housing, it does ensure that the units provided are specifically tailored to meet the specialist housing needs of Shropshire households. This in turn can often release other affordable properties to meet the wider needs of our community.

- k. Continuation and refinement of the Housing Enablement Teams proactive engagement with RSL's to secure provision of extra-care facilities, to meet older people's housing needs. Such provision is a positive response to the demographics of Shropshire; ensures affordable provision tailored towards the specific needs of Shropshire's older households – often releasing other properties to meet the wider needs of our community; is an important component of the strategy for meeting the needs of older people; extends the scope of Exception Sites; and offers an opportunity to increase the density and speed of delivery on appropriate sites.
- l. Continuation of the Housing Enablement Teams project to secure and apply funding to the provision of appropriate temporary accommodation to meet the needs of Shropshire households without housing, as an interim measure. This also supports households in their preparation and transition to independent living within appropriate affordable housing.
- m. Implementation of the emerging Empty Homes Strategy. This includes a strategy to apply grant funding to refurbish empty open market dwellings and bring them back into use as affordable dwellings. In this way new affordable dwellings will be provided, without actually providing a new property. Furthermore, it will support the wider strategy of reducing empty homes in Shropshire.

Conclusion

- 4.61. Within draft Policy SP2 of the draft Shropshire Local Plan, an affordable housing target has been proposed which is considered aspirational but achievable. Specifically, the proposed affordable housing target is around 7,700 affordable dwellings between 2016 and 2038, which equates to around 350 affordable dwellings per annum. This also equates to around 25% of the total housing requirement during the proposed plan period from 2016 to 2038.
- 4.62. The affordable housing target has been informed by careful consideration of identified affordable housing need (as summarised in **EV097.02**), identified Local Housing Need (as summarised in **EV069**), the distinction between the definitions of 'need' within these two assessments, past trends, and the various proposed policy mechanisms and wider mechanisms and initiatives available to meet these identified needs.
- 4.63. It is acknowledged that this proposed affordable housing provision target is less than the estimated affordable housing need calculated within **EV097.02**. However, it should be noted that as specified above, the definition of need in this calculation is different from that applied within the calculation of Local Housing Need and as such the approach to meeting this need is not simply through the provision of an equivalent number of net additional affordable dwellings.
- 4.64. It is also acknowledged that achieving this aspirational proposed affordable housing target will inevitably be challenging. However, it is considered to be deliverable having considered best available information, in the context of the wider strategy and policies proposed within the draft Shropshire Local Plan and given the wider mechanisms and initiatives being progressed by Shropshire Council. These mechanisms and initiatives are various, many of which have been discussed and summarised above. As such, the proposed affordable housing target is considered

consistent with Paragraph 16(b) of the NPPF, which states that Local Plans should *“be prepared positively, in a way that is aspirational but deliverable”*.

- 4.65. Subsequent sections of this housing topic paper address the issues of small and medium sized sites and windfall development. There are significant linkages between the mechanisms proposed for the delivery of affordable housing and these matters, as many of the sites upon which affordable housing is delivered represent both small/medium sites and windfall sites.

5. Small and Medium Sized Sites

Introduction

5.1. Paragraph 69 of the National Planning Policy Framework (NPPF) states:

“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;

c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”⁴⁸

Small and Medium Sized Sites in Shropshire

5.2. Shropshire is a large rural county containing the Strategic Centre of Shrewsbury; five Principal Centres (Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch); 11 Key Centres (Albrighton, Bishop's Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem); rural settlements identified as Community Hubs and Community Clusters; hundreds of other rural villages and hamlets; and a significant rural hinterland.

5.3. Consequently, there is a constant and significant recycling of existing buildings and previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings; and high uptake of affordable housing exception sites of varying sizes. Many of these represent small and medium sized sites, as such they have always represented and are expected to continue to represent an important component of the housing land supply and housing delivery achieved in Shropshire. Indeed, the recycling of existing buildings to create homes has been facilitated by changes to permitted development provisions related to changes of use. Furthermore, where planning permission is required, the potential sustainability benefits of appropriate reuse of existing buildings is recognised in the draft Shropshire Local Plan (draft Policies SP7 and SP10).

5.4. This is apparent when past completion rates are considered. Specifically, over the last five years (2016/17-2020/21), which also aligns with the first five years of the proposed plan period, 3,590 dwellings have been completed on small and medium sized sites of up to 1ha – which already exceeds 10% of the proposed housing requirement of 30,800 between 2016 and 2038 within the draft Shropshire Local Plan (which would equate to 3,080 dwellings).

⁴⁸ DLUHC, (2021), National Planning Policy Framework (NPPF)

- 5.5. Over this period, the average number of completions achieved on small and medium sized sites of up to 1ha was some 718 dwellings, which equates to 40.94% of total completions over the same period, significantly in excess of 10% of the total completions over this period. Additionally, in each of the last 5 years, small and medium sized sites of up to 1ha have represented significantly more than 10% of total completions.
- 5.6. Figure 16 summarises the dwellings completed on small and medium sized sites in Shropshire over the period from 2016/17 to 2020/21 and indicates the percentage of total completions that this represented:

Figure 16: Dwellings Completed on Small and Medium Sized Sites 2016/17-2020/21

Year	Completions on Small and Medium Sized Sites	Total Completions	Proportion of Total Completions on Small and Medium Sized Sites
2016/17	869	1,910	45.50
2017/18	717	1,876	38.22
2018/19	760	1,843	41.24
2019/20	648	1,554	41.70
2020/21	596	1,586	37.62
Total	3,590	8,769	40.94
Average*	718	1,754	40.94

**Average completions are rounded to the nearest whole number.*

- 5.7. Existing commitments on sites with Planning Permission or Prior Approval provide further endorsement of the importance of small and medium sized sites of up to 1ha in Shropshire. Specifically, as at 31st March 2021, 2,874 dwellings on sites with Planning Permission and 97 dwellings on sites with Prior Approval were on small and medium sized sites of up to 1ha. This equates to around 9.6% of the proposed housing requirement of 30,800 between 2016 and 2038 within the draft Shropshire Local Plan.
- 5.8. We would also note that of the remaining allocations within the adopted Local Plan without Planning Permission as at 31st March 2021, which are proposed to be 'saved', ten represent small or medium sized sites of up to 1ha in size with capacity for around 84 dwellings. In addition, 9 of the proposed allocations within the draft Shropshire Local Plan are small and medium sized sites of less than 1ha in size with a total capacity of around 128 dwellings.

Draft Shropshire Local Plan's Approach to Small and Medium Sized Sites

- 5.9. The importance of small and medium sized sites of up to 1ha in size is recognised, embedded within and appropriately facilitated through the draft Shropshire Local Plan. For instance:
- Draft Policy SP2 includes a proposed strategic approach to the level and distribution of development, which:
 - Recognises the contribution that residential development on small and medium sized sites can make to housing supply and delivery and as such allows for a cautious and robust amount of residential development on such sites to contribute towards meeting the proposed housing requirement. This includes consideration of past provision; provision through existing commitments (sites with Planning Permission, Prior Approval or Allocations within the adopted Local

Plan without Planning Permission); provision on proposed allocations; and provision through appropriate windfall development, where these sites comply with relevant policy requirements.

- Establishes a distribution of development which underpins various draft policies, including those which will facilitate appropriate residential development on small and medium sized sites. Notably part 5 of draft Policy SP2 allows for development within the various 'urban areas' which will given the nature of Shropshire inevitably include development on small and medium sized sites. Furthermore part 6 of draft Policy SP2 in "Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities" provides that "growth in urban areas will be complemented by appropriate new development within Community HubsandCommunity Clusters". Inevitably, given the scale of these settlements this development includes delivery on small & medium sized sites.
- b. Draft Settlement Policies (S1-S18) identify proposed development strategies for the proposed Strategic, Principal and Key Centres; proposed Community Hubs; and proposed Community Clusters. In addition to existing and proposed allocations, a proportion of which are on small & medium sized sites as previously discussed, these strategies specifically allow for appropriate windfall development including on small and medium sized sites. For instance:
- The strategies for proposed Strategic, Principal and Key Centres and proposed Community Hubs allow for the development of appropriate small and medium sized windfall sites (and where appropriate large windfall sites) within proposed development boundaries, where they comply with relevant draft policies in the draft Shropshire Local Plan.
Where appropriate, these strategies also allow for appropriate forms of affordable and cross-subsidy development, much of which will occur on small and medium sized sites, where they meet an identified local need and comply with relevant draft policies in the draft Shropshire Local Plan.
This development will contribute towards achieving the proposed residential development guidelines for the relevant settlements and importantly meeting local needs. Indeed, the proposed residential development guidelines for these settlements has been informed by consideration of each settlement's role within the settlement hierarchy and its specific characteristics, constraints and opportunities, including opportunities for small and medium sized windfall development.
 - The strategies for proposed Community Clusters recognise and allow for the development of appropriate small-scale windfall sites, where they comply with specified criteria within draft Policy SP9 and other relevant draft policies in the draft Shropshire Local Plan.
This development will contribute towards meeting local needs.
- c. Draft Policy SP7 specifies that there will be positive consideration of sustainable housing development, including on appropriate small and medium sized windfall sites, where they comply with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan.
- d. Draft Policy SP8 states that appropriate development within proposed Community Hubs includes upon sustainable sites within proposed development boundaries, which can of course include appropriate small and medium sized windfall sites,

where they comply with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan. It cross-references draft Policy SP10 with regard to development outside proposed development boundaries.

- e. Draft Policy SP9 states that appropriate development within proposed Community Clusters includes through the appropriate conversion of existing buildings within or immediately adjoining the built form of the settlement; on suitable small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings; and on affordable exception sites, cross-subsidy exception sites and entry level exception sites meeting evidenced need and the other requirements of Local Plan Policies. Such sites are appropriate where they comply with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan. These of course represent forms of small and medium sized windfall sites.
- f. Draft Policy SP10 identifies the forms of residential development appropriate within the 'countryside'. It includes suitably designed and located affordable exception site dwellings, entry level exception sites and cross-subsidy exception housing schemes; conversions of permanent buildings in locations which are not isolated and are reasonably accessible to services and facilities; schemes for the sympathetic subdivision of existing dwellings which do not exceed the ability of local infrastructure to service the additional dwellings; and essential rural workers dwellings. All such sites are subject to compliance with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan. These represent small and medium sized windfall sites.
- g. Draft Policy SP11 addresses Green Belt and in this context identifies the limited forms of residential development appropriate within the Green Belt. These limited forms of residential development are likely to represent small and medium sized windfall sites.
- h. Affordable housing policies (DP4-DP7) allow for affordable exception, entry level exception, single plot exception and cross-subsidy exception sites to come forward where they comply with relevant draft policies in the draft Shropshire Local Plan. These sites will often be of small or medium scale.
- i. As already referenced, a number of the existing allocations to be saved and proposed allocations within the draft Shropshire Local plan are of small or medium size.

Conclusion

- 5.10. Small and medium sized sites of up to 1ha have always represented an important component of the housing land supply in Shropshire. This is perhaps unsurprising given the characteristics of Shropshire and is born out when the number of completions already achieved on such sites within the proposed plan period (between 2016/17 and 2020/21) is considered.
- 5.11. Furthermore, given the number of the outstanding commitments on small and medium sized sites of up to 1ha (as at 31st March 2021), the allocations proposed on small and medium sized sites of up to 1ha within the draft Shropshire Local Plan and the approach to windfall development on appropriate small and medium sized sites of

up to 1ha within the draft Shropshire Local Plan, there is significant confidence that such sites will continue to represent an important component of the housing land supply in Shropshire.

- 5.12. Shropshire Council considers that there can be significant confidence that the NPPF requirement that 10% of the housing requirement proposed within the draft Shropshire Local Plan can be achieved on sites no larger than 1ha – indeed this has already been achieved through completions achieved within the first five years of the proposed plan period.
- 5.13. We would note that the preceding and subsequent sections of this housing topic paper address the issues of affordable housing provision and windfall development. There are significant linkages between the Council's approach to small and medium sized sites of up to 1ha and these two issues, given that the majority of Exception Sites for affordable housing are of small or medium sized sites also often represent windfall sites.

6. Windfall Sites

Introduction

- 6.1. Paragraph 71 of the National Planning Policy Framework (NPPF) specifies that *“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”*⁴⁹

Shropshire Context

- 6.2. The prevalence of windfall development, particularly of small scale windfall development, was considered within the **SLAA - Strategic Land Availability Assessment (2018) – EV106.01** (submitted as part of the evidence base for the draft Shropshire Local Plan), which noted that *“The current Local Plan recognises the importance of windfall development in Shropshire and makes allowances for appropriately located windfall sites (where they accord with the policies within the Local Plan) and it is expected that this approach will continue through the Local Plan Review.”*⁵⁰ **EV106.01** also included an assessment of past completions achieved on small scale windfall sites of less than 5 dwellings and noted that these rates *“supported the conclusions that windfall development does and will continue to represent an important part of the housing land supply.”*⁵⁰
- 6.3. This is unsurprising, because as already noted in the context of small and medium sized sites, Shropshire is a large rural county containing the Strategic Centre of Shrewsbury; five Principal Centres (Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch); 11 Key Centres (Albrighton, Bishop’s Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem); rural settlements identified as Community Hubs and Community Clusters; hundreds of other rural villages and hamlets; and a significant rural hinterland.
- 6.4. Consequently, there is a constant and significant recycling of previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings; and high uptake of affordable housing exception sites of varying sizes. Development of such sites often represents windfall development. Indeed, the recycling of existing buildings to create homes has been facilitated by changes to permitted development provisions related to changes of use. Furthermore, where planning permission is required, the potential sustainability benefits of appropriate reuse of existing buildings is recognised in the draft Shropshire Local Plan (draft Policies SP7 and SP10).
- 6.5. Best available data on past completions continues to support the importance of windfall sites as an important and appropriate source of supply for residential development. Specifically, over the last five years (2016/17-2020/21), which also

⁴⁹ DLUHC, (2021), National Planning Policy Framework (NPPF)

⁵⁰ Shropshire Council (2018), SLAA - Strategic Land Availability Assessment, Reference: EV106.01

aligns with the first five years of the proposed plan period, some 5,622 dwellings have been completed on windfall sites in Shropshire (1,716 dwellings on small scale windfall sites of less than 5 dwellings and 3,906 dwellings on medium and large scale windfall sites of 5 or more dwellings). This equates to around 64.11% of total completions achieved within this period (and in each of these five years windfall completions equated to in excess of 58% of total completions achieved).

- 6.6. Furthermore, over the same five year period (2016/17-2020/21), the average number of dwellings completed on windfall sites equates to some 1,124 dwellings per annum (343 dwellings per annum on small scale windfall sites of less than 5 dwellings and 781 dwellings per annum on medium and large scale windfall sites of 5 or more dwellings).
- 6.7. Some examples of large windfall sites upon which windfall completions have been achieved across Shropshire include:
- The Radbrook Centre on Radbrook Road, Shrewsbury for 104 dwellings of which 100 dwellings had been completed as at 31st March 2021;
 - Haughton Road, Shifnal for 216 dwellings of which 198 dwellings had been completed as at 31st March 2021;
 - Land south of Chester Road for 52 dwellings which was built out at 31st March 2021;
 - The Old Piggery, Park Hall for 44 dwellings of which 40 have been completed;
 - West of Oak Meadow Bishops Castle for 24 affordable dwellings which was built out at 31st March 2021; and
 - Stone House on Corve Street, Ludlow, for 48 dwellings which was built out at 31st March 2021.
- 6.8. This information is summarised within Figure 17 below:

Figure 17: Dwellings Completed on Small and Medium Sized Sites 2016/17-2020/21

Year	Small Scale Windfall Site Completions	Medium and Large Scale Windfall Site Completions	All Windfall Site Completions	Total Completions	Proportion of Total Completions on Windfall Sites
2016/17	330	972	1,302	1,910	68.17
2017/18	365	790	1,155	1,876	61.57
2018/19	395	903	1,298	1,843	70.43
2019/20	341	596	937	1,554	60.30
2020/21	285	645	930	1,586	58.64
Total	1,716	3,906	5,622	8,769	64.11
Average*	343	781	1,124	1,754	64.11

**Average completions are rounded to the nearest whole number*

- 6.9. Existing commitments on sites with Planning Permission or Prior Approval provide further endorsement of the importance of windfall sites in Shropshire. Specifically, as at 31st March 2021, 4,663 dwellings on sites with Planning Permission (consisting of 1,582 dwellings on small scale windfall sites of less than 5 dwellings and 3,051 dwellings on medium and large scale windfall sites of 5 or more dwellings) and 97 dwellings on sites with Prior Approval (consisting of 84 dwellings on small scale windfall sites of less than 5 dwellings and 13 dwellings on medium and large scale windfall sites of 5 or more dwellings) were on windfall sites.

- 6.10. Some examples of large windfall sites with windfall commitments in the housing land supply from across Shropshire include:
- a. Land at Foldgate Lane, Ludlow for 137 dwellings, for which preparatory work is ongoing prior to commencement;
 - b. The former Dairy on Mile Bank Road, Whitchurch for 70 dwellings at which demolition works have commenced (under a Full Planning Permission) and the Reserved Matters Application is pending consideration;
 - c. Enabling development at Brogyntyn Hall near Oswestry for 69 dwellings – works to the Hall are currently ongoing;
 - d. 50 retirement living apartments at Innage Lane, Bridgnorth for which works were progressing at pace as at 31st March 2021;
 - e. Land north of the A456 at Burford for 33 affordable dwellings, works are understood to have now commenced; and
 - f. Copthorne Barracks, Shrewsbury for 224 dwellings of which 22 dwellings were completed as at 31st March 2021.

Shropshire Five Year Housing Land Supply

- 6.11. Shropshire Council take a very precautionary approach to the inclusion of windfall sites within the five year housing land supply and wider housing land supply for Shropshire (this is summarised within the Five Year Housing Land Supply Statements, documents **EV048.01-EV048.06**, submitted in support of the draft Shropshire Local Plan⁵¹). Specifically:
- a. The Council only includes a specific allowance for appropriate small scale windfall sites of less than 5 dwellings.
 - b. The allowance made for appropriate small scale windfall sites of less than 5 dwellings is also very conservative. Specifically, the allowance made is for 299 dwellings to arise in years 4 and 5 of the five year period and then in all years beyond the five year period – this cautious approach is to allow for such sites to come through the planning process.
- 6.12. With regard to appropriate medium and larger scale windfall sites, although it is recognised that given the characteristics of Shropshire such sites will inevitably arise, presently no specific allowance is made for them within the housing land supply.
- 6.13. We would note that a cautious allowance is made within the five year housing land supply and wider supply identified for the wider proposed plan period, for accepted sites identified within **EV106.1** (see the appendices **EV106.2-EV106.10**) where there is considered a realistic prospect that some or all of the site will be delivered within the relevant timeframes, given that this assessment includes consideration of both sustainability (in accordance with the NPPF); and the suitability, availability and

⁵¹ Documents EV048.01 and EV048.02 represent the Five Year Housing Land Supply Statement and its Executive Summary undertaken for the adopted Local Plan with a base date of 31st March 2020; documents EV048.03 and EV048.04 represent the Five Year Housing Land Supply Statement and its Executive Summary undertaken for the draft Shropshire Local Plan with a base date of 31st March 2020; and documents EV048.05 and EV048.06 represent the Five Year Housing Land Supply Statement and its Executive Summary undertaken for the adopted Local Plan with a base date of 31st March 2019).

achievability (including viability) of sites, consistent within the definition of deliverability.

- 6.14. This conservative approach to windfall sites within the five year housing land supply and the assessment of the wider supply over the proposed plan period is taken to ensure that these assessments for Shropshire are robust and that there is confidence that the housing land supply identified is deliverable.

Draft Shropshire Local Plan's Approach to Windfall Development

- 6.15. The importance of windfall sites in Shropshire is recognised, embedded within and appropriately facilitated through the draft Shropshire Local Plan. For instance:
- a. Draft Policy SP2 includes a proposed strategic approach to the level and distribution of development, which:
 - Recognises the contribution that residential development on windfall sites can make to housing supply and delivery and as such allows for a cautious and robust amount of residential development on such sites to contribute towards meeting the proposed housing requirement. This includes consideration of past provision; provision through existing commitments (sites with Planning Permission or Prior Approval), and provision through further appropriate windfall sites, where these sites comply with relevant policy requirements.
 - Establishes a distribution of development which underpins various draft policies, including those which will facilitate appropriate residential development on windfall sites.
 - b. Draft Settlement Policies (S1-S18) identify proposed development strategies for the proposed Strategic, Principal and Key Centres; proposed Community Hubs; and proposed Community Clusters. These strategies specifically allow for the appropriate development of windfall sites. For instance:
 - The strategies for proposed Strategic, Principal and Key Centres and proposed Community Hubs allow for the development of appropriately sized windfall sites (the scale of an appropriate site of course varies between settlements) within proposed development boundaries, where they comply with relevant draft policies in the draft Shropshire Local Plan.

Where appropriate, these strategies also allow for appropriate forms of affordable and cross-subsidy development, which represents a form of windfall development, where they meet an identified local need and comply with relevant draft policies in the draft Shropshire Local Plan.

This windfall development will contribute towards achieving the proposed residential development guidelines for the relevant settlements and importantly meeting local needs. Indeed, the proposed residential development guidelines for these settlements has been informed by consideration of each settlements role within the settlement hierarchy and its specific characteristics, constraints and opportunities, including opportunities for windfall development.

Appendix 5 of the draft Shropshire Local Plan illustrates the amount of windfall development allowed for within each Strategic, Principal and Key Centres and proposed Community Hubs to achieve proposed residential development guidelines (as at 31st March 2019). As also explained within Appendix 5 of the draft Shropshire Local Plan, this data is to be reviewed and updated annually through the Shropshire Five Year Housing Land Supply Statement and the

Authority Monitoring Report. Further information on this matter is provided within the following sub-section of this Topic Paper (Windfall Allowances within Specific Settlements).

- The strategies for proposed Community Clusters recognise and allow for the development of appropriate small-scale windfall sites, where they comply with specified criteria within draft Policy SP9 and other relevant draft policies in the draft Shropshire Local Plan.

This development will contribute towards meeting local needs.

- c. Draft Policy SP7 specifies that there will be positive consideration of sustainable housing development, including on appropriate windfall sites, where they comply with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan.
- d. Draft Policy SP8 states that appropriate development within proposed Community Hubs includes upon sustainable sites within proposed development boundaries, where they comply with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan. Such sites are of course a form of windfall site. The draft policy also cross-references draft Policy SP10 with regard to development outside proposed development boundaries.
- e. Draft Policy SP9 states that appropriate development within proposed Community Clusters includes through the appropriate conversion of existing buildings within or immediately adjoining the built form of the settlement; on suitable small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings; and on affordable exception sites, cross-subsidy exception sites and entry level exception sites meeting evidenced need and the other requirements of Local Plan Policies. Such sites are appropriate where they comply with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan. These of course all represent forms of windfall sites.
- f. Draft Policy SP10 identifies the forms of residential development appropriate within the 'countryside'. It includes suitably designed and located affordable exception site dwellings, entry level exception sites and cross-subsidy exception housing schemes; conversions of permanent buildings in locations which are not isolated and are reasonably accessible to services and facilities; schemes for the sympathetic subdivision of existing dwellings which do not exceed the ability of local infrastructure to service the additional dwellings; and essential rural workers dwellings. All such sites are subject to compliance with wider requirements within this draft policy and other relevant draft policies in the draft Shropshire Local Plan. These all represent windfall sites.
- g. Draft Policy SP11 addresses Green Belt and in this context identifies the limited forms of residential development appropriate within the Green Belt. These limited forms of residential development represent windfall sites.
- h. Affordable housing policies (DP4-DP7) allow for affordable exception, entry level exception, single plot exception and cross-subsidy exception sites to come forward where they comply with relevant draft policies in the draft Shropshire Local Plan. These represent windfall sites.

Windfall Allowances within Specific Settlements

- 6.16. As documented above, the proposed residential development guidelines for the proposed Strategic, Principal and Key Centres and the proposed Community Hubs has been informed by consideration of each settlements role within the settlement hierarchy and its specific characteristics, constraints and opportunities, including opportunities for windfall development.
- 6.17. The specific windfall allowances proposed for each of these settlements is therefore considered to be appropriate and robust. These allowances as at 31st March 2019, which was the best available information when the draft Shropshire Local Plan was prepared for consultation, are documented within Appendix 5 of the draft Shropshire Local Plan.
- 6.18. However, as also explained within Appendix 5 of the draft Shropshire Local Plan, this data is to be reviewed and updated annually through the Shropshire Five Year Housing Land Supply Statement and the Authority Monitoring Report.
- 6.19. The most recent data as at the point of submission of the draft Shropshire Local Plan was summarised within **EV048.03**, which provided data as at 31st March 2020. Data as at 31st March 2021 is now available and summarised within Figure 18 (Proposed Strategic, Principal and Key Centres) and Figure 19 (Proposed Community Hubs) that follow.
- 6.20. It is apparent from Figure 18 that in the majority of the proposed Strategic, Principal and Key Centres, the windfall allowance required to achieve the proposed residential development guideline has reduced since that published within Appendix 5 of the draft Shropshire Local Plan. This has occurred because some of the windfall supply within these settlements that is expected to come forward within the proposed plan period, has already come forward. Perhaps most notable are Bridgnorth, Market Drayton and Shrewsbury, where windfall allowances have each reduced by more than 50 dwellings.
- 6.21. In only three of the proposed Strategic, Principal and Key Centres has the windfall allowance increased (Ludlow, Oswestry and Wem). However, in each of these settlements this increase is small (all increases are for less than 10 dwellings) proportional to the size of the relevant settlement and their overall proposed residential development guidelines (and associated windfall allowance). As such, it is considered that there is confidence that a sufficient supply of windfall sites will emerge to achieve the proposed residential development guidelines for these settlements.
- 6.22. Indeed, it is considered that there is confidence that a sufficient supply of windfall sites will emerge to achieve the proposed residential development guidelines for all the proposed Strategic, Principal and Key Centres.
- 6.23. Figure 19 illustrates that for the 40 proposed Community Hubs (excluding Cosford, which is considered separately due to its association with the proposed RAF Cosford Strategic Site):
- a. The windfall allowance has either reduced (or remains at 0) in 19 of the proposed Community Hubs;
 - b. The windfall allowance remains the same (other than at 0) in 11 of the proposed Community Hubs; and

- c. The windfall allowance has increased in 10 of the proposed Community Hubs. However, in all instances it is considered that there is confidence that a sufficient supply of windfall sites will emerge to achieve the proposed residential development guidelines for these settlements.

6.24. Indeed, it is considered that there is confidence that a sufficient supply of windfall sites will emerge to achieve the proposed residential development guidelines for all the Community Hubs.

Conclusion

- 6.25. We would note that the preceding sections of this housing topic paper address the issues of affordable housing provision and development of small and medium sites of up to 1ha in size. There are significant linkages between the Council's approach to windfall development and these two issues, given that Exception Sites for affordable housing and small or medium sized sites often represent windfall sites.
- 6.26. Windfall sites have always represented an important component of the housing land supply in Shropshire. This is perhaps unsurprising given the characteristics of Shropshire and is evidenced within **EV106.01** and born out when the number of completions already achieved on such sites within the proposed plan period (between 2016/17 and 2020/21) is considered.
- 6.27. Furthermore, given the number of the outstanding commitments on windfall sites (as at 31st March 2021) and the approach to windfall development on appropriate sites within the draft Shropshire Local Plan, there is significant confidence that such sites will continue to represent an important component of the housing land supply in Shropshire over the proposed plan period.
- 6.28. As such, it is considered that consistent with paragraph 71 of the NPPF, there is compelling evidence available to justify and support the inclusion of an appropriate windfall allowance within the sources of supply identified to achieve the proposed housing requirement for Shropshire – both in the next five years and the entirety of the proposed plan period.
- 6.29. The proposed residential development guidelines for the proposed Strategic, Principal and Key Centres and the proposed Community Hubs has been informed by consideration of each settlements role within the settlement hierarchy and its specific characteristics, constraints and opportunities, including opportunities for windfall development. As such, similar to the proposed housing requirement for Shropshire, it is considered that there is compelling evidence available to justify and support the inclusion of appropriate windfall allowances to support the achievement of proposed residential development guidelines for specific settlements in Shropshire.

Figure 18: Residential Guidelines and Residential Supply within the Strategic Centre, Principal Centre and Key Centres

Settlement	Type of Settlement	Proposed Residential Development Guideline	Total Residential Completions (2016/17 - 2020/21)	Total Residential Commitments			Windfall Allowance
				Sites with Planning Permission or Prior Approval (as at the 31st March 2021)	SAMDev Allocations without Planning Permission (as at 31st March 2021)	Proposed Local Plan Allocations	
Albrighton	Key Centre	500	60	138	77	180	45
Bishops Castle	Key Centre	150	41	34	40	0	35
Bridgnorth	Principal Centre	1,800	63	93	500	1,050	94
Broseley	Key Centre	250	143	66	0	0	41
Church Stretton	Key Centre	200	21	66	0	0	113
Cleobury Mortimer	Key Centre	200	53	30	0	0	117
Craven Arms	Key Centre	500	47	52	325	0	76
Ellesmere	Key Centre	800	140	324	0	170	166
Highley	Key Centre	250	105	32	0	100	13
Ludlow	Principal Centre	1,000	141	761	0	10*	88
Market Drayton	Principal Centre	1,200	184	468	41	435	72
Much Wenlock	Key Centre	200	39	20	0	120	21
Oswestry	Principal Centre	1,900	364	833	351	240	112
Shifnal	Key Centre	1,500	1,016	190	0	230	64
Shrewsbury	Strategic Centre	8,625	2,854	2,532	624	2,560	55
Wem	Key Centre	600	169	23	100	210	98
Whitchurch	Principal Centre	1,600	313	707	60	450	70

*Excluding LUD056 (90 dwellings) which has planning permission and as such is included within the sites with planning permission or prior approval (as at 31st March 2021).

Figure 19: Residential Guidelines and Residential Supply within the Community Hubs

Settlement	Place Plan Area	Proposed Residential Development Guideline	Total Residential Completions (2016/17 - 2020/21)	Total Residential Commitments			Windfall Allowance
				Sites with Planning Permission or Prior Approval (as at the 31st March 2021)	Allocations without Planning Permission (as at 31st March 2021)	Proposed Local Plan Allocations	
Bucknell	Bishop's Castle	110	6	7	70	20	7
Chirbury	Bishop's Castle	45	-1	1	27	14	4
Clun	Bishop's Castle	95	4	3	60	20	8
Worthen and Brockton	Bishop's Castle	55	2	3	0	45	5
Alveley	Bridgnorth	130	14	34	0	70	12
Ditton Priors	Bridgnorth	65	7	18	0	40	0
Dudleston Heath	Ellesmere	60	12	1	20	0	27
Burford	Ludlow	190	2	34	0	140	14
Clee Hill	Ludlow	75	42	12	0	20	1
Hinstock	Market Drayton	155	96	13	0	35	11
Hodnet	Market Drayton	105	2	52	0	40	11
Woore, Irelands Cross and Pipe Gate	Market Drayton	88	31	14	0	0	43
Minsterley	Minsterley and Pontesbury	155	79	70	7	20	0
Pontesbury	Minsterley and Pontesbury	175	83	68	0	40	0
Cressage	Much Wenlock	80	8	1	0	64	7
Gobowen	Oswestry	360	95	85	110	25	38
Kinnerley	Oswestry	60	19	20	0	0	21
Knockin	Oswestry	55	20	5	0	25	5
Llanymynech	Oswestry	125	38	4	32	50	1
Pant	Oswestry	50	8	5	0	25	12

Settlement	Place Plan Area	Proposed Residential Development Guideline	Total Residential Completions (2016/17 - 2020/21)	Total Residential Commitments			Windfall Allowance
				Sites with Planning Permission or Prior Approval (as at the 31st March 2021)	Allocations without Planning Permission (as at 31st March 2021)	Proposed Local Plan Allocations	
Ruyton XI Towns	Oswestry	125	14	13	0	65	33
St Martins	Oswestry	355	127	94	0	95	39
Trefonen	Oswestry	35	3	2	0	0	30
West Felton	Oswestry	130	59	-17	0	60	28
Weston Rhyn	Oswestry	155	25	3	40	100	0
Whittington	Oswestry	200	25	40	39	70	26
Baschurch	Shrewsbury	360	160	112	0	55	33
Bayston Hill	Shrewsbury	200	32	8	0	147	13
Bicton	Shrewsbury	30	1	4	0	15	10
Bomere Heath	Shrewsbury	110	52	1	0	55	2
Cross Houses	Shrewsbury	90	76	9	0	0	5
Dorrington	Shrewsbury	150	37	33	15	0	65
Ford	Shrewsbury	125	36	3	0	75	11
Hanwood	Shrewsbury	50	28	5	0	0	17
Longden	Shrewsbury	50	22	1	0	0	27
Nesscliffe	Shrewsbury	115	62	41	0	0	12
Clive	Wem	30	0	2	0	20	8
Hadnall	Wem	125	72	1	0	40	12
Shawbury	Wem	150	77	6	0	80	0
Prees	Whitchurch	170	30	48	62	35	0

APPENDICES

APPENDIX 1



Association of Black Country Authorities
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW
Date: 30 September 2020
Please ask for:
Direct Line:

Via email : Planningpolicy@Shropshire.gov.uk

Dear Colleagues

Shropshire Local Plan – Regulation 18 Consultation

Thank you for giving the opportunity for the Association of Black Country Authorities (ABCA) to respond to the Shropshire Local Plan Regulation 18 consultation. This letter provides our formal response to the consultation.

Background

ABCA have engaged with all previous stages of the Local Plan review in a constructive and cooperative manner. Our principal issue relates to the opportunity for the Local Plan to respond positively to help address the identified shortfall of land to meet housing and employment land needs arising in the Black Country, while at the same time helping to drive forward the realisation of Shropshire's economic growth ambitions.

In this context, we responded to the Local Plan Strategic Sites consultation in September 2019, strongly supporting the opportunity at Junction 3 of the M54 to provide a new mixed-use community including some 3,000 homes, 50ha of employment land with associated open space and community facilities. We specifically noted that this opportunity was well placed to meet needs arising in the Black Country given the strong physical and functional relationship.

We note that the Regulation 18 Plan does not include the allocation of land at junction 3, but recognise that the Regulation 18 Plan does respond to the Duty to Cooperate, particularly in relation to housing. We are disappointed that there is no equivalent proposal in respect of employment land, and so ABCA must object to the Regulation 14 Plan on this basis. We would welcome the opportunity to work with the Council in understanding the approach taken in the Regulation 18 Plan towards employment land, including evidence submitted by the promoters of the Junction 3 site as part of the Black Country Plan Call for Sites in August of this year.

We set out our detailed response to the consultation below.

Housing

Our most recent housing evidence, summarised in the Black Country Urban Capacity Review (UCR) 2019 (<https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4c/>), sets out our estimated housing need up to 2038. Whilst we acknowledge that this figure may change following the anticipated Government review of the Standard Methodology and will need to be extended by a year to cover the new Plan period, we are certain that we will not be able

Dr Helen Paterson, Secretary to ABCA
Walsall Metropolitan Borough Council,
The Civic Centre, Darwall Street, Walsall, WS1 1TP.
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to accommodate all of our identified housing needs within the urban area of the Black Country.

We therefore strongly support the Local Housing requirement of 30,800 homes as set out in Policy SP2 of the Regulation 18 Local Plan in terms of it incorporating 1,500 dwellings to support the housing needs of the emerging Black Country Plan. We agree that this reflects a positive approach to cross-boundary cooperation and responds to the functional relationship between the two areas.

We note that this contribution will be accommodated through the distribution of development proposed in the Regulation 18 Plan, and consider that allocations in the principal settlements in the eastern areas of the County closest to the Black Country including Shifnall and Bridgnorth are well placed to meet this need.

However, we are concerned that the Local Plan does not contain a mechanism which would allow the Council to trigger a partial review of the Plan in the light of the rate and location of housing delivery or in the event of a greater need for additional housing - either associated with meeting the needs of Shropshire, or adjacent housing market areas including the Black Country. We would be happy to work with you to explore these mechanisms in more detail.

Employment land

Turning to employment land, the Black Country economy has been performing well and is considered strong. Our future employment land requirement ranges between 592 ha (baseline growth) and 870 ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing urban employment land supply (including recent completions) provides approximately 305 ha of land, leaving a shortfall of between 263 ha and 500 ha, depending on the growth scenarios applied. As is the case with our approach to housing land, we are considering all opportunities to bring forward additional employment land within the urban area but this exercise will not make a significant impact upon addressing our unmet need.

We are therefore concerned that the Regulation 18 Plan does not seek to make a contribution to meeting employment land needs arising in the Black Country. The evidential basis of the Local Plan employment target of 300ha as set out in Policy SP2 is not clear and so it is not possible to determine whether within this requirement, there exists any 'headroom' above locally generated needs and / or associated with the housing contribution, that could be attributed to meeting needs arising in the Black Country without the need for additional allocations. This evidential gap should be addressed through the commissioning of an Economic Development Needs Assessment (EDNA) consistent with the guidance contained in the Governments Planning Practise Guidance (PPG) - <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>.

We also note information prepared by the Bradford Estate in relation to the Junction 3 site as submitted to the Black Country Call for Sites in August of this year. This includes an assessment of the need for Strategic Employment Land to serve the M54 and wider sub-region, recognising the opportunity of an employment-only scheme at Junction 3 to address this need.

We request further engagement with the Council through the Duty to Cooperate to explore how the Local Plan can respond to these issues.

Minerals and Waste issues

The welcome the approach set out in Policies DP31-DP35 in relation to minerals and waste management infrastructure. There is evidence that facilities in Shropshire provide for both minerals and waste requirements arising in the Black Country. The availability of aggregates is currently in excess above minimum guidelines and the Plan does not propose any additional site allocations. Turning to waste management, existing consented facilities are anticipated to provide sufficient capacity to accommodate forecast throughput negating the need for additional facilities.

Summary

In summary, we consider that the Regulation 18 Plan is responding to the Duty to Cooperate in relation to housing and minerals and waste issues. But we advise that further work and dialogue with the Black Country is required in relation to employment land. We suggest that a meeting is convened as soon as possible to scope out this work by contacting Ian Culley (Lead Planning Manager, Regional Strategy) at the City of Wolverhampton Council. (ian.culley@wolverhampton.gov.uk).

Yours sincerely

Councillor Patrick Harley
Leader
Dudley Metropolitan Borough Council

Councillor Mike Bird
Leader
Walsall Metropolitan Borough Council

Councillor Maria Crompton
Deputy Leader
Sandwell Metropolitan Borough Council

Councillor Ian Brookfield
Leader
City of Wolverhampton Council