Shropshire Council:
Regulation 18: Pre-Submission Draft
of the Shropshire Local Plan

Consultation Form

Part B Consultation Form: *Your Response(s) – this part (please fill in a separate Part B Consultation Form for each comment you wish to make, relating it to the relevant paragraph, policy (including its explanation) or site).*

Please ensure that you also complete one ***Part A Consultation Form*** *and submit this alongside you Part B Consultation Form(s).*

We have also published a separate ***Guidance Note*** *to assist in making effective representations.*

Part B: Response

Name:	TREFONEN RURAL PROTECTION GROUP
Organisation (if relevant):	

Q1. To which document does this response relate?

☑ Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

☐ Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

☐ Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this response relate?

Paragraph:	Para 2, Explanation Para 3.5, Para 3.6 and Para 3.7	Policy:	SP2 Strategic Approach
Site:		Policy Map:	

Please note: Responses to this Regulation 18: Consultation can address any of the Supporting Documents and Evidence by relating them to the resulting paragraph, policy (including its explanation) or site in the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

☐ *Agree*

☑ *Disagree*

☐ *Don't know / no opinion*

(Please tick one box)

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2:

Para 2 Housing Requirement - target of 30,800 Explanation Para 3.5, Para 3.6 and Para 3.7

This target is 19% in excess of the identified need of 25,894 for Shropshire.
The Council is still pursuing its “highly ambitious” High Growth target.

The incorporation of 1500 dwellings for the emerging Black Country Plan places an additional burden on Shropshire during the Plan period for the delivery of that additional supply to be provided as part of the annual 5Year Housing Supply assessments.

Both of these factors increase the risk of an “out of date” Plan due to economic fluctuations between now and 2038, completely outside the control of the Council.

Additionally the Covid-19 pandemic has had short term effect on construction and its long term impact on the economy and growth is unknown. The impact on consumer demand for housing will be financial led whilst in turn supply by developers is profit led.

Despite Government exaltations to “Build Build Build” the funding for Local Authority housing is limited and the supply is majority private sector.

It is established fact that whenever there is a lack of demand housing is not built, but developers pursue consent on otherwise unattainable land

An “out of date” Plan holds that inherent risk of exploitation by developers & landowners to gain consent for open market housing on sites not identified in the Plan, which will be contrary to the aims of “Right Homes in Right Place” in the Draft Housing Strategy 2020-2025.

By the next Partial Review (5yearly) the repercussions of the pandemic will be clearer, and the Housing Target can be adjusted to suit the new circumstances then, rather than increasing now when a downturn in demand & supply is widely predicted.

In view of the changed world circumstances we would again ask that the 15% “High Growth” Target is reconsidered by the Council, and changed to a more deliverable “Moderate Growth” 5% above identified needs to avoid a potential “out of date” Plan in the coming years.

Black Country Plan housing provision
We acknowledge the requirement for cross boundary co-operation with neighbouring authorities.
Our concern is the incorporation of the additional 1500 homes into the overall Shropshire Housing Target.
If the aim is to supply housing for residents of the Black Country surely these must be located close to that area, and not anywhere across the whole county.

We note the inclusion of Ironbridge Power Station strategic site into the housing supply calculation with 1000 potential homes, but that will not fulfil the full stated need.
This will increase pressures on settlements across the county for the supply of ‘out of county’ needs unless sites or location close to that region can be identified without impacting the Green Belt.

Please succinctly provide all evidence and supporting information necessary to support your response. Please continue on a separate sheet if necessary.

Completed Consultation Forms can be submitted by emailing:
Planningpolicy@Shropshire.gov.uk

If submitting your own response, please enter your last name in the subject field of the email; If submitting a response on behalf of a client, please enter their last name in the subject field of the email.

Completed Consultation Forms can also be submitted by post to:
Shropshire Council, Planning Policy & Strategy Team, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Office Use Only	Part A Reference:
	Part B Reference: