

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0377
Matter	2 – Duty to Cooperate
Relevant questions nos	3, 5, 7, 8, 9, 11, 12, 13, 14.
<p>3 - What are the relevant inter-relationships with other neighbouring authorities in terms of migration, commuting and housing markets?,</p> <p>The SoCG with ABCA sets out the functional relationship between the Black Country and Shropshire and this is explained in significant detail in the Housing Topic Paper. It is acknowledged that Shropshire is a separate HMA to the Black Country and wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA) but that there are close functional relationships based on migration and commuting flows between East Shropshire and the West Black Country, particularly Wolverhampton and Dudley.</p>	
<p>5 – What is the justification for the allocation of 1,500 homes to meet some of the unmet housing need from the Black Country?</p> <p>We address this issue in more detail in our response to Matter 4.</p> <p>In summary, there is no nationally prescribed policy guidance on how to determine how the extent of any shortfall generated within another Local Plan areas should be met. It is, therefore, a matter of judgement for plan making authorities to agree what is appropriate.</p> <p>The Housing Topic Paper examines past migration and commuting flows between the two areas to ascertain an appropriate contribution. More weight is given to migration flows than commuting flows; this is supported as migration data is more contemporary than migration data which is derived from the 2011 Census. The 1,500 contribution is based on migration flows increasing in line with uplifted past trends, support for this by ABCA at various stages is acknowledged in the Housing Topic Paper and endorsed in the SoCG.</p> <p>Whilst supporting the 1,500 uplift, it is stressed that this is a minimum and based on current migration flows. The implication being that should the requirement be increased further through the examination process, then the additional growth identified must contribute to the GBBCHMA / Black Country shortfall. A failure to acknowledge this will lead to double counting.</p>	

Our principal concern is that the Plan should recognise that it may be appropriate for Shropshire to accommodate additional levels of housing over and above the 1,500 contribution over the lifetime of the Plan given that a shortfall of housing to meet Black Country needs is likely to remain following the current round of Local Plans. We have recommended a programme of work to address this anticipated shortfall and consider that it should be carried out in an inclusive and comprehensive manner based on the GBBCHMA geography and other authorities which have a physical and functional relationship with the Black Country.

If this work recommends the release of land in Shropshire to meet wider needs, then we have suggested that this could be facilitated by a Policy which would enable the early delivery of land not currently identified in the Plan. We consider this to be a soundness issue and does not represent a failure of the Duty to Cooperate.

7 – Are the Statements of Common Ground (SoCG) with neighbouring authorities and stakeholders still relevant and up to date?

The SoCG between the Black Country Authorities and Shropshire remains largely up to date. In our response to Matter 4 we explain that the BCAs have written to all local authorities in the GBBCHMA, and neighbouring areas (including Shropshire) in April 2022. This letter outlines a programme of work designed to address the housing shortfall with a view to securing a Statement of Common Ground across the whole of this geography. This programme of work strengthens the need for an early review / early delivery mechanism as outlined above.

8 – What is the position of other authorities in the HMA and elsewhere in terms of the planned level of housing in Shropshire? Have specific concerns been raised through duty to co-operate discussions or representations which still are unresolved?

The BCAs support the planned level of housing growth, but as outlined above, we recommend that in order to be sound, the Local Plan requires additional Policy guidance to enable the early delivery of additional homes to meet needs arising in the Black Country should this be justified through ongoing evidence gathering.

9 – In overall terms, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of housing provision?

Yes. Shropshire Council have engaged in a constructive, active and ongoing manner with the BCAs in the preparation of the Local Plan. This has been achieved through direct engagement with the BCAs through meetings and correspondence, and through Shropshire attending meetings of the GBBCHMA Group.

The outcome of this engagement has been the incorporation of an uplift of 1,500 homes to meet needs arising in the Black Country and which cannot be accommodated within the Black Country administrative area.

11 – What are the relevant inter-relationships with other authorities in terms of economic activity, travel to work and the market for employment land and premises?

The SoCG with ABCA sets out the functional relationship between the Black Country and Shropshire and this is explained in significant detail in the Employment Topic Paper. It is acknowledged that Shropshire is a separate FEMA to the Black Country but that there are strong physical and functional relationships between the two areas as evidenced through analysis of commuting patterns, migration data and travel to work areas.

12 - How have these inter-relationships been considered in preparing the Local Plan in terms of jobs growth and employment land provision?

The Local Plan includes the provision of 30ha of land to meet employment land needs arising in the Black Country. The Employment Topic Paper (paras 6.63-6.95) provides a robust justification for the 30ha contribution, making use of a detailed analysis of commuting and migration patterns. This contribution is designed to assist with the strategic objective of Shropshire achieving 'net commuting balance' while at the same time providing employment land development opportunities in locations accessible from the Black Country.

13 - What is the justification for the allocation of 30ha of employment land to meet some of the unmet need from the Black Country?

The Employment Topic Paper (paras 6.63-6.95) provides a robust justification for the 30ha contribution, assisting with the strategic objective of Shropshire achieving 'net commuting balance' while at the same time providing employment land development opportunities in locations accessible from the Black Country.

As set out in our response to Matter 4, while the BCAs support the planned level of employment land development, we recommend that in order to be sound, the Local Plan requires additional Policy guidance to

enable the early delivery of additional land to meet needs arising in the Black Country and/or wider regional needs should this be justified through ongoing evidence gathering. The proposed follow on work from the 2021 West Midlands Strategic Employment Sites Study (WMSESS) is important here, and land within Shropshire which is not currently identified in the Plan could have a role in meeting the evidenced shortage of high-quality strategic employment land across the wider West Midlands.

14 - In overall terms, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of jobs growth and employment land provision?

Yes. Shropshire Council have engaged in a constructive, active and ongoing manner with the BCAs in the preparation of the Local Plan. This has been achieved through direct engagement with the BCAs through meetings and correspondence, and through Shropshire attending meetings of the GBBCHMA Group.

The outcome of this engagement has been the incorporation of an uplift of 30ha to meet needs arising in the Black Country which cannot be accommodated within the Black Country administrative area.