

ID 10

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor unique Part A Ref *	A0636
Matter	4 (Housing and Employment Needs)
Relevant questions nos	ID1 Paragraph 12(a) and ID1 Paragraph 17

Stage 1 Hearing Statement

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

1. **ID1 Paragraph 12(a): The Plan seeks to accommodate some of the unmet housing need from the Black Country. Has the unmet housing need been tested through a local plan examination? Also, can the Council please explain how the figure of 1500 dwellings over the Plan period was arrived at. A housing topic paper would be helpful in setting out this information along with the details of the Council’s spatial strategy and distribution and how it was arrived at.**
 - 1.1 It is acknowledged that SC have derived early evidence from the Joint Black Country Local Plan, which estimates there is a total housing need of 76,076 new homes, of which 28,239 are unlikely to be facilitated within the BCA. It has been made clear that this evidence has not been prepared to support the adopted Local Plan and so the level of unmet housing need has not been tested through either the examination of the joint Black Country Plan or through the Examination of any other Local Plans prepared by Local Authorities seeking to accommodate part of the unmet need in the Black Country. The above evidence was summarised within the Statement of Common Ground between SC and the Black Country Authorities (EV041) and the Regulation 18 draft Black Country Plan, recently the subject of consultation.
 - 1.2 We are concerned that the Black Country’s proposed unfulfilled need which derived the requirement for 1,500 new homes in SC, was set out in SC’s Regulation 18 consultation (August 2020) prior to the Regulation 18 draft Black Country Plan consultation (between the 16th August and 11th October 2021),

which introduced key draft policies on the Black Country's Development Strategy (CSP1).

- 1.3 It should also be stressed that the Statement of Common Ground between SC and the Association of Black Country Authorities (ABCA) was not published online until July 2021, which was after SC's Regulation 19 consultation.
- 1.4 Nevertheless, we consider that SC's new Housing Topic Paper (GC4i) still fails to provide any information which demonstrates why SC are proposing to include 1,500 dwellings to meet the Black Country needs. As set out in the SC's Employment Strategy Topic Paper (15 February 2022), SC state in paragraph 6.63 that *"there is there is no defined methodology for calculating an appropriate contribution to unmet employment need arising within another Local Planning Authority area, other than a general expectation for it to be 'taken into account' in determining the employment land requirement"*. This is applicable to the housing land quota that SC have decided to adopt from the Black Country Authorities, under the duty to cooperate. From SC's own omission, without the application of any clear methodology, SC cannot justify the figure of how 1,500 dwellings and 30 hectares of employment land over the Plan period was arrived at.
- 1.5 We find it difficult to understand how for example South Staffordshire are yet to make a contribution to the Black Country Authorities for the uptake of both housing and employment land. As it is in the same Functional Economic Market Area (FEMA) as 3 of the Black Country Authorities (Wolverhampton, Walsall and Dudley). Shropshire does not adjoin and is not within the same HMA or the same FEMA as any of the Black Country Authorities, yet it has made a significant contribution of land that they perceive warrants a circumstance where Green Belt land can be released for housing, employment, and safeguarded land in Shifnal, this will be discussed in more detail below and under Matter 6 (Green Belt and Safeguarded Land).
- 1.6 We would like to also question SC's distribution of the Black Country's unmet need. SC have continually reiterated that the contribution should not be fulfilled on a specific site allocation or within a specific settlement, but rather this shortfall in housing/ employment need should be incorporated into the Shropshire housing/employment need. This is clearly not the case, and it is clear that a large proportion of the delivery of this unsatisfied housing/employment need has been focused at Shifnal. In paragraph 3.121 of SC's Housing Topic Paper (February 2022), SC state that, *"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."* In paragraph 3.124 SC also state that *"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."*

- 1.7 Specific to the reallocation of Black Country’s unmet need to Shifnal, we would like to highlight that paragraph 141 of the NPPF states that *“before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for **meeting its identified need for development**”*, and under point 7 of Shifnal’s Development Strategy, it states that, *“development of this land during the Plan period (Green Belt and Safeguarded Land) will only be permitted in ‘very special circumstances’ to meet Shifnal’s longer term development needs in accordance with national and local Green Belt policies”*. It is evident when considering the above guidance notes that SC cannot present the Black Country’s unmet housing/employment need as an exceptional circumstance which warrants the release of Green Belt land, as it is not specific to Shifnal or its identified need for development. This is clearly an issue which has been overlooked throughout the local plan review process to date and the distribution of this unmet need should surely be brought into question.
- 1.8 On review of SC’s Housing Topic Paper, we would also like to raise concerns about SC’s commentary on their updated Local Housing Needs Assessment. In paragraphs 2.42 and 2.50 they state that *“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. 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”*. We would like to understand why SC have decided to ignore the reduced housing need which was evidenced in their latest Local Housing Needs Assessment. Surely economic indicators (rising inflation and interest rates) and the aftermath of Covid-19 should justify the need to revisit the distribution of their proposed housing stock, in line with this new lower calculated need.

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
Key Centres:		5,150 (around 17.0% of the proposed Housing Requirement)

- 1.9 We would also like to draw attention to the above table, which is set out in Figure 3: (Distribution of Residential Development Across Shropshire) of SC's Housing Topic Paper. Despite Shifnal being only one of two Key Centres surrounded by Green Belt (other Albrighton), the above table sets out that out of the 11 settlements listed as a Key Centre, Shifnal has been allocated a total of 29% of the housing land quota for all these Key Centres.
- 1.10 In communication between Shifnal Matters and Lezley Picton (Leader of Shropshire Council) on 1st March 2022 (Appendix 1), Lezley states that the requirement includes the housing completions made since 2016. Therefore, the Local Plan up to 2038 is actually planning for around an additional 300 dwellings to be developed at Shifnal.
- 1.11 If 300 dwellings are proposed over the plan period, SC need to explain how they are going to control the allocation of such a small amount of housing over 16 years without the land being developed well before 2038. This in turn will lead to demand in future reviews for additional land to be released for housing well before 2038.
- 2 ID1 Paragraph 17: The Plan seeks to accommodate some of the unmet employment land need from the Black Country. Has the unmet need been tested through a local plan examination? Also, please can the Council explain how the figure of 30 hectares of employment land over the Plan period was arrived at and where it would be accommodated? A topic paper would be helpful in setting out this information along with the details of the Council's spatial strategy and distribution and how it was arrived at.**
- 2.1 It is understood that SC have derived early evidence from the Joint Black Country Local Plan, which estimates that there is a total employment need of 565ha and that of this need 210ha is unlikely to be facilitated within the BCA. It has now been made clear that this evidence has not been prepared to support the adopted Local Plan and so the level of unsatisfied employment need has not been tested through either the examination of the joint Black Country Plan or through the Examination of any other Local Plans prepared by Local Authorities seeking to accommodate the need in the Black Country.
- 2.2 Without the need for repetition, we consider that SC have only answered question ID1 Paragraph 17. In part their Employment Topic Paper (August 2021) and Employment Strategy Topic Paper (February 2022) still fails to clarify their position on how the decision was reached to accommodate 30 hectares of the Black Country's need for employment land over the Plan period. As set out SC concede that there is no defined methodology for calculating an appropriate contribution to the employment need arising within another Local Planning Authority area.
- 2.3 We would also like to note that SC's Economic Development Needs Assessment Final Report was not published online until April 2021 and for this reason SC were not able to establish their own required employment need

when formulating their strategic approach, let alone the Black Country's requirement, which still lacks any clear reasoning on capacity and distribution.

- 2.4 The Employment Topic Paper highlights in paragraph 6.38 that SC proposes 65ha of its new employment land, which is within the Green Belt and comprises of allocations for 51ha (Topic Paper: Table 7) and safeguarded land with the potential for employment development of 14ha. It is commonly accepted that the allocation of significant levels of development in both Bridgnorth and Shifnal could credibly meet the needs of the Black Country, we find it extremely concerning that SC propose to remove such a high proportion of land from the Green Belt that will account for the Black Country's need for housing and employment land. In a scenario where the entirety of the Black Country's unsatisfied employment need was directed to Shifnal, this would account for 46% of all of SC's land planned for Green Belt release over the plan period. One would assume that a large proportion of the Black Country's requirement has been allocated to Shifnal as the guideline. Employment land figures for Shifnal was previously 16ha and when published the Pre-Submission Draft SLP illustrated that Shifnal's requirement increased to 41ha.

Table 42: DSLP - distribution of employment land supply - key centres (at 31st March 2020)

Location	Distribution Policies S1 - S20		Commitments		Saved Allocations		Proposed Allocations		TOTAL SUPPLY	
	Average ha	%	ha	%	ha	%	ha	%	ha	%
North-West: Ellesmere	9	2.4%	0.3	0.1%	9	2.2%	-		9.5	2.3%
North-East: Wem	6	1.6%	4.5	1.1%	4	1.0%	-		8.5	2.1%
Clive Barracks	6	1.6%	-		-		6	1.5%	6	1.5%
Central:	-		-		-		-		-	
South: Bishop's Castle	3	0.8%	2.9	0.7%	-		-		2.9	0.7%
Church Stretton	2	0.5%	0.11		1.3	0.3%	-		1.4	0.3%
Cleobury Mortimer	2	0.5%	0.23		0.4	0.1%	-		0.6	0.2%
Craven Arms	15	4.0%	0.64	0.2%	14.0	3.4%	-		14.6	3.5%
East: Albrighton	5	1.3%	0.02	0.0%	-		-		0.02	0.0%
Broseley	3	0.8%	1.6	0.4%	1.3	0.3%	-		2.9	0.7%
Highley	3	0.8%	1.02	0.2%	-		-		1.02	0.2%
Much Wenlock	2	0.5%	0.79		0.6	0.1%	-		1.4	0.3%
Shifnal	41	11%	0.38	0.1%	2.0	0.5%	39	9.4%	41.0	9.9%
Ironbridge Strategic Settlement	6	2%	-		-		6	1.5%	6.0	1.5%
TOTALS	103		12		33		51		96	23%

- 2.5 To reinforce the above point, the above table set out in SC's Employment Strategy Topic Paper (GC4n) demonstrates that out of the 13 settlements listed as a Key Centre/ Strategic Settlements, Shifnal has been allocated a total of 43% of the employment land quota for all of these identified settlements. This heavily weighted reliance for Shifnal to perform as an employment provider conflicts with the role of the Green Belt which its landscape designation currently surrounds the settlement.

2.5 Under paragraph 5.11 evidence is presented from SC's Annual Monitoring Report (AMR). Again, we would like to reiterate that the AMR was not published online until after both the Regulation 18 and 19 consultations, however it now is available in the list of 'Other Background Documents'. The AMR refers to data for employment development through to 31st March 2020 which indicates that the plot ratio in Shropshire is more accurately assessed at 26%. The AMR data also indicates that just over one third of a million sq.m of commercial / industrial floorspace (364,439 sq.m) has been delivered over the past 14 years (assessed on data one year later than the data available for the EDNA). An average of just over 26,000 sq.m annually. SC suggest that implications of the above, indicate, that the additional 134ha introduces 9 new employment allocations located in the centre (50ha), south (5ha), east (72.5ha) and north-east (6ha) of the County. Again, it would again appear that new retrospective evidence since the Regulation 19 consultation has been produced to reaffirm SC's employment land requirements. As SC are continually introducing new evidence at this stage of the review process, can we suggest that a new AMR is undertaken to monitor new data that more clearly identifies the impacts of Covid-19 and establishes the likely effects of the new Class E on employment development in Shropshire.

**Appendix 1: Communication between Shifnal Matters and Lezley Picton
(Leader of Shropshire Council)**

----- Original message -----

From: Lezley Picton <Lezley.Picton@shropshire.gov.uk>

Date: 01/03/2022 12:57 (GMT+00:00)

To: shifnal.matters@gmail.com

Cc: Edward West <edward.west@shropshire.gov.uk>, Mark Barrow
<Mark.Barrow@shropshire.gov.uk>

Subject: FW: Shropshire Councils Local Plan Review - Shifnal

Many thanks for your email.

As you're aware Shropshire Council submitted the draft Local Plan 2016-2038 to the Government in September 2021, following several stages of consultation. This is an important step to ensure the area continues to have an up-to-date Local Plan, and that decisions on planning applications remain Plan-led rather than based on speculative and often opportunistic proposals.

Whilst we of course understand that the process of preparing a Local Plan is often going to be controversial and will lead to local objections, I hope that you can acknowledge that the Council's role in preparing a Local Plan is to seek to balance a wide range of often competing issues, whilst being mindful of the need to plan effectively for much needed new housing and employment in the right areas. The reason for the Examination process is for these issues to be fully and independently tested by Government appointed Planning Inspectors. One of these issues is likely to be the Council's proposed release of Green Belt for future development needs. To this end the Inspectors will also be considering all the various objections to the Plan made at the Regulation 19 stage, which I understand includes representations from Shifnal Matters. You may have also seen that the Council has recently provided responses to an initial set of questions from the Inspectors, which included the issue of Green Belt release. Information on this can be found here [Local plan review | Shropshire Council](#)

At this stage, therefore, I would advise using the Examination process to forward your objections to the Local Plan. More information on the timing on the Examination, and when there will be an opportunity to respond to specific Issues, Matters and Questions will hopefully be available in the coming weeks. This process allows for potential modifications to be made to the Local Plan should the Inspectors feel them necessary to ensure a 'sound' strategy. This can of course include the deletion of proposed site allocations, but could include additional site allocations being included as well. Should this be the case, these modifications will be subject to further public consultation. Given this process is ongoing, I won't therefore be responding directly to either your 'open letter' to the Prime Minister or Christopher Pincher's response. However, I would like to note that there is a factual inaccuracy in your letter, in your reference to plans for over 2,000 more homes being proposed in submitted Local Plan. The total (gross) amount of housing being proposed in the

Plan period for Shifnal is 1,500 dwellings (2016-2038), and that this includes the housing completions made since 2016. **Therefore, the Local Plan up to 2038 is actually planning for around an additional 300 homes to be developed.**

The Local Plan does propose to 'safeguard' land for Shifnal's future development needs beyond 2038, but the actual allocation of the land for development in the safeguarded areas will only happen subject to future Local Plan Reviews.

Kind regards.

Lezley Picton

Shropshire Councillor for the Tern Division

(covering the Parishes of Astley, Bicton, Bomere Heath, Uffington, Upton Magna and Withington)

Leader of Shropshire Council

e: lezley.picton@shropshire.gov.uk