

Matter 4: Housing and Employment Land Needs

Representor A0137



SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0137
Matter	4 – Housing and Employment Land Needs
Relevant question nos	1,3,6,7,8

1. Q1. Is the preferred approach to housing growth and the housing requirement set out in Policy SP2 of 30,800 dwellings (1,400 dwellings per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?
 - 1.1.1. As set out in our Matter 2 responses, the approach to housing growth and the housing requirement is not considered to be justified, because it does not adequately accommodate the unmet needs of the BCA and wider GBBCHMA.
 - 1.1.2. The housing target is not positively prepared because it has not properly assessed the unmet need implications arising from the wider GBBCHMA, resulting in a significantly reduced offer from that which would otherwise have been expected if the analysis of ONS data had been extended along with a greater understanding of the constraints affecting neighbouring authorities to deliver their contribution to the housing shortfall
 - 1.1.3. The housing target is not justified because proportionate evidence relating to the GBBCHMA has not been properly taken into account. There is no link between the evidence on migration, TTWA and the existing infrastructure and the provision of housing land to meet the Black Country shortfall. Furthermore the assessment of alternatives and SA have failed to consider a higher housing contribution in line with the evidence (ONS trends – show outmigration from the Black Country to Shropshire being over 6%) and reference in the HTP (paragraph 3.89) to the likely increased patterns of out migration from the Black Country to Shropshire and reduced levels of in migration to the Black Country;
 - 1.1.4. The housing target is not effective because it fails to recognise the wider GBBCHMA shortfall, constraints preventing delivery of the shortfall in full across this wider area and the implications for Shropshire and South Staffordshire in terms of the spatial relationship that exists and is likely to get stronger due to the prevailing constraints in the wider HMA area.
 - 1.1.5. As per our responses to Matter 2, we consider the approach taken to the housing numbers in the plan to be flawed in respect of the GBBCHMA shortfall and the lack of interrogation in the evidence base on the role that Shropshire currently plays, particularly in respect of out migration from the Black Country to Shropshire.

2. Q3. What provision is made within the Local Plan to fulfil the identified unmet housing needs of the Black Country, and will the Local Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?

- 2.1.1. As set out in section 3 of the Housing Topic Paper (HTP), the Council is proposing to provide 1,500 homes towards the needs of the Black Country which are currently estimated to be 28,239 to 2039. As set out in our Matter 2 statement, we contend that the approach that has been taken in the HTP (Section 3) to the Black Country shortfall is flawed and to be too narrowly focussed. As a result, we consider that the offer of 1,500 dwellings is woefully short of what should reasonably be expected based on evidence and an objective interpretation of the constraints faced in the wider GBBCHMA and the constraints that affect other LPA ability to deliver on the 66,000+ housing shortfall which has been identified across the wider GBBCHMA. On this basis alone we do not consider that Shropshire is fulfilling its obligation under the duty to cooperate to support the Black Country housing shortfall in a manner which is positively prepared, justified or effective.
- 2.1.2. Our understanding of the explanation provided by SC in the Housing Topic Paper (HTP) is set out in our Matter 2 response. In short, the HTP explains that the SC has considered the out-migration from the Black Country to Shropshire between 2016 and 2020 and reports a 3.34% flow. However, when one looks at the position over 10 years (see Appendices 1 and 2) it actually shows an increase in migration from the Black Country with an average of over 6% from the Black Country. On this basis alone the amount of housing that Shropshire should be contributing as a minimum should be 2,000 dwellings (based on Shropshire's own base line position). When other factors, such as the impact of the Birmingham housing shortfall on the Black Country, the constraints of other Local Authorities in the wider GBBCHMA and the range of other positive influences and opportunities that Shropshire could draw upon (especially in relation to rail and road connections in the eastern part of Shropshire) then this figure would be significantly higher. This approach would be more in line with the evidence base and likely increase in out migration from the Black Country (as per paragraphs 3.64, 3.78, 3.89 of the HTP). The narrow approach taken by Shropshire, does not take account of the wider constraints in the GBBCHMA or take account of the 3rd place of Shropshire in the outmigration destinations from the Black Country which is actually 2nd when you factor in Birmingham's inability to accommodate need.
- 2.1.3. Furthermore, whilst the HTP (paragraph 3.32) makes passing reference to the contributions being made by other LPAs, it does not refer to any assessment or discussions with ABCA as to what the outcome of the offers in the wider area will mean for Shropshire's proposed offer of 1,500. There appears to be no evidence of a co-ordinated discussion in respect of meeting the Black Country and wider Birmingham HMA shortfalls which renders the Shropshire offer of 1500 dwellings being less than the minimum necessary to fulfil the Black Country housing shortfall.

Matter 4: Housing and Employment Land Needs

Representor A0137



- 2.1.4. We have reviewed the background papers to try and establish the emerging position which Shropshire is clearly part of. The supply from other LPA through duty to cooperate responses stated in the BCP Cabinet papers of 25 June 2021 was 8,000 – 9,500. This appears to have been an overstatement of what has actually been secured based upon the ABCA letter of 26 April 2022. In the case of South Staffordshire, we understand that their offer of 4,000 dwellings is to be shared between both of the Birmingham and Black Country HMA.
- 2.1.5. The ABCA letter of 7th December 2021 states that other contributions are being sought by the Black Country from Stafford (up to 2,000) and as yet undetermined contributions from Bromsgrove and Telford & Wrekin. The theoretical maximum potential contribution from other LPA identified by BC is 15,600 up to 2039. This appears to assume that all cross boundary provision made by others to the Greater Birmingham and Black Country Housing market Area is allocated to Black Country. That would still leave a shortfall of 12,650 for the period to 2039 which clearly means that an uplift in offers is required until the shortfall is met.
- 2.1.6. In short, there is no justification for Shropshire restricting their offer of support to 1,500 dwellings and moreover, there is sufficient evidence to demonstrate that it should be significantly higher than 1,500 and this would indicate that the plan has not been positively prepared, is not justified or effective on the proposed provision to support the Black Country and the plan should be modified to address this issue.
- 2.1.7. Policy SP2 claims that “**this local plan ensures that sufficient land in the right locations is available to achieve these growth aspirations**” (Savills emphasis). In terms of the 1,500 dwellings (and 30 Ha employment contribution) to the Black Country this is lacking appropriate or proportionate evidence in both quantitative and qualitative terms. To suggest that the ABCA shortfall has been addressed by placing land in the right location is plainly incorrect when the plan fails to identify specific allocations to meet the ABCA shortfall. This approach smacks of a plan which purports to look at Black Country housing numbers (quantitative) rather than a carefully planned strategy based on TTWA, migration patterns or transportation links between Shropshire and the Black Country (qualitative).
- 2.1.8. From our interpretation of the wording in the plan, the offer of 1500 dwellings is also conditional. Paragraph 3.7 states “Effective and on-going joint working between strategic policy-making authorities is an important part of plan-making and delivered through the Duty to Cooperate. With this in mind, and further to discussions with the Black County Authorities as part of their ongoing plan making process, Shropshire’s housing requirement of around 30,800 dwellings incorporates 1,500 dwellings to support the housing needs of the emerging Black Country Plan, where evidence indicates housing delivery opportunities are constrained.” We question why the underlined text is included in the plan as it leaves an impression that the 1500 dwelling offer that discussions are ongoing. If this is the correct interpretation then we suggest that this text is removed or amended to remove this potential ambiguity. The Black Country shortfall is clearly large enough to require support from the Black Country.
- 2.1.9. Based on ONS evidence we consider that as a minimum this offer should have been 2,000 dwellings but when other factors are taken into account, this should be more like 3,500 dwellings (although bearing in mind the wider issue of an assessment against paragraph 11 of the NPPF as we have dealt within our matter 2 statement). This level of provision should be included in the Shropshire Plan now and Main Modifications made to the current plan to address this under provision. Where other LPAs cannot support the GBBCHMA shortfall then this figure is likely to increase again and it is only once this issue is

confirmed that an early review should take place to address the shortfall.

3. Q6. Should the Local Plan include a housing trajectory showing the expected rate of delivery of housing land?

- 3.1.1. Yes the plan should include a detailed trajectory for each site across the whole plan period. This is the norm for plan making and enables the Council to evaluate whether the right housing is coming forward in the right place across the plan period and upon adoption the plan will have a deliverable 5 year housing land supply. At present it is unclear how the housing allocations are to be delivered across the plan period and whether there is a 5 Year Housing Land Supply upon adoption. Furthermore, as the housing provision for the Black Country is proposed to be absorbed in the overall provision, in undefined locations there is no ability to monitor whether this contribution is meeting the growing out-migration being experienced by the Black Country authorities.

4. Q7. Is the preferred “balanced growth” approach and the resulting employment land requirement set out in Policy SP2 of around 300 hectares (14ha per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

- 4.1.1. As we have set out in our response to Matter 2 Q1 there are cross boundary strategic needs which the Plan should provide for.
- 4.1.2. There are clear needs for up to 210ha of employment land arising from the BCA which the BCA consider would be most appropriately met through a strategic allocation for employment and housing in the M54 Strategic corridor at J3.
- 4.1.3. There is also a strategic need for strategic employment sites (>25ha) accessible to the motorway network, to meet needs related to the wider West Midlands and the WMCA area in particular.
- 4.1.4. The 300ha target does not include provision to meet either of these cross boundary strategic needs. Accordingly the 300ha target is not positively prepared, justified, or effective. On all three measures it conflicts with national policy.
- 4.1.5. As set out in Matters 1 and 2, the Council has not actively considered its ability to meet all of the BCA need or a higher proportion, and the Council has not considered what contribution it should make to meeting wider strategic employment site needs.
- 4.1.6. The Economic Development Needs Assessment (**EDNA**) April 2001 paras 9.16 – 9.23 identifies the strategic employment need requiring consideration flowing from analysis for the Council by JLL and the West Midlands Land Commission report before it to which the Shropshire Economic Growth Strategy 2017 (**SEGS**) refers and makes a priority action. The urgency of that regional need for strategic employment sites and the expectation that the M54 Strategic Corridor and specifically the area around J3 has to play in meeting that need, is set out in the West Midlands Strategic Employment Site Study (May 2021) which published shortly after the EDNA (see appendix 3 to our Matter 2 Statement).
- 4.1.7. Our responses to Matter 2 Q9, Q13 and Q14 explain the shortcomings of the process by which decision was made on the amount of cross boundary need to accept. Matter 2 Q13 and Q14 responses set out how the employment land target of 300ha in effect includes no provision for BCA or other cross boundary strategic needs. As such the target of 300ha is neither justified, effective or positively prepared. The wider explanation of the duty to cooperate engagement which we have set out generally in Matter 2 demonstrates that the process of cooperation (despite appearances and statements to the contrary) has not been constructive, active and ongoing.

Matter 4: Housing and Employment Land Needs

Representor A0137



- 4.1.8. Failure to take account of the BCA employment needs and West Midlands strategic employment site needs not only means that the Plan fails in soundness terms in respect of those cross boundary matters but it also fails in soundness as a strategy to meet Shropshire's needs. The draft Plan and Cabinet report of 7th December 2020 state that the Plan seeks to implement the SEGS and deliver step change in economic growth. The immediate actions are to accelerate economic growth, employment and productivity and focus on mutual priority actions with WMCA including specifically the Land Commission. Achievement of the SEGS actions can we suggest, best be achieved by accepting BCA and WMCA strategic needs and providing for them in the M54 strategic corridor which has been identified by the Council, the BCA, the EDNA, WMCA and WMSESS as the appropriate location to meet needs and target economic growth.
- 4.1.9. The SEGS sets out the following six priority actions:
1. Target actions and resources where there are economic opportunities
 2. Enable businesses to start, grow and succeed
 3. Deliver infrastructure to support growth
 4. Meet skills needs of businesses and people's aspirations for work
 5. Promote Shropshire to investors
 6. Build our reputation as a council that is 'good to do business with
- 4.1.10. Page 9 of the Strategy boldly claims "Having readily available serviced employment sites in the right locations is key to our growth strategy and fundamental to increasing our economic productivity. In terms of meeting the needs of Shropshire based companies including those who are starting up and expanding, and to meet the requirements of other businesses and developers outside of the county looking to relocate and invest in the county." Paragraph 3.28 claims that the strategic approach of the plan responds directly to the Economic Growth Strategy and "specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections." We contend that this is plainly not the case. The 39 hectare (15.6ha net developable) employment allocation at Shifnal and the 214 hectare Green Belt release at RAF Cosford are both prime examples that do very little for the strategic employment requirements looking to invest in the County. The Plan makes no provision either quantitatively or qualitatively to meet the strategic needs that have been identified.

5. Q8. What provision is made within the Local Plan to fulfil the identified unmet employment needs of the Black Country, and will the Local Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?

5.1.1. In effect no provision is made to fulfil unmet Black Country needs. Please refer to our response to Matter 4 Q7, and Matter 2 Q13 and Q14.

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