

**Inspectors:**

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Date: 21 February 2024

Dear Inspectors,

## **Shropshire Council – Initial Response to ID37 and ID38**

Thank you for your letters ID37 and ID38 dated 16<sup>th</sup> January.

Firstly, with regard to ID37, we would like to thank you for the clear responses to our request for clarification. The Council is currently considering your responses and has commenced preparing necessary additional material in line with your comments.

This new material will include the required updates to the Sustainability Appraisal (SA), including assessing the social, economic and environmental impacts of accommodating potential contributions to the unmet housing and employment land needs forecast to arise in the Black Country as a distinct and separate exercise (paragraph 4.1 of ID37) and assessing the three housing and employment growth options, each with and without potential contributions to the unmet needs forecast to arise in the Black Country (paragraphs 5.7 and 5.8 of ID37). The SA will set out clear conclusions.

We recognise and welcome your position that the housing requirement for Shropshire is a matter for the Council, and that consideration of it would need to be informed by the additional work being undertaken. We will therefore succinctly address this issue in an updated version of the Housing and Employment Topic Paper, which we will prepare following and informed by the additional SA work, once it is completed.

Regarding timescales, having reflected on ID37 and the additional work required, the Council considers that this additional work (updated SA assessment and Housing and Employment Topic Paper) can be prepared by April. Subject to approval at Cabinet, the material would then be submitted to the examination in late April alongside the commencement of the required Regulation 19 style consultation. This six week consultation would be undertaken between April and June.

The Council is also intending to utilise this Regulation 19 style consultation as an opportunity to consult on certain other material prepared in response to your Interim Findings (ID28). Specifically:

- GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.



- GC30: Green Belt Topic Paper (or an updated version of this Topic Paper if it is considered necessary to update it following the completion of the updated SA assessment and Housing and Employment Topic Paper).
- GC31: Addendum to the Gypsy and Traveller Accommodation Assessment (GTAA) 2019 Update – Conclusion & Executive Summary (subject to discussion of ID38).

Following completion of this consultation, the Council will consider and analyse these responses, before submitting them and an appropriate summary to the examination. Timescales for this process are dependent on the level and complexity of responses received, however we envisage that it will be possible to complete this process by the end of June.

Clearly the Council would wish to proceed positively to further hearing sessions in a timely manner following this consultation exercise, and we acknowledge this is a sentiment you share. With this in mind it would help the Council and other interested parties if we seek to establish a provisional timetable for potential hearing sessions, based on the above timescales, recognising that your availability is a key consideration. Ideally, the Council would like to aim to progress to future hearing sessions in late summer or early autumn.

Please can you therefore confirm that these timeframes are broadly appropriate and set-out a potential timeframe for future processes based upon them?

The Council also recognises your comments made in ID38 regarding the currency of the Council's Gypsy and Traveller Accommodation (GTAA) evidence. We would like to express our disappointment with this stated position, especially given the extensive discussions that have taken place on this matter to date during the examination process.

By way of summary this has included:

- A response to your Initial Question 15 (ID1) in February 2022 (GC4), where the Council confirmed that the 2019 update to the GTAA did not include re-surveying the gypsy and traveller community - the intention of this update was to provide a focussed update to ensure it remained robust and up-to-date.
- Responses to Stage 1 MIQs in April 2022, where specific questions relating to any change in circumstances between 2017 and 2019 with respect to the GTAA were answered and further information to support the robustness of this evidence was provided. This led to the specific discussion at the Matter 5 hearing sessions in July 2022, which included detailed discussion of the GTAA.
- Your interim response to the Stage 1 Hearing Sessions in February 2023 (ID28) where you requested:
  - The Council prepare an addendum to the GTAA evidence, which included an update to the executive summary, Table 7.9 and the conclusion of the GTAA to reflect the additional information presented at the hearing sessions regarding the need and supply of pitches. This additional work was undertaken and submitted to the examination in July 2023.



- The Council consider the implications of the Lisa Smith v SSLUHC judgement on the GTAA and whether any modifications were required to the draft Shropshire Local Plan. We responded to this position in July 2023 confirming we had considered this issue and in our view the GTAA did not require to be updated.

In light of this, the Council feels it has robustly responded to the issues raised, which has included the issue of the adequacy of the current evidence base on this matter. Whilst we appreciate the timeframes for the wider examination have slipped, we continue to be of the firm view that the Council's evidence on this matter is both up-to-date and proportionate.

Furthermore, whilst we also acknowledge that there has been a targeted update of the national Planning Policy for Traveller Sites (PPTS), this is to ensure that it aligns with the implications of the Lisa Smith v SSLUHC judgement. The Council has previously confirmed that it considered the GTAA and proposals within the draft Shropshire Local Plan align with the conclusions of this judgement, this also applies with regard to the requirements of the updated PPTS.

Notwithstanding this, we have sought advice from our consultants on the potential timeframes for the completion of an updated GTAA. They advised it would take around six months to complete (not including any necessary consultation period). Therefore there would be no possibility of aligning this work with the timeframes proposed for the additional work in response to ID37. Given this, the Council are concerned this could have the effect of further delaying the examination process.

Additionally, whilst we appreciate cost is not a material planning consideration, it is also worth noting that the commissioning of this evidence would place an additional financial burden on the Council's budget at a time where significant savings are being required in the next financial year from all Council departments.

Therefore, for the reasons set out above, we would request that you re-consider your conclusions on this matter, and invite you to instead rely upon the current submitted GTAA evidence which has supported the Council's draft policies on this matter and which have already been subject to extensive consultation and hearing time.

If you remain of the opinion that the Council does need to prepare this additional evidence, we would request that you give consideration to the alternative possibility of the Council seeking to remove the issue of Gypsy and Traveller Accommodation from this partial Local Plan Review.

I should make clear this is not the Council's preferred outcome. Our clear preference is that the draft Shropshire Local Plan includes a positive framework for accommodating the needs of the Gypsy and Traveller community. However, the Council is also aware of the importance of expediting the ongoing examination process.

Finally, following the completion of the mineral and waste hearing in May 2023, the Council had an exchange of correspondence with you regarding proposed main modification to mineral and waste policies. Please can you indicate whether subject to the latest schedule of main modification to draft mineral and waste policies, you require any further work to be undertaken on this issue?



Kind regards,

Eddie West  
Planning Policy and Strategy Manager

