

Shropshire Local Plan

Housing and Employment Topic Paper

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2. Executive Summary

Overview

- 2.1. This Topic Paper provides a summary of the housing and employment land needs and requirements in Shropshire. This updated position responds to the Inspectors comments in their interim findings, and reflects updated Sustainability Appraisal work.

Housing Need

- 2.2. The 2020 base date assessment of Local Housing Need (EV069) concluded that local housing need in Shropshire was some **25,894 dwellings** over the 22-year plan period from 2016-2038. This equates to an annual average of **1,177 dwellings**.

Unmet Housing Need in the Black Country

- 2.3. Shropshire Council has undertaken extensive duty-to-cooperate discussions with the Black Country Authorities. Through this process it is understood that an unmet housing need is forecast to arise in the Black Country.
- 2.4. Two reasonable options for contributing to this unmet housing need were considered within the Updated Additional Sustainability Appraisal (SA), Option 1: No Contribution and Option 2: 1,500 dwelling contribution.
- 2.5. The SA process concluded that **Option 2: 1,500 dwelling contribution** was the most sustainable option. The subsequent planning judgement exercise (summarised within this Topic Paper) also concluded that this was the most appropriate option for inclusion within the draft Shropshire Local Plan.

Reasonable Options for the Housing Requirement

- 2.6. Consistent with ID28, ID36 and ID37 issued by the Planning Inspectors, the reasonable options for the housing requirement have been **updated and re-assessed** through the updated additional SA work undertaken.
- 2.7. **Three** updated reasonable options for the housing requirement were identified and re-assessed within the SA process. In summary:
- a. The baseline for these options was the 2020 base date assessment of local housing need.
 - b. Consistent with the methodology previously utilised, three percentage uplifts (5%, 10% and 15%) above the identified baseline were applied.

- c. Each reasonable option was then considered with and without the proposed contribution of 1,500 dwellings towards the unmet housing need forecast to arise in the Black Country.
- 2.8. The SA process concluded **Option 3b: High Growth plus a 1,500 dwelling contribution to the unmet housing need forecast to arise in the Black Country** was the most sustainable option. The subsequent planning judgement exercise (summarised within this Topic Paper) also concluded that this was the most appropriate option for inclusion within the draft Shropshire Local Plan.

The Proposed Housing Requirement

- 2.9. The proposed housing requirement is therefore a **minimum of 31,300 dwellings between 2016 and 2038**, which equates to an **annual average of around 1,423 dwellings**. This represents:
- a. A **continuation of the 'High Growth' option** for the housing requirement previously identified and contained in the submission version of the draft Shropshire Local Plan (15% uplift to local housing need);
 - b. An uplift of 500 dwellings on the housing requirement proposed in the submission version of the Plan; and
 - c. A **continuation of the specific contribution of 1,500 dwellings** towards the unmet housing need forecast to arise in the Black Country proposed within the submission version of the draft Shropshire Local Plan. This is however now achieved through a further specific uplift of 1,500 dwellings, rather than having these dwellings 'blended' into the housing requirement as proposed in the submission version of the Local Plan.

Reasonable Options to Accommodate the Proposed 500 Dwelling Uplift to the Housing Requirement

- 2.10. Four reasonable options for accommodating the uplift were identified and assessed through the Updated Additional SA. These are:
- a. Option 1: Increasing Settlement Guidelines and Windfall Allowances.
 - b. Option 2: Densification of Proposed Site Allocations.
 - c. Option 3: Increasing Site Allocations.
 - d. Option 4: A Combination of Two or More of the Other Options.
- 2.11. The SA process concluded that **Option 1: Increasing Settlement Guidelines and Windfall Allowances** was the most sustainable option. The subsequent planning judgement exercise (summarised within this Topic Paper) also concluded that this was the most appropriate option for inclusion within the draft Shropshire Local

Plan. **Therefore, it is not considered necessary to identify any further site allocations to accommodate this proposed uplift.**

- 2.12. Through planning judgement, it was concluded that the most appropriate adjustments to settlement guidelines and windfall allowances to accommodate the proposed uplift are:
- a. Shrewsbury (Strategic Centre): 350 dwelling increase to the proposed housing guideline to some 8,975 dwellings between 2016 and 2038.
 - b. Whitchurch (Principal Centre): 75 dwelling increase to the proposed housing guideline to some 1,675 dwellings between 2016 and 2038.
 - c. Former Ironbridge Power Station (Strategic Settlement): 75 dwelling increase to the proposed housing guideline to some 1,075 dwellings between 2016 and 2038.

Reasonable Options to Accommodate the Proposed 1,500 Dwelling Contribution to the Black Country

- 2.13. Within ID28 the Planning Inspectors concluded that any proposed contribution to the unmet housing need forecast to arise in the Black Country would need to be provided on a specific site or sites. To inform identification of site(s) to accommodate the proposed 1,500 dwelling contribution, updated additional SA and site assessment work was undertaken.
- 2.14. Through the updated SA site assessment process, a series of sites have been identified to accommodate the proposed 1,500 dwelling contribution to the Black Country. These are:
- a. BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings.
 - b. SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings.
 - c. IRN001 - Former Ironbridge Power Station: 600 dwellings

Housing Land Supply

- 2.15. The Council has re-assessed its housing land supply based on the updated proposed housing requirement (March 2023 base date).
- 2.16. With regard to the five year period from 2023/24-2027/28, the assessment concludes a **6.86 years' supply of deliverable housing land is available.**
- 2.17. With regard to the proposed plan period from 2016-2038, the assessment concludes that given completions of 11,761 dwellings between 2016/17 and 2022/23, **sufficient deliverable or developable housing land is available to deliver 34,874 dwellings over the proposed plan period.**

2.18. This identified housing land supply is therefore sufficient to **achieve the proposed housing requirement of a minimum of 31,300 dwellings** and allow for **around 10% flexibility** in the overall housing land supply.

Employment Land Need

2.19. This 'labour demand' jobs growth scenario derived from the Economic Development Needs Assessment (EDNA) identifies an adjusted baseline employment land need for **250ha at an annual rate of 11.5ha/yr**. This baseline employment land need provides the starting point for identifying reasonable employment land options for the employment land requirement.

Unmet Employment Land Need in the Black Country

2.20. Two reasonable options for contributing to this unmet employment land need were considered within the Updated Additional Sustainability Appraisal (SA), Option 1: No Contribution and Option 2: 30 hectare contribution.

2.21. The SA process concluded that **Option 2: a 30 hectare contribution** was the most sustainable option. The subsequent planning judgement exercise (summarised within this Topic Paper) also concluded that this was the most appropriate option for inclusion within the draft Shropshire Local Plan.

Reasonable Options for the Employment Land Requirement

2.22. Consistent with ID28, ID36 and ID37 issued by the Planning Inspectors, the reasonable options for the employment land requirement have been **updated and re-assessed** through the updated additional SA work undertaken.

2.23. **Three** updated reasonable options for the employment land requirement were identified and re-assessed within the SA process.

In summary:

- a. The baseline for these options was the 'labour demand' jobs growth identifies an adjusted baseline employment land need for 250ha at an annual rate of 11.5ha/yr.
- b. Consistent with the methodology outlined in ID37 and the Updated Additional Sustainability Appraisal, three percentage uplifts (0%, 10% and 15%) above the identified baseline employment land need were applied.
- c. Each reasonable option was then considered with and without the proposed contribution of 30 hectares towards the unmet employment land need forecast to arise in the Black Country.

2.24. The SA process concluded **Option 3b: High Growth (15%) plus a 30 hectare contribution to the unmet employment land need forecast to arise in the Black Country** was the most sustainable option. The subsequent planning judgement exercise (summarised within this Topic Paper) also concluded this was the most appropriate option for inclusion within the draft Shropshire Local Plan.

Proposed Employment Land Requirement

- 2.25. The proposed employment land requirement is therefore a **minimum of 320 hectares between 2016 and 2038**, which equates to an **annual average of around 14.5 hectares per year**. This represents:
- a. A **continuation of the 'High Growth' option** for the employment land requirement previously identified and contained in the submission version of the draft Shropshire Local Plan;
 - b. An uplift of 20 hectares on the employment land requirement proposed in the submission version of the Plan; and
 - c. A **continuation of the specific contribution of 30 hectares** towards the unmet employment land need forecast to arise in the Black Country proposed within the submission version of the draft Shropshire Local Plan. This is achieved through a further specific uplift of 30 hectares, rather than this provision being 'blended' into the employment land requirement as proposed in the submission version of the Local Plan.

Reasonable Options to Accommodate the Proposed 20 hectare Uplift to the Employment Land Requirement

- 2.26. Four reasonable options for accommodating the uplift were identified and assessed through the Updated Additional SA. These are:
- a. Option 1: Utilising settlement guidelines and windfall allowances for the identified employment land supply.
 - b. Option 2: Densification of proposed site allocations.
 - c. Option 3: Extensions to current proposed site allocations or the allocation of additional sites.
 - d. Option 4: A combination of two or more of the above Options.
- 2.27. The SA process concluded that **Option 1: Utilising Settlement Guidelines and Windfall Allowances** is the most sustainable option. The subsequent planning judgement exercise (summarised within this Topic Paper) also concluded this was the most appropriate option for inclusion within the draft Shropshire Local Plan.
- 2.28. This found that the identified existing employment land supply was sufficient to provide for the uplift of 20ha to deliver the proposed

'minimum' employment land requirement of 320ha. **Therefore, it is not considered necessary to identify any further site allocations to accommodate this proposed uplift.**

Reasonable Options to Accommodate the Proposed 30 hectare Contribution to the Black Country

2.29. Within ID28 the Planning Inspectors concluded that any proposed contribution to the unmet employment land need forecast to arise in the Black Country would need to be provided on a specific site or sites.

2.30. Through the updated SA site assessment process, a series of sites were considered in the centre and east of the County as summarised in this Topic Paper. It is concluded that the proposed 30 hectare contribution to the Black Country should be accommodated at:

SHF018b & SHF018d – Land east of Shifnal Industrial Estate, Upton Lane, Shifnal: 39 hectares to achieve 16 hectares of floorspace.

Employment Land Supply

2.31. This Topic Paper identifies a total employment land supply of 413 hectares. This provides significant flexibility in seeking to deliver the proposed employment requirement of 320ha over the whole plan period.

Aligning Proposed Employment with Housing Growth

2.32. Aligning employment and housing growth means identifying suitable opportunities for growth in the future labour supply. This topic paper provides information on the various strands of the future labour supply, with new housing growth being the most significant, but not sole expected source.

2.33. This Topic Paper identifies the sources of a future labour supply in Shropshire of 25,420 persons to meet a projected jobs growth of 21,400 jobs including 8,440 Class B or equivalent jobs.

Strategic Distribution of Development

2.34. Following identification of the proposed housing and employment land requirement, it was considered appropriate to assess updated reasonable options for the strategic distribution of development. These being:

- a. Option A: Rural Rebalance
- b. Option B: Urban Focus
- c. Option C: Balanced Growth

- 2.35. The SA process concluded that **Option B: Urban Focus** was the most sustainable option. The subsequent planning judgement exercise (summarised within this Topic Paper) also concluded that this was the most appropriate option for inclusion within the draft Shropshire Local Plan.
- 2.36. As such, the proposed strategic distribution of planned development within the draft Shropshire Local Plan **remains 'Urban Focus'**.

Spatial Strategy

- 2.37. Reflecting the conclusions summarised within this Topic Paper, the revised spatial strategy for the level and distribution of development across Shropshire proposed to be set out in draft Policy SP2 includes:
- a. A housing requirement of a minimum of 31,300 dwellings between 2016 and 2038, of which 1,500 dwellings are a contribution towards the unmet housing needs forecast to arise within the Black Country.
 - b. An employment land requirement of a minimum of 320ha between 2016 and 2038, of which 30ha is a contribution towards the unmet employment land needs forecast to arise within the Black Country.
 - c. An urban focussed strategy for the strategic distribution of development, by which development will be focused in the 'urban areas', which consist of Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements. This will be complemented by appropriate development within Community Hubs and to a lesser extent Community Clusters. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.
- 2.38. This revised spatial strategy:
- a. **Continues the principle of high growth** which underpinned the housing and employment land requirements within the submission version of the draft Shropshire Local Plan.
 - b. **Retains the 1,500 dwelling and 30ha of employment land contributions** towards the unmet needs forecast to arise in the Black Country.
 - c. **Continues the urban focused approach** to the strategic distribution of development.

3. Introduction

- 3.1. The submission version of the draft Shropshire Local Plan proposed that over the period from 2016 to 2038:
 - a. Around 30,800 dwellings would be delivered. This was based on the principle of '**High Growth**', (15% uplift above local housing need), which incorporated a specific contribution of 1,500 dwellings towards the unmet housing needs forecast to arise in the Black Country.
 - b. Around 300ha of employment land would be developed, incorporating a specific contribution of 30ha of employment land towards the unmet employment land needs forecast to arise in the Black Country.
 - c. An 'urban focused' strategy for the distribution of development. This entails a significant proportion of development being directed towards urban settlements that have the infrastructure available to best support development. This is complemented by development in rural areas (particularly the larger rural settlements) to maintain and enhance sustainability.
 - 3.2. On 15th February 2023, the Planning Inspectors examining the draft Shropshire Local Plan issued an Interim Findings document (ID28). This followed completion of Stage 1 Hearing Sessions, which focused on legal, procedural and strategic issues (including strategic policies). These Hearing Sessions were primarily undertaken in July 2022, with a further session specifically regarding the Duty to Cooperate in January 2023.
 - 3.3. ID28 addresses a range of matters, including a number related to housing and employment. This included:
 - a. The housing and employment land needs of Shropshire.
 - b. Proposed contributions to unmet housing and employment land needs forecast to arise within the Black Country.
 - c. The proposed housing and employment land requirements within the draft Shropshire Local Plan.
 - 3.4. ID28 requested that the Council undertake additional Sustainability Appraisal (SA), in relation to these issues. It also requested that the Council prepare a "*Topic Paper that unambiguously sets out the need for housing over the plan period and the local plan's housing requirement and the same for employment land.*"
- Responding to the Interim Findings**
- 3.5. Following receipt of ID28, Shropshire Council undertook additional SA work (GC29) and prepared a new Housing and Employment Topic Paper (GC28) with the intention of positively responding to ID28.

Updating the Response to the Interim Findings

- 3.6. After consideration of the additional SA work (GC29) undertaken by Shropshire Council, the Planning Inspectors issued correspondence (ID36) on the 4th October 2023. This raised some soundness concerns with the additional SA work undertaken and as such requested further updated SA work and an updated Housing and Employment Topic Paper.
- 3.7. Following consideration of ID36, Shropshire Council sought clarification regarding the concerns raised and the assessment work necessary to resolve them, within correspondence on the 16th November 2023 (GC41). On the 16th January 2024, the Planning Inspectors issued correspondence (ID37) which addressed the questions raised by the Council within GC41.
- 3.8. Shropshire Council has now undertaken updated additional SA work and prepared an updated Housing and Employment Topic Paper (this document), in order to positively respond to the information requested by the Planning Inspectors in ID28, ID36 and ID37.

4. Purpose of this Document

- 4.1. The purpose of this document is to positively respond to the Planning Inspectors' request for a clear and unambiguous Topic Paper regarding the housing and employment land needs and requirements in Shropshire. In doing so it draws a clear distinction between defined housing and employment need and requirements.
- 4.2. In seeking to positively respond to the conclusions of the Planning Inspectors within ID28, ID36 and ID37, Shropshire Council has also undertaken updated additional SA assessment work regarding the housing and employment land requirement. This updated additional SA assessment work has directly informed the preparation of this updated Topic Paper.
- 4.3. A range of previously published material prepared by the Council has also informed this updated Topic Paper, including the Local Housing Need Assessment (EV069), the Strategic Housing Market Assessment (EV097.01 and EV097.02), the Housing Topic Paper (GC4i), the Five Year Housing Land Supply (GC33), the Housing Trajectory (GC4p), Productivity Growth Forecasts (EV090), the Economic Development Needs Assessment (EV043), the Economic Growth Strategy (EV044), the Employment Topic Paper (EV112), the Strategic Employment Topic Paper (GC4n), the Authority Monitoring Report (EV012); and the Local Plan Viability Study (EV115.01).
- 4.4. **For the avoidance of doubt, this document supersedes document GC28.**
- 4.5. **Similarly, the updated additional SA work supersedes document GC29.**

5. Local Housing Need

- 5.1. The National Planning Policy Framework (NPPF) 2021 specifies that *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals..."*¹
- 5.2. The Local Housing Need Assessment (2020 base date) utilises Government's standard methodology and underpinned the housing requirement when the Regulation 19: Pre-Submission Consultation Draft Shropshire Local Plan was prepared, at the time of the Regulation 19 Consultation, and when Shropshire Council made the decision to submit the draft Shropshire Local Plan for examination.
- 5.3. This calculation of local housing need is summarised within the Local Housing Need Assessment (2020) (EV069). In summary, this assessment concludes that local housing need for Shropshire was some **25,894 dwellings** over the 22-year plan period from 2016-2038. This equates to an annual average **of 1,177 dwellings**.

¹DLUHC (formerly MHCLG), (2021), The NPPF – Paragraph 61 (Reference retained to NPPF (2021) due to transitional arrangements for plan making).

6. Unmet Housing Need Forecast to Arise in the Black Country

- 6.1. Shropshire Council has undertaken extensive duty to cooperate discussions with the Black Country Authorities regarding housing issues, including their local housing needs and approach to identifying existing and future housing land supply. Through these discussions and associated processes, it is understood that an unmet housing need is forecast to arise in the Black Country. It was also established that it may be appropriate for a contribution to this forecast unmet housing need to be accommodated in Shropshire.
- 6.2. Within paragraph 13 of ID28, the Planning Inspectors specified that *"the Council's intention to address some of the Association of Black Country Authorities (ABCA) unmet needs (1500 homes and 30ha of employment land), aligns with the spirit of the DtC. It is clear that the Council and the ABCA authorities are all content with this contribution and this is set out in a Statement of Common Ground (SoCG), signed prior to the submission of the Plan for examination. We recognise that there is a lack of any prescribed formula in national planning policy for calculating any uplift to Shropshire's housing need to meet some of this externally derived unmet need."*

Reasonable Options for Any Contribution to Unmet Housing Need Forecast to Arise in the Black Country

- 6.3. Within the updated additional SA assessment work, two reasonable options for any contribution to unmet housing needs forecast to arise in the Black Country were identified. These were:
 - a. **Option 1:** No contribution towards the unmet housing needs forecast to arise within the Black Country.
 - b. **Option 2:** Contribution of 1,500 dwellings towards the unmet housing needs forecast to arise within the Black Country.
- 6.4. This updated additional SA Assessment work is an important consideration when undertaking the planning judgement regarding which reasonable option for any contribution to the unmet housing needs forecast to arise in the Black Country should be identified within the draft Shropshire Local Plan. However, a range of other evidence/factors also requires due consideration when undertaking this planning judgement.
- 6.5. As such, key evidence/factors given due consideration within the planning judgement included:
 - a. The updated additional SA assessment of reasonable options for any contribution to unmet housing needs forecast to arise in the Black Country.

- b. The extensive duty to cooperate process undertaken by Shropshire Council with the Black Country Authorities.
 - c. The various factors considered in determining the extent of the relationship between Shropshire and the Black Country and whether it may be appropriate for a contribution to forecast unmet housing need to be accommodated in Shropshire, as summarised within the Housing Topic Paper (GC4i).
 - d. Agreements reached within the Statement of Common Ground between Shropshire Council and the Black Country Authorities (EV041).
- 6.6. In conclusion, it is considered **Option 2**: contribution of 1,500 dwellings towards the unmet housing needs forecast to arise within the Black Country is the most appropriate. This conclusion was reached as this option:
- a. Presents an opportunity to achieve a strongly positive effect on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society in the short, medium and long term.
 - b. Presents an opportunity to achieve positive impacts against a range of identified sustainability objectives.
 - c. Whilst posing a potential negative impacts against other sustainability objectives, it is considered that mitigation can reduce these impacts. Mitigation opportunities include consideration of the interplay between this contribution and the total level of development proposed in Shropshire and the strategic distribution/location of site allocations.
 - d. Positively responds to the relationship between Shropshire and the Black Country – geographic, infrastructure links, migration patterns and commuting patterns.
 - e. Positively responds to the Duty to Cooperate process and signed Statement of Common Ground between Shropshire Council and the Black Country Authorities.
 - f. Would result in an appropriate contribution to the unmet housing need forecast to arise in the Black Country, supporting the ability to meet housing need beyond the Shropshire area. Conversely, Option 1: No Contribution would result in no contribution to the unmet housing need forecast to arise in the Black Country and as such would not support the ability to meet housing need beyond the Shropshire area.
- 6.7. **However, it is also considered that any decision on this matter is ultimately most appropriately considered in the context of reasonable options for the housing requirement.**

7. The Housing Requirement

Reasonable Housing Requirement Options

- 7.1. During preparation of the draft Shropshire Local Plan, three reasonable options for the housing requirement were identified within the Issues and Strategic Options Consultation Document (EV003.01). These options were based on percentage uplifts (around 5%, 10% and 15%) against defined housing need at that time.
- 7.2. In response to ID28, ID36 and ID37 the reasonable options for the housing requirement have been **updated and re-assessed** through the updated additional SA work undertaken.
- 7.3. The baseline for these updated reasonable options is the Local Housing Need Assessment (2020), which underpins the housing requirement in the draft Shropshire Local Plan.
- 7.4. Within paragraph 2 of ID36, the Planning Inspectors confirmed that in ID28 *"we found that the Council's approach to identifying the housing and employment land needs derived within Shropshire itself to be sound"* whilst paragraph 3 noted that *"The housing requirement figure in policy SP2 is based on the Local Housing Need figure (LHN) assessed in 2020"*.
- 7.5. Within paragraph 5.7 of ID37, the Planning Inspectors specified that the updated additional SA assessment of housing growth options should be *"based on the 2020 baseline"*.
- 7.6. Consistent with the methodology previously utilised to identify reasonable options for the housing requirement, percentage uplifts (5%, 10% and 15%) above the identified baseline were then applied to identify reasonable alternative options to assess.
- 7.7. These uplifts ensure local housing need is achieved, whilst also providing some flexibility to respond to changes to local housing need over the plan period and opportunities to:
 - a. Respond positively to specific sustainable development opportunities;
 - b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;
 - c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;
 - d. Support the diversification of the labour force; and
 - e. Support wider aspirations, including increased economic growth and productivity.

7.8. Furthermore, reflecting the outcomes of duty to cooperate discussions undertaken with the Black Country Authorities, each reasonable option is assessed with and without a further specific uplift of 1,500 dwellings to reflect reasonable options for any proposed contribution to unmet housing need forecast to arise within the Black Country.

7.9. This approach positively responds to the Planning Inspectors guidance in paragraph 5.7 of ID37.

7.10. As such, **three reasonable options for the housing requirement (each with and without a proposed contribution to the unmet housing need forecast to arise in the Black Country)** were identified and assessed within the updated additional SA assessment work.

Updated Reasonable Housing Requirement Options

7.11. The three reasonable options for the housing requirement (each with and without a proposed contribution to the unmet housing need forecast to arise in the Black Country) identified using the methodology summarised in paragraphs 7.1-7.10, are:

Table 7.1: Reasonable Housing Requirement Options

| Option | Baseline Local Housing Need | Percentage Uplift Above Local Housing Need | 1,500 Dwelling Contribution to Black Country |
|--|--|--|--|
| Housing Requirement Option 1a: Moderate Growth | 2020 Assessment of Local Housing Need. | Around a 5% uplift | No |
| <p>Summary: This option represents around a 5% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings). This option represents a total minimum housing requirement of 27,200 dwellings over the 22-year plan period from 2016-2038, which equates to around 1,236 dwellings as an annual average.</p> | | | |
| Housing Requirement Option 1b: Moderate Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs | 2020 Assessment of Local Housing Need. | Around a 5% uplift | Yes |
| <p>Summary: This option represents around a 5% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings), plus a further 1,500 dwelling uplift as a contribution toward unmet housing need forecast to arise in the Black Country. This option represents a total minimum housing requirement of 28,700 dwellings over the 22-year plan period from 2016-2038, which equates to around 1,305 dwellings as an annual average.</p> | | | |
| Housing Requirement Option 2a: Significant Growth | 2020 Assessment of Local Housing Need. | Around a 10% uplift | No |
| <p>Summary: This option represents around a 10% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings). This option represents a total minimum housing requirement of 28,500 dwellings over the 22-year plan period from 2016-2038, which equates to around 1,296 dwellings as an annual average.</p> | | | |

| Option | Baseline Local Housing Need | Percentage Uplift Above Local Housing Need | 1,500 Dwelling Contribution to Black Country |
|--|--|--|--|
| Housing Requirement Option 2b: Significant Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs | 2020 Assessment of Local Housing Need. | Around a 10% uplift | Yes |
| <p>Summary: This option represents around a 10% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings), plus a further 1,500 dwelling uplift as a contribution toward forecast unmet housing need in the Black Country. This option represents a total minimum housing requirement of 30,000 dwellings over the 22-year plan period from 2016-2038, which equates to around 1,364 dwellings as an annual average.</p> | | | |
| Housing Requirement Option 3a: High Growth | 2020 Assessment of Local Housing Need. | Around a 15% uplift | No |
| <p>Summary: This option represents around a 15% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings). The total minimum housing requirement would equate to 29,800 dwellings over the 22-year plan period from 2016-2038, which equates to around 1,355 dwellings as an annual average.</p> | | | |
| Housing Requirement Option 3b: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs | 2020 Assessment of Local Housing Need. | Around a 15% uplift | Yes |
| <p>Summary: This option represents around a 15% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings), plus a further 1,500 dwelling uplift as a contribution toward forecast unmet housing need in the Black Country. This option represents a total minimum housing requirement of 31,300 dwellings over the 22-year plan period from 2016-2038, which equates to around 1,423 dwellings as an annual average.</p> | | | |

Identifying the Proposed Housing Requirement

- 7.12. The decision regarding which of these options should form the basis for the proposed housing requirement within the draft Shropshire Local Plan is ultimately one of planning judgement.
- 7.13. There is however an extensive range of information/factors to inform this planning judgement, including:
- a. Local housing need in Shropshire.
 - b. Updated additional SA assessment of reasonable options for any contribution to the unmet housing needs forecast to arise in the Black Country.
 - c. Updated additional SA assessment work regarding reasonable housing requirement options.
 - d. The ability to positively contribute to local issues and opportunities, including:
 - i. Providing flexibility to respond to changes to local housing need over the proposed plan period.

- ii. Responding positively to specific sustainable development opportunities.
 - iii. Increasing delivery of family and affordable housing to meet needs of local communities and support new families coming into Shropshire.
 - iv. Supporting delivery of specialist housing for older people, people with disabilities and meet the housing needs of other groups within the community.
 - v. Support diversification of our labour force.
 - vi. Support wider aspirations, including increased economic growth and productivity.
- e. The ability for some of the Black Country's unmet need to positively contribute towards Shropshire's Local Plan vision and strategy.
- f. Deliverability.
- g. Responses to Regulation 18 consultations undertaken to inform the draft Shropshire Local Plan and representations received during the Regulation 19 consultation on the draft Shropshire Local Plan.
- h. The Planning Inspectors conclusion in ID28 that the housing requirement should be expressed as 'a minimum' rather than 'around'.

7.14. Dealing with each in turn:

Local Housing Need

- 7.15. As each of the reasonable options for the housing requirement include a percentage uplift above baseline housing need, all are sufficient to meet local housing need.

Updated Additional SA Assessment Work: Reasonable Options - Contribution to Unmet Housing Need Forecast to Arise in the Black Country

- 7.16. The updated additional SA assessment work included a specific consideration of reasonable options for Shropshire making a contribution to the unmet housing need forecast to arise in the Black Country.

7.17. The reasonable options identified were:

- a. **Option 1:** No contribution towards the unmet housing need forecast to arise within the Black Country.
- b. **Option 2:** Contribution of 1,500 dwellings towards the unmet housing need forecast to arise within the Black Country.

- 7.18. This SA assessment provides a crucial source of information to inform the planning judgement regarding the approach to any contribution to unmet housing needs forecast to arise in the Black Country, within the housing requirement of the draft Shropshire Local Plan.
- 7.19. This work assessed each option against the SA objectives and in this way informs judgements about their relative sustainability. It concluded that on balance, **Option 2: Contribution of 1,500 dwellings towards the unmet housing needs forecast to arise within the Black Country**, is the most sustainable of the two options identified. Further detail on the outcomes of this updated additional SA assessment work is provided within the updated Additional SA Report.
- 7.20. Furthermore, the planning judgement exercise summarised within paragraphs 6.1-6.7 of this Topic Paper, also concluded that **Option 2: Contribution of 1,500 dwellings towards the unmet housing needs forecast to arise within the Black Country**, was the most appropriate of these options. However, it also concluded this matter was best considered in the context of the proposed Housing Requirement.

Updated Additional SA Assessment Work: Reasonable Housing Requirement Options

- 7.21. The updated additional SA assessment work included assessment of the three reasonable options for the housing requirement (each with and without a proposed contribution to the unmet housing need forecast to arise in the Black Country).
- 7.22. This updated additional SA assessment work provides a crucial source of information to inform the planning judgement regarding which of the reasonable housing requirement options should form the basis for the proposed housing requirement within the draft Shropshire Local Plan.
- 7.23. This work assessed each option against the SA objectives and in this way informs judgements about their relative sustainability.
- 7.24. In general terms, the updated additional SA assessment work can be summarised as concluding that the greater the level of housing proposed within the option, the greater the likelihood of positive impacts on social and economic factors. Conversely the greater the level of housing proposed within the option, the greater the potential of negative impacts on environmental factors. It is important to recognise that the principle of sustainable development is about achieving balance across all three pillars – social, economic, and environmental.
- 7.25. The updated additional SA assessment work concluded that none of the options are likely to result in a strongly negative effect.

- 7.26. It also concluded that only one option is likely to result in a strongly positive effect. This is Option 3b: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs, which is likely to result in a strongly positive effect in the short, medium and long term on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society, and potentially in the long term on SA objective 4: promoting access to services for all sections of society.
- 7.27. The updated additional SA assessment work ultimately concluded that on balance, **Option 3b**: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs represented the most sustainable of the reasonable options for the level of housing growth identified. Further detail on the outcomes of this updated additional SA assessment work is provided within the Updated Additional SA Report.

Ability to Respond to Identified Issues and Support Identified Opportunities

- 7.28. The evidence base and consultation responses that have informed preparation of the draft Shropshire Local Plan identified a range of issues and opportunities in Shropshire. Key issues and opportunities identified include:
- a. Providing flexibility to respond to changes to local housing need over the proposed plan period.
 - b. Responding positively to specific sustainable development opportunities.
 - c. Increasing delivery of family and affordable housing to meet needs of local communities and support new families coming into Shropshire.
 - d. Supporting delivery of specialist housing for older people, people with disabilities and meet the housing needs of other groups within the community.
 - e. Support diversification of our labour force.
 - f. Support wider aspirations, including increased economic growth and productivity.
- 7.29. Key evidence which informed identification of these issues and opportunities include assessments of local housing need (including EV069), the various iterations of the Authority Monitoring Report (including EV012), the Strategic Housing Market Assessment (EV097.01 and EV097.02), Productivity Growth Forecasts (EV090), the Economic Development Needs Assessment (EV043), the Economic Growth Strategy (EV044), and the Local Plan Viability Study (EV115.01).

- 7.30. The material prepared to facilitate and subsequent responses / representations to consultations undertaken as part of the preparation of the draft Shropshire Local Plan also informed identification of these issues and opportunities. This includes the Issues & Strategic Options Consultation (EV003.01 and EV003.02), the Preferred Scale and Distribution of Development Consultation (EV004.01 and EV004.02), the Regulation 18: Pre-Submission Consultation (EV007.01 and EV007.03), and the Regulation 19: Pre-Submission Consultation (SD002, SD014.01-SD014.02; representations A0001-A0682 and GC4o).
- 7.31. Each of the reasonable options for the housing requirement include a percentage uplift above local housing need in order to support addressing identified issues and achievement of identified opportunities.
- 7.32. In general terms, the greater the level of uplift above local housing need proposed within the option, the greater the ability to support addressing the identified issues and the achievement of the identified opportunities.
- 7.33. Furthermore the level of development proposed must also be deliverable – this is considered in further detail in the deliverability section.
- 7.34. It is also important to note that level of housing is only one mechanism within the scope of the draft Shropshire Local Plan to contribute to delivering the overall vision and strategy. Policies that address the resultant location, type, tenure, and quality of housing, to ensure new housing is responsive to identified issues and opportunities is equally if not more important. These policies have all been subject to SA.

Relationship between identified issues and opportunities in Shropshire and a proposed contribution to unmet housing need forecast to arise in the Black Country.

- 7.35. It is considered that a proposed contribution to unmet housing needs forecast to arise in the Black Country is complementary to and will facilitate achievement of wider issues and opportunities identified in Shropshire. As:
- a. The ability to positively respond to sustainable development opportunities generally increases as the amount of development proposed rises. This includes to provide a contribution to unmet housing need forecast to arise in the Black Country.
 - b. Increasing overall housing numbers is one mechanism available to provide more family and affordable housing, adaptable and

specialist housing for older people and people with disabilities, and housing to meet the needs of other groups in Shropshire communities, as such housing generally forms a portion of total housing provision.² Increased levels of housing to provide a contribution to unmet housing need forecast to arise in the Black Country would facilitate this mechanism.

- c. The Black Country is one location from which new families can be attracted into Shropshire. Established migration patterns between the two areas support this conclusion³.
- d. One way to supplement and diversity the Shropshire labour force is retaining and attracting more working-aged people into Shropshire, including through provision of appropriate housing to meet their needs⁴. Increased levels of housing to provide a contribution to unmet housing need forecast to arise in the Black Country, would facilitate this mechanism.
- e. The Black Country is a potential source of labour supply for Shropshire. Established migration and commuting patterns between the two areas support this conclusion⁵.
- f. A means of supporting wider aspirations for Shropshire, including increased economic growth and productivity, is provision of appropriate housing opportunities, particularly for working-aged people. Increased housing provision as a contribution to unmet housing need forecast to arise in the Black Country would facilitate this mechanism.

7.36. Three of the reasonable options for the housing requirement include both a percentage uplift above local housing need and a further specific 1,500 dwelling contribution to the unmet housing need forecast to arise within the Black Country. Both these adjustments can support the ability to address wider identified issues and achieve identified opportunities in Shropshire. This 'overlap' must be appropriately considered when determining an appropriate housing requirement for inclusion in the draft Shropshire Local Plan.

² Increased housing provision is only one mechanism available to provide the types of housing required to meet the needs of families, older people and other groups within our communities. The draft Shropshire Local Plan includes a range of draft policies that address the location, type, tenure, and quality of housing, to ensure new housing effectively supports the ability to meet the needs of our communities and all the groups within them.

³ These migration patterns informed consideration of the relationship between Shropshire and the Black Country, as documented within the Housing Topic Paper GC4i. These migration patterns also directly inform sub-national population projections and associated sub-national household projections which underpin calculations of local housing need.

⁴ It is important to note that increased housing provision is only one of the mechanisms available to supplement and diversity the labour force. Provision of appropriate employment opportunities and lifestyles that people aspire to are other such mechanisms.

⁵ Migration and commuting patterns informed consideration of the relationship between the two areas, as documented within the Housing Topic Paper GC4i.

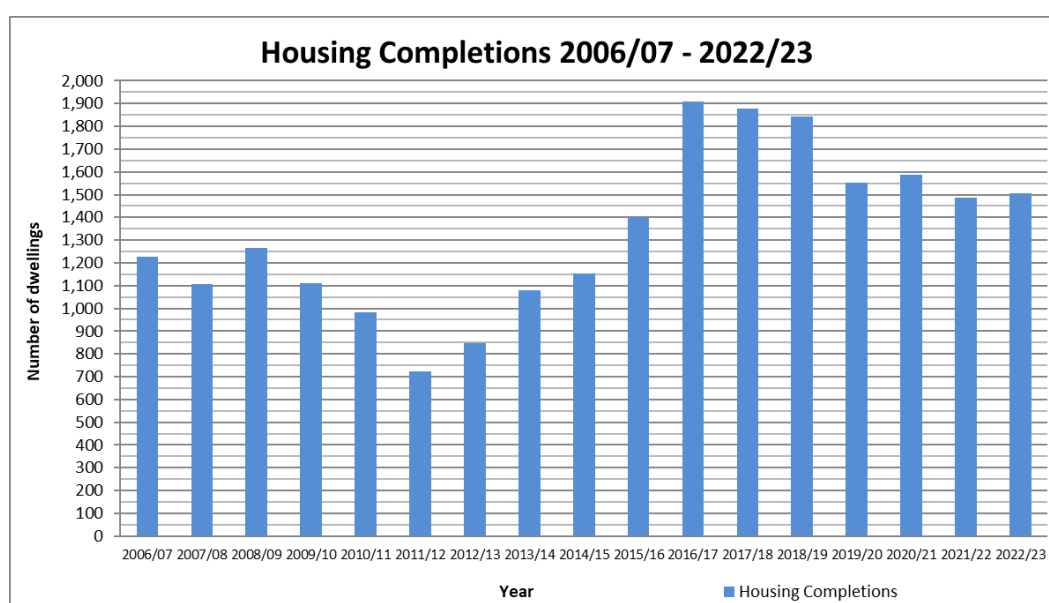
Deliverability

7.37. It is essential that the proposed housing requirement is deliverable. Whilst past trends on housing completions are inevitably influenced by a range of factors, they form a useful indicator of potential future deliverability.

7.38. Figure 7.1 summarises annual housing completion rates over the current plan period thus far (from 2006/07-2022/23).

Figure 7.1: Housing Completions in Shropshire for 2006/07-2022/23

| | | | | | | | | | |
|----------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Financial Year | 2006 / 07 | 2007 / 08 | 2008 / 09 | 2009 / 10 | 2010 / 11 | 2011 / 12 | 2012 / 13 | 2013 / 14 | 2014 / 15 |
| Housing Completions | 1,228 | 1,106 | 1,265 | 1,112 | 984 | 724 | 847 | 1,079 | 1,155 |
| Financial Year | 2015 / 16 | 2016 / 17 | 2017 / 18 | 2018 / 19 | 2019 / 20 | 2020 / 21 | 2021 / 22 | 2022 / 23 | |
| Housing Completions | 1,402 | 1,910 | 1,876 | 1,843 | 1,554 | 1,586 | 1,485 | 1,507 | |



7.39. It illustrates that over this period, housing completions experienced both significant peaks (with a particular 'spike' of completions in 2016/17-2018/19 as part of a wider peak in 2016/17-2022/23) and significant troughs (particularly 2009/10-2014/15). This is not surprising and is a common pattern within the housing market, reflecting the range of known and unknown local, regional, national and international factors that influence it.

7.40. Over the longer term period (2006/07-2022/23), the annual average housing completion rate was some 1,333 dwellings, which is higher than the annual average associated with Option 1a, Option 1b and Option 2a; but lower than the annual average associated with Option 2b, Option 3a and Option 3b.

7.41. Over the shorter term (most recent five year period from 2018/19-2022/23) which represents a part of a peak in the housing market,

the annual average housing completion rate was some 1,595 dwellings, which is higher than the annual average of all the reasonable options for the housing requirement.

- 7.42. This past trend data indicates that it is possible, in an individual year, to achieve/exceed the annual average housing requirement associated with all of the reasonable options for the housing requirement. However, it also suggests that ensuring consistent achievement of the annual average housing requirement associated with all the reasonable options (particularly Option 2b, Option 3a and Option 3b) over the proposed plan period, will require proactive implementation of the draft Shropshire Local Plan by Shropshire Council and the effective operation of the housing market.
- 7.43. It is recognised that there are a myriad of known and unknown local, regional, national and international factors that will influence the housing market and housing completion rates in Shropshire. These factors will inevitably result in fluctuations to housing completion rates over the proposed plan period – similar to those identified within the past delivery trends. It is important that the proposed housing requirement is responsive to the potential for such fluctuations and the potential for peaks and troughs in the housing market and associated housing completion rates.
- 7.44. It is also acknowledged that the higher the annual average housing requirement, the more challenging it becomes to ensure delivery over the entirety of the proposed plan period. However, it is important that caution regarding deliverability is balanced with aspiration to support the ability to contribute to addressing identified issues and opportunities in Shropshire.
- 7.45. It is also acknowledged that the higher the annual average housing requirement, the greater the potential for investment in supporting infrastructure. Throughout the preparation of the submission version of the draft Shropshire Local Plan, Shropshire Council have proactively engaged with infrastructure providers. These discussions have provided confidence regarding the deliverability of infrastructure necessary to support the housing requirement proposed within the submission version of the draft Shropshire Local Plan.
- 7.46. Given the level of housing growth associated with the reasonable options for the housing requirement, Shropshire Council has confidence regarding the deliverability of infrastructure necessary to support all the growth options. This is informed by the engagement previously undertaken with infrastructure providers.

7.47. Identification of a robust housing land supply to provide confidence regarding deliverability of the proposed housing requirement is also important.

Consultation Responses

7.48. As documented within paragraph 7.30, consultation material and responses/representations directly informed identification of key issues and opportunities in Shropshire, which can be contributed to through the proposed housing requirement.

7.49. Consultation responses/representations also directly informed identification of the housing requirement proposed within the draft Shropshire Local Plan (at the point of submission).

7.50. The responses/representations received during the various consultations undertaken to inform the draft Shropshire Local Plan have been given due consideration when undertaking the planning judgement regarding an appropriate housing requirement for inclusion within the draft Shropshire Local Plan.

Expression of the Housing Requirement

7.51. Throughout preparation of the draft Shropshire Local Plan, reasonable options for the housing requirement and the proposed housing requirement within the draft Shropshire Local Plan were expressed as 'around'.

7.52. Within ID28, the Planning Inspectors concluded that the housing requirement should be expressed as 'a minimum' "*for both monitoring and effectiveness.*"

7.53. Shropshire Council accepts this principle. However, the implications do require careful consideration in the context of identifying which of the reasonable housing requirement options should form the basis for the proposed housing requirement within the draft Shropshire Local Plan.

The Proposed Housing Requirement

7.54. In exercising planning judgement regarding which of the reasonable options should form the basis for the housing requirement within the draft Shropshire Local Plan, Shropshire Council has carefully considered the extensive range of information available.

7.55. In conclusion, Shropshire Council considers **Option 3b** should form the basis for the proposed housing requirement within the draft Shropshire Local Plan.

7.56. **Option 3b: High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs** represents around a 15% uplift on local housing need of 25,894 dwellings over the 22-year plan period (annual average of 1,177 dwellings), plus a further 1,500 dwelling uplift as a contribution toward forecast unmet housing need in the Black Country.

7.57. The resultant proposed housing requirement is **31,300 dwellings** over the proposed plan period from 2016-2038. This equates to an **annual average of around 1,423 dwellings**.

Reasons for the Proposed Housing Requirement

7.58. As documented within paragraph 7.53, in undertaking the planning judgement exercise to determine which of the reasonable should form the basis for the housing requirement proposed within the draft Shropshire Local Plan, careful consideration of available information has been undertaken.

7.59. Key considerations included:

- a. The level of housing associated with Option 3b is sufficient to **meet local housing need (2020 base date)**, whilst also providing a buffer above local housing need. This provides significant confidence that need will be achieved and allows flexibility to respond to changes to need over the proposed plan period.
- b. The level of housing associated with Option 3b is sufficient to allow for **a significant positive contribution** to the various identified **issues and opportunities in Shropshire** (when considered in the context of specific policies to positively influence the location, type, tenure, and quality of housing).
- c. The level of housing associated with Option 3b **achieves the principle of and will deliver High Growth**, which underpins the level of growth proposed within the spatial strategy of the draft Shropshire Local Plan.
 - i. This option more than meets evidenced housing need and offers significant opportunities to meet the requirements of all sections of society in terms of location, affordability and adaptability.
 - ii. It is likely to support existing services such as schools, doctor's surgeries, shops and play areas in the medium to long term and to create a balanced supply of employment land and/or more or higher value jobs.
 - iii. It also is likely to support new leisure, recreational and cultural activities in the medium to long term and economies of scale may offer opportunities to increase the provision of energy from

- renewable sources, support reductions in energy consumption and promote energy efficiency.
- d. Option 3b includes a **specific contribution of 1,500 dwellings towards the unmet housing need forecast to arise in the Black Country**. This is consistent with the option considered most sustainable in the updated additional SA assessment work regarding options for any contribution to unmet housing needs forecast to arise in the Black Country. It is also consistent with the conclusions of the planning judgement regarding the most appropriate approach to this matter – summarised earlier in this document.
 - e. Option 3b is considered **ambitious but deliverable**, having regard to available information (including consultation responses from site promoters and the evidence base prepared to inform the draft Shropshire Local Plan) on short and longer term delivery trends and recognising there is likely to be a myriad of known and unknown local, regional, national and international factors that can influence the housing market and housing completion rates in Shropshire and the need to provide sufficient flexibility to respond to these factors.
 - f. It is considered that the **infrastructure** necessary to support the housing growth associated with Option 3b is **deliverable**, informed by engagement previously undertaken with infrastructure providers during the preparation of the draft Shropshire Local Plan.
 - g. Based on the updated additional SA assessment work undertaken, it is considered that Option 3b presents an opportunity to:
 - i. Achieve a **strongly positive effect** on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society in the short, medium and long term.
 - ii. In the long-term, achieve a **strongly positive effect** on SA objective 4: promoting access to services for all sections of society.
 - iii. Achieve **positive impacts** against a range of other identified sustainability objectives.
 - h. Based on the updated additional SA assessment work undertaken, it is considered that Option 3b is **unlikely to result in any strongly negative effects on any SA objectives**. Whilst a potential risk of achieving negative impacts against a range of identified sustainability objectives is acknowledged, it is considered that opportunities exist to **mitigate** the extent of such impacts. This includes through careful consideration of the locations of site allocations and the identification of appropriate policies to manage resultant development.

- i. Based on the updated additional SA assessment work undertaken, it is considered that Option 3b strikes an appropriate balance across the three pillars (social, economic, and environmental) of **sustainable development** and will contribute towards the achievement of the **long term sustainability** of Shropshire.
 - j. Whilst Options 1b and 2b would: ensure local housing need is achieved; result in a contribution to the unmet housing need forecast to arise in the Black Country; and provide opportunities to respond to the identified issues and opportunities in Shropshire, there would be fewer opportunities to respond to the identified issues and opportunities in Shropshire compared to Option 3b.
 - k. Whilst Options 1a and 2a would ensure that local housing need is achieved and provide opportunities to respond to the identified issues and opportunities in Shropshire, the opportunities to respond to the identified issues and opportunities in Shropshire would be less than those associated with Option 3b. Furthermore, these options would result in no contribution to the unmet housing need forecast to arise in the Black Country.
 - l. Whilst Options 3a would ensure that local housing need is achieved and provide opportunities to respond to the identified issues and opportunities in Shropshire, it would result in no contribution to the unmet housing need forecast to arise in the Black Country.
 - m. A series of consultations have been undertaken regarding the proposed housing requirement of the draft Shropshire Local Plan (as summarised within paragraph 7.30). Having carefully reflected upon **consultation responses** received, Shropshire Council considers the level of housing associated with Option 3b responds to and balances the range of issues, considerations and differing perspectives raised.
 - n. Option 3b is considered sufficiently **responsive to the 'overlap'** between uplifts to local housing need to support achievement of identified issues and opportunities in Shropshire, and contributions to the achievement of identified issues and opportunities in Shropshire associated with a contribution to the unmet housing need forecast to arise within the Black Country.
 - o. As documented in ID28, the proposed housing requirement is to be expressed as a 'minimum' rather than as 'around'. This means there is significantly more certainty about the minimum level of housing to be provided.
- 7.60. In conclusion, having considered available evidence, responses to previous consultations, the results of technical assessment, and other relevant information in applying planning judgement, Shropshire Council considers the housing requirement within the draft

Shropshire Local Plan should be based on **Option 3b** of the reasonable options identified.

- 7.61. **The proposed housing requirement is therefore a minimum of 31,300 dwellings between 2016 and 2038, which equates to an annual average of around 1,423 dwellings. This represents:**
- a. A continuation of the 'High Growth' option for the housing requirement previously identified and contained in the submission version of the draft Shropshire Local Plan (15% uplift to local housing need); and**
 - b. A continuation of the specific contribution of 1,500 dwellings towards the unmet housing need forecast to arise in the Black Country proposed within the submission version of the draft Shropshire Local Plan. This is however achieved through a further specific uplift of 1,500 dwellings.**

Implications of the Proposed Housing Requirement

- 7.62. The submission version of the draft Shropshire Local Plan proposed a housing requirement of 30,800 dwellings between 2016 and 2038. This equates to an annual average of around 1,400 dwellings.
- 7.63. Following careful consideration of the updated reasonable options for the housing requirement, both through the updated additional SA assessment process and the planning judgement exercise (as summarised within this document), it is proposed that the housing requirement within the draft Shropshire Local Plan increases to some 31,300 dwellings between 2016 and 2038. This equates to an annual average of around 1,423 dwellings.
- 7.64. This would result in an increase to the housing requirement of some **500 dwellings** over the period from 2016 to 2038. This equates to an annual average increase of **around 23 dwellings**.
- 7.65. Main modifications would be required to the draft Shropshire Local Plan to reflect this proposed change – including to draft Policy SP2 and its supporting text and the explanation to draft Policy SP7.
- 7.66. Main modifications would also be required to draft Policy SP2 to expressly state the proposed housing requirement includes a 1,500 dwelling contribution to the unmet housing need forecast to arise within the Black Country. Furthermore, it is also necessary to:
- a. Consider through the SA process reasonable options and subsequently identify appropriate main modifications in order to accommodate the proposed 500 dwelling uplift to the proposed housing requirement.

- b. Consider through the SA site assessment process, reasonable sites to accommodate the proposed contribution to the unmet housing need forecast to arise in the Black Country⁶ and subsequently identify appropriate main modifications in order to support the accommodation of the proposed 1,500 dwelling contribution to the unmet housing needs forecast to arise in the Black Country.

⁶ Consistent with Paragraph 21 of ID28 which specified that for the purpose of effectiveness, there is a need to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country, through additional SA and site assessment work.

8. Accommodating the Proposed Uplift to the Housing Requirement

Options to Accommodate the Proposed Uplift to the Housing Requirement

- 8.1. Having carefully considered the range of mechanisms available to ensure delivery of the proposed housing requirement and in particular the proposed 500 dwelling uplift to the housing requirement, four reasonable options have been identified.
- 8.2. Each option could facilitate provision of more housing. Either through densification of development on proposed allocations (which would not constitute an additional site or extend the developed area); extension to site allocations (this does not constitute an additional site but does extend the area developed); or facilitation of development on additional sites (windfall sites or site allocations, as suggested may be necessary in paragraph 22 of ID28).
- 8.3. These options are:
 - a. **Option 1: Increasing Settlement Guidelines and Windfall Allowances.**
 - b. **Option 2: Densification of Proposed Site Allocations.**
 - c. **Option 3: Increasing Site Allocations.**
 - d. **Option 4: A Combination of Two or More of the Other Options.**

Option 1: Increasing Settlement Guidelines and Windfall Allowances

- 8.4. Settlement housing guidelines constitute the level of residential development specifically planned for at a settlement within the draft Shropshire Local Plan. Draft Policy SP7: Managing Housing Development summarises key considerations in circumstances where either the proposed settlement housing guideline appears either likely to be exceeded or unlikely to be achieved.
- 8.5. Windfall allowances are in effect the difference between the settlements housing guideline and the capacity of completions already achieved in the proposed plan period / identified commitments (sites with planning permission or prior approval, 'saved' SAMDev allocations and proposed allocations). This allowance can be achieved through the emergence of additional dwellings on windfall sites (sites not specifically planned for but facilitated by the draft Shropshire Local Plan) and/or other sources of additional dwellings that emerge in a settlement.
- 8.6. It is considered likely that opportunities exist to increase settlement guidelines and associated windfall allowances for one or more

Strategic, Principal, Key Centres and/or Strategic Settlements to provide additional capacity for windfall development.

- 8.7. Settlement guidelines and associated windfall allowances in the draft Shropshire Local Plan were considered reasonable when proposed, and there is flexibility within the draft Shropshire Local Plan for settlement guidelines to be exceeded. However, there is evidence that in some instances settlement guidelines and associated windfall allowances have been overly cautious.
- 8.8. Additional capacity associated with any increased windfall allowances would need to be deliverable within the proposed plan period and support delivery of necessary supporting infrastructure.

Option 2: Densification of Proposed Site Allocations

- 8.9. There are likely opportunities to increase the density and thereby the capacity of one or more proposed site allocations. Particularly in circumstances where further assessment work / masterplanning has been undertaken regarding capacity by site promoters since submission of the draft Shropshire Local Plan and / or where a development is expected to include a form of housing which is of a higher density, such as smaller properties and specialist housing for older people - including in response to wider policies in the draft Shropshire Local Plan.
- 8.10. However, a cautious approach would be required to ensure that the increased density would still result in an appropriate form of development, as such this exercise would need to be undertaken on a site by site basis.
- 8.11. Additional capacity associated with densification of site allocations would need to be deliverable within the proposed plan period and support delivery of necessary supporting infrastructure.

Option 3: Increasing Site Allocations

- 8.12. There may be opportunities to extend the site area of proposed allocations to increase their capacity and/or opportunities to identify additional site allocations (including through the early release of proposed safeguarded land, identification of new strategic site allocations or identification of new site allocations associated with existing settlements in order to provide additional capacity).
- 8.13. Additional capacity associated with increasing site allocations would need to be deliverable within the proposed plan period and support delivery of necessary supporting infrastructure.

Option 4: A Combination of Two or More of the Other Options

8.14. It may be appropriate to consider utilising a combination of all or a selection of mechanisms from the other reasonable options for accommodating the uplift to the proposed housing requirement.

Identifying the Preferred Option to Accommodate the Proposed Uplift to the Housing Requirement

8.15. The decision regarding which of the reasonable options to accommodate the proposed uplift to the housing requirement should be utilised within the draft Shropshire Local Plan is ultimately one of planning judgement.

8.16. There is however an extensive range of information/factors that informs this planning judgement. This includes:

- a. The updated additional SA assessment work regarding options to accommodate a proposed uplift to the housing requirement.
- b. Compatibility with the wider vision, strategy and spatial framework of the draft Shropshire Local Plan.
- c. Feasibility and deliverability, including through consideration of whether there are actual opportunities to achieve the proposed uplift and whether these opportunities would be deliverable within the proposed plan period.

8.17. Dealing with each in turn:

Updated additional SA assessment work regarding options to accommodate a proposed uplift to the housing requirement

8.18. The updated additional SA assessment work included assessment of the four reasonable options to accommodate a proposed uplift to the housing requirement.

8.19. This updated additional SA assessment work provides an important source of information to inform the planning judgement regarding the approach to accommodate the proposed uplift to the housing requirement within the draft Shropshire Local Plan. It assesses each option against the SA objectives, and in this way informs judgements about their relative sustainability.

8.20. In general terms, the updated additional SA assessment work can be summarised as concluding that options that provide greater certainty about the proportion of the uplift to the housing requirement direct to urban areas achieve more positive impacts on social, economic and environmental factors.

8.21. It is important to note that the housing needs of Shropshire's rural communities must be recognised and appropriately planned for within any strategic distribution of planned development incorporated

into the draft Shropshire Local Plan. However, this component of the updated additional SA assessment work considers only the accommodation of the proposed uplift to the housing requirement.

- 8.22. On balance, the updated additional SA assessment concludes that **Option 1**: increasing settlement guidelines and windfall allowances, represents the most sustainable of the reasonable options for accommodating an uplift to the proposed housing requirement. This is because:
- a. It presents an opportunity to achieve a strongly positive effect on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society in the short, medium and long term.
 - b. It presents an opportunity to achieve a strongly positive effect on SA Objective 4: promotion of access to services for all sections of society in the short, medium and long term.
 - c. It presents an opportunity to achieve a strongly positive effect on SA objective 14: promotion of efficient use of natural resources in the short, medium and long term.
 - d. It presents an opportunity to achieve positive impacts against a range of identified sustainability objectives.
 - e. Whilst it poses a potential risk of achieving negative impacts against a range of identified sustainability objectives, it is considered that opportunities exist to mitigate the extent of such impacts. Particularly through identification of appropriate policies to manage resultant development.
 - f. This option would ensure that the proposed uplift to the proposed housing requirement is accommodated within the most sustainable settlements with the widest array of infrastructure, services and facilities necessary to support new development.
- Option 2: densification of proposed site allocations would also achieve this outcome. However, on balance it is considered that the positive sustainability outcomes associated with Option 1 are more significant than Option 2 and the risks of negative sustainability outcomes associated with Option 1 are lower than Option 2 – primarily due to the increased certainty regarding the urban focus of development. Furthermore, it is important to note that the reason for the Council’s cautious approach to site densities is to both provide confidence in deliverability of the proposed housing requirement and avoid risk of over-development which can have negative impacts on a number of SA objectives.
- Option 3: increasing site allocations would also achieve the proposed uplift to the proposed housing requirement. However, on balance it is considered that the positive sustainability outcomes

associated with Option 1 are more significant than Option 3 and the risks of negative sustainability outcomes associated with Option 1 are lower than Option 3 – primarily due to the increased certainty regarding the urban focus of development.

-Option 4: a combination of the other options would also achieve the proposed housing requirement uplift. However, the effects against each SA objective will align with the effects of the other three options. Applying the precautionary principle, the conclusion for this reasonable option must reflect the 'worst case' scenario from each of the other reasonable options.

8.23. Further detail on the outcomes of the updated additional SA assessment work is provided within the Updated Additional SA Report.

Compatibility with the wider vision, strategy and spatial framework of the draft Shropshire Local Plan

8.24. It is important that any option to accommodate the proposed uplift to the housing requirement is compatible with the wider vision, strategy and spatial framework proposed within the draft Shropshire Local Plan. However, it should also be recognised the level of uplift to the proposed (500 dwellings) is unlikely to result in significant change to the overall distribution of development.

8.25. On balance, it is considered all of the reasonable options to accommodate the proposed uplift to the housing requirement have the potential to be compatible with the wider vision, strategy and spatial framework proposed within the draft Shropshire Local Plan.

8.26. In particular they all have the potential to support the proposed 'urban focus' approach to the strategic distribution of planned development.

- a. Option 1: aligns with the principle of urban focus, directing additional windfall development towards the Strategic, Principal, Key Centres and/or Strategic Settlements.
- b. Option 2: would likely continue to align with the principle of 'urban focus' as the majority of proposed allocations are associated with urban settlements. However, there are those associated with rural settlements. As such, this is somewhat dependent on the allocations selected (although the level of uplift to the proposed housing requirement in the context of the total proposed housing requirement is unlikely to result in a significant change to the overall distribution of development).
- c. Option 3: would likely continue to align with the principle of 'urban focus' if it entailed an extension to one or more proposed allocations, as the majority are associated with urban settlements.

However, there are those associated with rural settlements. as such, this is somewhat dependent on the allocations selected. It could also continue to align with the principle of 'urban focus' if it entailed identification of one or more additional site allocations, however this would to be dependent on the location/characteristics of such proposed allocations.

d. Option 4: Is directly linked to the other identified options.

Feasibility and Deliverability

8.27. The intention of this exercise is to consider feasibility and deliverability of the reasonable options to achieve the uplift to the proposed housing requirement.

Option 1: Increasing Settlement Guidelines and Windfall Allowances

8.28. Windfall development has traditionally constituted a significant proportion of total residential development occurring in Shropshire. This is perhaps unsurprising, given the characteristics of Shropshire.

8.29. It is a large and diverse rural county containing the Strategic Centre of Shrewsbury; five Principal Centres (Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch); 11 Key Centres (Albrighton, Bishop's Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem); numerous rural settlements identified as Community Hubs and Community Clusters; hundreds of other rural villages and hamlets; and a significant rural hinterland.

8.30. Consequently, there is a consistent and significant recycling of previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings; and high uptake of affordable housing exception sites of varying sizes. Development of such sites often represents windfall development.

8.31. This is also likely to be facilitated over the proposed plan period through recent/future changes to permitted development rights.

8.32. The prevalence of windfall development, particularly of small scale windfall development, was noted within the Strategic Land Availability Assessment (SLAA) (EV106.01). The SLAA included an assessment of past completions achieved on small scale windfall sites of less than 5 dwellings and noted that these rates "*supported the conclusions that windfall development does and will continue to represent an important part of the housing land supply.*"

- 8.33. The Housing Topic Paper (GC4i) also included analysis of windfall development in Shropshire. It concluded that "*consistent with paragraph 71 of the NPPF, there is compelling evidence available to justify and support the inclusion of an appropriate windfall allowance within the sources of supply identified to achieve the proposed housing requirement for Shropshire – both in the next five years and the entirety of the proposed plan period.*"
- 8.34. Best available data on past completions continues to support the importance of windfall sites as a significant and appropriate source of supply for residential development. Specifically, over the last five years (2018/19-2022/23), **some 4,683 dwellings** (net) have been completed on windfall sites in Shropshire (1,669 dwellings on small scale windfall sites of less than 5 dwellings and 3,014 dwellings on medium and large scale windfall sites of 5 or more dwellings), equating to a net annual average of 937 dwellings.
- 8.35. This equates to around 59% of total completions achieved within this period (and in each of these five years windfall completions equated to in excess of 50% of total completions achieved). This information is summarised within Figure 8.1 below:

Figure 8.1: Net Dwellings Completed on Windfall Sites 2018/19-2022/23

| Year | Small Windfall Site Completions | Medium and Large Windfall Site Completions | All Windfall Site Completions | Total Completions | Proportion of Total Completions on Windfall Sites |
|----------------|---------------------------------|--|-------------------------------|-------------------|---|
| 2018/19 | 390 | 893 | 1,283 | 1,843 | 69.61% |
| 2019/20 | 328 | 596 | 924 | 1,554 | 59.46% |
| 2020/21 | 269 | 642 | 911 | 1,586 | 57.44% |
| 2021/22 | 290 | 509 | 799 | 1,485 | 53.80% |
| 2022/23 | 392 | 374 | 766 | 1,507 | 50.83% |
| Total | 1,669 | 3,014 | 4,683 | 7,975 | 58.72% |
| Average | 334 | 603 | 937 | 1,595 | 58.72% |

- 8.36. Existing commitments on sites with Planning Permission or Prior Approval provide further endorsement of the importance of windfall sites in Shropshire. Specifically, as at 31st March 2023, 3,971 net dwellings were committed on windfall sites with Planning Permission or Prior Approval (consisting of 1,272 dwellings on small scale windfall sites of less than 5 dwellings and 2,699 dwellings on medium and large scale windfall sites of 5 or more dwellings).
- 8.37. It is considered the proposed policies in the draft Shropshire Local Plan would also facilitate residential development occurring on appropriate windfall sites. This includes:
- a. The strategy for the level and distribution of development across Shropshire in draft Policy SP2 facilitates windfall development on appropriate sites to complement proposed allocations.

- b. Draft Settlement Policies (S1-S18) identify proposed development strategies for Strategic, Principal and Key Centres; Community Hubs; and Community Clusters. In addition to existing and proposed allocations, these strategies specifically allow for appropriate and complementary windfall development.
 - c. Draft Policy SP7 allows positive consideration of sustainable housing development, including on appropriate windfall sites, where they comply with wider requirements within this draft policy and other relevant draft policies in the Local Plan.
 - d. Draft Policy SP8 provides the policy framework for permitting windfall development within the development boundaries of proposed Community Hubs.
 - e. Draft Policy SP9 facilitates a range of forms of appropriate windfall development within Community Clusters, where they comply with specified criteria within the policy and other relevant draft policies in the draft Shropshire Local Plan.
 - f. Draft Policy SP10 identifies the forms of residential development appropriate within the 'countryside'. It includes a range of forms of affordable housing, conversions of appropriate permanent buildings, sympathetic and appropriate subdivision of existing dwellings, and essential rural workers dwellings.
 - g. Draft Policy SP11 identifies the limited forms of residential development appropriate within the 'Green Belt'.
 - h. Affordable housing policies (DP4-DP7) allow for various forms of affordable housing where they comply with relevant draft policies in the draft Shropshire Local Plan.
- 8.38. Through comparison of windfall allowances identified within Appendix 5 of the draft Shropshire Local Plan (data as at 31st March 2019) and at 31st March 2023, it is apparent that in many of the urban areas (Strategic, Principal and Key Centres), these windfall allowances have significantly reduced. This is as a result of increases to completions and commitments identified to contribute to the achievement of proposed settlement guidelines. In some instances this reduction is very significant and in others it has resulted in the windfall allowance for some settlements already being exceeded.
- 8.39. The settlement guidelines for proposed strategic settlements in the draft Shropshire Local Plan do not include a specific windfall allowance. However, it is apparent that the Planning Permission granted on the Former Ironbridge Power Station (19/05560/OUT) site exceeds the 1,000 dwelling proposed settlement guideline identified in draft Policy S20 of the draft Local Plan.

Table 8.1: Residential Guidelines, Supply and Windfall Allowances: Strategic, Principal and Key Centres and Strategic Settlements

| Settlement | Draft Local Plan Proposed Guideline (2016-2038) | Completions (2016/17 to 2022/23) | Commitments | | | Windfall Data | |
|---------------------------------|---|----------------------------------|---|--|---|--|--|
| | | | Sites with Planning Permission or Prior Approval (at the 31 st March 2023) | SAMDev Plan Allocations without Planning Permission (at 31 st March 2023) | Proposed Allocations without Planning Permission (at 31 st March 2023) | Windfall Allowance: Appendix 5 of the Draft Shropshire Local Plan (at 31 st March 2019) | Current Windfall Allowance Reflecting Commitments & Completions (at 31 st March 2023) |
| Albrighton | 500 | 140 | 76 | 83 | 180 | 48 | 21 |
| Bishops Castle | 150 | 50 | 25 | 40 | 0 | 40 | 35 |
| Bridgnorth | 1,800 | 132 | 61 | 550 | 1,050 | 160 | 7 |
| Broseley | 250 | 174 | 73 | 20* | 0 | 50 | -17 |
| Church Stretton | 200 | 39 | 77 | 0 | 0 | 121 | 84 |
| Cleobury Mortimer | 200 | 56 | 24 | 125* | 0 | 120 | -5 |
| Craven Arms | 500 | 61 | 28 | 325 | 0 | 94 | 86 |
| Ellesmere | 800 | 188 | 232 | 250 | 0 | 170 | 130 |
| Highley | 250 | 131 | 10 | 0 | 100 | 31 | 9 |
| Ludlow | 1,000 | 339 | 585 | 0 | 19 | 82 | 57 |
| Market Drayton | 1,200 | 307 | 334 | 64 | 435 | 206 | 60 |
| Much Wenlock | 200 | 43 | 30 | 0 | 120 | 27 | 7 |
| Oswestry | 1,900 | 437 | 818 | 343 | 240 | 105 | 62 |
| Shifnal | 1,500 | 1,186 | 16 | 0 | 230 | 92 | 68 |
| Shrewsbury | 8,625 | 3,891 | 1,938 | 467 | 2,410 | 505 | -81 |
| Wem | 600 | 188 | 108 | 0 | 210 | 89 | 94 |
| Whitchurch | 1,600 | 368 | 276 | 561 | 450 | 82 | -55 |
| Clive Barracks, Tern Hill** | 350 | 0 | 0 | 0 | 350 | 0 | 0 |
| Former Ironbridge Power Station | 1,000 | 0 | 1,075 | 0 | 0 | 0 | -75 |

*Includes Neighbourhood Plan Allocations.

**The total capacity of Clive Barracks, Tern Hill is 750 dwellings, however it is forecast that 350 dwellings will be completed on the site by 2037/38 with the remainder of the dwellings completed beyond the plan period.

- 8.40. It is apparent from Table 8.1 that in a number of settlements, the windfall allowances proposed have reduced considerably over the past four years, and in some areas have already been exceeded. This suggests that in some instances windfall allowances in these settlements have either been set overly cautiously or there has been a disproportionate windfall delivery in the early part of the plan period. In reality, it is likely that a number of factors have impacted this, but the end result remains that there are now clearly opportunities to amend them to provide additional capacity for windfall development in the remaining part of the plan to 2038.
- 8.41. As such, it is considered there are feasible opportunities to increase settlement guidelines and associated windfall allowances to reflect changes to windfall commitments/understanding of likely windfall supply since submission of the draft Shropshire Local Plan in 2021.
- 8.42. It is also considered this evidence provides confidence that such amendments to settlement guidelines and associated windfall allowances would be deliverable within the proposed plan period. In addition, it is considered that it would support the delivery of necessary supporting infrastructure. This would need to be informed by an updated SA assessment of the strategic distribution of development.

Option 2: Densification of Proposed Site Allocations

- 8.43. Generally a cautious approach has been taken to the identification of approximate site capacities for proposed site allocations. In doing so, this provides confidence that proposals will result in an appropriate form of development that is complementary to its setting, proposed settlement guidelines are deliverable, and the proposed housing requirement for Shropshire is deliverable. These assumptions are informed by a proportionate and robust site assessment process.
- 8.44. Table 8.2 summarises approximate site capacities, net site densities and net site densities for the proposed residential allocations:

Table 8.2: Proposed Residential Allocations – Approximate Site Capacity, Site Area and Site Area Density

| <i>Proposed Site Allocation</i> | <i>Settlement</i> | <i>Type of Settlement</i> | <i>Place Plan</i> | <i>Net Site Area(ha)*</i> | <i>Dwellings Proposed</i> | <i>Net Density</i> | <i>Notes**</i> |
|---------------------------------|----------------------|---------------------------|-------------------|---------------------------|---------------------------|--------------------|--|
| ALB017 & ALB021 | Albrighton | Key Centre | Albrighton | 4.57 | 180 | 39 | |
| BKL008a | Bucknell | Community Hub | Bishops Castle | 0.85 | 20 | 24 | |
| CHR001 | Chirbury | Community Hub | Bishops Castle | 0.26 | 7 | 27 | |
| CHR002 | Chirbury | Community Hub | Bishops Castle | 0.29 | 7 | 24 | |
| CLU005 | Clun | Community Hub | Bishops Castle | 0.88 | 20 | 23 | |
| WBR007 & WBR008 | Worthen and Brockton | Community Hub | Bishops Castle | 1.02 | 25 | 25 | |
| WBR010 | Worthen and Brockton | Community Hub | Bishops Castle | 1.79 | 20 | 11 | |
| BRD030 | Bridgnorth | Principal Centre | Bridgnorth | 49.18 | 1,050 | 21 | |
| ALV006 & ALV007 | Alveley | Community Hub | Bridgnorth | 1.92 | 35 | 18 | |
| ALV009 | Alveley | Community Hub | Bridgnorth | 1.07 | 35 | 33 | |
| DNP009 | Ditton Priors | Community Hub | Bridgnorth | 1.98 | 40 | 20 | |
| ELL005, ELL008 & ELL033 | Ellesmere | Key Centre | Ellesmere | 6.65 | 170 | 26 | Planning Permission (21/03602/FUL) granted for 107 dwellings on ELL005. ELL008 & ELL033 now linked to delivery of existing mixed use allocation ELL003a & ELL003b. Full Planning Application (23/02170/FUL) pending consideration for enabling works to facilitate development. |
| HNN016 | Highley | Key Centre | Highley | 3.28 | 100 | 31 | |
| LUD056 | Ludlow | Principal Centre | Ludlow | 2.32 | 90 | 39 | Phase 1: Outline and Reserved Matters Permissions (16/03096/OUT & 19/02060/REM) granted. Subsequent Full Planning Permissions (19/05374/FUL & 20/01326/FUL) increasing capacity to 78 dwellings. Phase 2: Outline Planning Application (23/03716/OUT) pending decision with a resolution to grant for 9 dwellings. |
| LUD057 | Ludlow | Principal Centre | Ludlow | 0.48 | 10 | 21 | |
| BUR002 | Burford | Community Hub | Ludlow | 1.63 | 40 | 25 | |
| BUR004 | Burford | Community Hub | Ludlow | 4.68 | 100 | 21 | |
| CHK002 | Clee Hill | Community Hub | Ludlow | 0.95 | 20 | 21 | |
| MDR006 | Market Drayton | Principal Centre | Market Drayton | 3.19 | 125 | 39 | |
| MDR012 | Market Drayton | Principal Centre | Market Drayton | 2.32 | 70 | 30 | |
| MDR034 | Market Drayton | Principal Centre | Market Drayton | 3.97 | 120 | 30 | |
| MDR039 & MDR043 | Market Drayton | Principal Centre | Market Drayton | 4.92 | 120 | 24 | |

| Proposed Site Allocation | Settlement | Type of Settlement | Place Plan | Net Site Area(ha)* | Dwellings Proposed | Net Density | Notes** |
|---|-------------------|---------------------------|---------------------------|---------------------------|---------------------------|--------------------|---|
| HKW009 | Hinstock | Community Hub | Market Drayton | 1.47 | 35 | 24 | |
| HHH001 & HHH014 | Hodnet | Community Hub | Market Drayton | 2.19 | 40 | 18 | |
| MIN018 | Minsterley | Community Hub | Minsterley and Pontesbury | 0.84 | 20 | 24 | |
| PON008, PON017 & PON030 | Pontesbury | Community Hub | Minsterley and Pontesbury | 2.09 | 40 | 19 | Planning Permission (21/03660/FUL) granted for 38 dwellings on the PON008. The remainder of the site expected to follow on. |
| MUW012VAR | Much Wenlock | Key Centre | Much Wenlock | 2.67 | 120 | 45 | |
| CES005 | Cressage | Community Hub | Much Wenlock | 1.93 | 60 | 31 | |
| CES006 | Cressage | Community Hub | Much Wenlock | 0.23 | 4 | 17 | Planning Permission (21/02078/FUL) granted for conversion of the former Public House to two dwellings. Wider site expected to follow on as phase 2 development. |
| PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 | Oswestry | Principal Centre | Oswestry | 8.55 | 240 | 28 | |
| GWR009 | Gobowen | Community Hub | Oswestry | 1.90 | 25 | 13 | |
| KCK009 | Knockin | Community Hub | Oswestry | 0.91 | 25 | 27 | |
| LYH007 | Llanymynech | Community Hub | Oswestry | 1.48 | 50 | 34 | |
| PYC021 | Pant | Community Hub | Oswestry | 0.86 | 25 | 29 | |
| RUY019 | Ruyton XI Towns | Community Hub | Oswestry | 1.81 | 65 | 36 | |
| SMH031 | St Martins | Community Hub | Oswestry | 2.37 | 60 | 25 | |
| SMH038 | St Martins | Community Hub | Oswestry | 1.19 | 35 | 29 | Planning Permission (20/02248/FUL) granted for 35 dwellings. |
| WEF025 | West Felton | Community Hub | Oswestry | 1.61 | 60 | 37 | |
| WRP001VAR | Weston Rhyn | Community Hub | Oswestry | 2.69 | 60 | 22 | |
| WRP017 | Weston Rhyn | Community Hub | Oswestry | 1.24 | 40 | 32 | |
| WHN024 | Whittington | Community Hub | Oswestry | 2.02 | 70 | 35 | |
| SHF013 | Shifnal | Key Centre | Shifnal | 2.08 | 65 | 31 | |
| SHF015 & SHF029 | Shifnal | Key Centre | Shifnal | 2.70 | 65 | 24 | |
| SHF022 & SHF023 (part) | Shifnal | Key Centre | Shifnal | 2.80 | 100 | 36 | |
| SHR054a | Shrewsbury | Strategic Centre | Shrewsbury | 2.70 | 60 | 22 | |
| SHR057 & SHR177 | Shrewsbury | Strategic Centre | Shrewsbury | 11.40 | 400 | 35 | |

| Proposed Site Allocation | Settlement | Type of Settlement | Place Plan | Net Site Area(ha)* | Dwellings Proposed | Net Density | Notes** |
|--|---------------------------------|---------------------------|-------------------|---------------------------|---------------------------|--------------------|--|
| SHR060, SHR158 & SHR161 | Shrewsbury | Strategic Centre | Shrewsbury | 59.29 | 1,500 | 25 | |
| SHR145 | Shrewsbury | Strategic Centre | Shrewsbury | 4.08 | 150 | 37 | Outline and Reserved Matters Permissions (19/04389/OUT and (22/04331/REM) granted at appeal for 150 dwellings. |
| SHR173 | Shrewsbury | Strategic Centre | Shrewsbury | 13.98 | 450 | 32 | |
| BNP024 | Baschurch | Community Hub | Shrewsbury | 2.17 | 35 | 16 | |
| BNP035 | Baschurch | Community Hub | Shrewsbury | 0.93 | 20 | 22 | |
| BAY039 | Bayston Hill | Community Hub | Shrewsbury | 4.27 | 100 | 23 | |
| BAY050 | Bayston Hill | Community Hub | Shrewsbury | 2.21 | 47 | 21 | Full Planning Permission (22/02517/FUL) granted for 23 dwellings on part of the site. |
| BIT022 | Bicton | Community Hub | Shrewsbury | 1.44 | 15 | 10 | |
| BOM019 | Bomere Heath | Community Hub | Shrewsbury | 1.58 | 40 | 25 | |
| BOM020 | Bomere Heath | Community Hub | Shrewsbury | 0.90 | 15 | 17 | |
| FRD011 | Ford | Community Hub | Shrewsbury | 2.84 | 75 | 26 | |
| WEM010 | Wem | Key Centre | Wem | 2.92 | 120 | 41 | |
| WEM025 | Wem | Key Centre | Wem | 1.02 | 30 | 30 | |
| WEM033 | Wem | Key Centre | Wem | 2.39 | 60 | 25 | |
| CLV012 & CLV018 | Clive | Community Hub | Wem | 1.74 | 20 | 12 | |
| HDL006 | Hadnall | Community Hub | Wem | 1.37 | 40 | 29 | |
| SHA019 | Shawbury | Community Hub | Wem | 3.68 | 80 | 22 | |
| WHT014 | Whitchurch | Principal Centre | Whitchurch | 1.74 | 70 | 40 | |
| WHT037 & WHT044 | Whitchurch | Principal Centre | Whitchurch | 6.01 | 200 | 33 | |
| WHT042 | Whitchurch | Principal Centre | Whitchurch | 5.71 | 180 | 32 | |
| PPW025 | Prees | Community Hub | Whitchurch | 1.41 | 35 | 25 | |
| Clive Barracks, Tern Hill (BNT002) | Clive Barracks, Tern Hill | Strategic Settlement | Strategic Site | 39.80 | 750 | 19 | |
| Former Ironbridge Power Station (IRN001) | Former Ironbridge Power Station | Strategic Settlement | Strategic Site | 84.19 | 1,000 | 12 | Outline Planning Permission (19/05560/OUT) granted for 1,075 dwellings. Series of association Reserved Matters approved / pending consideration. |

**Net Site Area adjusted to exclude any employment land that forms part of the proposed allocation and standard assumptions regarding developable area following on-site infrastructure and open space provision. Please Note: Proposed allocations may be subject to further requirements which further reduce the net developable area available. Particularly open space requirements, biodiversity net gain and infrastructure requirements.*

***Where planning permission is for less than the approximate site guideline for a proposed allocation, this is reflected within the commitments for a settlement.*

- 8.45. It is apparent from Table 8.2 that net site densities for proposed site allocations vary considerably. This is perhaps unsurprising given:
- a. The different characteristics of proposed site allocations.
 - b. The diverse characteristics of settlements across Shropshire and the intention that proposed allocations should positively respond to the characteristics of their setting.
 - c. The varied design considerations and requirements for proposed allocations. This includes requirements for larger sites to provide greater on-site infrastructure to support the development, reducing net developable area.
 - d. The differing types of constraints relevant to proposed allocations.
- 8.46. The data in Table 8.2 suggests there may be some feasible opportunities to increase the density of proposed site allocations. This is particularly the case given policy expectations regarding housing mix and provision of specialist housing. It is also recognised that further assessment work/masterplanning undertaken regarding site capacity by site promoters since submission of the draft Shropshire Local Plan may also identify opportunities for densification of proposed site allocations.
- 8.47. However, a cautious approach would be required to ensure any increase to a site's density would still result in an appropriate form of development. This would therefore require consideration on a site-by-site basis through a targeted update to the additional SA assessment work.
- 8.48. It is also important to ensure there is sufficient confidence that any development resulting from 'densification' of a proposed site allocation and accounted for within the total housing land supply is deliverable within the proposed plan period.
- 8.49. The Council forecast delivery timescales for proposed allocations when preparing the draft Shropshire Local Plan (documented within Appendix 7 of the draft Shropshire Local Plan). These assumptions were informed by careful consideration of site-specific evidence and other local factors relevant to each site; past delivery rates for similar projects across Shropshire; local market absorption rates and other known market factors; consideration of 'standard' assumptions applied by the Council when analysing housing land supply; proactive discussions with relevant landowners, land promoters and developers; and professional judgement.
- 8.50. These assumptions have been reviewed annually as part of the preparation of the Five Year Housing Land Supply Statement for the draft Shropshire Local Plan. The most recent assumptions are presented within Table 8.3:

Table 8.3: Proposed Residential Allocations – Approximate Site Capacity and Delivery Forecasts (as at 1st April 2023)

| Proposed Site Allocation Reference | Settlement | Type of Settlement | Place Plan | Number of Dwellings Proposed* | Total Years 1-5 | Total Years 6-10 | 2033 / 34 | 2034 / 35 | 2035 / 36 | 2036 / 37 | 2037 / 38 | Post Local Plan Period |
|------------------------------------|----------------------|--------------------|---------------------------|-------------------------------|-----------------|------------------|-----------|-----------|-----------|-----------|-----------|------------------------|
| ALB017 & ALB021 | Albrighton | Key Centre | Albrighton | 180 | 72 | 108 | 0 | 0 | 0 | 0 | 0 | 0 |
| BKL008a | Bucknell | Community Hub | Bishops Castle | 20 | 0 | 0 | 0 | 0 | 0 | 10 | 10 | 0 |
| CHR001 | Chirbury | Community Hub | Bishops Castle | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 |
| CHR002 | Chirbury | Community Hub | Bishops Castle | 7 | 0 | 7 | 0 | 0 | 0 | 0 | 0 | 0 |
| CLU005 | Clun | Community Hub | Bishops Castle | 20 | 0 | 0 | 0 | 0 | 0 | 10 | 10 | 0 |
| WBR007 & WBR008 | Worthen and Brockton | Community Hub | Bishops Castle | 25 | 0 | 25 | 0 | 0 | 0 | 0 | 0 | 0 |
| WBR010 | Worthen and Brockton | Community Hub | Bishops Castle | 20 | 0 | 20 | 0 | 0 | 0 | 0 | 0 | 0 |
| BRD030 | Bridgnorth | Principal Centre | Bridgnorth | 1,050 | 176 | 410 | 90 | 90 | 90 | 100 | 94 | 0 |
| ALV006 & ALV007 | Alveley | Community Hub | Bridgnorth | 35 | 0 | 35 | 0 | 0 | 0 | 0 | 0 | 0 |
| ALV009 | Alveley | Community Hub | Bridgnorth | 35 | 0 | 35 | 0 | 0 | 0 | 0 | 0 | 0 |
| DNP009 | Ditton Priors | Community Hub | Bridgnorth | 40 | 40 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| ELL005, ELL008 & ELL033 | Ellesmere | Key Centre | Ellesmere | 107 | 107 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| HNN016 | Highley | Key Centre | Highley | 100 | 72 | 28 | 0 | 0 | 0 | 0 | 0 | 0 |
| LUD056 | Ludlow | Principal Centre | Ludlow | 80** | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| LUD057 | Ludlow | Principal Centre | Ludlow | 10 | 0 | 10 | 0 | 0 | 0 | 0 | 0 | 0 |
| BUR002 | Burford | Community Hub | Ludlow | 40 | 0 | 40 | 0 | 0 | 0 | 0 | 0 | 0 |
| BUR004 | Burford | Community Hub | Ludlow | 100 | 41 | 59 | 0 | 0 | 0 | 0 | 0 | 0 |
| CHK002 | Clee Hill | Community Hub | Ludlow | 20 | 0 | 20 | 0 | 0 | 0 | 0 | 0 | 0 |
| MDR006 | Market Drayton | Principal Centre | Market Drayton | 125 | 75 | 50 | 0 | 0 | 0 | 0 | 0 | 0 |
| MDR012 | Market Drayton | Principal Centre | Market Drayton | 70 | 0 | 50 | 20 | 0 | 0 | 0 | 0 | 0 |
| MDR034 | Market Drayton | Principal Centre | Market Drayton | 120 | 0 | 50 | 25 | 25 | 20 | 0 | 0 | 0 |
| MDR039 & MDR043 | Market Drayton | Principal Centre | Market Drayton | 120 | 50 | 70 | 0 | 0 | 0 | 0 | 0 | 0 |
| HKW009 | Hinstock | Community Hub | Market Drayton | 35 | 0 | 35 | 0 | 0 | 0 | 0 | 0 | 0 |
| HHH001 & HHH014 | Hodnet | Community Hub | Market Drayton | 40 | 0 | 40 | 0 | 0 | 0 | 0 | 0 | 0 |
| MIN018 | Minsterley | Community Hub | Minsterley and Pontesbury | 20 | 20 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

| Proposed Site Allocation Reference | Settlement | Type of Settlement | Place Plan | Number of Dwellings Proposed* | Total Years 1-5 | Total Years 6-10 | 2033 / 34 | 2034 / 35 | 2035 / 36 | 2036 / 37 | 2037 / 38 | Post Local Plan Period |
|---|-----------------|--------------------|---------------------------|-------------------------------|-----------------|------------------|-----------|-----------|-----------|-----------|-----------|------------------------|
| PON008, PON017 & PON030 | Pontesbury | Community Hub | Minsterley and Pontesbury | 40 | 40 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| MUW012VAR | Much Wenlock | Key Centre | Much Wenlock | 120 | 56 | 64 | 0 | 0 | 0 | 0 | 0 | 0 |
| CES005 | Cressage | Community Hub | Much Wenlock | 60 | 0 | 60 | 0 | 0 | 0 | 0 | 0 | 0 |
| CES006 | Cressage | Community Hub | Much Wenlock | 4 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 | Oswestry | Principal Centre | Oswestry | 240 | 40 | 125 | 25 | 25 | 25 | 0 | 0 | 0 |
| GWR009 | Gobowen | Community Hub | Oswestry | 25 | 0 | 25 | 0 | 0 | 0 | 0 | 0 | 0 |
| KCK009 | Knockin | Community Hub | Oswestry | 25 | 0 | 25 | 0 | 0 | 0 | 0 | 0 | 0 |
| LYH007 | Llanymynech | Community Hub | Oswestry | 50 | 40 | 10 | 0 | 0 | 0 | 0 | 0 | 0 |
| PYC021 | Pant | Community Hub | Oswestry | 25 | 0 | 25 | 0 | 0 | 0 | 0 | 0 | 0 |
| RUY019 | Ruyton XI Towns | Community Hub | Oswestry | 65 | 0 | 65 | 0 | 0 | 0 | 0 | 0 | 0 |
| SMH031 | St Martins | Community Hub | Oswestry | 60 | 0 | 60 | 0 | 0 | 0 | 0 | 0 | 0 |
| SMH038 | St Martins | Community Hub | Oswestry | 35 | 35 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| WEF025 | West Felton | Community Hub | Oswestry | 60 | 0 | 60 | 0 | 0 | 0 | 0 | 0 | 0 |
| WRP001VAR | Weston Rhyn | Community Hub | Oswestry | 60 | 35 | 25 | 0 | 0 | 0 | 0 | 0 | 0 |
| WRP017 | Weston Rhyn | Community Hub | Oswestry | 40 | 15 | 25 | 0 | 0 | 0 | 0 | 0 | 0 |
| WHN024 | Whittington | Community Hub | Oswestry | 70 | 40 | 30 | 0 | 0 | 0 | 0 | 0 | 0 |
| SHF013 | Shifnal | Key Centre | Shifnal | 65 | 0 | 65 | 0 | 0 | 0 | 0 | 0 | 0 |
| SHF015 & SHF029 | Shifnal | Key Centre | Shifnal | 65 | 0 | 65 | 0 | 0 | 0 | 0 | 0 | 0 |
| SHF022 & SHF023 (part) | Shifnal | Key Centre | Shifnal | 100 | 72 | 28 | 0 | 0 | 0 | 0 | 0 | 0 |
| SHR054a | Shrewsbury | Strategic Centre | Shrewsbury | 60 | 20 | 40 | 0 | 0 | 0 | 0 | 0 | 0 |
| SHR057 & SHR177 | Shrewsbury | Strategic Centre | Shrewsbury | 400 | 96 | 190 | 38 | 38 | 38 | 0 | 0 | 0 |
| SHR060, SHR158 & SHR161 | Shrewsbury | Strategic Centre | Shrewsbury | 1,500 | 285 | 532 | 114 | 114 | 114 | 114 | 118 | 109 |
| SHR145 | Shrewsbury | Strategic Centre | Shrewsbury | 150 | 150 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| SHR173 | Shrewsbury | Strategic Centre | Shrewsbury | 450 | 38 | 152 | 57 | 57 | 57 | 57 | 32 | 0 |
| BNP024 | Baschurch | Community Hub | Shrewsbury | 35 | 35 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BNP035 | Baschurch | Community Hub | Shrewsbury | 20 | 0 | 20 | 0 | 0 | 0 | 0 | 0 | 0 |

| Proposed Site Allocation Reference | Settlement | Type of Settlement | Place Plan | Number of Dwellings Proposed* | Total Years 1-5 | Total Years 6-10 | 2033 / 34 | 2034 / 35 | 2035 / 36 | 2036 / 37 | 2037 / 38 | Post Local Plan Period |
|--|---------------------------------|----------------------|----------------|-------------------------------|-----------------|------------------|-----------|-----------|-----------|-----------|-----------|------------------------|
| BAY039 | Bayston Hill | Community Hub | Shrewsbury | 100 | 76 | 24 | 0 | 0 | 0 | 0 | 0 | 0 |
| BAY050 | Bayston Hill | Community Hub | Shrewsbury | 23 | 23 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| BIT022 | Bicton | Community Hub | Shrewsbury | 15 | 0 | 15 | 0 | 0 | 0 | 0 | 0 | 0 |
| BOM019 | Bomere Heath | Community Hub | Shrewsbury | 40 | 20 | 20 | 0 | 0 | 0 | 0 | 0 | 0 |
| BOM020 | Bomere Heath | Community Hub | Shrewsbury | 15 | 0 | 15 | 0 | 0 | 0 | 0 | 0 | 0 |
| FRD011 | Ford | Community Hub | Shrewsbury | 75 | 35 | 40 | 0 | 0 | 0 | 0 | 0 | 0 |
| WEM010 | Wem | Key Centre | Wem | 120 | 0 | 120 | 0 | 0 | 0 | 0 | 0 | 0 |
| WEM025 | Wem | Key Centre | Wem | 30 | 30 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| WEM033 | Wem | Key Centre | Wem | 60 | 0 | 0 | 25 | 25 | 10 | 0 | 0 | 0 |
| CLV012 & CLV018 | Clive | Community Hub | Wem | 20 | 0 | 20 | 0 | 0 | 0 | 0 | 0 | 0 |
| HDL006 | Hadnall | Community Hub | Wem | 40 | 15 | 25 | 0 | 0 | 0 | 0 | 0 | 0 |
| SHA019 | Shawbury | Community Hub | Wem | 80 | 50 | 30 | 0 | 0 | 0 | 0 | 0 | 0 |
| PPW025 | Prees | Community Hub | Whitchurch | 35 | 0 | 35 | 0 | 0 | 0 | 0 | 0 | 0 |
| WHT014 | Whitchurch | Principal Centre | Whitchurch | 70 | 50 | 20 | 0 | 0 | 0 | 0 | 0 | 0 |
| WHT037 & WHT044 | Whitchurch | Principal Centre | Whitchurch | 200 | 50 | 125 | 25 | 0 | 0 | 0 | 0 | 0 |
| WHT042 | Whitchurch | Principal Centre | Whitchurch | 180 | 0 | 115 | 25 | 25 | 15 | 0 | 0 | 0 |
| Clive Barracks, Tern Hill (BNT002) | Clive Barracks, Tern Hill | Strategic Settlement | Strategic Site | 750 | 0 | 100 | 50 | 50 | 50 | 50 | 50 | 400 |
| Former Ironbridge Power Station (IRN001) | Former Ironbridge Power Station | Strategic Settlement | Strategic Site | 1,075 | 280 | 400 | 80 | 80 | 80 | 80 | 75 | 0 |

*Where relevant site capacities have been amended to reflect the implications of planning permissions.

**60 dwellings on this site were completed before the 1st April 2023.

- 8.51. On balance, it is considered the evidence in Table 8.3 suggests that feasible opportunities for densification of proposed allocations could be identified. However, the draft Shropshire Local Plan already provides a level of flexibility for appropriate 'densification' of site allocations to occur. Specifically, draft settlement policies S1-S20 are clear that site provision figures are approximate, rather than a rigid requirement. Any such proposal would be subject to careful consideration at the planning application stage.
- 8.52. Where such 'densification' occurs through the planning application process, any additional delivery beyond the approximate provision figure on a site within the draft Shropshire Local Plan would contribute to the achievement of any windfall allowance for the settlement. As such, there is a level of synergy between this option and option 1.

Option 3: Increasing Site Allocations

- 8.53. A significant volume of potential site allocations were identified and assessed (in excess of 2,000) and subsequently a range of proposed residential/residential-led mixed use allocations (around 70) were selected for inclusion within the draft Shropshire Local Plan.
- 8.54. Identified sites and summaries of the various stages of the site assessment process are provided within the SLAA (EV106.01-EV106.10); the appendices of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.03-SD006.22); and the appendices of the updated additional SA assessment work.
- 8.55. In light of the proposed uplift to the housing requirement, having reflected on the range of sites identified through the site assessment process and the conclusions reached within it, it is considered there are potential opportunities to:
- a. Extend the site area of some of the proposed allocations to increase their capacity; and/or
 - b. Identify additional site allocations, including through the early release of proposed safeguarded land, identification of new strategic site allocations or identification of new site allocations associated with existing settlements.
- 8.56. To ensure identification of sustainable and feasible opportunities for the extension of the site area of a proposed allocation and/or identification of additional site allocations, this process would need to be informed by a targeted update to the additional SA site assessment work. This would also need to be informed by an updated SA assessment of the strategic distribution of development. Before this happens, the Council must first determine if this is an

appropriate option to accommodate some or all of the proposed uplift to the housing requirement.

- 8.57. With regard to opportunities to extend the site area of some of the proposed allocations, it is apparent from the data in Table 8.3 that the majority of proposed allocations would have some capacity for the delivery of additional dwellings resulting from any extension to the site area, within the proposed plan period. However, this data also illustrates this is not necessarily the case for all proposed allocations.
- 8.58. Dependent on their scale, any new site allocation proposed are likely to be deliverable within the proposed plan period. This conclusion is informed by the Council's evidence from its call for sites process early in plan preparation, and experience of forecasting timescales for the delivery of development sites.
- 8.59. However, final judgement on deliverability would require consideration on a site-by-site basis, informed by careful consideration of site-specific evidence and other local factors relevant to each site; past delivery rates for similar projects across Shropshire; local market absorption rates and other known market factors; consideration of 'standard' assumptions applied by the Council when analysing housing land supply; proactive discussions with relevant landowners, land promoters and developers; and professional judgement.
- 8.60. As such, on balance it is considered this evidence suggests that through a targeted update to the additional SA site assessment work, feasible opportunities to extend the site area of proposed allocations in order to increase their capacity and/or feasible opportunities to identify additional site allocations (including through the early release of proposed safeguarded land, identification of new strategic site allocations or identification of new site allocations associated with existing settlements in order to provide additional capacity) represent a reasonable option for accommodating the proposed uplift to the housing requirement.

Option 4: A Combination of Two or More of the Other Options

- 8.61. Option 4 is directly linked to the other identified options. Given this assessment concludes each of the other options could be feasible and deliverable, it is considered this option could be similarly feasible and deliverable.

The Mechanism to Accommodate the Proposed Uplift to the Housing Requirement

8.62. In conclusion, following consideration of the above factors and exercising planning judgement, Shropshire Council considers **Option 1** should form the basis for accommodating the proposed uplift to the housing requirement for inclusion within the draft Shropshire Local Plan.

8.63. **Option 1: Increasing Settlement Guidelines and Windfall Allowances** entails identifying opportunities to increase settlement guidelines and associated windfall allowances for one or more Strategic, Principal, Key Centres and/or Strategic Settlements to provide additional capacity for windfall development sufficient to achieve the proposed uplift to the housing requirement.

Reasons for the Proposed Mechanism to Accommodate the Proposed Uplift to the Housing Requirement

8.64. Key considerations that informed this decision included:

- a. The updated additional SA assessment of the reasonable options to accommodate a proposed uplift to the housing requirement concluded that on balance Option 1: increasing settlement guidelines and windfall allowances represented the **most sustainable** of the reasonable options for accommodating the uplift to the proposed housing requirement.
- b. Based on the updated additional SA assessment work undertaken, it is considered that Option 1: increasing settlement guidelines and windfall allowances, presents an opportunity to:
 - i. Achieve a **strongly positive effect** on SA objective 3: provision of a sufficient amount of good quality housing which meets the needs of all sections of society in the short, medium and long term.
 - ii. Achieve a **strongly positive effect** on SA Objective 4: promotion of access to services for all sections of society in the short, medium and long term.
 - iii. Achieve a **strongly positive effect** on SA objective 14: promotion of efficient use of natural resources in the short, medium and long term.
 - iv. Achieve **positive impacts** against a range of other identified sustainability objectives.
- c. Based on the updated additional SA assessment work, it is considered Option 1: increasing settlement guidelines and windfall allowances is **unlikely to result in any strongly negative effects on any SA objectives**. Whilst it is acknowledged it poses a potential risk of achieving negative impacts against a range of

identified sustainability objectives, it is considered opportunities exist to **mitigate** the extent of such impacts.

- d. Based on the updated additional SA assessment work undertaken, it is considered that Option 1: increasing settlement guidelines and windfall allowances strikes an appropriate balance across the three pillars (social, economic, and environmental) of **sustainable development** and will contribute towards the achievement of the **long term sustainability** of Shropshire.
- e. Option 1: increasing settlement guidelines and windfall allowances **aligns with the principle of urban focus**, directing additional windfall development towards the Strategic, Principal, Key Centres and/or Strategic Settlements and **positively responds to changes to completions and commitments** across these settlements since the submission of the Local Plan in 2021. As such this option best reflects the agreed spatial strategy.
- f. Option 1 **positively responds** to the potential for proposed settlement guidelines and windfall allowances to be exceeded.
- g. It is considered the amendments to settlement guidelines and associated windfall allowances would be **deliverable within the proposed plan period** and would **support the delivery of necessary supporting infrastructure**.
- h. Whilst Option 2 would also present opportunities to accommodate the proposed uplift to the housing requirement, there are **already mechanisms to allow for appropriate 'densification' of proposed allocations**, and any such densification would contribute to the achievement of any windfall allowance for the settlement where it exceeds the level of development planned for on the proposed allocation.
- i. Whilst Option 3 would also present opportunities to accommodate the proposed uplift to the housing requirement, based on available data on changes to completions and commitments and the potential for proposed settlement guidelines and windfall allowances to be exceeded / potential for further windfall opportunities to arise, it is considered that **this mechanism is unnecessary to ensure certainty of delivery**.

8.65. The proposed mechanism for accommodating the proposed uplift to the housing requirement is therefore Option 1: Increasing Settlement Guidelines and Windfall Allowances.

8.66. This option entails identifying opportunities to increase settlement guidelines and associated windfall allowances for one or more Strategic, Principal, Key Centres and/or Strategic Settlements to provide additional capacity for windfall development sufficient to achieve the proposed uplift to the housing requirement.

Increasing Settlement Guidelines and Windfall Allowances in Strategic, Principal, Key Centres and/or Strategic Settlements

- 8.67. In order to identify appropriate Strategic, Principal, Key Centres and/or Strategic Settlements within which to increase settlement guidelines and windfall allowances, the Council carefully considered:
- a. Remaining windfall allowances in Strategic, Principal, Key Centres and/or Strategic Settlements as at the 1st April 2023.
 - b. Known potential windfall opportunities within Strategic, Principal, Key Centres and/or Strategic Settlements.
 - c. The likelihood of further windfall opportunities arising within Strategic, Principal, Key Centres and/or Strategic Settlements, based on past trends.
 - d. Other relevant considerations.

- 8.68. Dealing with each in turn:

Remaining windfall allowances in Strategic, Principal, Key Centres and/or Strategic Settlements as at the 1st April 2023.

- 8.69. Windfall allowances are in effect the difference between the settlements housing guideline and the capacity of completions already achieved in the proposed plan period / identified commitments (sites with planning permission or prior approval, 'saved' SAMDev allocations and proposed allocations).
- 8.70. As a result they inevitably fluctuate over time as additional dwellings are completed/committed either on windfall sites (sites not specifically planned for but facilitated by the draft Shropshire Local Plan) and/or other sources of additional dwellings that emerge in a settlement.
- 8.71. Table 8.2 above summarises windfall allowances for each Strategic, Principal, Key Centre and Strategic Settlement as identified within Appendix 5 of the draft Shropshire Local Plan (based on data as at 31st March 2019) and the windfall allowance for each settlement as at 31st March 2023.

8.72. An extract is provided below in Table 8.4:

Table 8.4: Windfall Data for Strategic, Principal, Key Centre and Strategic Settlements

| Settlement | Windfall Data | |
|---------------------------------|---|---|
| | Proposed Windfall Allowance: Appendix 5 of the Draft Shropshire Local Plan (at 31st March 2019) | Current Windfall Allowance Reflecting Commitments & Completions (at 31st March 2023) ⁷ |
| Albrighton | 48 | 21 |
| Bishops Castle | 40 | 35 |
| Bridgnorth | 160 | 7 |
| Broseley | 50 | -17 |
| Church Stretton | 121 | 84 |
| Cleobury Mortimer | 120 | -5 |
| Craven Arms | 94 | 86 |
| Ellesmere | 170 | 130 |
| Highley | 31 | 9 |
| Ludlow | 82 | 57 |
| Market Drayton | 206 | 60 |
| Much Wenlock | 27 | 7 |
| Oswestry | 105 | 62 |
| Shifnal | 92 | 68 |
| Shrewsbury | 505 | -81 |
| Wem | 89 | 94 |
| Whitchurch | 82 | -55 |
| Clive Barracks, Tern Hill | 0 | 0 |
| Former Ironbridge Power Station | 0 | -75 |

8.73. Notable changes to windfall allowances (either where the allowance has already been exceeded or more than 50% of the allowance has been committed over the past 4 years) include:

- a. Shrewsbury: The windfall allowance of 505 dwellings has already been exceeded, by 81 dwellings. As such, over the past 4 years windfall development opportunities committed at Shrewsbury have increased by 586 dwellings (around 150 per annum). It also means that currently within the draft Shropshire Local Plan there is no planned capacity for further windfall development at Shrewsbury, the proposed Strategic Centre of Shropshire.
- b. Whitchurch: The windfall allowance of 82 dwellings has already been exceeded, by 55 dwellings. As such, over the past 4 years windfall development opportunities committed at Whitchurch have increased by 137 dwellings (around 35 per annum). It also means that currently there is no planned capacity within the draft Shropshire Local Plan for further windfall development at Whitchurch, one of the proposed Principal Centres.

⁷ Negative numbers reflect development levels already exceeding identified windfall allowance.

- c. Broseley: The strategy for achieving proposed residential development guideline for Broseley is established in the recently 'made' Broseley Neighbourhood Plan. The strategy for this settlement includes identification of a residential site allocation (with capacity for around 20 dwellings).
 - d. Cleobury Mortimer: The strategy for achieving the proposed residential development guideline for Cleobury Mortimer is established in the recently 'made' Cleobury Mortimer Neighbourhood Plan. The strategy for this settlement includes identification of a residential site allocation (with capacity for around 120 dwellings).
 - e. The Former Ironbridge Power Station: No specific windfall allowance was provided, rather the site's capacity aligned with the approximate settlement guideline set out in Policy S20 of the draft Local Plan. However, outline planning permission has subsequently been granted (19/05560/OUT) which allows for 1,000 dwellings and a retirement village (viability assessment work assumes 75 dwellings). As such, the capacity of the outline planning permission exceeds the approximate site provision figure in the draft Shropshire Local Plan.
 - f. Bridgnorth: The windfall allowance of 160 dwellings has reduced by 153 dwellings to 7 dwellings. As such, over the past 4 years windfall development opportunities committed at Bridgnorth have increased by around 38 dwellings per annum and the remaining windfall allowance is less than 1 dwelling per annum.
 - g. Market Drayton: The windfall allowance of 206 dwellings has reduced by 146 dwellings to 60 dwellings. This means that over the past 4 years, windfall development opportunities committed at Market Drayton have increased by around 37 dwellings per annum and the remaining windfall allowance is around 4 dwellings per annum.
 - h. Albrighton, Highley and Much Wenlock: Have also demonstrated notable reductions to windfall allowances over the past 4 years. They constitute smaller Key Centre settlements and Albrighton is inset within and therefore surrounded by Green Belt, which is a relevant constraint to further windfall development opportunities.
- 8.74. It is therefore considered that a number of the Strategic, Principal, Key Centres and/or Strategic Settlements have some potential to accommodate amendments to settlement guidelines and windfall allowances proposed within the draft Shropshire Local Plan.

Known potential windfall opportunities within Strategic, Principal, Key Centres and/or Strategic Settlements

- 8.75. It is difficult or event impossible to identify potential windfall development opportunities before they arise.
- 8.76. As such, the fact potential windfall development opportunities are not specifically identified **does not mean that they will not arise**, as evidenced since 2019 in Table 7.4. Notably, through consideration of the evidence base that informs the draft Shropshire Local Plan and other available information, it is possible to identify some potential windfall development opportunities.
- 8.77. For the purpose of this assessment, consideration has been given to:
- a. The SLAA (EV106.01-EV106.10).
 - b. The appendices of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.03-SD006.22).
 - c. The appendices of the updated additional SA assessment work.
 - d. The Council’s Housing Delivery Framework which informs the annual Five Year Housing Land Supply Assessment.
 - e. The Council’s Planning Application Register.
 - f. Discussions with landowners, site promoters and/or developers (where not confidential).
 - g. Any other relevant information on potential windfall development opportunities.
- 8.78. Table 8.5 summarises significant potential windfall development opportunities identified within the Strategic, Principal, Key Centres and Strategic Settlements following consideration of these sources.

Table 8.5: Known Significant Potential Windfall Development Opportunities: Strategic, Principal and Key Centres and Strategic Settlements

| Settlement | Known Significant Windfall Development Opportunities |
|----------------|--|
| Albrighton | <ul style="list-style-type: none"> • Site ALB003 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 6 dwellings. • Site ALB024 was identified as a potential windfall opportunity within the Site Assessment process. Full Planning Permission (23/00870/FUL) subsequently granted on the site in October 2023 for 43 dwellings. |
| Bishops Castle | <ul style="list-style-type: none"> • BIS016 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 15 dwellings. • BIS020 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 13 dwellings. |

| Settlement | Known Significant Windfall Development Opportunities |
|-------------------|---|
| Bridgnorth | <ul style="list-style-type: none"> BRD012 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 40 dwellings. |
| Broseley | <ul style="list-style-type: none"> BRO034 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 6 dwellings. Planning Permission (13/02623/FUL) previously granted but subsequently lapsed for erection of 6 dwellings on the grounds of Broseley Social Club on High Street. |
| Church Stretton | <ul style="list-style-type: none"> CST008 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 6 dwellings. |
| Cleobury Mortimer | <ul style="list-style-type: none"> Planning Permission (10/01319/FUL) previously granted but subsequently lapsed for redevelopment for 9 dwellings at No 1 Pinkham. |
| Craven Arms | <ul style="list-style-type: none"> CRA001 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 26 dwellings. CRA029 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 8 dwellings. Planning Permission (11/02801/OUT) previously granted but subsequently lapsed for erection of 9 dwellings on land at Wilton Lodge, Clun Road. |
| Ellesmere | <ul style="list-style-type: none"> Planning Permission (11/04589/EIA) previously granted for a mixed-use redevelopment of a former Creamery on Wharf Road. Much of the scheme was subject to Reserved Matters Approval and implemented, however a relatively small part of the site was not and subsequently lapsed. Components of this remaining land have subsequently gained Planning Permission, but capacity remains for around 50 dwellings. |
| Highley | <ul style="list-style-type: none"> HNN021 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 10 dwellings. Planning Application for a 24 dwelling affordable housing scheme north of Hazelwells Road currently being 'worked up'. |
| Ludlow | <ul style="list-style-type: none"> LUD005 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. LUD022 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 41 dwellings. Planning Permission (16/04032/FUL) previously granted but subsequently lapsed for redevelopment including 10 dwellings and new retail provision at No 9 Tower Street. |
| Market Drayton | <ul style="list-style-type: none"> MDR002 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. MDR003 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 7 dwellings. |

| Settlement | Known Significant Windfall Development Opportunities |
|--------------|---|
| | <ul style="list-style-type: none"> • MDR004 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. • MDR026 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. • Planning Permission (10/00968/FUL) previously granted but subsequently lapsed for redevelopment for 10 dwellings at the Phoenix Garage, Great Hales Street. • Planning Permission (10/01264/FUL) previously granted but subsequently lapsed for redevelopment for 6 dwellings at The Stables, Prospect Road. • Planning Permission (10/04004/OUT) previously granted but subsequently lapsed for erection of 6 dwellings on the grounds of St Marys Croft, Berrisford Road. • Planning Permission (11/00983/FUL) previously granted but subsequently lapsed for redevelopment for 5 dwellings at No 6 St Marys Street. • Planning Permission (13/03051/FUL) previously granted but subsequently lapsed for change of use of No 117 Cheshire Street to 6 dwellings. • Hybrid Planning Permission (19/01639/FUL) granted for redevelopment of the Vicon Works Site on Milton Drive to a supermarket and care facility. The supermarket was completed but the care facility subsequently lapsed. The site included formation of C2 care home facilities, as such the ratio applied to communal accommodation is applied consistent with the Housing Delivery Test. This ratio is based on the national average number of adults in all households, with a ratio of 1.8. $70/1.8 = 39$ dwellings. |
| Much Wenlock | <ul style="list-style-type: none"> • MUW001 is identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 17 dwellings. |
| Oswestry | <ul style="list-style-type: none"> • OSW002 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 22 dwellings. • OSW005 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. • OSW043 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. • OSW045 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. • OSW051 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 10 dwellings. |
| Shifnal | <ul style="list-style-type: none"> • SHF004 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. |

| Settlement | Known Significant Windfall Development Opportunities |
|------------|---|
| | <ul style="list-style-type: none"> • SHF016 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 12 dwellings. • SHF021 identified as a potential windfall opportunity within the Site Assessment process. Planning Permission (23/02771/FUL) subsequently granted in November 2023 for 6 dwellings. • SHF027 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 7 dwellings. • SHF028 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 5 dwellings. |
| Shrewsbury | <ul style="list-style-type: none"> • SHR011 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 15 dwellings. • SHR014 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 14 dwellings. • SHR015 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 30 dwellings. • SHR165 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 10 dwellings. • Part of site SHR178 was identified as a potential windfall opportunity within the Site Assessment process. Planning Permission (20/05217/FUL) granted in May 2023 for 26 affordable dwellings. • SHR211 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 9 dwellings. • Site SHR217 was initially identified as a potential windfall site within the SLAA, although it was later understood to be unavailable for residential development within the wider site assessment process. Subsequently Full Planning Permission (22/03877/FUL) was granted in August 2023 for a mixed-use development on part of the site, including an 80 bedroom care home. The site includes the formation of C2 care home facilities, as such the ratio applied to communal accommodation is applied consistent with the Housing Delivery Test. This ratio is based on the national average number of adults in all households, with a ratio of 1.8. $80/1.8 = 44$ dwellings. • Planning Permission (23/01592/FUL) granted in June 2023 for conversion of upper floors of No 12&13 Mardol Head 8 apartments. • Prior Approval (23/01889/PA3MA) received in June 2023 for conversion of upper floors of Talbot House on Market Street to 13 apartments. • Planning Permission (23/03503/FUL) granted in November 2023 for conversion of the Former HSS Hire Shop on St Michaels Street to 8 apartments. • Planning Permission (23/03843/FUL) granted in February 2024 for a 78 dwelling affordable housing scheme (68 extra-care apartments and 10 bungalows) following demolition of William Farr House on Mytton Oak Road. |

| Settlement | Known Significant Windfall Development Opportunities |
|---------------------------|--|
| | <ul style="list-style-type: none"> • Planning Application for a 14 dwelling affordable housing scheme at Sandhurst Meadows currently being 'worked up'. • Planning Application for a 5 dwelling affordable housing scheme replacing 2 existing dwellings, at Weston Court, Featherbed Lane currently being 'worked up'. • Planning Permission (17/02809/OUT) granted for redevelopment of the Former HM Prison Shrewsbury on The Dana. Part of the scheme was subject to Reserved Matters Approval and implemented and other parts were superseded by a commercial use. However a portion of the site is retained for redevelopment. It is considered that this component of the site has capacity for around 40 dwellings. • Planning Permission (18/03206/FUL) previously granted but subsequently lapsed for erection of 9 dwellings on the Car Park at The Dana. • Planning Permission (13/00022/OUT) previously granted but subsequently lapsed for erection of 10 dwellings on land at 66 Spring Gardens. • Planning Permission (14/04383/FUL) previously granted but subsequently lapsed for conversion of office space and an extension to form 50 dwellings at Princess House, The Square. • Planning Permission (14/01530/REM) previously granted but subsequently lapsed for redevelopment for 6 dwellings at 67 Aston Street. • Shropshire Council is progressing the Smithfield Riverside masterplan which entails regeneration of the area between The Darwin Shopping Centre and the River Severn in Shrewsbury town centre. Planning Application (23/05402/FUL) currently pending consideration for enabling works, which will be facilitated by around £19million of Levelling Up Funding awarded to the project by the Government. Redevelopment would result in formation of a new council headquarters, hotels, restaurants, a transport hub, offices and up to 270 dwellings. Due to the complexity of this scheme, the extent of enabling works, and associated lead-in timescales, it may be that some of this delivery does not occur until beyond the proposed plan period. |
| Wem | <ul style="list-style-type: none"> • WEM018 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 38 dwellings. • Full Planning Permission (23/00059/FUL) granted in April 2023 for part redevelopment of the Old Post Office and Buildings to Rear of No 25 High Street to form an additional 7 dwellings. |
| Whitchurch | <ul style="list-style-type: none"> • WHT005 identified as a potential windfall opportunity within the Site Assessment process. It is considered this site would have capacity for around 9 dwellings. • Full Planning Permission (23/01684/FUL) granted in October 2023 for conversion of a former doctors surgery at No29 Dodington into 5 apartments. |
| Clive Barracks, Tern Hill | <ul style="list-style-type: none"> • No known significant windfall opportunities identified. |

| Settlement | Known Significant Windfall Development Opportunities |
|---------------------------------|--|
| Former Ironbridge Power Station | <ul style="list-style-type: none"> Outline Planning Permission (19/05560/OUT) granted in September 2022 which allows for 1,000 dwellings and a retirement village (viability assessment work assumes 75 dwellings). Planning Permission therefore exceeds the approximate site provision figure of 1,000 dwellings in the draft Shropshire Local Plan. |

Please Note:

-Potential windfall development opportunities identified are limited to those considered consistent with the content of the draft Shropshire Local Plan.

-Not all potential windfall development opportunities identified will necessarily come forward, but this list is limited to opportunities considered deliverable/developable within the proposed plan period.

-Inclusion of potential windfall development opportunities in this analysis is without prejudice to the ongoing examination of the draft Shropshire Local Plan and any future Planning Application process.

Likelihood of further windfall opportunities arising within Strategic, Principal, Key Centres and/or Strategic Settlements

8.79. Table 8.6 summarises the windfall completions that have occurred in each of the Strategic, Principal and Key Centres over the last 5 and 10 years. It also identifies total completions over these same periods and the proportion of total completions that occurred on windfall sites.

Table 8.6: Completions on Windfall Sites in Strategic, Principal and Key Centres: Last 5 and 10 Years

| Settlement | Last 5 Years | | | Last 10 Years | | |
|-------------------|---|-----------------------------------|---|---|-----------------------------------|---|
| | Windfall Site Completions 2018/19-2022/23 | Total Completions 2018/19-2022/23 | Proportion of Total Completions on Windfall Sites 2018/19-2022/23 | Windfall Site Completions 2013/14-2022/23 | Total Completions 2013/14-2022/23 | Proportion of Total Completions on Windfall Sites 2013/14-2022/23 |
| Albrighton | 29 | 120 | 24.17% | 51 | 152 | 33.55% |
| Bishops Castle | 45 | 45 | 100.00% | 63 | 71 | 88.73% |
| Bridgnorth | 91 | 92 | 98.91% | 311 | 315 | 98.73% |
| Broseley | 89 | 89 | 100.00% | 211 | 211 | 100.00% |
| Church Stretton | 27 | 27 | 100.00% | 107 | 107 | 100.00% |
| Cleobury Mortimer | 28 | 49 | 57.14% | 104 | 125 | 83.20% |
| Craven Arms | 19 | 29 | 65.52% | 27 | 62 | 43.55% |
| Ellesmere | 113 | 124 | 91.13% | 144 | 391 | 36.83% |
| Highley | 28 | 59 | 47.46% | 91 | 154 | 59.09% |
| Ludlow | 132 | 252 | 52.38% | 271 | 391 | 69.31% |
| Market Drayton | 115 | 264 | 43.56% | 233 | 396 | 58.84% |
| Much Wenlock | 12 | 12 | 100.00% | 66 | 66 | 100.00% |
| Oswestry | 132 | 196 | 67.35% | 309 | 534 | 57.87% |
| Shifnal | 396 | 807 | 49.07% | 725 | 1,410 | 51.42% |
| Shrewsbury | 959 | 2,637 | 36.37% | 2,262 | 4,917 | 46.00% |
| Wem | 64 | 89 | 71.91% | 222 | 277 | 80.14% |
| Whitchurch | 139 | 202 | 68.81% | 305 | 454 | 67.18% |
| Total | 2,418 | 5,093 | 47.48% | 5,502 | 10,033 | 54.84% |

Please Note:

-The data in Table 8.6 relates only to completions on windfall sites and not other sources of additional dwellings that emerge in a settlement.

-The proposed Strategic Settlements do not have relevant past windfall completion data.

- 8.80. It is apparent from Table 8.6 that windfall development has constituted a significant component of development that has occurred in the Strategic, Principal and Key Centres over the past 5 and 10 years.
- 8.81. Whilst it is recognised that windfall development rates in a settlement can be subject to change, particularly where influenced by a large development opportunity that occurred and may not arise again in the future, this data:
- a. Provides significant confidence regarding the ability to achieve windfall allowances associated with proposed settlement guidelines.
 - b. Indicates that a number of Strategic, Principal and Key Centres have potential to accommodate additional windfall development, through appropriate amendments to settlement guidelines within the draft Shropshire Local Plan.

Other relevant factors

- 8.82. There are a range of other relevant factors which need to be considered. One consideration is the characteristics of a settlement. A settlement's character is likely to influence the potential for small-scale windfall development opportunities and the potential for larger scale windfall redevelopment opportunities. The Market Town Profiles (EV073.01-EV073.17) provide succinct summaries of each of the Strategic, Principal and Key Centres, demonstrating the unique character of each settlement.
- 8.83. The categorisation of settlements within the draft Shropshire Local Plan recognises this diversity, and provide an indicator of potential for windfall development. Larger settlements, with greater levels of services and facilities and associated built form generally generate greater potential for windfall development.
- 8.84. Another consideration is the presence of significant known constraints that may or may not limit their potential to accommodate additional windfall development. For instance:
- a. Albrighton and Shifnal are inset within the Green Belt
 - b. Church Stretton is located within the Shropshire Hills National Landscape (formerly known as the Area of Outstanding Natural Beauty (AONB)).
- 8.85. It is also important to recognise that for Broseley, Bishop's Castle and Cleobury Mortimer, the proposed settlement strategy is linked to the production of a Neighbourhood Plan. Neighbourhood Plans have subsequently been 'made' in both Broseley and Cleobury Mortimer and the examination is ongoing for the Bishop's Castle

Neighbourhood Plan. As such, it may not be appropriate to amend proposed settlement strategies and associated windfall allowances in these locations, other than to reflect additional windfall development which has happened to date.

- 8.86. Other Neighbourhood Plans are currently in production and seeking to align with the proposals of the draft Shropshire Local Plan, including at Church Stretton, and Tasley (near Bridgnorth).
- 8.87. It should also be noted that Neighbourhood Plans have also been 'made' in both Much Wenlock (where a review of the Plan has recently commenced) and Shifnal. These Neighbourhood Plans cover the period to 2026 (consistent with the adopted Development Plan), and therefore there was a need for the Council to plan effectively for a further 12 years to the end of the proposed plan period to 2038. In these cases, the Shropshire Local Plan provides a development strategy for these areas.

Proposed Amendments to Settlement Guidelines and Associated Windfall Allowances

- 8.88. In summary, the following factors have been considered in determining the most appropriate settlements to accommodate an uplift to their settlement guidelines and associated windfall allowance:
- a. Remaining windfall allowances in Strategic, Principal, Key Centres and/or Strategic Settlements as at the 1st April 2023.
 - b. Known potential windfall opportunities within Strategic, Principal, Key Centres and/or Strategic Settlements.
 - c. Likelihood of further windfall opportunities arising within Strategic, Principal, Key Centres and/or Strategic Settlements, based on past trends.
 - d. Other relevant factors.

8.89. Table 8.7 shows the Council's conclusions.

Table 8.7: Proposed Amendments to Settlement Guidelines and Associated Windfall Allowances to Accommodate the Proposed Uplift to the Housing Requirement

| Settlement | Submission Draft Local Plan Proposed Guideline (2016-2038) | Proposed Uplift | Updated Draft Local Plan Proposed Guideline (2016-2038) | Submission Draft Windfall Allowance (at 31st March 2023) | Updated Proposed Windfall Allowance (at 31st March 2023) |
|---------------------------------|---|------------------------|--|---|---|
| Shrewsbury | 8,625 | 350 | 8,975 | -81 | 269 |
| Whitchurch | 1,600 | 75 | 1,675 | -55 | 20 |
| Former Ironbridge Power Station | 1,000 | 75 | 1,075 | -75 | 0 |

Reasons for Proposed Amendments to Settlement Guidelines and Associated Windfall Allowances to Accommodate the Proposed Uplift to the Housing Requirement

- 8.90. Key considerations that informed this decision included:
- a. It is considered proposed increases to settlement guidelines and associated windfall allowances at Shrewsbury, Whitchurch and the Former Ironbridge Power Station are complementary to and support the proposed vision and spatial strategy within the draft Shropshire Local Plan – particularly the principle of **urban focus**.
 - b. It is considered proposed increases to settlement guidelines and associated windfall allowances at Shrewsbury, Whitchurch and the Former Ironbridge Power Station are **feasible and deliverable** within the proposed plan period.
 - c. **Outline Planning Permission** (19/05560/OUT) was granted for redevelopment of the Former Ironbridge Power Station in September 2022. This consent allows for **1,000 dwellings and a retirement village** (viability assessment work assumes 75 dwellings in the retirement village). This exceeds the settlement guideline proposed within the draft Shropshire Local Plan.
 - d. Within the settlements of Shrewsbury and Whitchurch, completions already achieved in the proposed plan period (2016/17-2022/23) and commitments at 31st March 2023 **exceed the proposed housing guideline**.
 - e. There is currently **no planned capacity** for further windfall development at Shrewsbury or Whitchurch despite 15 years remaining within the proposed plan period.
 - f. There are significant known potential windfall opportunities at Shrewsbury, this includes around 180 dwellings granted planning permission since the 31st March 2023; and further opportunities for residential provision within the town centre.
 - g. Past windfall completion trends in Shrewsbury and Whitchurch provide significant confidence about potential to accommodate proposed increases to settlement guidelines and associated windfall allowances.
 - h. The characteristics of Shrewsbury and Whitchurch provide significant confidence about potential to accommodate proposed increases to settlement guideline and associated windfall allowances.
 - i. Whilst other Strategic, Principal, Key Centres and/or Strategic Settlements could potentially accommodate proposed uplifts to settlement guidelines and associated windfall allowances, it is considered proposals for Shrewsbury, Whitchurch and the Former Ironbridge Power Station positively respond to available

information regarding remaining windfall allowances (at 1st April 2023); known potential windfall opportunities; past trends on windfall provision; and other relevant information.

- 8.91. In conclusion, having considered available evidence when applying planning judgement, it is considered appropriate settlements within which to increase settlement guidelines and windfall allowances to accommodate the proposed uplift to the housing requirement are:

- a. Shrewsbury (Strategic Centre): 350 dwelling increase to the proposed housing guideline to some **8,975 dwellings** between 2016 and 2038.
- b. Whitchurch (Principal Centre): 75 dwelling increase to the proposed housing guideline to some **1,675 dwellings** between 2016 and 2038.
- c. Former Ironbridge Power Station (Strategic Settlement): 75 dwelling increase to the proposed housing guideline to some **1,075 dwellings** between 2016 and 2038.

Implications of the Proposed Amendments to Settlement Guidelines and Associated Windfall Allowances to Accommodate the Proposed Uplift to the Housing Requirement

- 8.92. Main modifications would be required to the draft Shropshire Local Plan to reflect these proposed changes – including to draft Policy SP2 and its supporting text; draft Policy S16.1 and its supporting text; draft Policy S18.1 and its supporting text; draft Policy S20; Appendix 5; and Appendix 7.

9. Accommodating the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

Introduction

- 9.1. Paragraph 21 of ID28 specified that for the purpose of effectiveness, there is a need to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country, through additional SA and site assessment work.
- 9.2. Specifically, it states "*...the Council will also need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan.*"
- 9.3. As the proposed housing requirement includes a proposed contribution of 1,500 dwellings towards the unmet housing need forecast to arise in the Black Country, there is a need to identify appropriate site or sites to accommodate this proposed contribution.

Options to Accommodate the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

- 9.4. To inform identification of the site or sites to accommodate the proposed contribution of 1,500 dwellings towards unmet housing needs forecast to arise within the Black Country, Shropshire Council has undertaken updated additional SA and site assessment work.
- 9.5. First, an appropriate geography within which reasonable options for sites to accommodate the proposed contribution to the unmet housing need forecast to arise within the Black Country may be located, was identified. This was informed by consideration of:
 - a. Geographic proximity and the location and quality of main road and rail transport links between Shropshire and the Black Country.
 - b. Migration patterns between sub-geographies (Place Plan Areas) within Shropshire and the entirety of the Black Country.
 - c. Commuting patterns between sub-geographies (Place Plan Areas) within Shropshire and the entirety of the Black Country.
 - d. The extent to which Travel to Work Areas (TTWA's) associated with the Black Country penetrate into Shropshire and vice versa.
- 9.6. In summary, this assessment concluded that reasonable options for sites to accommodate the proposed contributions to unmet housing need forecast to arise within the Black Country are in the east and central parts of Shropshire at the larger settlements where housing growth is proposed, and potential strategic settlements/sites.

9.7. Following identification of this reasonable assessment geography, the Council re-assessed **all available sites within it** through the updated additional SA site assessment. This re-assessment was informed by:

- a. The continued use of the stage 1 assessment, which involved a high-level strategic assessment of sites across Shropshire, with more detailed assessment undertaken in later stages of the process.
- b. A targeted update to stage 2a of the site assessment process in order to allow for comparison of **all sites within the relevant assessment geography** identified.
- c. The continued use of the stage 2b filters⁸, which were considered suitable in the context both the consideration of sites to accommodate the needs and objectives of Shropshire and the needs of the Black Country.
- d. The update of the stage 3 site assessment process, considering **all sites within the relevant assessment geography that proceeded to stage 3 of the site assessment process**, both within the Green Belt and non-Green Belt sites, and not just those sites that are proposed for allocation within the draft Shropshire Local Plan. This assessment also explicitly considered the outcome of the Green Belt assessment and review and specifically assessed the relationship of sites with the Black Country.

9.8. This process therefore involved assessment of around 450 sites as part of the targeted update to Stage 2a and around 230 sites at Stage 3, as potential locations to accommodate proposed contributions to unmet housing needs forecast to arise in the Black Country.

9.9. The scope and conclusions of this assessment work are explained within the updated additional SA and site assessment work.

⁸ The three filters applied in Stage 2b are:

a. Size: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). The site size 'filters' applied are 0.2ha in Community Hubs and Strategic/Principal/Key Centres within/partly within the Green Belt or Shropshire Hills AONB, and 0.5ha for other Strategic/Principal/Key Centres. No other filters on size were applied.

b. Availability: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.

Strategic Suitability: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.

-Significant physical constraints include where the site is landlocked (cannot be accessed); some distance from the built form (unless it could represent a potential strategic site); or the majority of the site is in flood zones 2/3, an identified open space, or has a severely adverse topography.

-Significant environmental/heritage constraints include where the majority of the site has been identified as a heritage or natural environment asset.

Sites Proposed to Accommodate the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

- 9.10. Through the updated SA site assessment process, a series of sites have been identified to accommodate the proposed contribution of 1,500 dwellings towards the unmet housing need forecast to arise within the Black Country. These sites and the quantity of the proposed contribution it is proposed they accommodate are:
- a. BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings.
 - b. SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings.
 - c. IRN001 - Former Ironbridge Power Station: 600 dwellings.

Reasoning: Sites Proposed to Accommodate Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

- 9.11. The updated additional SA assessment summarises the conclusions of this assessment work, including the reasons these sites are proposed to accommodate the proposed contribution to the unmet housing need forecast to arise in the Black Country. A brief summary of these reasons is documented within Table 9.1.

Table 9.1: Sites Identified to Accommodate the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

| Site Reference | Site Name | Draft Policy | Total Capacity | Black Country Contribution | Summary |
|-------------------------|---|--------------|---|----------------------------|--|
| BRD030 | Tasley Garden Village, Bridgnorth | S3.1 | 1,050 dwellings 16ha employment land New local centre 20ha of green infrastructure and a 19ha linear park | 600 dwellings | <p>Bridgnorth is located in south-east Shropshire with a functional relationship to the Black Country. It benefits from strong road links to the Black Country via the A454 corridor.</p> <p>Bridgnorth is a principal centre and performs a strategic role in the east of Shropshire.</p> <p>The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt). Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p> |
| SHR060, SHR158 & SHR161 | Land between Mytton Oak Road and Hanwood Road, Shrewsbury | S16.1 | 1,500 dwellings 5ha of employment land | 300 dwellings | <p>Shrewsbury is located in central Shropshire with a functional relationship to the Black Country. It benefits from strong road and rail links to the Black Country via the M54 / A5 corridor and Shrewsbury-Wolverhampton railway line. Shrewsbury is the strategic centre of Shropshire and the primary focus for new development in the County.</p> <p>The site constitutes a proposed sustainable urban extension, with the capacity to accommodate a significant volume of development.</p> |

| Site Reference | Site Name | Draft Policy | Total Capacity | Black Country Contribution | Summary |
|----------------|---------------------------------|--------------|--|----------------------------|---|
| | | | | | <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt). Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p> |
| IRN001 | Former Ironbridge Power Station | S20 | <p>Range of local services and facilities</p> <p>Around 1,075 dwellings</p> <p>Around 6ha of employment land</p> <p>Extensive green infrastructure</p> | 600 dwellings | <p>The Former Ironbridge Power Station is located in east Shropshire with a functional relationship to the Black Country. It benefits from road access to the M54 / A5 corridor link to the Black Country via either the A4169 / A5523 or A4169 / A442.</p> <p>The Former Ironbridge Power Station is a part brownfield site that benefits from Outline Planning Permission and will form a new strategic settlement, with the capacity to accommodate a significant volume of development.</p> <p>The site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints (including the fact that it is not located within the Green Belt). Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p> |

Implications of the Proposed Sites Identified to Accommodate the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

- 9.12. The submission version of the draft Shropshire Local Plan included a proposed contribution of 1,500 dwellings to the Black Country, but proposed that this would be achieved through the spatial strategy for the level and distribution of development across Shropshire.
- 9.13. In responding to the Inspector's Interim Findings (ID28) and to ensure the effectiveness of the draft Shropshire Local Plan, specific sites have been identified to accommodate this proposed contribution to the unmet housing need forecast to arise in the Black Country.
- 9.14. Main modifications will be required to the draft Shropshire Local Plan to reflect this proposed change – including to draft Policy SP2 and its supporting text; draft Policy S3.1 and its supporting text; draft Policy S16.1 and its supporting text; and draft Policy S20 and its supporting text.

10. Housing Land Supply

- 10.1. This latest assessment of housing land supply, both over the next five year period and over the proposed plan period, is summarised within the **Five Year Housing Land Supply Statement (2023) - Draft Shropshire Local Plan**.
- 10.2. With regard to the five year period from 2023/24-2027/28, the assessment concludes a **6.86 years' supply of deliverable housing land is available**.
- 10.3. With regard to the proposed plan period from 2016-2038, the assessment concludes that given completions of 11,761 dwellings between 2016/17 and 2022/23, **sufficient deliverable or developable housing land is available to deliver 34,874 dwellings over the proposed plan period**.
- 10.4. This identified housing land supply is therefore sufficient to **achieve the proposed housing requirement of a minimum of 31,300 dwellings** and allow for **around 10% flexibility** in the overall housing land supply.
- 10.5. The identified housing land supply is summarised within Table 10.1.

Table 10.1: Housing Land Supply across the Proposed Plan Period

| Category | Housing Land Supply | | | | |
|---|---------------------|--------------|--------------|--------------|---------------|
| | Complete | Years 1-5 | Years 6-10 | Years 11-15 | Total |
| (A) Completions (2016/17-2022/23): | 11,761 | N/A | N/A | N/A | 11,761 |
| (B) Dwellings on sites with Planning Permission* | N/A | 5,958 | 1,428 | 628 | 8,009 |
| (C) Dwellings on sites with Prior Approval* | N/A | 72 | 7 | 1 | 80 |
| (D) Dwellings on selected sites with a 'resolution to grant'* Planning Permission | N/A | 10 | 1 | 0 | 11 |
| (E) Dwellings on 'saved' site allocations* | N/A | 1,274 | 1,478 | 510 | 3,262 |
| (F) Dwellings proposed for allocation within the Draft Shropshire Local Plan * | N/A | 1,491 | 3,294 | 2,145 | 6,930 |
| (G) Dwellings on SLAA sites* | N/A | 111 | 379 | 132 | 622 |
| (H) Dwellings on emerging affordable housing sites* | N/A | 247 | 25 | 2 | 274 |
| (I) Dwellings on lapsed Planning Permissions* | N/A | 0 | 302 | 30 | 332 |
| (J) Dwellings on windfall sites** | N/A | 598 | 1,495 | 1,495 | 3,588 |
| Total: (A) + (B) + (C) + (D) + (E) + (F) + (G) + (H) + (I) + (J) | 11,761 | 9,761 | 8,409 | 4,943 | 34,874 |

*An assumption that 10% of deliverable dwellings on sites with Planning Permission; Prior Approval; 'resolution to grant' Planning Permission; 'saved' site allocations within the adopted Local Plan; proposed allocation within the draft Local Plan; identified within the SLAA; and identified as an Emerging Affordable Housing Site will not be delivered in each five year period has been applied to figures in this table.

**Based on historic delivery rates and expected future trends.

- 10.6. The spatial distribution of this supply is summarised within Table 10.2 which addresses the Strategic, Principal and Key Centres and Strategic Settlements, Table 10.3 which addresses Community Hubs, and Table 10.4 which addresses Community Clusters and the wider rural area.
- 10.7. It should be noted that the windfall allowance to achieve proposed settlement guidelines and the windfall allowance within the housing land supply differ in that the allowance within the housing land supply is responsive to and informed by past trends rather than being limited to that specifically required to achieve proposed development guidelines. Furthermore, the windfall allowance within the housing land supply is not identified to specific locations, rather it is across the entirety of the Shropshire geography.
- 10.8. Ultimately, it is considered that sufficient housing land supply exists to provide significant confidence regarding the deliverability of the proposed housing requirement for inclusion within the draft Shropshire Local Plan, including the proposed 500 dwelling uplift.

Table 10.2: Residential Guidelines and Residential Supply within the Strategic Centre, Principal Centres and Key Centres and Strategic Settlements

| Settlement | Type of Settlement | Draft Local Plan Proposed Guideline (2016-2038) | Completions (2016/17 to 2022/23) | Commitments | | | Windfall Allowance** (as at 31st March 2023) |
|---------------------------------|----------------------|---|----------------------------------|--|---|--|--|
| | | | | Sites with Planning Permission or Prior Approval (as at the 31 st March 2023) | SAMDev Plan Allocations without Planning Permission (as at 31st March 2023) | Proposed Allocations without Planning Permission (as at 31st March 2023) | |
| Albrighton | Key Centre | 500 | 140 | 76 | 83 | 180 | 21 |
| Bishops Castle | Key Centre | 150 | 50 | 25 | 40 | 0 | 35 |
| Bridgnorth | Principal Centre | 1,800 | 132 | 61 | 550 | 1,050 | 7 |
| Broseley | Key Centre | 250 | 174 | 73 | 20* | 0 | 0 |
| Church Stretton | Key Centre | 200 | 39 | 77 | 0 | 0 | 84 |
| Cleobury Mortimer | Key Centre | 200 | 56 | 24 | 125* | 0 | 0 |
| Craven Arms | Key Centre | 500 | 61 | 28 | 325 | 0 | 86 |
| Ellesmere | Key Centre | 800 | 188 | 232 | 250 | 0 | 130 |
| Highley | Key Centre | 250 | 131 | 10 | 0 | 100 | 9 |
| Ludlow | Principal Centre | 1,000 | 339 | 585 | 0 | 19 | 57 |
| Market Drayton | Principal Centre | 1,200 | 307 | 334 | 64 | 435 | 60 |
| Much Wenlock | Key Centre | 200 | 43 | 30 | 0 | 120 | 7 |
| Oswestry | Principal Centre | 1,900 | 437 | 818 | 343 | 240 | 62 |
| Shifnal | Key Centre | 1,500 | 1,186 | 16 | 0 | 230 | 68 |
| Shrewsbury | Strategic Centre | 8,975 | 3,891 | 1,938 | 467 | 2,410 | 269 |
| Wem | Key Centre | 600 | 188 | 108 | 0 | 210 | 94 |
| Whitchurch | Principal Centre | 1,675 | 368 | 276 | 561 | 450 | 20 |
| Clive Barracks, Tern Hill*** | Strategic Settlement | 350 | 0 | 0 | 0 | 350 | 0 |
| Former Ironbridge Power Station | Strategic Settlement | 1,075 | 0 | 1,075 | 0 | 0 | 0 |
| Total: | | 23,125 | 7,730 | 5,786 | 2,683 | 5,794 | 1,009 |

*Includes Neighbourhood Plan Allocations.

**Windfall allowance to achieve proposed residential development guidelines. Cannot be less than 0.

***The total capacity of Clive Barracks, Tern Hill is 750 dwellings, however it is forecast that 350 dwellings will be completed on the site by 2037/38 with the remainder of the dwellings completed beyond the plan period.

Table 10.3: Residential Guidelines and Residential Supply within Community Hubs

| Settlement | Place Plan Area | Draft Local Plan Proposed Guideline (2016-2038) | Completions (2016/17 to 2022/23) | Commitments | | | Windfall Allowance* (as at 31st March 2023) |
|-------------------------------------|---------------------------|---|----------------------------------|--|---|--|---|
| | | | | Sites with Planning Permission or Prior Approval (as at the 31 st March 2023) | SAMDev Plan Allocations without Planning Permission (as at 31st March 2023) | Proposed Allocations without Planning Permission (as at 31st March 2023) | |
| Cosford/Donington | Albrighton | 0 | 0 | 0 | 0 | 0 | 0 |
| Bucknell | Bishop's Castle | 110 | 6 | 7 | 70 | 20 | 7 |
| Chirbury | Bishop's Castle | 45 | 0 | 0 | 40 | 14 | 0 |
| Clun | Bishop's Castle | 95 | 5 | 2 | 60 | 20 | 8 |
| Worthen and Brockton | Bishop's Castle | 55 | 3 | 4 | 0 | 45 | 3 |
| Alveley | Bridgnorth | 130 | 40 | 7 | 0 | 70 | 13 |
| Ditton Priors | Bridgnorth | 65 | 24 | 2 | 0 | 40 | 0 |
| Dudleston Heath | Ellesmere | 60 | 13 | 20 | 0 | 0 | 27 |
| Burford | Ludlow | 190 | 35 | 3 | 0 | 140 | 12 |
| Clee Hill | Ludlow | 75 | 52 | 3 | 0 | 20 | 0 |
| Hinstock | Market Drayton | 155 | 105 | 2 | 0 | 35 | 13 |
| Hodnet | Market Drayton | 105 | 5 | 62 | 0 | 40 | 0 |
| Woore, Irelands Cross and Pipe Gate | Market Drayton | 88 | 39 | 23 | 0 | 0 | 26 |
| Minsterley | Minsterley and Pontesbury | 155 | 96 | 28 | 14 | 20 | 0 |
| Pontesbury | Minsterley and Pontesbury | 175 | 127 | 70 | 0 | 2 | 0 |
| Cressage | Much Wenlock | 80 | 8 | 1 | 0 | 62 | 9 |
| Gobowen | Oswestry | 360 | 114 | 115 | 90 | 25 | 16 |
| Kinnerley | Oswestry | 60 | 21 | 18 | 0 | 0 | 21 |
| Knockin | Oswestry | 55 | 22 | 3 | 0 | 25 | 5 |
| Llanymynech | Oswestry | 125 | 41 | 0 | 32 | 50 | 2 |
| Pant | Oswestry | 50 | 14 | 3 | 0 | 25 | 8 |
| Ruyton XI Towns | Oswestry | 125 | 19 | 7 | 0 | 65 | 34 |

| Settlement | Place Plan Area | Draft Local Plan Proposed Guideline (2016-2038) | Completions (2016/17 to 2022/23) | Commitments | | | Windfall Allowance* (as at 31st March 2023) |
|---------------|-----------------|---|----------------------------------|--|---|--|---|
| | | | | Sites with Planning Permission or Prior Approval (as at the 31 st March 2023) | SAMDev Plan Allocations without Planning Permission (as at 31st March 2023) | Proposed Allocations without Planning Permission (as at 31st March 2023) | |
| St Martins | Oswestry | 355 | 161 | 102 | 0 | 60 | 32 |
| Trefonen | Oswestry | 35 | 6 | 0 | 0 | 0 | 29 |
| West Felton | Oswestry | 130 | 65 | -22 | 0 | 60 | 27 |
| Weston Rhyn | Oswestry | 155 | 28 | 45 | 0 | 100 | 0 |
| Whittington | Oswestry | 200 | 92 | 35 | 0 | 70 | 3 |
| Baschurch | Shrewsbury | 360 | 212 | 120 | 0 | 55 | 0 |
| Bayston Hill | Shrewsbury | 200 | 34 | 30 | 0 | 100 | 36 |
| Bicton | Shrewsbury | 30 | 3 | 5 | 0 | 15 | 7 |
| Bomere Heath | Shrewsbury | 110 | 53 | 5 | 0 | 55 | 0 |
| Cross Houses | Shrewsbury | 90 | 85 | 0 | 0 | 0 | 5 |
| Dorrington | Shrewsbury | 150 | 69 | 4 | 15 | 0 | 62 |
| Ford | Shrewsbury | 125 | 37 | 4 | 0 | 75 | 9 |
| Hanwood | Shrewsbury | 50 | 30 | 3 | 0 | 0 | 17 |
| Longden | Shrewsbury | 50 | 25 | 2 | 0 | 0 | 23 |
| Nesscliffe | Shrewsbury | 115 | 90 | 22 | 0 | 0 | 3 |
| Clive | Wem | 30 | 0 | 2 | 0 | 20 | 8 |
| Hadnall | Wem | 125 | 73 | 0 | 0 | 40 | 12 |
| Shawbury | Wem | 150 | 78 | 7 | 0 | 80 | 0 |
| Prees | Whitchurch | 170 | 32 | 61 | 62 | 35 | 0 |
| Total: | | 4,988 | 1,962 | 805 | 383 | 1,483 | 477 |

*Windfall allowance to achieve proposed residential development guidelines. Cannot be less than 0.

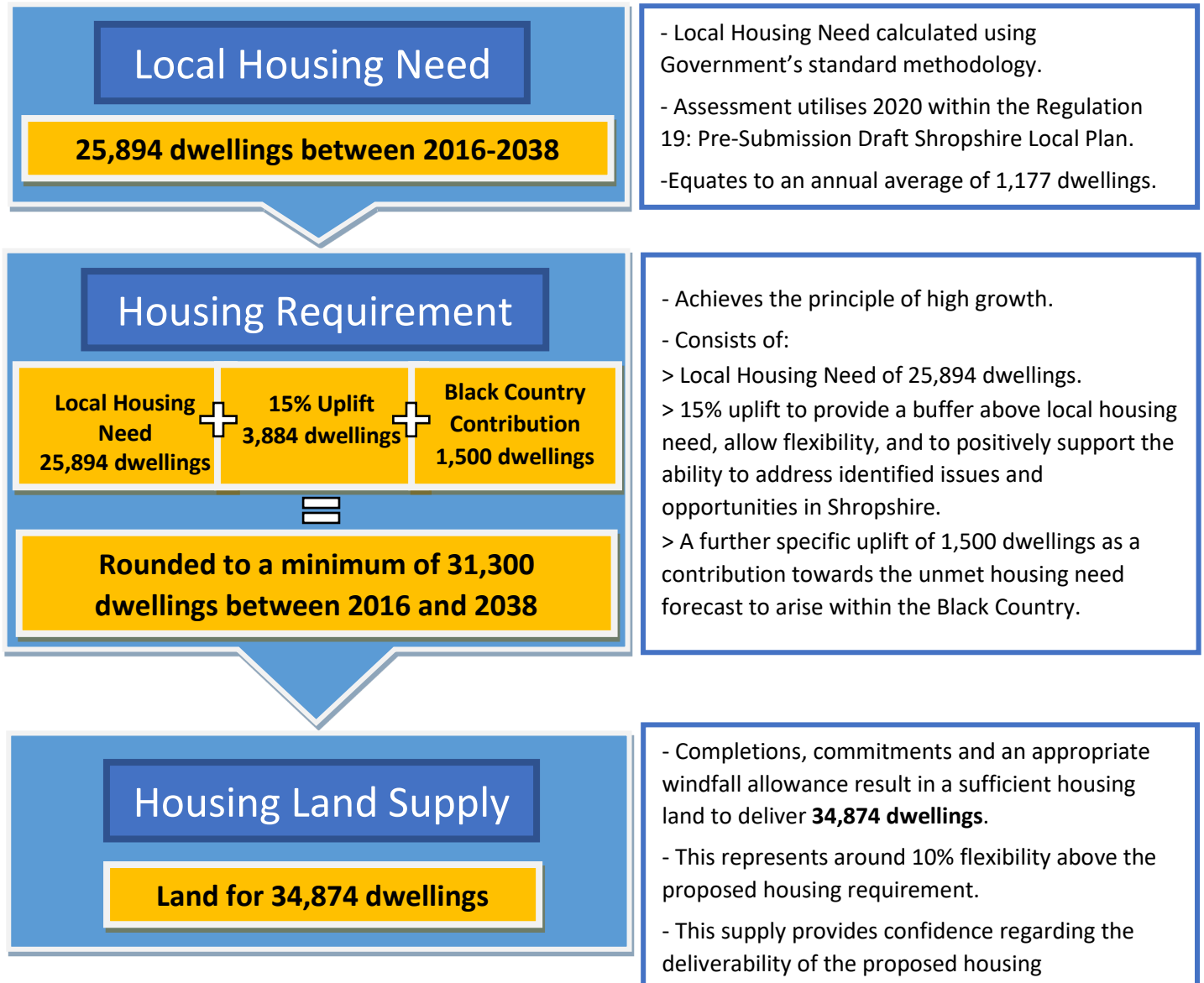
Table 10.4: Residential Supply within Community Clusters and the Wider Rural Area

| Geography | Completions (2016/17 - 2022/23) | Commitments | | |
|-------------------|---------------------------------------|---|--|---|
| | | Sites with Planning Permission or Prior Approval (as at the 31 st March 2023) | SAMDev Plan Allocations without Planning Permission (as at 31st March 2023) | Proposed Allocations without Planning Permission (as at 31st March 2023) |
| Community Cluster | 478 | 279 | 90 | 0 |
| Wider Rural Area | 1,591 | 1,285 | 17 | 0 |
| Total: | 2,069 | 1,506 | 107 | 0 |

11. Summary: Housing Need, Requirement and Supply

11.1. Figure 11.1 provides a summary of local housing need, the components of the proposed housing requirement, and the identified housing land supply:

Figure 11.1: Overarching Summary of the Identified Local Housing Need, Proposed Housing Requirement and Identified Housing Land Supply



12. Employment Land Need

- 12.1. National Planning Practice Guidance (NPPG) advises strategic policy making authorities: *"to develop an idea of future [employment land] needs on a range of data which is current and robust, such as:*
- *sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand);*
 - *demographically derived assessments of current and future local labour supply (labour supply techniques);*
 - *analysis based on the past take-up of employment land and property and/or future property market requirements."*
- [NPPG Paragraph: 027 Reference ID: 2a-027-20190220]
- 12.2. Shropshire Council's early forecasting of jobs growth in 2016, provided by Oxford Economics, was considered to underestimate Shropshire's economic performance. This early forecasting subsequently informed the commission for the Economic Development Needs Assessment (EDNA) (EV042) in 2020. The EDNA identifies five potential growth scenarios including 'labour supply' from new housing delivery and an Economic Baseline Forecast (Experian 2020 base date) for 'labour demand' from the anticipated jobs growth.
- 12.3. The EDNA assessed 'labour supply' need to be 140.9 hectares to balance the housing need in the Government's Standard Methodology. The EDNA assessed 'labour demand' need from forecast investment and business growth to be 161.9ha.
- 12.4. These assessments of the employment land needs in the County were lower than anticipated from past trends in Shropshire. This reflected an assumption in the EDNA that in Shropshire, employment land would be built at the market standard 40% density per site (gross to net). The Employment Topic Paper (EV112 in paragraphs 5.24 to 5.36) used county wide trend data to adjust this density assumption to 26% based on the recorded delivery of employment land to 2020 in the Shropshire Authority Monitoring Report (EV012).
- 12.5. This use of local evidence to increase the accuracy of forecasted data is supported in the NPPG⁹. The EDNA (EV043 in paragraph 9.8) also advocated this approach, stating: *'The EDNA finds the Council's own evidence from monitoring past take up and delivery of developed land and floorspace provide an equally strong method for assessing the further employment land needs of the [County]'*.

⁹ NPPG Paragraph: 025 Reference ID: 2a-025-20190220

- 12.6. The Employment Topic Paper (EV112) therefore concluded The 'labour supply' need scenario therefore increased to 217ha, and the 'labour demand' need scenario increased to 250ha.
- 12.7. The baseline employment land need for the Plan should consider the baseline jobs growth forecast from the performance of the local economy. The 'labour demand' jobs growth need provides this data which identifies an adjusted baseline employment land need for 250ha at an annual rate of 11.5ha/yr.
- 12.8. The baseline employment land need of 250ha therefore provides the basis for identifying reasonable employment land options to help determine the appropriate employment land requirement for the draft Shropshire Local Plan. This baseline need does not include any contribution towards unmet employment land needs in the Black Country.

13. Unmet Employment Land Need Forecast to Arise in the Black Country

13.1. Shropshire Council has undertaken extensive duty to cooperate discussions with the Black Country Authorities regarding employment land issues. Through these discussions and associated processes, it is understood that an unmet employment land need is forecast to arise in the Black Country. It was also established that it may be appropriate for a contribution to this forecast unmet employment land need to be accommodated in Shropshire.

Reasonable Options for Any Contribution to Unmet Employment Land Need Forecast to Arise in the Black Country

13.2. Within the updated additional SA assessment work, two reasonable options for any contribution to unmet employment land need forecast to arise in the Black Country were identified. These were:

- a. **Option 1:** No contribution towards the unmet employment land need forecast to arise within the Black Country.
- b. **Option 2:** Contribution of 30 hectares towards the unmet employment land need forecast to arise within the Black Country.

13.3. The updated additional SA Assessment work is an important consideration in the planning judgement about which option to include in the draft Shropshire Local Plan to address the unmet employment land need in the Black Country. This planning judgement considered a range of other evidence or factors.

13.4. The key evidence or factors considered in the planning judgement included:

- a. The updated additional SA assessment of options to contribute to unmet employment land need in the Black Country.
- b. The extensive duty to cooperate process undertaken between Shropshire Council and the Black Country Authorities.
- c. The various factors considered in the Employment Topic Paper (GC4n) to determine:
 - i. the extent of the relationship between Shropshire and the Black Country and
 - ii. whether it is appropriate to make a contribution in Shropshire towards unmet employment land need in the Black Country;
- d. Agreements in the Statement of Common Ground between Shropshire Council and the Black Country Authorities (EV041).

- 13.5. In conclusion, it is considered **Option 2**: contribution of 30 hectares towards the unmet employment land need in the Black Country is the most appropriate because Option 2:
- a. Positively responds to the relationship between Shropshire and the Black Country – geographic, infrastructure links, and commuting patterns.
 - b. Delivers an appropriate contribution to the unmet employment land need in the Black Country and supports growth across the west of the region by:
 - i. Accommodating investment and business growth on new strategic employment land;
 - ii. Providing employment opportunities for the growing labour force;
 - iii. Improving the functional relationship and sustainability of Shropshire and the Black Country Authorities.
 - c. Presents an opportunity to achieve positive impacts against a range of identified sustainability objectives in particular:
 - i. To achieve a strongly positive effect on SA objective 2: to encourage a strong and sustainable economy throughout Shropshire.
 - d. Whilst posing potential negative impacts against other sustainability objectives, it is considered that mitigation can reduce these impacts including:
 - i. Consideration of the interplay between this contribution and the total level of development proposed in Shropshire; and
 - ii. The strategic scale and distribution of site allocations proposed in the draft Local Plan.
 - e. Positively responds to the Duty to Cooperate process and signed Statement of Common Ground between Shropshire Council and the Black Country Authorities.
 - f. Conversely, Option 1: No Contribution would result in no contribution to the unmet employment land need in the Black Country which would not support the ability to meet the need for employment beyond the Shropshire area.
- 13.6. **However, it is also considered that any decision on this matter is ultimately most appropriately considered in the context of reasonable options for the employment land requirement.**

14. Employment Land Requirement

Reasonable Employment Land Requirement Options

- 14.1. The initial direction for the employment land requirement for the draft Shropshire Local Plan came from the Issues and Strategic Options Consultation. This set out three broad growth options for Productivity Growth, Significant Growth and High Growth to help define the employment land requirement to 2038.
- 14.2. In ID37, paragraph 5.8, it is noted that 'The original SA [SD006.01] did not ascribe land amounts to the different growth options it tested and so it is not as straightforward to compare as housing'. Although these Economic Growth Options were not quantified in the original SA, the anticipated scales of development for these options were indicated by the Council, as part of the proposed 20 year plan period at that time (the plan period was extended to 2038 in 2019):
- a. Issues and Strategic Options Consultation (January 2017) (EV003.01) identified Significant Growth to be **290ha, delivered over 20 years at a rate of 14.5ha/year.**
 - b. Scale and Distribution of Development Consultation (October 2017) (EV004.01) identified High Growth to be **300ha, delivered over 20 years at a rate of 15ha/year.**
 - c. Issues and Strategic Options Consultation (January 2017) identified Productivity Growth as a lower employment requirement which would provide more 'higher value' jobs. The expectation is this option would not require an percentage uplift in baseline need, and would therefore be around **249ha, delivered over 20 years at a rate of 12.45ha/year.**
- 14.3. It is recognised in ID37, paragraph 6.1, that comparing the original Economic Growth Options to contemporary employment land options, requires some reasonable adjustments to the original 2017 options, whilst maintaining their overarching approach to defining levels of growth. These adjustments recognise the:
- a. Extension of the Plan period from 20 years to 22 years at 2038;
 - b. Contribution of 30ha towards unmet employment land needs in the Black Country, formally agreed by Shropshire Council in December 2020 and agreed with the Black Country Authorities in July 2021 as part of the Statement of Common Ground (EV041);
 - c. Contemporary assessment of employment land need based on forecast jobs growth in the EDNA (EV043) published in 2020;
 - d. Application of percentage uplifts for employment land need to provide for growth options consistent with housing growth options.

Extension to the Plan Period

- 14.4. This adjustment was made after the initial Issues and Options consultation in 2017, and therefore needs to be reflected in this updated assessment of options. However, it is important to recognise that this adjustment was already reflected in the contemporary employment land scenarios in the EDNA which recognises the Plan period is now 22 years from 2016 to 2038, and which provides a more up to date baseline 'need' position for the full 22 year plan period.
- 14.5. When the Plan period was extended to 22 years, the scales of growth indicated in the Economic Growth Options (2017) were maintained at their previously proposed figures. This re-aligned the annual requirements in these growth options to the pattern of employment development in the County. This recognised that the baseline employment land need in Shropshire should be re-assessed in relation to changing economic circumstances since the previous need assessment was undertaken in 2012. These changing circumstances included: the County's economic experiences from the start of the millennium, the UK departure from the European Union and the Covid-19 downturn.

Contemporary economic needs assessments of Shropshire

- 14.6. The original growth options in the Consultation document EV003.01 (Issues and Strategic Options) provided three options for strategic economic growth - 'Productivity', 'Significant' and 'High' Growth - but did not ascribe a land requirement to each option. In response to ID37 and in particular paragraphs 5.3, 5.4, 5.7, 5.8, 6.1, 6.4 and 6.5, the Council have identified contemporary employment land options for: 'Productivity', 'Significant' and 'High' Growth which are consistent in principle with the economic growth options in EV003.01 after making the reasonable adjustments noted here.
- 14.7. The important consideration in determining these contemporary employment land options is that, like the housing options, the baseline position for employment land need has changed since 2017. The updated need assessment is an important component of these reasonable employment land options for this updated SA.
- 14.8. As described above, The needs assessment is now underpinned by the EDNA with adjustments made to plot rations detailed in the Employment Topic Paper (EV112). This contemporary evidence identifies the appropriate employment land need for Shropshire to be assessed in this updated SA.

Percentage uplifts for employment land options consistent with housing options

- 14.9. In ID37, paragraph 5.8 seeks to provide consistent advice on confirming the employment land options to the advice provided for the housing options. Further, in paragraph 5.8, the importance of aligning the employment growth with housing growth is recognised.
- 14.10. Whilst it is considered appropriate to maintain the 'productivity' growth option at 0% uplift to align with the original principle of this option in the 2017 Issues and Options document, it is considered appropriate to apply consistent percentage uplifts against the baseline need to the 'significant' growth and 'high' growth options as applied to the housing options, i.e. 10% uplift for 'significant' growth and 15% for 'high' growth.

| Considerations | Productivity Growth | Significant Growth | High Growth |
|---|---------------------|--------------------|-------------|
| Contemporary Shropshire Employment Land Requirement Options | 250 | 275 | 290 |
| | 11.5 ha/yr. | 12.5 ha/yr. | 13 ha/yr. |
| | 0% | 10% | 15% |

Contribution to unmet need in the Black Country

- 14.11. Shropshire Council intends to contribute 30ha towards unmet employment needs in the Black Country, as agreed through the Duty to Cooperate process. This contribution should be considered in each of the employment land growth options, and is set out below:

| Considerations | Productivity Growth | Significant Growth | High Growth |
|---|---------------------|--------------------|-------------|
| Contemporary Shropshire Employment Land Requirement Options | 250 hectares | 275 | 290 |
| | 11.5 ha/yr. | 12.5 ha/yr. | 13 ha/yr. |
| | 0% | 10% | 15% |
| Contemporary Shropshire & Black Country Employment Land Requirement Options | 280 hectares | 300 | 320 |
| | 12.75 ha/yr. | 14 ha/yr. | 14.5 ha/yr. |
| | 0% | 7% | 14% |

Updated Reasonable Employment Land Requirement Options

- 14.12. Using the methodology described above, the reasonable adjustments to the Economic Growth Options from the Issues and Strategic Options become three reasonable employment land requirement options, all with or without a contribution towards unmet needs in the Black Country which are shown in Table 14.1.

Table 14.1: Reasonable Employment Land Options

| Option | Percentage Uplift Above Minimum Employment Land Need | 30 hectare Black Country Contribution |
|--|--|---------------------------------------|
| Employment Land Option 1a: Productivity Growth | No Uplift | No |
| <p>This option represents the baseline employment land forecast over the 22-year plan period from 2016-2038. The baseline employment land forecast for Shropshire is identified in the Shropshire Economic Development Needs Assessment for 161.91 hectares and has been adjusted to 250 hectares to take account of the lower density of development in Shropshire. This option represents a total minimum employment land requirement of 250 hectares over the 22 year period from 2016 to 2038 which gives an annual average of around 11.5 hectares/year.</p> | | |
| Employment Land Option 1b: Productivity Growth with Black Country Contribution | No Uplift | Yes |
| <p>This option represents the adjusted baseline employment land forecast of 250 hectares which equates to an annual average of around 11.5 hectares/year over the 22-year plan period from 2016-2038. This option provides a further 30 hectare contribution to the Black Country Authorities which represents a total minimum employment land requirement of 280 hectares over the 22 year period from 2016 to 2038 which gives an annual average of around 12.75 hectares/year.</p> | | |
| Employment Land Option 2a: Significant Growth | Uplift around 10% | No |
| <p>This option represents a 10% uplift on the adjusted baseline employment land forecast of 250 hectares over the 22-year plan period from 2016-2038 (annual average 11.5 hectares/year). This option represents a total minimum employment land requirement of 275 hectares over the 22 year period from 2016 to 2038 which gives an annual average of around 12.5 hectares/year.</p> | | |
| Employment Land Option 2b: Significant Growth with Black Country Contribution | Uplift around 10% | Yes |
| <p>This option represents the adjusted baseline employment land forecast of 250 hectares (annual average 11.5 hectares/year) with a 10% uplift to 275 hectares at an annual average of 12.5 hectares/year over the 22 year period from 2016 to 2038. This option provides a further 30 hectare contribution to the Black Country Authorities which represents a total minimum employment land requirement of 300 hectares over the 22 year period from 2016 to 2038 which gives an annual average of around 14 hectares/year.</p> | | |
| Employment Land Option 3a: High Growth | Uplift around 15% | No |
| <p>This option represents a 15% uplift on the adjusted baseline employment land forecast of 250 hectares over the 22-year plan period from 2016-2038 (annual average 11.5 hectares/year). This option represents a total minimum employment land requirement of 290 hectares over the 22 year period from 2016 to 2038 which gives an annual average of around 13 hectares/year.</p> | | |
| Employment Land Option 3b: High Growth with Black Country Contribution | Uplift around 15% | Yes |
| <p>This option represents the adjusted baseline employment land forecast of 250 hectares (annual average 11.5 hectares/year) with a 15% uplift to 290 hectares at an annual average of 13 hectares/year over the 22 year period from 2016 to 2038. This option provides a further 30 hectare contribution to the Black Country Authorities which represents a total minimum employment land requirement of 320 hectares over the 22 year period from 2016 to 2038 which gives an annual average of around 14.5 hectares/year.</p> | | |

Identifying Proposed Employment Land Requirement

- 14.13. The Council has reached a planning judgement to determine which employment land option should become the updated employment land requirement in the draft Shropshire Local Plan as required by the Examination process and in particular the Inspectors comments in ID28, ID36 and ID37.
- 14.14. An extensive range of information has informed this planning judgement including the:
- a. Economic spatial strategy objectives to:
 - i. Support an expanding business base to deliver an increasing range and type of investment and employment opportunities;
 - ii. Provide greater choice and competition for employment sites;
 - iii. Provide greater efficiency in the development of employment land;
 - iv. Modernise the commercial building stock and employment floorspace across the County;
 - v. Deliver a greater proportion of higher value employment;
 - vi. Provide a broader range of employment generating uses;
 - vii. Support the growth and diversification of our labour force;
 - viii. Deliver a 'step change' in the growth and productivity of the local economy;
 - b. Identification of key opportunities and challenges in Shropshire;
 - c. Formal agreement between Shropshire Council and the Black County Authorities, through ABCA, to make a 30ha contribution towards unmet employment land needs in the Black Country;
 - d. employment land needs and other conclusions reached in the EDNA;
 - e. Conclusion that the employment land requirement should be expressed as 'a minimum' rather than 'around';
 - f. Responses to the Regulation 18 consultations to inform the draft Shropshire Local Plan and representations to the Regulation 19 consultation on the draft Shropshire Local Plan;
 - g. Updated additional SA assessment of reasonable options for any contribution to the unmet housing needs forecast to arise in the Black Country;
 - h. Updated additional SA assessment work regarding reasonable employment land requirement options; and
 - i. Deliverability of the employment land requirement including matters set out in the Employment Topic papers (EV112/GC4n).

14.15. Dealing with each in turn:

Economic Spatial Strategy

- 14.16. The consultation responses that informed the preparation of the draft Shropshire Local Plan identified a range of issues and opportunities which helped to inform the Economic Growth Strategy (2017).
- 14.17. The Economic Growth Strategy captured the broad spectrum of activity required to improve the performance and productivity of the local economy. The strategy also considered how growth might be delivered through the provision of housing, improving the communications and transport networks, support from the public sector and utilities providers and through the promotion of Shropshire as a good location for investment and enterprise.
- 14.18. The Economic Growth Strategy is recognised as the pathway for Shropshire to deliver qualitative improvements to the local economy through the Submission Local Plan. To achieve this objective, the employment land requirement should provide a sufficient scale of employment land, offer choice and competition for employment sites and premises and be realistic and deliverable in relation to the local plan evidence base.
- 14.19. The Economic Growth Strategy has subsequently been updated in 2022 after the submission of the Local Plan, but continues to provide a consistent overarching strategy by supporting key sectors to target new growth opportunities and to address labour skills gaps in order to improve the employability and upskilling of the workforce available to businesses in Shropshire.

Opportunities and Challenges in Shropshire

- 14.20. The Employment Strategy Topic Paper (GC4n in Economic Spatial Strategy paragraph 4.14) captures the material considerations for the economic spatial strategy including the delivery of:
- a. **'Step change' in growth and productivity** – to achieve a 'step change' in Shropshire's economic performance by offering higher quality investment opportunities and improving the quality of the employment offer to retain skilled and qualified people;
 - b. **Supporting unmet needs in neighbouring areas** – to help address unmet needs within the appropriate scale of planned development to satisfy national policy especially to deliver sustainable development. Improvements in employment generation in centre, east and south of the County will improve Shropshire's economic profile, investment offer and potential to deliver economic growth and productivity improvements;

- c. **Expanding business base of investment and employment** – to improve Shropshire’s economic investment potential particularly in significant commuting locations from vibrant urban markets with higher concentrations of labour, skills and qualifications offering opportunities for higher quality investment and employment uses;
- d. **Growth and diversification of labour force** - to balance new economic development and employment generation with the delivery of new housing and unmet needs for employment especially in urban centres, to help deliver a growing and diverse labour force and support improving rates of economic growth and productivity;
- e. **Range of employment generating uses** – to reflect the changes to the Use Classes Order and the introduction of Class E to capture the broader contribution to the employment offer in the County;
- f. **Delivery of more higher value employment** - to support the working age population especially professionals and key workers to live and work in Shropshire by offering good quality job opportunities with career advancements and to reduce the under-employment of skilled people;
- g. **Choice and competition for employment sites** – to deliver an employment land requirement that improves Shropshire’s investment potential and job opportunities, shaping an employment land supply offering a range, choice and quality of locations and opportunities;
- h. **Greater efficiency in the development of employment land** - to deliver more effective planning of development on employment land to improve the density of land use, delivery of floorspace and out-turn of jobs to meet Shropshire’s economic needs;
- i. **Modern supply of commercial premises** - to replenish the building stock with modern premises and reduce the loss of good quality employment land and floorspace to other uses.

Purpose and Strategy for Co-operating with Unmet Need

- 14.21. The two previous Employment Topic Papers prepared to support the Local Plan - (GC4n: Section 6 and EV112: section 7) explain that Shropshire Council recognises the need to counter the labour market effects of an ageing population along with the significant movement of older migrants into Shropshire.
- 14.22. The unmet employment needs in the four, centrally located Black Country Authorities would create a surplus supply of labour in the accessible and vibrant economic heart of the region. These unmet needs may potentially change the supply, availability and movement of labour from this combined population of over 1 million persons.

- 14.23. Shropshire's response seeks in time, to retain more of the resident working population of the County, by managing out-commuting, in order to drive its economic growth strategy. A key step towards this, is to reach a 'net commuting balance' by securing 'equilibrium' with in-commuting. Progress can be made towards this interim objective, by increasing the number of in-commuters entering Shropshire from neighbouring areas including the Black Country.
- 14.24. Whilst the Black Country has a shortfall in the availability of land for employment development. The significant demand for employment opportunities in the Black Country, combined with the proximity of Shropshire, and the connectivity between the two areas, contribute to the impacts of the unmet employment land need in the Black Country. Shropshire considers that helping to relieve these commuting pressures will have longer term benefits both for Shropshire and for the Black Country Authorities.
- 14.25. A further matter to be considered in this relationship, was addressed by the Examining Authority for the West Midlands Interchange (WMI) in South Staffordshire. The Examining Authority accepted that the Black Country "*labour pool should support the scale of growth at [the] WMI including residents who are unemployed and those who are not currently economically active but want a job*". However, the Examining Authority wished to ensure: "*there would be an adequate labour pool to support the Proposed Development without a significant adverse effect on the ability of existing businesses [in the Black Country] to fulfil their employment needs*".
- 14.26. In seeking to assist the Black Country Authorities with their unmet need, Shropshire still wishes to support their capacity to continue to meet their own labour needs. This objective meets the obligations in NPPF, paragraph 85 to "*allow each area to build on its strengths, counter any weaknesses and address the challenges of the future*".
- 14.27. To achieve this outcome, Shropshire is seeking to support unmet employment needs in the Black Country by influencing commuting patterns between Shropshire and the Black Country. This would be in addition to support for the migration of some labour to new housing in Shropshire. This means managing the scale of the contributions to the Black Country Authorities to the proposed 1,500 dwellings and 30ha of employment land, to effectively '*share*' an element of the Black Country labour pool.
- 14.28. This approach sought primarily to meet the duty to cooperate in satisfying unmet needs across the region and also to ensure each participating authority still has the resources to deliver effective planning strategies for their administrative areas.

Employment Land Need and Options in the EDNA

- 14.29. As described above, the conclusions of the EDNA, and the subsequent adjustment to likely plot ratios have provided the baseline employment land needs of the County to 2038
- 14.30. One of the intentions for the preferred employment land requirement is to respond effectively to paragraph 85 of the NPPF, where significant weight should be given to need to support economic growth and productively. To achieve this, it is necessary to meet the employment needs of the growing population and demand from those seeking employment in the County in response to forecast growth in the size and performance of the business base.

Expression of the 'minimum' Employment Land Requirement

- 14.31. Throughout the preparation of the draft Local Plan, it was expected that the scale of development to be delivered would be 'around' the scale of the proposed employment land requirement in the draft Shropshire Local Plan.
- 14.32. In ID28, the Planning Inspectors concluded that the employment land requirement should actually be expressed as 'a minimum' "*for both monitoring and effectiveness*" of the Local Plan.
- 14.33. Shropshire Council accepts this principle. However, the implications require careful consideration in the context of identifying which of the reasonable employment land requirement options should form the basis for the proposed requirement in the draft Shropshire Local Plan.
- 14.34. Where the employment land requirement is expressed as 'around', this would not provide a definitive minimum or a definitive maximum, but rather, a general target for the scale of development to be delivered. Where the requirement is expressed as a definitive 'minimum' it would provide for both the achievement of the Shropshire need and for the delivery of development to meet the unmet need in the Black Country.
- 14.35. The assumption would follow that, the scale of development to be delivered would meet the requirement but may reasonably exceed this requirement where the functional relationship with the Black Country proved to be a strong influence on Shropshire.
- 14.36. This would be subject to the economic circumstances that prevailed through the Plan period. However, this approach is supported by Shropshire Council and the scale of employment development would be supported by the Shropshire Economic Growth Strategy.

Consultation Responses and Identification of Opportunities

- 14.37. The evidence base and consultation responses that informed the preparation of the draft Shropshire Local Plan identified a range of issues and opportunities in Shropshire including:
- a. Promoting the County at national and regional levels to capture greater investment, support key growth sectors and deliver a 'high growth' strategy;
 - b. Delivering sustainable economic growth which increases the size and diversification of the business base and delivers improvements to economic performance and productivity;
 - c. Delivering an urban focused strategy to locate opportunities where investment is most likely to be delivered;
 - d. Delivering balanced, mixed use developments in key locations to manage travel patterns and promote sustainable travel options;
 - e. Providing a good range and choice of suitably located and deliverable employment land and premises with attractive and accessible strategic investment sites;
 - f. Improving the highway and public transport networks especially along the Strategic Corridors including the A49, A5, A458;
 - g. Delivering high quality education and training opportunities in further education (FE), higher education (HE) and vocational training;
 - h. Delivering good quality housing to meet the full range of housing needs supported by modern retail and leisure services.
- 14.38. Key evidence to inform these issues and opportunities includes the local housing need assessments (with EV069), Authority Monitoring Reports (including EV012), Strategic Housing Market Assessment (EV097.01 and EV097.02), Productivity Growth Forecast (EV090), Economic Development Needs Assessment (EV043), Economic Growth Strategy (EV044), Employment Land Review (EV046) and Local Plan Viability Study (EV115.01).

Updated additional SA assessment of reasonable options for any contribution to the unmet housing needs forecast to arise in the Black Country

- 14.39. The updated additional SA assessment work has included a specific consideration of reasonable options for Shropshire making a contribution to the unmet employment land need forecast to arise in the Black Country.

14.40. The reasonable options identified were:

- a. **Option 1:** No contribution towards the unmet employment land need forecast to arise within the Black Country.
- b. **Option 2:** Contribution of 30ha towards the unmet employment land need forecast to arise within the Black Country.

14.41. This SA assessment provides an important source of information to inform the planning judgement. This work considers the implications of making a contribution to unmet employment land need forecast to arise in the Black Country as part of the employment land requirement of the draft Shropshire Local Plan. This is contrasted with the implications of not making this contribution to support neighbouring unmet employment land needs.

14.42. This work assessed each option against the SA objectives and in this way informs judgements about their relative sustainability. It concluded that on balance, **Option 2:** Contribution of 30ha towards the unmet employment land need forecast to arise within the Black Country, is the most sustainable of the two options identified. Further detail on the outcomes of this updated additional SA assessment work is provided within the updated Additional SA Report.

14.43. The planning judgement exercise summarised within paragraphs 6.1-6.7 of this Topic Paper, also concluded that **Option 2:** Contribution of 30ha towards the unmet employment land need forecast to arise within the Black Country, was the most appropriate of these options.

Updated additional SA assessment work regarding reasonable employment land requirement options

14.44. The updated additional SA assessment work included assessment of the three reasonable options for the employment land requirement to meet the needs and demands of the Shropshire economy. Each of these three options then had a further proposed option to make an additional contribution of 30ha towards the unmet employment land need forecast to arise in the Black Country.

14.45. The updated additional SA assessment considered each of these options against the SA objectives (comprising 16 sustainability outcomes) for the assessment. This assessment work is an important source of information for the planning judgement about which reasonable employment land requirement options should provide the proposed employment land requirement for the Local Plan.

14.46. The updated additional SA assessment work concluded that the greater the level of employment land proposed within an option, the greater the likelihood of positive impacts on social and economic

sustainability outcomes. Conversely the greater the level of employment land proposed, the greater the potential for negative impacts on environmental factors. The purpose of the SA assessment is to explore the principle of sustainable development and to achieve an appropriate balance across all the three pillars for sustainability– for the social, economic, and environmental implications of development.

- 14.47. It is important to recognise that, the updated additional SA assessment work concluded that none of the options are likely to result in a strongly negative effect on any of the sustainability outcomes.
- 14.48. Further, it concluded that only one option is likely to result in strongly positive effects on any of the sustainability outcomes. This is Option 3b: High Growth Plus a 30 hectare contribution to the Black Country Authorities Unmet Employment Land Needs.
- 14.49. This is likely to result in a strongly positive effect in the short, medium and long term on SA objective 2: to encourage a strong and sustainable economy and also throughout the plan period, a strongly positive effect on SA objective 5: to encourage the use of sustainable means of transport.
- 14.50. The updated additional SA assessment work concluded that on balance, **Option 3b**: High Growth Plus a 30 hectare Contribution to the Black Country Authorities Unmet Employment Land Need represented the most sustainable of the reasonable options for the proposed 'minimum' employment land requirement. Further detail on the outcomes of this updated additional SA assessment work is provided within the Updated Additional SA Report.

Deliverability

- 14.51. The proposed employment land requirement should meet local need and facilitate the contribution towards unmet needs in the Black Country. In addition, the requirement should accommodate the aspirations of the business community and the need to improve Shropshire's economic performance and productivity.
- 14.52. In Employment Topic Paper (EV112), the Shropshire Authority Monitoring Report (2020) was found to indicate that the:
- a. Average development rate in Shropshire from 2016 to 2020 has increased and regained the historical rate of 12.5 ha each year only previously achieved from 1989 to 2006;
 - b. Employment development in Shropshire from 2016 continued to fluctuate with a lower level of 10.5ha in 2016-17 and 6.8ha in 2018-19 reflecting changes in the regional and national economy;

- c. However, development in 2017-18 (15.2ha) and particularly in 2019-20 (17.4ha) significantly exceeded any historical records and on average saw the rate of development in Shropshire return to rates only previously experienced before 2006. This occurred despite the anticipated effects of Brexit and the emergence of the coronavirus Covid-19. Indeed, since 2016, Shropshire has seen the average rate of development increase by +30% from 9.6ha each year to 12.5ha each year;
- d. This positive response in Shropshire to the recent economic circumstances, coincided with the publication of the first Shropshire Economic Growth Strategy (2017). The experience of the business community in Shropshire since 2016, supported by their partnership with the public sector, appears to be encouraging investment confidence;
- e. The evidence of recent, higher annual completions in Shropshire, would indicate the deliverability of a higher aspirational option for the employment land requirement.

The Proposed Employment Land Requirement

14.53. Shropshire Council considers **Option 3b** should provide the employment land requirement for the draft Shropshire Local Plan.

14.54. **Option 3b: High Growth PLUS 30ha contribution to Black Country Authorities Unmet Employment Land Need** represents 15% uplift on the forecast economic baseline need of 250ha over the 22 year period (annual average of 11.5ha/yr) plus a further 30ha uplift as a contribution toward forecast unmet employment land need in the Black Country.

14.55. The resultant proposed employment land requirement is 320ha over the proposed plan period from 2016 – 2038. This equates to an annual average of around 14.5ha/yr.

Reasons for the Proposed Employment Land Requirement

14.56. Key considerations included:

- a. The level of employment land associated with Option 3b is sufficient to meet the employment land need for the forecast baseline economic growth (2020 base date), whilst providing a significant buffer above this local need. This provides significant confidence that the level of need will be achieved and allows sufficient flexibility to respond to changes to need and to market demands over the proposed plan period.
- b. The level of employment development associated with Option 3b is sufficient to allow for **a significant positive contribution** to the

various identified **opportunities and challenges in Shropshire** (when considered in the context of specific policies to positively influence the location, type, size, quality and choice of employment sites and premises in Shropshire).

- c. The level of employment development associated with Option 3b **achieves the principle of and will deliver High Growth**, which underpins the level of growth proposed within the spatial strategy of the draft Shropshire Local Plan.
 - i. This option more than meets the evidenced employment land need with flexibility to provide significant opportunities to meet the requirements of an expanding business base in terms of location, type, size and quality.
 - ii. This will help to achieve a 'step change' in Shropshire's economic performance by offering higher quality investment opportunities and improving the quality of the employment offer to support improving rates of economic growth and productivity;
 - iii. This will help balance new economic development and employment generation with the delivery of new housing and with unmet needs for employment especially in urban centres to help deliver a growing and diverse labour force.
 - iv. This is also expected to support the use of energy from renewable sources particularly in production processes, support reductions in energy consumption and promote energy efficiency in the move towards a 'net zero carbon' economy.
 - v. This will support the delivery of a sustainable pattern of development in Shropshire.
 - vi. A series of consultations have been undertaken regarding the proposed housing requirement of the draft Local Plan. Reflecting on the **consultation responses** received, Shropshire Council considers the level of employment land associated with Option 3b responds to and balances the issues, considerations and differing perspectives raised through these consultations.
- d. Option 3b will also include a specific contribution of 30ha towards the unmet employment land needs in the Black Country. This is considered to be appropriate and will support further co-operation between Shropshire and neighbouring Functional Economic Market Areas (FEMA) to strengthen strategic relationships with neighbouring authorities.
- e. Shropshire and the Black Country recognise their mutual objectives under paragraph 26 of the NPPF in proposing Option 3b, that:
 - i. Shropshire and the Black Country have mutual objectives for their emerging Local Plans and these strategic policy-making authorities are working towards the "production of a positively

- prepared and justified strategy” for their respective administrative areas;
- ii. This ‘mutuality’ seeks to counter the challenges created by the more limited development capacity of the Black Country through:
 - Facilitating the Black Country Authorities to further access the strategic corridors, principal settlements and land resources in the adjacent sub-regional area; and
 - Using the land resource capacity of Shropshire to support the sustainable growth of their local economy and to support the Black Country Functional Economic Market Area;
 - Helping to meet some of the Black Country investment demands in the business markets and some of the employment needs of their labour markets in Shropshire.
 - f. Option 3b is considered sufficiently responsive to the ‘overlap’ between uplifts to local employment land need to support the objectives of the Shropshire strategy, and the contribution to address issues and opportunities in the Black Country to further support the achievement of the Shropshire strategy.
 - g. Based on the updated additional SA assessment work undertaken, it is considered that Option 3b presents an opportunity to:
 - iv. Achieve a **strongly positive effect** on SA objective 2: encouraging a strong and sustainable economy throughout Shropshire.
 - v. In the long-term, achieve a **strongly positive effect** on SA objective 5: encouraging the use of sustainable means of transport.
 - vi. Achieve **positive impacts** against a range of other identified sustainability objectives including SA Objective 13: to promote the adaptation and mitigation to climate change.
 - h. Based on the updated additional SA assessment work undertaken, it is considered that Option 3b is **unlikely to result in any strongly negative effects on any SA objectives**. Whilst a potential risk of achieving negative impacts against a range of identified sustainability objectives is acknowledged, it is considered that opportunities exist to mitigate the extent of such impacts. This includes through careful consideration of the scale and locations of new site allocations, the identification of appropriate policies to manage this development and the requirement to masterplan the proposed development schemes.
 - i. Whilst Options 1b and 2b would ensure the employment land need would be met, and result in a contribution to unmet employment land need forecast to arise in the Black Country, with further opportunities to respond to identified opportunities and challenges

in Shropshire; the opportunities to deliver the preferred strategy for Shropshire would be less significant than those with Option 3b.

- j. As documented in ID28, the proposed employment land requirement is to be expressed as a 'minimum' rather than as a figure 'around' the requirement. This means there is significantly more certainty about the minimum level of employment development to be provided, Shropshire Council considers Option 3b **positively responds to the employment land requirement as a 'minimum' level of delivery.**

14.57. In conclusion, considering the available evidence, responses to previous consultation and the results of technical assessments, other relevant information in applying the planning judgement, Shropshire Council considers the employment land requirement in the draft Shropshire Local Plan should be based on **Option 3b** of the identified reasonable employment land requirement options.

14.58. The proposed employment land requirement is a minimum of 320ha which equates to an annual average of 14.5ha/yr. This reflects a continuation of the High Growth option previously identified and presented in the Submission Local Plan (at 15% above the identified employment land need) and includes a specific contribution of 30ha towards unmet employment land need forecast to arise in the Black Country.

Implications of Proposed Employment Land Requirement

14.59. The draft Submission Local Plan proposed an employment land requirement of 300ha between 2016 and 2038. This equates to an annual average of around 14 hectares per year (actually 13.6ha/yr rounded upwards) over the 22 year plan period.

14.60. The updated reasonable options for the employment land requirement, when considered through the updated additional SA assessment process and the planning judgement exercise (as summarised within this document) has concluded **Option 3b**: 'High Growth Plus a 30 hectare Contribution to the Black Country Authorities' to be the most appropriate and sustainable strategy for Shropshire.

14.61. The employment land requirement in the draft Local Plan should therefore be **increased to 320 hectares between 2016 and 2038**. This equates to a higher annual average of around 14.5 hectares per year over the 22 year plan period.

14.62. Main modifications would be required to the draft Submission Local Plan to reflect this proposed change – including to draft Policy SP2

and its supporting text and to draft Policy SP13 and its supporting text.

- 14.63. Main modifications would also be required to draft Policy SP2 to expressly state the proposed employment land requirement includes a 30 hectare contribution to the unmet employment land need forecast to arise within the Black Country. Furthermore, it is also necessary to:
- a. Consider through the SA process reasonable options and subsequently identify appropriate main modifications in order to accommodate the proposed 20 hectare uplift to the proposed employment land requirement.
 - b. Consider through the SA site assessment process, reasonable sites to accommodate the proposed 30 hectare contribution to the unmet employment land need forecast to arise in the Black Country¹⁰.
 - c. Identify appropriate main modifications to support the accommodation of the proposed 30 hectare contribution to the unmet employment land need forecast to arise in the Black Country.

¹⁰ Consistent with Paragraph 21 of ID28 which specified that for the purpose of effectiveness, there is a need to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country, through additional SA and site assessment work.

15. Accommodating the Proposed Uplift to the Employment Land Requirement

Options to Accommodate the Proposed Uplift to the Employment Land Requirement

- 15.1. The new proposed employment land requirement of 320ha requires the delivery of an additional 20ha of employment land compared with the current submitted version of the Plan. The Council has considered four reasonable options to deliver this uplift.
- 15.2. These options set out how the requirement for additional employment land may be provided in relation to the scale and distribution of development in the employment strategy in the draft Local Plan.
- 15.3. These options are:
 - a. Option 1: Utilising settlement guidelines and windfall allowances.
 - b. Option 2: Densification of proposed site allocations.
 - c. Option 3: Extensions to current proposed site allocations or the allocation of additional sites.
 - d. Option 4: A combination of two or more of the above options.

Option 1: Utilising Settlement Guidelines and Windfall Allowances

- 15.4. Within the draft Local Plan, Shrewsbury and the identified Principal and Key Centres have proposed settlement employment land guidelines.
- 15.5. The employment settlement guidelines and associated windfall allowances proposed in the submission Local Plan provide significant flexibility, principally in order to allow for choice and competition in the market. This is different to the housing requirements for settlements, as described in the options considered in section 7 of this report, where this same flexibility in how settlement guidelines are presented is not considered necessary.
- 15.6. The intention of this approach to employment guidelines is to provide additional confidence regarding the deliverability of the overall proposed employment requirement. It is therefore appropriate to assess utilising this existing position to accommodate the proposed uplift. This option needs to take into account whether the identified employment land supply is sufficient to deliver the proposed employment land requirement.

Option 2: Densification of Proposed Site Allocations

- 15.7. The Council considered the densification of development in some detail in the Employment Requirement Topic Paper (EV112). This discussion identified that the lower average density of development in Shropshire necessitated a higher employment land requirement than suggested by the growth scenarios in the Economic Development Needs Assessment (EV043).

Option 3: Increasing Site Allocations

- 15.8. There may be opportunities to extend the site area of proposed allocations to increase their capacity and/or opportunities to identify additional site allocations (including through the early release of proposed safeguarded land, identification of new strategic site allocations or identification of new site allocations associated with existing settlements in order to provide additional capacity).
- 15.9. Additional capacity associated with increasing site allocations would need to be deliverable within the proposed plan period and support delivery of necessary supporting infrastructure.

Option 4: A Combination of Two or More of the above Options

- 15.10. It may be appropriate to consider utilising a combination of all or a selection of mechanisms from the other reasonable options for accommodating the uplift to the proposed housing requirement.

Identifying the Preferred Option to Accommodate the Proposed Uplift to the Employment Requirement

- 15.11. The decision regarding which of the reasonable options to accommodate the proposed uplift to the employment requirement should be utilised within the draft Local Plan is ultimately one of planning judgement.
- 15.12. There is however an extensive range of information/factors that informs this planning judgement. This includes:
- a. The updated additional SA assessment work regarding options to accommodate a proposed uplift to the housing requirement.
 - b. Compatibility with the wider vision, strategy and spatial framework of the draft Shropshire Local Plan.
 - c. Feasibility and deliverability, including through consideration of whether there are actual opportunities to achieve the proposed uplift and whether these opportunities would be deliverable within the proposed plan period.

15.13. Dealing with each in turn:

Updated additional SA assessment work regarding options to accommodate a proposed uplift to the employment land requirement

15.14. The updated additional SA assessment work included assessment of the above four reasonable options to accommodate a proposed uplift to the employment land requirement.

15.15. This updated additional SA assessment work is an important source of information for the planning judgement on the approach to accommodate the proposed uplift to the employment land requirement in the draft Submission Local Plan. The updated additional SA assesses each option against the SA objectives to reach a judgement about their relative sustainability.

15.16. An important consideration would remain to be addressed, that the employment needs of Shropshire's rural communities also must be recognised. The strategic scale and distribution of planned development should also deliver employment opportunities of an appropriate scale and within accessible locations in the rural areas of the County. It is considered that this matter has already been addressed in the identified employment land supply which is proposed for the draft Submission Local Plan.

15.17. The updated additional SA assessment concludes the following (the updated SA provides detailed summaries of each option):

Option 1: *Utilising Settlement Guidelines and Windfall Allowances* - the updated additional SA assessment indicates that this option has a strongly positive impact on the SA objective to encourage a strong and sustainable economy. It presents an opportunity to achieve a strongly positive effect on the SA objective to promote an efficient use of natural resources in the short, medium and long term. It presents an opportunity to achieve positive impacts against a range of identified sustainability objectives. Whilst it poses a potential risk of achieving negative impacts against a range of identified sustainability objectives, it is considered that opportunities exist to mitigate the extent of such impacts. Particularly through identification of appropriate policies to manage resultant development (assessed separately within the SA process).

Option 2: *Densification of Proposed Site Allocations* - This option also has a strongly positive impact on the SA objective to encourage a strong and sustainable economy. This option would also likely support a positive effect on the promotion of access to services for all sections of society, encouragement of the use of sustainable modes of transport, reduction of reliance on travel by car, and reducing carbon dioxide emissions. This is because proposed employment land

allocations are associated with urban areas which benefit from the greatest access to a range of sustainable means of transport. This option would likely have a negative effect on the conservation and enhancement of landscape character and local distinctiveness, as densification of proposed allocations is likely to increase the potential for impact on landscape character and change to the character of those places where the majority of people currently live. At the same time, harm to visual amenity is possible with all forms of development, regardless of location.

Option 3: *Increasing site allocations (including proposing one or more additional allocations)* – this option would also likely support the encouragement of a strong and sustainable economy throughout Shropshire, although the extent of this impact would largely be dependent on the location of any extensions to existing proposed allocations/new proposed allocations. There are a number of SA objectives against which this option has the potential for a positive impact, although there is some uncertainty as well given there is a dependence upon the location of additional or increased site allocations. Given this option would entail additional allocations in one form or another, this option would likely have a negative effect on the conservation and enhancement of landscape character and local distinctiveness. Again, whilst this is dependent upon the location and nature of any extensions to existing proposed allocations/new proposed allocations, any development is still likely to change the character of those places where the majority of people currently live and harm to visual amenity is possible with all forms of development, regardless of location.

Option 4: *A Combination of Two or More of the Other Options* - In relation to the updated SA assessment, the effects on each SA objective in this option would also align with the best and the worst of the sustainability outcomes of the other three options. In conclusion, the precautionary principle would indicate that this reasonable option would be likely to provide the 'worst case' scenario from each of the other reasonable options.

Compatibility with the wider vision, strategy and spatial framework of the draft Shropshire Local Plan

- 15.18. It is important that any option to accommodate the proposed uplift to the employment land requirement is compatible with the wider vision, strategy and spatial framework proposed within the draft Local Plan.
- 15.19. On balance, it is considered all of the reasonable options to accommodate the proposed uplift to the employment land

requirement have the potential to be compatible with the wider vision, strategy and spatial framework proposed within the draft Shropshire Local Plan.

- a. Option 1: aligns with the principle of urban focus, by utilising settlement guidelines and windfall allowances in the submitted Local Plan. Given the 'in built' flexibility contained in the settlement guidelines, which provides a total land supply in excess of the requirement figure, it is considered maintaining these guidelines would both be entirely compatible with the wider vision, strategy and spatial framework, and would deliver the housing requirement, including the proposed uplift.
- b. Option 2: would be likely to align with the principle of urban focus as the majority of proposed allocations are associated with urban settlements. However, the evidence of development in the County indicates that the environment around many of the main settlements and the character of their townscapes may place some restrictions on the capacity to increase the density of employment development in Shropshire.
- c. Option 3: would likely continue to align with the principle of urban focus if it entailed an extension to one or more proposed allocations, as the majority are associated with urban settlements. It may also continue to align with the principle of urban focus if it entailed identification of one or more additional site allocations, but this is dependent on the location/characteristics of any potential new employment land allocations. It is considered that whilst the identification of new site allocations or extensions to currently identified allocations may have a significant impact on particular settlements, the relatively modest increase in the proposed 'minimum' employment land requirement would be unlikely to result in a significant change to the overall distribution of employment development.
- d. Option 4: is directly linked to the other identified options.

15.20. It is considered that a continued reliance on the on the current identified settlement guidelines would have the most compatible approach.

15.21. The uplift would instead provide for a further 20ha of development to be drawn down from the identified employment land supply in response to market demands for employment development. The spatial focus for delivering the uplift would be determined by the scale and distribution of demand for investment and development opportunities in the County. This outcome has already been planned for in the settlement guidelines and the identified employment land supply for the draft Submission Local Plan.

Feasibility and Deliverability

Option 1: Utilising Settlement Guidelines and Windfall Allowances

- 15.22. Shropshire is a large and diverse rural county containing the Strategic Centre of Shrewsbury; five Principal Centres (Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch); 11 Key Centres (Albrighton, Bishop's Castle, Broseley, Church Stretton, Cleobury Mortimer, Craven Arms, Ellesmere, Highley, Much Wenlock, Shifnal and Wem); numerous rural settlements identified as Community Hubs and Community Clusters; hundreds of other rural villages and hamlets; and a significant rural hinterland.
- 15.23. The County also has a network of established employment areas across the County located with the hierarchy of settlements identified above and in locations adjoining or close to many of these settlements or in rural locations within the Place Plan areas around these settlements. There is also an established pattern of employment development within or adjoining agricultural enterprises or within individual or groups of rural buildings in suitably accessible locations.
- 15.24. Consequently, there is a constant and significant recycling of previously developed land, existing employment floorspace and suitable rural premises for employment uses. Development of such sites often represents windfall employment development and settlement guidelines provide for this development. This may also capture the potential for development within the wider Place Plan area to supplement the development potential of main settlements.
- 15.25. The identified settlement employment guidelines across the Principal and Key Centres of the County have sought to reflect the significant capability of the County to deliver small scale employment development in addition to more significant allocated sites identified in the Plan. This outcome seeks to ensure that the provision of guidelines for settlements does not itself become a constraint on the development potential of the County and recognises the capacity of certain Place Plan areas to bring forward both urban and rural employment development.
- 15.26. The proposed settlement employment land guidelines seek to ensure that the employment land requirement may be achieved as a minimum provision. This also seeks to ensure that the spatial distribution of employment development in relation to market demands will not be unduly restricted across Shropshire as a result of the settlement employment land guidelines.
- 15.27. Particular regard has been given to locations where demand is most likely to be expressed. In these areas, proposed settlement

employment land guidelines have been identified which will facilitate an appropriate level of employment development and in some instances, development has been permitted and sites have been proposed for allocation to ensure the proposed settlement employment land guidelines can be met. This is illustrated in Table 15.1.

Table 15.1: Proposed Settlement Guidelines and Urban Land Supply

| Location | | | Policy Designation | Proposed Settlement Guidelines | Urban Land Supply | Windfall Capability |
|-------------------|---------------------|----------------------|----------------------|--------------------------------|-------------------|---------------------|
| Place Plan Area | Strategic Corridors | Settlement | | | | |
| | | | | hectares | | |
| Shrewsbury | Yes | Shrewsbury | Strategic Centre | 100 | 105 | |
| Oswestry | Yes | Oswestry | Principal Centre | 57 | 47 | 10 |
| Ellesmere | | Ellesmere | Key Centre | 9 | 9.5 | |
| Bridgnorth | Yes | Bridgnorth | Principal Centre | 49 | 39 | 10 |
| Albrighton | Yes | Albrighton | Key Centre | 5 | | 5 |
| Broseley | | Broseley | Key Centre | 3 | 2 | |
| Highley | | Highley | Key Centre | 3 | 1 | 2 |
| Much Wenlock | Yes | Much Wenlock | Key Centre | 2 | 1.5 | 0.5 |
| | Yes | Ironbridge | Strategic Settlement | 6 | 6 | |
| Shifnal | Yes | Shifnal | Key Centre | 41 | 41 | |
| Market Drayton | Yes | Market Drayton | Principal Centre | 35 | 31 | 4 |
| | Yes | Clive Barracks, Tern | Strategic Settlement | 6 | 6 | |
| Whitchurch | Yes | Whitchurch | Principal Centre | 20 | 26 | |
| Wem | | Wem | Key Centre | 6 | 9 | |
| Ludlow | Yes | Ludlow | Principal Centre | 11 | 12 | |
| Bishop's Castle | | Bishop's Castle | Key Centre | 3 | 3 | |
| Church Stretton | Yes | Church Stretton | Key Centre | 2 | 1.5 | 0.5 |
| Cleobury Mortimer | | Cleobury Mortimer | Key Centre | 2 | 1 | 1 |
| Craven Arms | Yes | Craven Arms | Key Centre | 15 | 15 | |
| TOTALS | | | | 375 | 357 | 33 |

15.28. Table 15.1 shows how the identified settlement employment guidelines provide for a generous identified employment land supply in each of the Principal and Key Centres. In settlements where investment demand is likely to be expressed, sites have been allocated to meet the guideline figures to provide surety of supply. In other locations, the guideline figure provides for further employment windfall capability both in the settlement, in adjoining locations or in the Place Plan area.

15.29. The Council considers that the employment land supply currently identified in the draft Submission Local Plan is significantly generous and sufficient to support the range of reasonable employment land options considered in the updated additional Sustainability Appraisal.

15.30. **The Council have an identified employment land supply which totals 413ha of land and includes proposed 'saved'**

allocations, proposed new allocations and smaller scale windfall development which comprises both brownfield and greenfield land and the redevelopment of premises on established employment areas, within settlements and in rural locations. The Council have identified this employment land supply in (GC4n) Employment Strategy Topic Paper in Table 4 on pages 11 – 16.

- 15.31. The Council considers the identified employment land supply provides a generous scale of employment land providing a range and choice of sites and premises. This offers a variety of types, sizes and quality of investment and development opportunities. The scale of employment land provided at 413ha is significantly greater than the proposed employment land requirement at 320ha.
- 15.32. The buffer provided by the identified employment land supply is considered to provide sufficient flexibility to respond to changing circumstances through the plan period to 2038.
- 15.33. The Council also considers the identified employment land supply provides a robust spatial distribution of opportunity across the County. The identified employment land supply is distributed through the settlement hierarchy and into the rural areas. The proposed new employment allocations have also refreshed the identified employment land supply in key areas of the County most notably in the centre, east and south. This required the identification of proposed new employment allocations totalling 134ha. This provision of new land for economic investment and development represents 42% of the proposed employment land requirement for 320ha.
- 15.34. In conclusion, the Council consider the identified employment land supply, which would include the 134ha of new employment allocations in the draft Local Plan, capable of accommodating the proposed 20ha uplift to the proposed 'minimum' employment land requirement.

Option 2: Densification of Proposed Strategic Site Allocations

- 15.35. The Council considered the densification of development in some detail in the Employment Requirement Topic Paper (EV112). This discussion identified that the lower average density of development in Shropshire (at 26%) necessitated a higher employment land requirement than suggested by the growth scenarios in the Economic Development Needs Assessment (EV043). These growth scenarios were assumed to deliver employment development at 40% of the land area under development but this plot ratio is considered to be too high in Shropshire.

15.36. The Council has considered the matter of density in the preparation of a number of the proposed site allocations comprising:

- a. Shifnal, Land east of Shifnal Industrial Estate (SHF018b & SHF018d) – this 39ha site has a recommended plot ratio of 40% to deliver over 15ha of built development. This seeks to optimise the development potential of this important strategic site to deliver high quality development opportunities and to deliver a high ratio of new employment with a significant proportion of higher quality jobs.

The densification of the employment allocation on Land east of Shifnal Industrial Estate also seeks to satisfy the obligations of NPPF paragraph 146. This requires that proposals should optimise the density of development to make effective use of land especially in sensitive locations including the Green Belt.

- b. Ludlow, Land south of The Sheet on the A49 (LUD052) – this 5 hectare site forms a continuous extension to saved employment allocation ELR058 for 3.5ha. The proposed allocation LUD052 would extend the existing allocation ELR058 to a continuous area of over 8ha where development is due to commence through the development of a primary plot for retail development to access and service the larger allocation. This proposed 5 hectare site is expected to provide around 2ha of built development to meet the employment needs of Ludlow and to protect the setting of this important historic town.

15.37. The Council has not currently set this objective into policy due to the difficulty of achieving a standard plot ratio for the County. The Council would wish to work with the development industry towards this objective, starting by developing an understanding of how to achieve this outcome by testing design solutions key new allocations. It is expected that further density improvements may be achieved on the remaining proposed employment allocations located at Bridgnorth on both the Tasley Garden Village and Stanmore Industrial Estate. However, this is not considered to be a suitable means of accommodating the proposed uplift to the proposed employment land requirement given the uncertainty about its delivery.

Option 3: Proposed Site Allocation extensions or identification of additional sites

15.38. Through the proportionate and robust site assessment process undertaken by Shropshire Council a significant volume of potential site allocations were identified.

15.39. A range of proposed new employment allocations have been identified comprising:

| Location | Settlement | Site | Designation | Employment Land |
|------------|------------|---|---------------------------|-----------------|
| | | | | hectares |
| East | Bridgnorth | Tasley Garden Village | Employment Allocation | 16 |
| | | North of Stanmore Industrial Estate | Employment Allocation | 7 |
| | | Adjoining Hickman Road, | Employment Allocation | 4.5 |
| | Shifnal | East of Shifnal Industrial Estate | Employment Allocation | 39 |
| | Ironbridge | Former Power Station | Strategic Settlement | 6 |
| Centre | Shrewsbury | Preston Island | Employment Allocation | 45 |
| | | Land between Mytton Oak Road and Hanwood Road | Mixed Use Urban Extension | 5 |
| South | Ludlow | South of The Sheet on A49 | Employment Allocation | 5 |
| North-East | Tern Hill | Clive Barracks | Strategic Settlement | 6 |
| | | | TOTAL | 134 |

15.40. The Council has already utilised and proposed extensions to a number of existing employment sites and 'saved' allocations as part of the proposed allocation of new sites in the submitted Local Plan. These include:

- a. Bridgnorth, Stanmore Industrial Estate (P58a & STC002) – employment allocations already propose to extend the existing and successful Stanmore Industrial to extend the lifespan and investment offer of this significant employment area.
- b. Ludlow, Land south of The Sheet on the A49 (LUD052) – 5ha site forms a continuous extension to saved employment allocation ELR058 for 3.5ha. The proposed allocation LUD052 would extend the existing allocation ELR058 to a continuous area of over 8ha.
- c. Shifnal, Land east of Shifnal Industrial Estate (SHF018b & SHF018d) – whilst not considered an extension this proposal does benefit from being co-located with the existing employment area to consolidate this investment location.

15.41. Identified sites and summaries of the various stages of the site assessment process are provided within the SLAA (EV106.01-EV106.10); the appendices of the Sustainability Appraisal and Site Assessment Environmental Report (SD006.03-SD006.22); and the appendices of the updated additional SA assessment work.

15.42. Having reflected on the range of sites identified through the site assessment process and the conclusions reached within it, it is considered there are feasible opportunities to:

- a. Extend the site area of some of the proposed allocations to increase their capacity.
- b. Identify additional site allocations, including through the early release of proposed safeguarded land, identification of new strategic site allocations or identification of new site allocations associated with existing settlements.

- 15.43. To ensure identification of sustainable and feasible opportunities for the extension of the site area of a proposed allocation and/or identification of additional feasible and sustainable site allocations, this process would need to be informed by a targeted update to the additional SA site assessment work.
- 15.44. It should also be informed by recognition that during the 'call for sites'; the various consultations undertaken to inform the draft Shropshire Local Plan, and the ongoing examination, promoters of many of these sites have provided information regarding deliverability of sites during the proposed plan period.
- 15.45. However, final judgement on deliverability would require consideration on a site-by-site basis, informed by careful consideration of site-specific evidence and other local factors relevant to each site; past delivery rates for similar projects across Shropshire; local market absorption rates and other known market factors; consideration of 'standard' assumptions applied by the Council when analysing employment land supply; proactive discussions with relevant landowners, land promoters and developers; and professional judgement.

Option 4: A Combination of Two or More of the Other Options

- 15.46. Option 4 is directly linked to the other identified options. Given this assessment concludes each of the other options could be feasible and deliverable, it is considered this option could be similarly feasible and deliverable.

The Mechanism to Accommodate the Proposed Uplift to the Employment Land Requirement

- 15.47. In conclusion, the Council considers the basis for accommodating the proposed uplift to the employment land requirement for the draft Shropshire Local Plan is Option 1 – to utilise the existing settlement guidelines and windfall allowances, which provide for an employment land supply in excess of the proposed employment requirement of 320ha. This is therefore considered sufficient to provide for the uplift of 20ha to deliver the proposed employment land requirement of 320ha.

- 15.48. **Utilising existing settlement guidelines and windfall allowances** would allow the current range, choice and distribution of sites, premises and development opportunities and committed proposals to meet the needs of the Shropshire economy and to provide for an appropriate balance between urban and rural employment development across the County to achieve the proposed uplift to the employment land requirement.

16. Accommodating the Proposed Contribution to the Unmet Employment Land Need Forecast to Arise in the Black Country

Introduction

- 16.1. Paragraph 21 of ID28 specified that for the purpose of effectiveness, there is a need to identify sites to accommodate any proposed contributions to unmet needs forecast to arise in the Black Country, through additional SA and site assessment work.
- 16.2. Specifically, it states "*...the Council will also need to consider which site or sites in the Plan will be identified to meet that need. This also needs to be subject to sustainability appraisal to reflect the objectives and geographical scope of the Plan.*"
- 16.3. As the proposed employment land requirement includes a contribution of 30ha of employment land towards the unmet employment land need forecast to arise in the Black Country, there is a need to identify appropriate site or sites to accommodate this proposed contribution.

Options to Accommodate the Proposed Contribution to the Unmet Employment Land Need Forecast to Arise in the Black Country

- 16.4. To inform identification of the site or sites to accommodate the proposed contribution of 30ha of employment land towards unmet employment land needs forecast to arise within the Black Country, Shropshire Council has undertaken updated additional SA and site assessment work.
- 16.5. First, an appropriate geography within which reasonable options for sites to accommodate the proposed contribution to the unmet employment land need forecast to arise within the Black Country may be located, was identified. This was informed by consideration of:
 - a. Geographic proximity and the location and quality of main road and rail transport links between Shropshire and the Black Country.
 - b. Migration patterns between sub-geographies (Place Plan Areas) within Shropshire and the entirety of the Black Country.
 - c. Commuting patterns between sub-geographies (Place Plan Areas) within Shropshire and the entirety of the Black Country.
 - d. The extent to which Travel to Work Areas (TTWA's) associated with the Black Country penetrate into Shropshire and vice versa.

- 16.6. In summary, this assessment concluded that reasonable options for sites to accommodate the proposed contributions to unmet employment land need forecast to arise within the Black Country are in the east and central parts of Shropshire at the larger settlements where employment growth is proposed and potential strategic settlements/sites.
- 16.7. Following identification of this reasonable assessment geography, the Council re-assessed all available sites within it through the updated additional SA site assessment. This re-assessment was informed by:
- a. The continued use of the stage 1 assessment, which involved a high-level strategic assessment of sites across Shropshire, with more detailed assessment undertaken in later stages of the process.
 - b. A targeted update to stage 2a of the site assessment process in order to allow for comparison of all sites within the relevant assessment geography identified.
 - c. The continued use of the stage 2b filters¹¹, which were considered suitable in the context both the consideration of sites to accommodate the needs and objectives of Shropshire and the needs of the Black Country.
 - d. The update of the stage 3 site assessment process, considering all sites within the relevant assessment geography that proceeded to stage 3 of the site assessment process. This included both Green Belt and non-Green Belt sites, and not just those sites that are proposed for allocation within the draft Shropshire Plan. This assessment also explicitly considered the outcome of the Green Belt assessment and review undertaken to inform the preparation of the draft Shropshire Local Plan. It also specifically assessed the relationship of sites with the Black Country.

¹¹ The three filters applied in Stage 2b are:

a. Size: Sites were 'filtered out' of the site assessment process where they were less than a specified size (unless there was potential for allocation as part of a wider site). The site size 'filters' applied are 0.2ha in Community Hubs and Strategic/Principal/Key Centres within/partly within the Green Belt or Shropshire Hills AONB, and 0.5ha for other Strategic/Principal/Key Centres. No other filters on size were applied.

b. Availability: Sites were 'filtered out' of the site assessment process where there remained uncertainty about whether the site is available for relevant forms of development, despite best efforts to ascertain site availability.

Strategic Suitability: Sites were 'filtered out' of the site assessment process where they were identified as being subject to a significant physical, heritage and/or environmental constraint (identified within the Strategic Land Availability Assessment). These constraints are such that it was considered they were unsuitable for development.

-Significant physical constraints include where the site is landlocked (cannot be accessed); some distance from the built form (unless it could represent a potential strategic site); or the majority of the site is in flood zones 2/3, an identified open space, or has a severely adverse topography.

-Significant environmental/heritage constraints include where the majority of the site has been identified as a heritage or natural environment asset.

- 16.8. This process therefore involved assessment of around 350 sites as part of the targeted update to Stage 2a and around 160 sites at Stage 3, as potential locations to accommodate proposed contributions to unmet housing needs forecast to arise in the Black Country.
- 16.9. The scope and conclusions of this assessment work are explained within the updated additional SA and site assessment work.

Sites Proposed to Accommodate the Proposed Contribution to the Unmet Employment Land Need Forecast to Arise in the Black Country

- 16.10. Through the updated SA site assessment process, a site has been identified to accommodate the proposed contribution of 30ha of employment land towards the unmet employment land need forecast to arise within the Black Country.
- 16.11. **This site is SHF018b & SHF018d - Land east of Shifnal Industrial Estate, Upton Lane, Shifnal: 30ha employment land.**
- 16.12. As the site is located within the Green Belt, consistent with paragraph 146 of the NPPF, it was necessary to consider 'all other reasonable alternatives' before considering whether exceptional circumstances existed to justify this release.
- 16.13. This process was undertaken as part of the updated additional SA and site assessment work undertaken. This also responds to paragraphs 15-22 of ID36 and paragraph 7.3 of ID37.

Reasoning: Why the Site Proposed to Accommodate Proposed Contribution to the Unmet Employment Land Need Forecast to Arise in the Black Country is Located in Shifnal

Introduction

- 16.14. The site SHF018b & SHF018d is located at Shifnal, in the east of the County. This site and the town of Shifnal is considered ideally suited to accommodate the proposed contribution to the unmet employment land need forecast to arise in the Black Country. This is for a number of reasons, including:

Role within the draft Shropshire Local Plan

- 16.15. Within the draft Shropshire Local Plan, the proposed spatial strategy for the distribution of development is underpinned by the principle of 'urban focus', whereby the majority of development is directed towards the larger urban settlements (complemented by appropriate development within rural areas).

- 16.16. Shifnal is identified as a Key Centre within both the adopted Development Plan and the draft Shropshire Local Plan, due to its size and the level of services, facilities and infrastructure available. Key Centres form part of the urban area.
- 16.17. As such, Shifnal is identified as a focus for investment, employment, housing and development in the east of the County. To this end, draft Policy S15.1 proposes that around 1,500 dwellings will be delivered and around 41ha of employment land made available for development during the proposed plan period (2016-2038). This role was informed by constraints present and identified issues and opportunities. This growth will help maintain and enhance the town's role, support key services and facilities and maximise its economic potential.
- 16.18. Due to Shifnal's role within the draft Local Plan, it constitutes a settlement that is well-suited to accommodate employment development. Indeed, accommodating the proposed contribution to the unmet employment land forecast to arise in the Black Country could support the achievement of Shifnal's role within the draft Shropshire Local Plan.

Sustainability of the Settlement

- 16.19. Shifnal benefits from a range of services, facilities and infrastructure (which informed its role within the proposed spatial strategy for the distribution of development).
- 16.20. These services, facilities and infrastructure are key contributors to the current and future sustainability of Shifnal. They also support the ability of the town to sustainably accommodate well-designed new employment development. Furthermore, such development can in turn support the maintenance and enhancement of the town's services and facilities and therefore the town's long term sustainability.
- 16.21. Due to the sustainability of Shifnal, it is considered that it constitutes a settlement that is well-suited to accommodate employment development. Indeed, accommodating the proposed contribution to the unmet employment land forecast to arise in the Black Country could, through the support for existing and provision of new associated services and infrastructure, enhance the sustainability of Shifnal.

Location

- 16.22. Shropshire does not directly adjoin the Black Country. Furthermore, due to geographic size, the proximity of settlements in Shropshire to the Black Country varies considerably.

- 16.23. Shifnal is located in the east of the County and as such is one of the Shropshire settlements in closest proximity to the Black Country. This proximity means that it is well-suited to accommodate an employment land contribution to the Black Country.
- 16.24. Geographic proximity is considered to be particularly important in the context of identifying an appropriate location for the provision of a contribution in Shropshire to the unmet employment land need forecast to arise in the Black Country.
- 16.25. This is because an employment land contribution to an unmet need, is intended to:
- a. Provide land for organisations that would have previously sought such opportunities in the location where the need had arisen, i.e. the Black Country.
 - b. Provide employment opportunities for those that would previously have sought such opportunities in the location the need had arisen.
- 16.26. For both these considerations, for a contribution to be an attractive alternative to meeting the need in its original location, it must be within a location that meets their geographic needs, and is in a location considered commutable, preferably by sustainable means.
- 16.27. In the context of a contribution to the unmet employment land need forecast to arise in the Black Country, such employees include residents within the Black Country itself and residents of other locations that considered the Black Country an acceptable commuting location (which includes residents in east Shropshire). As such, geographic proximity to the Black Country is likely a key factor when determining if a contribution is appropriately located.
- 16.28. This is an important distinction to accommodating a contribution to unmet housing needs, where occupiers migrate to this provision and associated employment opportunities are also provided (as is the case in the context of the proposed Shropshire contribution to the unmet housing need forecast to arise in the Black Country).

Connectivity

- 16.29. The considerations around connectivity are similar to that of general proximity, although it is recognised that due to the size and diverse geography of Shropshire, the connectivity of settlements in Shropshire to the Black Country varies very significantly.
- 16.30. Shifnal is located on the M54/A5 strategic corridor and on the Shrewsbury-Wolverhampton railway line corridor. As such, it benefits from direct road and rail links to the Black Country. This connectivity

means that Shifnal is well-suited to accommodate an employment land contribution to the Black Country.

Scale of Development

- 16.31. For a contribution to the unmet employment land need forecast to arise in the Black Country to be effective, it needs to be attractive to those organisations seeking employment space within the Black Country and those seeking employment in the Black Country.
- 16.32. On balance, it is considered that larger scale employment sites are generally better able to meet the needs of those seeking employment in the Black Country than smaller scale employment sites. This is because they normally offer a range of employment opportunities (often within a particular sector, thereby providing enhanced career progression opportunities) and ancillary services and facilities which can support commuting.
- 16.33. Due to the scale of the development proposed at Shifnal and the location of the settlement, it is considered well placed to support a larger employment site that meets both local and regional employment needs.
- 16.34. Such provision is considered likely to align with the profile of unmet employment land needs forecast to arise in the Black Country; be attractive to organisations seeking employment land within the Black Country; and be attractive to those seeking employment in the Black Country. This supports the conclusion that the town is well-suited to accommodate an employment land contribution to the Black Country.

Supporting the Achievement of the Shropshire Economic Growth Strategy

- 16.35. The Shropshire Economic Growth Strategy (EV044) identifies an ambitious vision and strategy for the economic growth of Shropshire. This includes focusing new employment provision onto strategic corridors such as the M54/A5 and maximising the potential of employment provision in east Shropshire – such as at Shifnal.
- 16.36. It is considered that accommodating the proposed contribution to the unmet employment land need forecast to arise in the Black Country at Shifnal, a Key Centre on the M54/A5 corridor in the east of Shropshire, will directly support the achievement of this strategy.

Proximity to Growth Sectors

- 16.37. Due to Shifnal's location on the M54 strategic corridor, it benefits from proximity to a number of strategic employment centres with concentrations of employment in target growth sectors for Shropshire (as identified within the Shropshire Economic Growth Strategy

(EV044)). Such locations include RAF Cosford; t54 at Telford; i54 at Junction 2 of the M54; and the emerging West Midlands Interchange.

16.38. As such, it is considered that employment provision in Shifnal has the potential to capitalise on this proximity and connectivity, attracting a complementary offer within these sectors and/or associated supply chain. Such provision is considered well placed to meet the aspirations of organisations seeking employment space within the Black Country. It is also considered a suitable alternative for those seeking employment in the Black Country.

Demand for Employment Sites

16.39. The evidence base prepared to inform the draft Local Plan concludes Shifnal is a location that is particularly attractive to the employment market – both for local and strategic employment sites (Employment Land Review (EV046) and M54 Strategic Options Study (EV072)). This evidence therefore provides confidence that a contribution at Shifnal to the unmet employment need forecast to arise in the Black Country would be attractive to the market and deliverable.

Opportunity to Support the Role of Shifnal

16.40. Shifnal has experienced significant growth over recent years, much of which has occurred during the period addressed within the draft Shropshire Local Plan.

16.41. However, there has been an imbalance in this growth, which has primarily consisted of residential development, with only minimal additional employment development. This is acknowledged in the explanatory text to Policy S15 of the SAMDev Plan which identifies that *"It is important that this scale of residential development is balanced by the provision of employment opportunities' but that 'Green Belt around Shifnal limits the opportunities for suitable employment sites."*

16.42. As a result, this has created a significant and growing labour pool, with more limited local employment opportunities. It has also meant that opportunities for local employers to expand and for new employers to locate into Shifnal have been limited.

16.43. Addressing this imbalance, through the provision of a significant new local/strategic employment offer provides a range of opportunities for the town. This includes:

- a. Providing opportunities for local employers to expand.
- b. Providing opportunities for new employers to locate into Shifnal, with its growing labour pool and location on a key strategic corridor.

- c. Reversing the trend of out-commuting from the town - including to the Black Country.
- d. Increasing economic activity rates within the town, which will also support the intention of increasing economic activity rates across Shropshire and nationally.
- e. Supporting the ability for Shifnal to provide an employment offer to its surrounding rural hinterland. This will enhance the town's role as a Key Centre and could further support the intention of increasing economic activity rates across Shropshire and nationally.
- f. Increasing the vibrancy of the community and local economy – particularly during the day.
- g. Supporting the provision of services, facilities and infrastructure associated with employment development.

16.44. Conversely, accommodating the proposed contribution to the unmet employment land need forecast to arise in the Black Country at Shifnal also has the potential to support plan making within the Black Country. Providing a significant new local/strategic employment offer in the town provides opportunities to reverse the process of out-commuting Shifnal (including to the Black Country), which will reduce the pressure to provide equivalent employment offer in the Black Country.

16.45. As such, it is considered that there is the potential for a symbiotic relationship between the aspirations of providing employment at Shifnal in order to address imbalances in provision and to ensure the town's long-term sustainability; and accommodating the proposed contribution to the unmet employment land need forecast to arise in the Black Country and thereby supporting plan making in the Black Country.

16.46. This further supports the conclusion that Shifnal is well placed to accommodate the proposed contribution to the unmet employment land need forecast to arise in the Black Country.

Supporting the Vision and Spatial Strategy of the Draft Local Plan

16.47. It is considered that accommodating the proposed contribution to the unmet employment land need forecast to arise in the Black Country at Shifnal also has the potential to support the wider vision and strategy of the Shropshire Local Plan.

16.48. It will enhance the labour supply available at Shifnal and support promotion of the new local/strategic employment offer at the town as a new strategic location, thereby increasing the ability to attract new

employers. Such provision aligns with the vision and spatial strategy within the draft Local Plan.

Assessment of All Other Reasonable Options

Introduction

- 16.49. The consideration of alternatives to the proposed release of Green Belt at Shifnal has been undertaken as a multi-stage process.
- 16.50. The first stage involved identification of a specific 'area of search' for potential location(s) to accommodate the proposed contributions to the 'unmet' needs forecast to arise in the Black Country. This was undertaken in the updated additional SA Report.
- 16.51. As the detail of how specific settlements or strategic locations were decided upon is summarised within paragraphs 12.17 to 12.41 of the updated additional SA assessment, this is not repeated here.
- 16.52. The locations ultimately identified as reasonable options to accommodate the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country are summarised in paragraph 12.39 of the updated additional SA assessment. These are:
- a. Sites associated with the settlement of Bridgnorth.
 - b. Sites associated with the settlement of Shifnal.
 - c. Sites associated with the settlement of Shrewsbury.
 - d. Potential strategic settlements/sites within Albrighton Place Plan Area.
 - e. Potential strategic settlements/sites within Bridgnorth Place Plan Area.
 - f. Potential strategic settlements/sites within Broseley Place Plan Area.
 - g. Potential strategic settlements/sites within Highley Place Plan Area.
 - h. Potential strategic settlements/sites within Much Wenlock Place Plan Area.
 - i. Potential strategic settlements/sites within Shifnal Place Plan Area.
 - j. Potential strategic settlements/sites within Shrewsbury Place Plan Area.
- 16.53. In effect the reasonable options for sites to accommodate the proposed contributions to unmet housing and employment land need forecast to arise within the Black Country are in the eastern and central parts of Shropshire at the larger settlements where growth is proposed or potential strategic settlements/ other sites.

- 16.54. These reasonable options therefore constitute the geography within which 'reasonable alternatives' to SHF018b & SHF018d site, to accommodate the proposed 30ha employment land contribution to the Black Country, could be located.
- 16.55. The second stage involved assessment of the strategic role and capacity of those locations to accommodate the proposed unmet need. (as well as 'home grown' Shropshire growth needs), taking into account quantitative and qualitative requirements and considerations, as well as the availability of sites. This also involved the specific assessment of identified sites.
- 16.56. Through this process, all 'reasonable alternatives' to SHF018b & SHF018d site, to accommodate the proposed 30ha employment land contribution to the Black Country, were considered.
- 16.57. It can be noted that where undertaking the assessment of reasonable alternatives to accommodate the proposed 30ha employment land contribution to the Black Country:
- a. As with accommodating the proposed 1,500 dwelling contribution, an option considered from the outset was the possibility of disaggregating the proposed employment land contribution to multiple sites. However, through the SA and site assessment process, it was ultimately concluded that the most effective and sustainable means of accommodating the proposed 30ha employment land contribution was a single site (SHF018b & SHF018d).
 - b. There was no assumption that the proposed contributions to employment and housing needed to be accommodated in the same location(s). This provided further flexibility in accommodating the proposed contributions to the unmet housing and employment land needs forecast to arise in the Black Country and provided an opportunity to minimise Green Belt release, given a number of the potential locations were outside Green Belt.
 - c. There was no assumption that the proposed employment land contribution needed to be accommodated at an existing settlement – equal consideration was given to sites associated with existing settlements and potential strategic settlements within the assessment geography that contained the 'reasonable options' for site(s) to accommodate the proposed contribution to the unmet housing and employment land needs forecast to arise in the Black Country. This provided further flexibility in accommodating these contributions and again provided an opportunity to minimise Green Belt release, given a number of the potential locations were outside Green Belt.

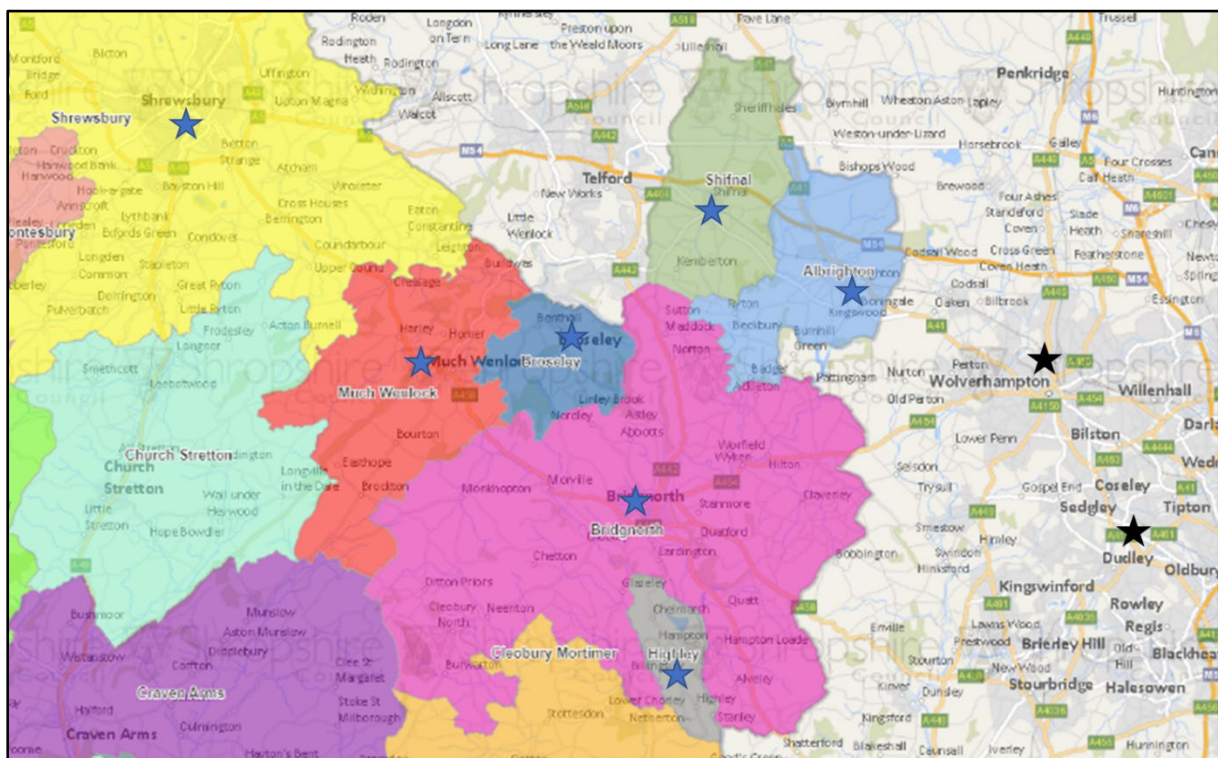
Ultimately, the sustainability benefits of a location more closely associated with a settlement was favoured. This reflected the presence of an established community and labour force; existing infrastructure, services and facilities to support new provision; and opportunity for any new infrastructure, services and facilities required to support the development.

16.58. For the avoidance of doubt, it is recognised that sites which are not closely linked to a settlement can also provide necessary supporting infrastructure, services and facilities which can also benefit the wider hinterland. As such, these sites were not discounted when considering sites to accommodate the proposed 30ha employment land contribution to the Black Country.

Other Reasonable Options

16.59. Before concluding Shifnal was the most appropriate location to accommodate the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country, all 'reasonable alternative options' within the identified assessment geography (as summarised within Paragraph 16.64) were considered.

Figure 16.1 General location and extent of the Place Plan Areas 'in scope' (illustrated by blue stars) in Shropshire relative to Wolverhampton & Dudley (illustrated by black stars)



Albrighton Place Plan Area

- 16.60. The Albrighton Place Plan area generally has a strong functional relationship to the Black Country, due to its geographical location and the presence of the M54/A5 strategic corridor which runs from east-west through it. It contains the Key Centre of Albrighton and a number of smaller settlements. Outside of Albrighton, the majority of the Place Plan area is designated Green Belt.
- 16.61. Due to the characteristics of the settlements in the Albrighton Place Plan Area, the draft Shropshire Local Plan identifies only Albrighton itself as a specific location to accommodate development, which will contribute towards strategic growth objectives in the east of the County. Proposed development guidelines envisage the delivery of around 500 dwellings and 5ha of employment land in Albrighton between 2016 and 2038.
- 16.62. In formulating this strategy, the sustainability of the settlement and the benefits of its location on the M54/A5 road corridor and Shrewsbury-Wolverhampton railway line have been recognised. It is also recognised that it has the closest proximity to the Black Country of all the 'urban' settlements in Shropshire, as illustrated by Figure 16.1. However, the characteristics and constraints present which constrain the ability to accommodate significant development have also been carefully considered.
- 16.63. Whilst a Key Centre, it is functionally a larger village with a corresponding range of services and infrastructure supporting that role. Furthermore, there are a number of physical, heritage and environmental constraints present. For example:
- a. The conservation area focused on Donington and the Donington and Albrighton Local Nature Reserve along the village's northern development boundary.
 - b. The proximity to RAF Cosford which is in proximity to the north-west (maintenance of an appropriate gap between Albrighton and RAF Cosford forms part of the proposed strategy for the settlement and is considered important to ensure the successful operation of RAF Cosford and reduce potential public protection conflicts).
 - c. The A41 and railway line to the north-east and east, which create a physical barrier separating the area beyond from the services and facilities available within the settlement.
- 16.64. The settlement of Albrighton is also inset within and therefore surrounded by the Green Belt and remaining available non Green Belt development opportunities are therefore extremely limited:
- a. Within the existing defined development boundary it is considered only small-scale windfall opportunities exist. Whilst sites that could

deliver some small scale infill development have been identified, it is not considered that they are suitable to accommodate employment development of a type to accommodate the proposed employment land contribution to the Black Country. Such sites are also intended to support the achievement of the proposed strategy for Albrighton.

- b. Whilst the settlement currently has safeguarded land, the draft Local Plan proposes to allocate this in its entirety for residential development to meet the housing needs of Albrighton and its hinterland. This development is intended to redress previous low housing completion rates, which has been assessed to be a higher priority requirement than employment delivery in this location (as summarised in paragraph 5.15 of EV051).
- c. Maximising site density and using infill sites has been a consideration with regard to existing and proposed allocations at Albrighton (as set out in paragraphs 5.35-5.38 of EV051). It is considered that there is no realistic scope to further maximise land supply to address employment requirements by increasing development density and using brownfield and other infill in this location.

16.65. These same characteristics and constraints mean it is not considered a suitable location to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country. Furthermore, any allocation to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country would be located within the Green Belt.

16.66. It is acknowledged that within the proposed strategy, land is proposed to be removed from the Green Belt and safeguarded for future development. However, it is considered important to provide safeguarded land for future development beyond the proposed plan period. Furthermore, whilst these sites are considered suitable to be safeguarded for future development it is not considered that they could accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.

16.67. Whilst no other settlements in the Albrighton Place Plan area are identified as specific locations to accommodate development, a number of potential strategic settlements/sites were identified and considered as 'reasonable options' to accommodate the proposed contribution to the unmet employment land.

16.68. Cosford, including RAF Cosford and the range of non-military uses grouped with it, lies wholly in Green Belt within Albrighton Place Plan area. It was identified as both a Strategic Site and a Community Hub

addressed through Policy S21 of the submission version of the draft Shropshire Local Plan.

- 16.69. The intention of this status was to facilitate the existing military and charitable activities that occur on the site. Through the examination process, the Planning Inspectors have concluded (within ID28) that the site does not need to be removed from the Green Belt in order to facilitate these activities and as *'exceptional circumstances do not exist to justify the removal of this site from the Green Belt'*.
- 16.70. Whilst this site, as a potential strategic site/settlement, was considered as a location to accommodate all or part of the proposed 30ha contribution to the unmet employment land needs forecast to arise in the Black Country, given it is a predominantly developed site with very specific access constraints (given the significant military presence) and it is known that the existing occupiers have long term plans to remain and increase the functions at the site, it is not considered available for such uses.
- 16.71. Following the Inspector's Interim Findings, the Council are now proposing that the site is identified as a major developed site in the Green Belt (as within the adopted Development Plan), with the intention of continuing to support existing military and charitable activities on the site.
- 16.72. Land north of Junction 3 (various iterations of site P26) is also partly located within the Albrighton Place Plan area. It is understood that this site is available for various forms of development including a mixed-use development (with an employment element) and stand-alone employment development.
- 16.73. As such, the site was given full consideration by the Council through the SA and site assessment process, as a potential location to accommodate all or part of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country (in addition to consideration as a potential option to accommodate all or part of the proposed 1,500 dwelling contribution to the unmet housing need forecast to arise in the Black Country).
- 16.74. This consideration and the conclusions reached are documented in the site assessment that form part of the updated additional SA assessment and as such are not duplicated here.
- 16.75. However, it is important to note that this site is itself located within the Green Belt. Within the Green Belt Review undertaken to inform the draft Shropshire Local Plan, the release of relevant parcels that contain the site are considered to result in either moderate-high or high harm to the Green Belt (it is considered likely that there would

be high harm to the Green Belt resulting from release, associated with Parcel P4 which was not specifically assessed).

- 16.76. The site is also detached from any significant existing settlements and as such would lead to significant encroachment on the countryside; could affect the integrity of neighbouring Green Belt land; and would also lead to the creation of a new area inset into the Green Belt.
- 16.77. Furthermore, due to its location, when compared to sites associated with significant existing settlements, this option is considered to have a reduced opportunity to capitalise on existing infrastructure, services and facilities and for new infrastructure, services and facilities to directly serve existing communities (although it is acknowledged that those in its hinterland would be able to access them, as would those willing and able to travel).
- 16.78. It is considered this site offers more limited opportunities, especially when compared to the option of delivering a new employment site at Shifnal, in particular the aspiration of rebalancing the town's housing and employment opportunities, as described above. As such, on balance it is considered that SHF018b & SHF018d constitute a more appropriate location to accommodate the proposed contributions to unmet employment land needs forecast to arise within the Black Country.
- 16.79. With respect of other large sites in more rural locations removed from Albrighton these generally lack transport and other suitable infrastructure restricting capacity to directly access services and facilities as well as utilise sustainable modes of transport. In these locations therefore significant improvement of local infrastructure would be required to improve site sustainability to a level that is considered appropriate to support a strategic employment site.
- 16.80. No other potential strategic sites/settlements other than those associated with Albrighton itself were identified within the Albrighton Place Plan Area.

Bridgnorth Place Plan Area

- 16.81. The Bridgnorth Place Plan area is located in east Shropshire and is considered to have a functional relationship to the Black Country.
- 16.82. Bridgnorth is the third largest settlement in Shropshire (by population) with corresponding infrastructure to meet the needs of the town and its rural hinterland. As a result, it is proposed to be identified as a Principal Centre within the draft Local Plan. Such centres constitute a particular focus for development, which will contribute towards strategic growth objectives in the east of the

County, meeting local needs and those of the town's significant hinterland.

- 16.83. Three further settlements are proposed to be identified as specific locations to accommodate development in the draft Shropshire Local Plan, these are the Community Hub villages of Alveley and Ditton Priors; and the Community Cluster at Neenton.
- 16.84. The levels of development proposed for Bridgnorth in the draft Shropshire Local Plan reflect the scale and sustainability of the settlement and the proposed strategic role intended. It includes the delivery of around 1,800 dwellings and making available around 49ha of employment land to create choice and competition in the market.
- 16.85. The town is in close road proximity to the Black Country with Wolverhampton some 16 miles in distance and is connected to the West Midlands via the A4169/A458/A454 network. However, it has no rail service or close motorway access.
- 16.86. Given this role and the location of Bridgnorth, it was considered that it formed a potential reasonable alternative location to accommodate all or part of the proposed 30ha employment land contribution to the Black Country.
- 16.87. There are a number of physical, heritage and environmental constraints that require due consideration when determining appropriate locations for development at Bridgnorth. This includes:
 - a. Bridgnorth is a historic market town with in parts a medieval street pattern, a conservation area, and many listed buildings.
 - b. Bridgnorth is bounded on its eastern side by the Green Belt.
 - c. Significant topographic changes and areas of landscape sensitivity exist in the surrounding area – particularly to the north.
 - d. Whilst Bridgnorth benefits from 'A road' links to many larger surrounding settlements, these roads do not form part of the strategic road network.
 - e. Rock outcrops restrict capacity to improve exit roads from the town towards Telford and the M54 corridor, although the Bridgnorth bypass provides less constrained access towards Wolverhampton and Stourbridge and other directions.
 - f. There is no main line railway station at Bridgnorth, only a heritage railway (Severn Valley Railway) linking to Kidderminster.
 - g. There are significant areas of land subject to flood risk, particularly in association with the River Severn which runs through the town.
 - h. The relationship and potential impact on adjoining settlements such as Oldbury village with its own conservation area.

- 16.88. Following due consideration of these constraints, a suitable non-Green Belt site to the west of Bridgnorth (Tasley Garden Village – BRD030) has been identified which provides sufficient capacity to bring forward a large housing and employment allocation in the form of a sustainable urban extension expected to deliver 1,050 dwellings 16ha employment land supported by a new local centre and extensive open space/ green infrastructure.
- 16.89. Through the updated additional SA and site assessment work, it has been determined (as previously set out) that there is scope to accommodate a contribution (600 dwellings) towards the unmet housing needs forecast to arise in the Black Country.
- 16.90. Whilst the site also includes employment provision, given the constraints to connectivity to the motorway and main line railway network, it is considered that this site does not constitute an appropriate location to accommodate any of the proposed 30ha contribution to the unmet employment land needs forecast to arise in the Black Country.
- 16.91. This connectivity is particularly important in the context of the provision of a contribution to the unmet employment land forecast to arise in the Black Country. This is because an employment land contribution to an unmet need, is intended to:
- a. Provide land for organisations that would have previously sought such opportunities in the location the need arises.
 - b. Provide employment opportunities for those that would previously have sought such opportunities in the location the need arises.
- 16.92. For both these considerations, to be an attractive alternative to meeting the need in its original location, it must be within a location that meets geographic needs and is in a location considered commutable, preferably by sustainable means. As such, connectivity, ideally by sustainable forms of transport, to the Black Country is a key factor when determining if a contribution is appropriately located.
- 16.93. This is an important distinction to accommodating a contribution to unmet housing needs, where occupiers migrate to this provision and associated employment opportunities are also provided (as is the case in the context of the proposed Shropshire contribution to the unmet housing need forecast to arise in the Black Country).
- 16.94. Furthermore, whilst employment provision represents an intrinsic element of the proposed development, it is expected to be cross-subsidised by the provision of housing. Given the interrelationship with housing and expectations regarding the types of employment uses and design and layout reflecting the sensitivity of the location

(including physical, heritage and ecology constraints), this restricts flexibility and impacts on the suitability of the site for a strategic employment site to meet the needs of the Black Country.

- 16.95. This would also represent a 'lost opportunity' to achieve many of the various benefits associated with accommodating this contribution at Shifnal – in particular addressing the imbalances in delivery at Shifnal, as described elsewhere in this paper.
- 16.96. As this proposed site allocation is a non-Green Belt site associated with a settlement that is bounded on one side by the Green Belt, it is intended that it would be developed at an appropriate density which considers both the need to use land effectively and taking into account the character and development requirements of the location (as detailed in the development guidelines in the draft Shropshire Local Plan). It is therefore not considered that there is significant scope for additional land use efficiencies to create additional development delivery capacity to address the Black Country contribution.
- 16.97. Stanmore Industrial estate is an existing strategic employment area which is inset in the Green Belt in a location to the east of Bridgnorth. It is proposed that two parcels of land, totalling around 11.5ha, would be released from the Green Belt in order to support the long-term sustainability of this strategic employment location.
- 16.98. The consideration of 'alternative options' and exceptional circumstances for this proposed release are documented within the Green Belt Exceptional Circumstances Statement (EV051) and Green Belt Topic Papers (GC4g and the newly submitted document).
- 16.99. Ultimately, the same considerations applied to BRD030 regarding connectivity to the Black Country, particularly via sustainable modes of transport, are applicable to sites associated with the proposed allocations at Stanmore Industrial Estate, other potential development sites associated with Stanmore Industrial Estate, and other potential development sites associated with Bridgnorth.
- 16.100. As such, these sites are not considered appropriate locations to accommodate any of the proposed 30ha contribution to the unmet employment land needs forecast to arise in the Black Country.
- 16.101. As rural settlements the Alveley and Ditton Priors Community Hubs and Neenton Community Cluster have more limited infrastructure. The expectation as set out in the draft Shropshire Local Plan's strategic approach is that these smaller village settlements would accommodate more modest levels of development focused on meeting local need and maintaining settlement sustainability, rather than accommodating contribution to Black Country needs.

- 16.102. The settlement of Alveley, together with an industrial estate which is detached from the village, are inset within the Green Belt (with no existing safeguarded land). Therefore proposed allocations to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country would themselves be within the Green Belt.
- 16.103. Green Belt release, for allocation and safeguarding is proposed to service the existing and likely future needs of Alveley. Allocations focus on meeting residential development requirements and making provision for community facilities as set in the exceptional circumstances paper EV051. However, due to the size, character and proposed role of the settlement within the draft Shropshire Local Plan, it was not considered to be a suitable location to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.104. The small industrial estate at Alveley was developed at the site of the former pithead buildings and lies close to the Severn Valley Country Park created by a reclamation scheme following the cessation of mining activity on the site. Access to the industrial estate from the A442 is through Alveley village and narrow rural roads. This sensitive and attractive rural location is therefore also not considered suitable as a location for significant expansion of employment use.
- 16.105. The settlements of Ditton Priors and Neenton are geographically some distance from the Black Country conurbation. Both are also relatively remote, being located to the far south west of the Bridgnorth Place Plan Area and accessed by a network of rural roads with no direct road or rail linkage to the Black Country. Furthermore, with regard to Ditton Priors, it is also constrained by being partly located within the Shropshire Hills National Landscape. These settlements therefore have capacity issues not only related to its identified strategic function, but also available infrastructure, accessibility and environmental constraints.
- 16.106. As such, these settlements are not considered suitable locations to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.107. With respect of large sites in more rural locations removed from Bridgnorth these generally lack transport and other suitable infrastructure restricting capacity to directly access services and facilities as well as utilise sustainable modes of transport. In these locations therefore significant improvement of local infrastructure would be required to improve site sustainability to a level that is considered appropriate to support a strategic employment site.

16.108. No potential strategic sites/settlements other than those associated with Bridgnorth itself were identified within the Bridgnorth Place Plan Area.

Broseley Place Plan Area

16.109. The Broseley Place Plan area is located in east Shropshire in close proximity of the settlements of Ironbridge and Telford within the Telford and Wrekin administrative area, and is considered to have a functional relationship to the Black Country. It contains the Key Centre of Broseley and a number of smaller settlements. The Place Plan Area lies outside the Green Belt.

16.110. Due to the characteristics of the settlements in the Broseley Place Plan Area, the draft Shropshire Local Plan identifies only Broseley itself as a specific location to accommodate development. This growth is intended to contribute towards strategic growth objectives in the east of the County with proposed development guidelines envisaging the delivery of around 250 dwellings and 3ha of employment land in Broseley between 2016 and 2038.

16.111. The levels of development proposed for Broseley in the draft Shropshire Local Plan reflect the scale and sustainability of the settlement but also the known constraints. As such, Broseley is intended to deliver sufficient housing and employment land to meet local needs, rather than performing a more significant strategic role.

16.112. Broseley is a relatively small town and is in close proximity to the settlements of Ironbridge and Telford. It is subject to physical, environmental, infrastructure and other constraints that need to be considered when bringing forward development. For example:

- a. It is an historic settlement containing a large conservation area, archaeological interest and many listed buildings.
- b. It is in proximity of other significant heritage and environmental assets. This includes the Ironbridge Gorge World Heritage Site; areas of ancient woodland; and several designated wildlife sites/areas of geological interest.
- c. Due to its mining and industrial heritage, ground conditions and potential for subsidence are important considerations.
- d. Whilst in geographical terms it is close to Telford and the M54 corridor beyond, it lacks a railway station and main road links to both. The most direct road links to Telford and the M54 corridor being via B roads crossing the Ironbridge Gorge.
- e. The road network in the town is characterised by narrow lanes and streets which do not reflect modern highway standards.

- 16.113. These same characteristics and constraints mean it is not considered a suitable location to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.114. Furthermore, the detailed strategy for achieving the proposed development guidelines for Broseley are established in the recently 'made' Broseley Neighbourhood Plan. The Neighbourhood Plan includes a small residential site allocation (for some 20 dwellings) and provision for local employment needs, through the saved SAMDev Plan employment allocation and an additional (under 1 ha) site allocated by the Neighbourhood Plan. The Neighbourhood Plan thus provides for a level of development which is of an insufficient scale to make a significant contribution to meeting Black Country development needs.
- 16.115. With respect of large sites in more rural locations removed from Broseley these generally lack transport and other suitable infrastructure restricting capacity to directly access services and facilities as well as utilise sustainable modes of transport. In these locations therefore significant improvement of local infrastructure would be required to improve site sustainability to a level that is considered appropriate to support a strategic employment site.
- 16.116. No potential strategic sites/settlements other than those associated with Broseley itself were identified within the Broseley Place Plan Area.

Highley Place Plan Area

- 16.117. The Highley Place Plan area is located in east Shropshire and is considered to have a functional relationship to the Black Country. Highley is the only significantly sized settlement within the Place Plan Area, other settlements are small and as such the character of the areas is predominately rural. The Place Plan Area lies outside the Green Belt.
- 16.118. Due to the characteristics of the settlements in the Highley Place Plan Area, the draft Shropshire Local Plan identifies only Highley itself as a specific location to accommodate development, which will contribute towards strategic growth objectives in the east of the County. Proposed development guidelines envisage the delivery of around 250 dwellings and 3ha of employment land in Highley between 2016 and 2038.
- 16.119. The levels of development proposed for Highley in the draft Shropshire Local Plan reflect the scale and sustainability of the settlement but also the known constraints. As such, Highley is

intended to deliver sufficient housing and employment land to meet local needs, rather than performing a more significant strategic role.

- 16.120. Highley is a relatively small settlement and is subject to physical, environmental and other constraints that need to be considered when bringing forward development. For example:
- a. Road connectivity between Highley and other settlement is via B roads or other minor roads and there is no main line rail station, only a heritage railway (Severn Valley Railway) linking to Bridgnorth.
 - b. The River Severn directly adjoins the settlement and forms a significant physical barrier restricting connectivity to the east (including to the Black Country). The nearest vehicular river crossings are at Bridgnorth and Bewdley which are linked by B roads.
 - c. It has an historic core to the settlement containing a conservation area, archaeological interest and listed buildings.
 - d. Due to its mining and industrial heritage, ground conditions and potential for subsidence are important considerations.
- 16.121. Due to the character of the Highley and its associated Place Plan Area, it is somewhat isolated and therefore considered less suitable to absorb a strategic or larger employment allocation, particularly as part of a contribution to the unmet employment land needs forecast to arise in the Black Country. Indeed Highley (and the Highley Place Plan Area) are considered the most remote location from the main road and rail network of all the locations being considered, with connectivity to the Black Country slow and indirect.
- 16.122. The same characteristics and constraints mean it is not considered a suitable location to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.123. With respect of large sites in more rural locations removed from Highley these generally lack transport and other suitable infrastructure restricting capacity to directly access services and facilities as well as utilise sustainable modes of transport. In these locations therefore significant improvement of local infrastructure would be required to improve site sustainability to a level that is considered appropriate to support a strategic employment site.
- 16.124. No potential strategic sites/settlements other than those associated with Highley itself were identified within the Highley Place Plan Area.

Much Wenlock Place Plan Area

- 16.125. The Much Wenlock Place Plan Area is located in east Shropshire and is considered to have a functional relationship to the Black Country. The entirety of the Place Plan Area is located outside the Green Belt.
- 16.126. Much Wenlock is a small town and the only Key Centre within the Place Plan Area. The other settlements within the Place Plan identified as specific locations to accommodate development in the draft Shropshire Local Plan are the Community Hub village of Cressage and the Buildwas Community Cluster.
- 16.127. Proposed development guidelines for Much Wenlock envisage the delivery of around 200 dwellings and 2ha of employment land in Highley between 2016 and 2038.
- 16.128. The levels of development proposed for Much Wenlock in the draft Shropshire Local Plan reflect the scale and sustainability of the settlement but also the known constraints. As such, Much Wenlock is intended to deliver sufficient housing and employment land to meet local needs, rather than performing a more significant strategic role.
- 16.129. Furthermore, it is expected that much of the employment development to meet local needs will be delivered via the employment allocation within the Much Wenlock Neighbourhood Plan, which was to meet local needs.
- 16.130. Much Wenlock is a relatively small settlement and is subject to physical, infrastructure, environmental and other constraints that need to be considered when bringing forward development. For example:
- a. Much Wenlock is a historic settlement containing a large conservation area, archaeological interest and many listed buildings.
 - b. The town catchment has been designated as a highest category Flood Rapid Response Catchment and flood risk is a very significant local consideration, which impacts on the identification of development sites. The proposed housing allocation is underpinned by a strategy which seeks to manage flood risk to the site and existing built form within the settlement.
 - c. It is located on the A458 corridor linking to the Black Country, but it lacks a rail connection and the nearest railway stations to Much Wenlock (and its Place Plan area) are located in Telford and Shifnal.
- 16.131. The scale of Much Wenlock and the constraints to development present mean that it is not considered a suitable location to

accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.

- 16.132. As rural settlements the Cressage Community Hub and Buildwas Community Cluster have more limited infrastructure. The expectation as set out in the draft Shropshire Local Plan's strategic approach is that these smaller village settlements would accommodate more modest levels of development focused on meeting local need and maintaining settlement sustainability, rather than accommodating contribution to Black Country needs. As such, they are not considered suitable locations to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.133. Also within the Much Wenlock Place Plan Area is the large part brownfield site at the former Ironbridge Power Station, which has been identified as a new strategic settlement to contribute towards strategic growth aspirations within the draft Shropshire Local Plan.
- 16.134. This site has the capacity to accommodate a significant volume of development. Specifically, the draft Shropshire Local Plan development guidelines indicate that the new settlement will include a range of local services and facilities, around 1,000 dwellings, 6ha of employment land, and extensive green infrastructure. Extensive site remediation and new infrastructure will be required and this will shape suitable end uses.
- 16.135. Outline Planning Permission (19/05560/OUT) has subsequently been granted and a series of association Reserved Matters approved / pending consideration to facilitate this re-development. *Notably, aligning the site guideline with the capacity demonstrated by the Outline Planning Permission results in a 75 dwelling increase to the proposed housing guideline to some 1,075 dwellings between 2016 and 2038.*
- 16.136. The location benefits from road access to the M54 / A5 corridor link to the Black Country via either the A4169 / A5523 or A4169 / A442. It has no direct rail connection, although opportunities to re-establish rail services are being investigated. Furthermore, Telford station is accessible to the site.
- 16.137. This scale of development provides an opportunity to sympathetically remediate the site which has extensive areas of brownfield land and is also subject to contamination. It has been determined through the updated additional SA and site assessment process (as previously set out) that there is scope to accommodate a contribution (600 dwellings) towards the unmet housing needs forecast to arise in the Black Country.

- 16.138. The site was also considered as a potential 'reasonable alternative' to accommodate a portion of the proposed 30ha employment land contribution to the unmet employment land needs forecast to arise in the Black Country. However, it is considered that the type and amount of employment land available on the site would not offer enough flexibility of use furthermore it would only be sufficient to accommodate a proportion of the 30ha proposed contribution.
- 16.139. With respect of other large sites in more rural locations removed from Much Wenlock these generally lack transport and other suitable infrastructure restricting capacity to directly access services and facilities as well as utilise sustainable modes of transport. In these locations therefore significant improvement of local infrastructure would be required to improve site sustainability to a level that is considered appropriate to support a strategic employment site.
- 16.140. No other potential strategic sites/settlements other than those associated with Much Wenlock itself were identified within the Much Wenlock Place Plan Area.

Shifnal Place Plan Area

- 16.141. The Shifnal Place Plan area generally has a strong functional relationship to the Black Country, due to its geographical location and the presence of the M54/A5 strategic corridor which runs from east-west through it. It contains the Key Centre of Shifnal and a number of smaller settlements. Outside of Shifnal, the majority of the Place Plan area is designated Green Belt.
- 16.142. Due to the characteristics of the settlements in the Shifnal Place Plan Area, the draft Shropshire Local Plan identifies only Shifnal itself as a specific location to accommodate development, which will contribute towards strategic growth objectives in the east of the County.
- 16.143. Also reflecting the characteristics of the Shifnal Place Plan Area, the majority of the potential strategic sites/settlements are associated with the town itself. As such, these were considered as potential alternatives to SHF018b and SHF018d when considering the most appropriate site in the settlement to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.144. One exception is the site at Madeley, which adjoins the built form of Telford. Whilst the sites size and location (proximity and connectivity to the Black Country) could mean that it is an appropriate location to meet cross-boundary needs arising in the Black Country, its location adjoining the built form of Telford means that it would likely be reliant upon it from an infrastructure perspective.

- 16.145. Furthermore, the site is wholly located within the Green Belt and performs an important role against purpose 1, checking the unrestricted sprawl of large built-up areas. As such it is considered important to retention the site within the Green Belt.
- 16.146. It is considered this site offers more limited opportunities, especially when compared to the option of delivering a new employment site at Shifnal, in particular the aspiration of rebalancing the town's housing and employment opportunities, as described above.
- 16.147. As such, on balance it is considered that SHF018b & SHF018d constitutes a more appropriate location to accommodate the proposed contributions to unmet employment land needs forecast to arise within the Black Country.

Shrewsbury Place Plan Area

- 16.148. The Shrewsbury Place Plan Area is located in central Shropshire and is considered to have a functional relationship to the Black Country. It contains the town of Shrewsbury and a significant number of smaller settlements. The Place Plan Area lies outside the Green Belt.
- 16.149. Shrewsbury is the largest town in Shropshire and offers a significant array of infrastructure. The town is at the hub of the road and rail network in the County and is identified in the draft Shropshire Local Plan as the Strategic Centre of Shropshire and the primary focus for new development.
- 16.150. A significant number of other smaller settlements are proposed to be identified as specific locations to accommodate development in the draft Shropshire Local Plan. These are the Community Hubs of Baschurch, Bayston Hill, Bicton, Bomere Heath, Cross Houses, Dorrington, Ford, Hanwood, Longden and Nesscliffe; and three Community Clusters consisting of Albrighton; Grafton and Newbanks; and Montford Bridge West.
- 16.151. The levels of development proposed for Shrewsbury in the draft Shropshire Local Plan reflect the scale and sustainability of the settlement and the proposed strategic role intended. It includes the delivery of around 8,625 dwellings (proposed to be increased to 8,975 dwellings – see Chapter 8 of this document) and making available around 100ha of employment land to create choice and competition in the market. This new housing and employment development seeks to make provision for the existing needs of the town and its rural hinterland and attract inward investment.
- 16.152. Employment land to be made available consists of existing allocations, provision on new allocations and windfall development opportunities.

- 16.153. Proposed new employment land allocations consists of a minimum of 5ha on the land between Mytton Oak Road and Hanwood Road, Shrewsbury (SHR060, SHR158 & SHR161) sustainable urban extension; and around 45ha on a dedicated employment allocation to the west of the A49, Shrewsbury (SHR166).
- 16.154. SHR166 is intended to perform a strategic employment role, being capable of delivering a range of employment uses, including B2 and B8 uses. Flexibility to deliver the whole range of employment uses on this site has however subsequently been impacted by heritage considerations raised by Historic England and the designation of the site of a temporary Roman marching camp as a Scheduled Monument. It is acknowledged that this issue is yet to be discussed fully at the Examination and is likely to form part of the considerations for Stage 2 hearing sessions.
- 16.155. The strategy also reflects the potential development opportunities presented by the delivery of the North West Relief Road (NWRR). It is identified that there is potential for additional windfall commercial development between the development boundary and the NWRR once constructed, where an appropriate access can be achieved.
- 16.156. It is acknowledged that Shrewsbury as a strategic settlement on the M54/A5 corridor offers a potential alternative location to Shifnal to deliver a strategic site to contribute to meeting Black Country employment need.
- 16.157. However, the town is sited centrally in Shropshire and therefore lies further to the west on the corridor and a significantly greater distance than Shifnal from the Black Country. Distance is a significant factor in meeting unmet employment land need forecast to arise in the Black Country. This is because an employment land contribution to an unmet need, is intended to:
- c. Provide land for organisations that would have previously sought such opportunities in the location the need arises, i.e. the Black Country; and
 - d. Provide employment opportunities for those that would previously have sought such opportunities in the location the need arises.
- 16.158. For both these considerations, to be an attractive alternative to meeting the need in its original location, it must be within a location that meets geographic needs and is in a location considered commutable, preferably by sustainable means. As such, connectivity, ideally by sustainable forms of transport, to the Black Country is a key factor when determining if a contribution is appropriately located.

- 16.159. This is an important distinction to accommodating a contribution to unmet housing needs, where occupiers migrate to this provision and associated employment opportunities are also provided (as is the case in the context of the proposed Shropshire contribution to the unmet housing need forecast to arise in the Black Country).
- 16.160. As a result, it is considered that Shrewsbury does not constitute an appropriate location to accommodate any of the proposed 30ha contribution to the unmet employment land needs forecast to arise in the Black Country.
- 16.161. By way of comparison between Shrewsbury and Shifnal:
- a. Unsurprisingly travel times and costs from Shrewsbury to the Black Country are greater than at Shifnal by both road and rail. For example, rail journey times from Shifnal to Wolverhampton are in the range of 23 to 25 minutes by rail for a cost of around £7 to £9 for an open return. Whereas rail journey times from Shrewsbury to Wolverhampton are in the range of 39 to 51 mins at a cost ranging between around £13 to £17 (standard fares identified as of March 2024).
 - b. Distances and accessibility to Shrewsbury railway station vary significantly across potential employment sites in and around the town. However, since Shifnal is a compact settlement there is generally good proximity to the station and for example, from the proposed strategic employment area to the station which is within a 20 minute walking distance.
 - c. Research suggests that representative road travel times from Shifnal to Wolverhampton centre (around 14 miles) vary from around 30 minutes to 55 minutes and travel to Dudley centre (20 to 22 miles) around 40 minutes to 1 hour 20 minutes dependent on route and time of travel. Whereas Shrewsbury town centre to Wolverhampton (about 31 miles) is approximately 45 minutes to 1hour 25 minutes and to Dudley (37 miles approximately) 1 hour to 1hour 50 minutes.
 - d. Shifnal is also closely located for access to Telford as well as the larger centres of population within the West Midlands. Considering wider logistics efficiency, the journey distances set out above would equally apply to companies servicing the employment delivered on any strategic site where these have journeys originating and /or terminating the wider West Midlands and further afield to London and the south-east.
- 16.162. The additional preference of Shifnal over Shrewsbury to accommodate the proposed 30ha contribution to the unmet employment land need reflects the Council's intention to grasp the unique opportunity to deliver an employment site which addresses

the structural needs of Shifnal as well as, being in the Council's opinion, best placed to serve employment land requirements of the Black Country. In doing so the settlement offers a 'dual role' in being best placed to serve both local employment needs, but also offering the opportunity to support cross boundary needs in a measured and sustainable manner.

- 16.163. As described in preceding paragraphs, the allocation of a large strategic employment site at Shifnal would have a hugely significant role in addressing the imbalances between housing and employment opportunities in Shifnal described and set out further within the Green Belt Exceptional Circumstances paper (EV051). This is considered to constitute a unique opportunity to achieve planned employment growth to balance recent housing growth, much of which was granted permission due to the consequences of the Council not being able to demonstrate a five year housing land supply in 2013/14.
- 16.164. As rural settlements the Community Hub and Community Cluster settlements in the Shrewsbury Place Plan area have more limited infrastructure – with significant differences in provision within these settlement. The expectation as set out in the draft Shropshire Local Plan's strategic approach is that these smaller village settlements would accommodate more modest levels of development focused on meeting local need and maintaining settlement sustainability, rather than accommodating contribution to Black Country needs.
- 16.165. As such, these settlements are not considered suitable locations to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.166. A range of strategic scale sites around Shrewsbury and in locations detached from the town have been promoted and considered by the Council. The merits of these sites have been fully assessed and documented in the site assessments that form part of the updated additional SA and site assessment. The Council considers that the issue identified with regard to proximity for sites associated with Shrewsbury, equally apply to strategic sites within the Shrewsbury Place Plan Area. As such, these sites are not considered suitable locations to accommodate any of the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.167. With specific regard to site BWU001 which is a potential strategic sites/settlement located between Shrewsbury and Telford, south of the A5, there are a number of significant constraints which mean that the Council consider it is an inappropriate location to accommodate

the proposed 30ha contribution to the unmet employment land need forecast to arise in the Black Country. This includes:

- a. The site is located in proximity to but some distance from the M54/A5 strategic corridor and any connection to it and the Black Country beyond would be via B roads.
- b. Given the distance from the M54/A5 strategic corridor and nature of potential connections it is unclear whether the site would be attractive as a centre for employment.
- c. Around half of the site is located within a source protection zone (primarily zone 3, however part of the north-west of the site is located in zone 2).
- d. There are possible HRA required due to road emissions from increased traffic (in-combination) on Hencott Pool.
- e. The site contains woodland, mature trees, ponds and the stream/brook along the northern boundary forms an environmental network corridor.
- f. The site likely to have a substantial negative impact on setting of the Scheduled Monument of Site of Roman town of Wroxeter (Viroconium).
- g. There are a number of known cropmark sites which may be associated with the Roman city situated within site boundary and due to its very large size and proximity to Wroxeter it is likely to have high archaeological potential.

16.168. Additionally in respect of large sites in more rural locations removed from Shrewsbury these generally lack transport and other suitable infrastructure restricting capacity to directly access services and facilities as well as sustainable modes of transport. In these locations therefore significant improvement of local infrastructure would be required to improve site sustainability to a level that is considered appropriate to support a strategic employment site.

Strategic Sites

16.169. As documented within the SA and site assessment environmental report (SD006.01), potential strategic sites/settlements are large sites of more than 25ha in size, which are not associated with meeting the growth needs of any particular settlement and contribute to achieving the aspirations of the Economic Growth Strategy for Shropshire.

16.170. For completeness, the Council considered all potential strategic sites/settlements when assessing potential 'alternative options' to Green Belt release. However, for the reasons documented within this topic paper and the site assessments which form the appendices to the updated additional SA and site assessment work, the Council

does not consider that any of these sites constitute an appropriate location / or more appropriate location (including with regard to implications for the Green Belt) to accommodate the proposed contributions to unmet employment land needs forecast to arise within the Black Country.

Shifnal Proposed Release of Green Belt- Consideration of Reasonable Options

- 16.171. The draft Shropshire Local plan has considered the requirements in Chapter 11 of the NPPF in relation to 'Making effective use of land' and this is embedded in strategic, site and detailed development management policies. The development guidelines identified for sites proposed for allocation in the draft local plan are individually tailored to seek to deliver development densities which reflect site constraints, the local context, and deliver an appropriate range of housing and employment types to meet need and support the sustainability of Shropshire as informed by the strategic approach and a range of supporting evidence.
- 16.172. The main considerations relevant to each site are identified in the SA site assessments. This has resulted in proposed allocations with a range of development densities as considered appropriate to reflect each site and its local context. Whilst there has been a generally cautious approach to the identification of expected scale of delivery on individual sites, in the event these are exceeded, additional delivery will positively contribute to windfall requirements across the County. It is not however considered that greater efficiencies in land use, should they be forthcoming, would negate the need for Green Belt release to provide a specific strategic employment to meet the dual needs of providing employment for Shifnal and which is proposed to contribute to the employment land need for the Black Country.
- 16.173. The Council have also, as required by paragraph 146 of the NPPF, considered and made as much use as possible of suitable brownfield sites and underutilised land. Potential brownfield sites are considered in the SA site assessments. Indeed, two substantial strategic brownfield sites have been identified for allocation at Clive Barracks, Tern Hill (Policy S19) and the Former Ironbridge Gorge Power Station (Policy S20).
- 16.174. The Council, having initially identified Shifnal as requiring employment development and, latterly, the most suitable location to accommodate the contribution to meeting the Black Country employment contribution, have also given due consideration to whether there are specific opportunities to accommodate the

required scale of employment development on safeguarded land, brownfield sites or otherwise within the existing built form of Shifnal, including through densification, rather than amending the Green Belt boundary and releasing land for development at Shifnal. This is set out in EV051.

16.175. Paragraphs 8.64 to 8.72 of EV051 set out an Assessment of All Other 'Reasonable Options' focused on Shifnal. This included consideration of scope to use existing safeguarded land and the availability of brownfield and non-Green Belt sites at Shifnal. The conclusion reached is that these are either not available or not viable options.

16.176. The proposals for Green Belt release have also been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. This is set out in paragraphs 8.82 to 8.87 in relation to Shifnal and it is concluded that this is not an appropriate option.

Green Belt Performance

16.177. Given the lack of alternative reasonable options to accommodate the significant employment requirement identified at Shifnal, Green Belt release options were considered.

16.178. Green Belt assessment and review studies were commissioned at an early stage of Plan preparation to support site assessment work and identification of preferred options. This evidence, produced by the Council's consultants LUC, provided an independent, robust and transparent assessment of the role and performance of Green Belt across Shropshire and identified what level of harm to Green Belt might result from any specific release.

16.179. The Stage 1 study - Green Belt Assessment divided all of the Green Belt within Shropshire into 85 discrete land areas and assessed the extent to which they serve the Green Belt purposes (as defined by the NPPF). The aim of this was to assess the relative performance of the Green Belt within the whole of Shropshire.

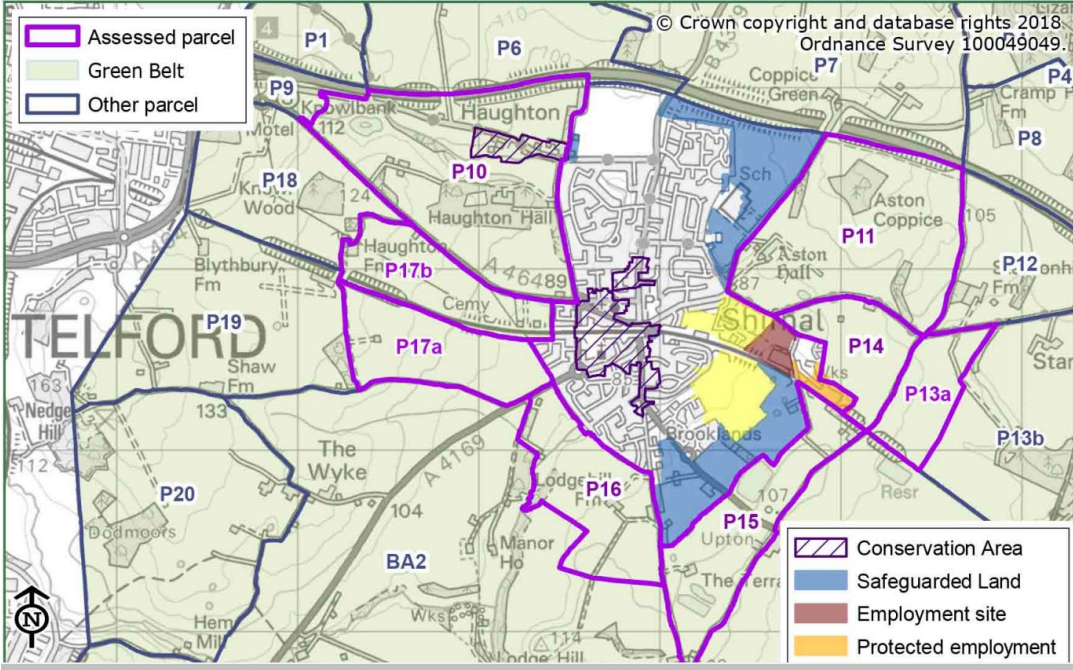
16.180. The Stage 2 Green Belt Study took the findings of the Stage 1 Assessment regarding the contribution of parcels to the Green Belt purposes and with this knowledge considered the potential harm of removing area from the Green Belt, taking into account the impact on the integrity of the remaining Green Belt land and the strength of the remaining Green Belt boundaries.

16.181. The Stage 2 Green Belt Study built on the foundation of the Stage 1 Green Belt assessment work. It looked in greater detail at more focused areas around existing Green Belt settlements (Albrighton, Alveley, Bridgnorth and Shifnal) , as well as around Cosford village

and military base, and Junctions 3 and 4 of the M54 motorway, these having been identified as potential strategic geographical locations to meet development needs and support a sustainable pattern of future growth in the County.

- 16.182. The Stage 2 Green Belt Study quantifies as part of that assessment not only the degree of potential 'harm' to the Green Belt of releasing each individual parcel but identifies any sub-areas where harm may be lower than the release of the parcel as a whole. This is presented in tables and maps summarising the harm of release of parcels or any sub-parcels. Additionally the Stage 2 Study considers scope for suitable alternative Green Belt boundaries and any potential mitigation / boundary enhancement measures that could be implemented to minimise harm to the Green Belt.
- 16.183. All this information has been considered and reflected in the relevant SA Site assessment.
- 16.184. Shifnal Green Belt assessment outcomes from the two LUC studies are set out in paragraphs 8.42 to 8.53 of EV051 and main other planning considerations summarised in paragraphs 8.54 to 8.63.
- 16.185. The areas of land proposed for release from the Green Belt, specifically to allow for the growth and expansion of the employment area around Shifnal (together with an adjoining area of safeguarded land) comprise land identified as P13a and P14 in the LUC Green Belt review study. This land which lies east of Shifnal Industrial Estate is around 53ha.

**Figure 16.1 Extract LUC Green Belt Review Study:
Appendix 7 – Shifnal**



16.186. Ultimately, it is considered the Council's existing evidence presented in the Green Belt Assessment (EV049); Green Belt Review (EV050); the Exceptional Circumstances Statement (EV051) and Site Assessments (SD006) have fully presented the rationale for the proposed release of Green Belt in Shifnal on the proposed employment allocation (SHF018b and SHF018d) having considered all reasonable options for accommodating development on non-Green Belt options. It is also acknowledged this proposed release of Green Belt land at Shifnal is yet to be subject to examination.

Reasoning: Why the Site Proposed to Accommodate Proposed Contribution to the Unmet Employment Land Need Forecast to Arise in the Black Country

16.187. The updated additional SA assessment summarises the conclusions of this assessment work, including the reasons this site is proposed to accommodate the proposed contribution to the unmet employment land need forecast to arise in the Black Country.

Exceptional Circumstances

16.188. In broad summary, the council's exceptional circumstances argument recognised the following key considerations in support of proposed allocation of SHF018b and SHF108d. These considerations are equally applicable to the identification of this site for the purposes of accommodating Black Country unmet need:

- a. Supports addressing dormitory status of Shifnal – and in particular reduces out commuting to Black Country.
- b. Strategically located on the M54 Corridor.
- c. Supports aspirations of the Economic Growth Strategy, including having potential to attract inward investment.
- d. Supports strategic role, function and sustainability of Shifnal (including infrastructure delivery).
- e. Improves existing provision of employment at Shifnal, and rebalances the town's recent growth profile.
- f. Meets the needs of Shifnal businesses.
- g. Acknowledges the site's Green Belt performance.

16.189. In addition to the site's strategic role to attract inward investment, the Council are aware of a proactive landowner and prospective developer for the proposed employment site. Publicly available information provides evidence of the intention to bring forward the site promoted by Harrow Estates for employment development, and it was reported in January 2023 that property developer Stofords have been appointed as the specialist delivery partner to support the proposals for strategic employment land.

Table 16.1: Site Identified to Accommodate the Proposed Contribution to the Unmet Employment Land Need Forecast to Arise in the Black Country

| Site Reference | Site Name | Draft Policy | Total Capacity | Black Country Contribution | Summary |
|-------------------|---|--------------|--------------------------------------|----------------------------|--|
| SHF018b & SHF018d | Land east of Shifnal Industrial Estate, Upton Lane, Shifnal | S15.1 | 39 hectares (15.6ha net development) | 30ha employment land | <p>Shifnal is located in east Shropshire with a functional relationship to the Black Country. It benefits from strong road and rail links to the Black Country via the M54 corridor and Shrewsbury-Wolverhampton railway line.</p> <p>Shifnal is a key centre and a focus for investment, employment, housing and development on the M54/A5 strategic corridor.</p> <p>The site constitutes a proposed strategic employment allocation which due to its size and location has the potential to form both a local and regionally important employment centre.</p> <p>The site can accommodate a sizeable contribution towards the unmet employment land needs forecast to arise in the Black Country.</p> <p>Development of the site would be considered to constitute sustainable development, informed by careful consideration of identified opportunities and constraints.</p> <p>Whilst the site is located within the Green Belt, it is considered that consideration of all other reasonable options has been undertaken and exceptional circumstances exist to justify the release of this land for employment, as documented within the new Housing & Employment Topic Paper and Green Belt Topic Paper.</p> <p>Accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.</p> |

Implications of the Proposed Site Identified to Accommodate the Proposed Contribution to the Unmet Housing Need Forecast to Arise in the Black Country

- 16.190. The submission version of the draft Shropshire Local Plan included a proposed contribution of 30ha of employment land to the Black Country, but proposed that this would be achieved through the proposed spatial strategy for the level and distribution of development across Shropshire.
- 16.191. To ensure the effectiveness of the draft Shropshire Local Plan, specific sites have been identified to accommodate this proposed contribution to the unmet employment land need forecast to arise in the Black Country.
- 16.192. Main modifications will be required to the draft Shropshire Local Plan to reflect this proposed change – including to draft Policy SP2 and its supporting text; and draft Policy S15.1 and its supporting text.

17. Employment Land Supply

- 17.1. The employment land supply is summarised in EV012 Shropshire Authority Monitoring Report (2020). This identifies an employment land supply of 413 hectares(ha) to meet the needs of the County and the demands of the local economy to 2038.
- 17.2. The employment land supply comprises a committed supply (102ha) and 'saved' employment allocations (128ha) with proposed, new allocations (134ha) in the centre, east and south of the County.
- 17.3. Figure 17.1 identifies the strategic distribution of employment land through the settlement hierarchy.

Figure 17.1: Distribution of Employment Land Supply

| Location | Hectares | % |
|--------------------------|------------|------------|
| Urban Focus | 344 | 83 |
| Strategic Centre | 105 | 25 |
| Principal Centres | 155 | 38 |
| Key Centres | 84 | 20 |
| Rural Development | 70 | 17 |
| Strategic Settlements | 12 | 3 |
| Community Hubs | 10 | 2 |
| Community Clusters | 4 | 1 |
| Rural Areas | 44 | 11 |
| SHROPSHIRE | 413 | 100 |

- 17.4. The detailed scale and distribution of the employment land supply for the plan period 2016 to 2038 is shown in Table 17.1. In the first four years of the plan period from 2016 to 2020, employment development of just below 50ha was completed in the County.
- 17.5. If the 50ha of completed employment land is discounted from both the available supply and the proposed requirement, it can be concluded there is **sufficient deliverable or developable employment land supply of 363ha of employment development for the period 2020 to 2038 to support a residual requirement of 270ha (comprising 320ha minus 50ha).**
- 17.6. The remaining employment land supply of 363ha would exceed the remaining employment land requirement of 270ha by **around 35%**.

Table 17.1: Strategic Employment Land Supply (31st March 2020)

| Location | Completions | Permissions | Allocations | | SUMMARY OF SUPPLY |
|---------------------------------|-------------|-------------|--------------------------------|------------------------|-------------------|
| | | | Saved Sites without Permission | Proposed in Draft Plan | |
| | | | hectares | | |
| SHROPSHIRE | 50 | 102 | 128 | 134 | 412 |
| Strategic Centre Shrewsbury | 8 | 38 | 9 | 50 | 105 |
| Hubs | | 0.2 | | | 0.2 |
| Clusters | | | | | |
| Principal Centres | 15 | 23 | 84 | 33 | 155 |
| Hubs | 3 | 3 | | | 6 |
| Clusters | 0.5 | 3 | | | 4 |
| Key Centres | 3 | 10 | 33 | 39 | 84 |
| Hubs | 1 | 2 | 1.4 | | 4 |
| Clusters | 0.01 | | | | 0.01 |
| Strategic Settlements: | | | | | |
| Clive Barracks, Tern Hill | | | | 6 | 6 |
| Former Ironbridge Power Station | | | | 6 | 6 |
| Rural Settlements & Countryside | 20 | 23 | 0.3 | | 43 |

Aligning Employment with Housing and the Population of Shropshire

- 17.7. A key step towards sustaining the growth of the local economy and achieving the levels of employment growth is the provision of labour within or accessible to businesses within Shropshire.

Evidence on Labour Supply

- 17.8. This seeks to align the employment land requirement to the housing requirement to secure balanced growth through the strategy in the draft Submission Local Plan. This assessment supports the Council's submissions on labour supply for Matter 4 of the Stage 1 Examination Hearings. This supports evidence presented in (EV043) Shropshire Economic Development Needs Assessment, (EV112) Employment Requirement Topic Paper and (GC4n) Employment Strategy Topic Paper. This matter was first explored in (EV003.01) Issues and Strategic Options Consultation and (EV004.01) Preferred Scale and Distribution of Development Consultation.

Jobs Growth and Housing & Employment Requirements

- 17.9. The Experian Baseline Forecast presented in the (EV043) EDNA (Tables 8.1 and 8.3 pages 98 and 100) projected a baseline jobs growth forecast for 16,700 jobs in Shropshire from 2016 to 2038. This forecast for the adjusted baseline employment land need of 250ha would deliver around 67.07jobs/ha at the average density for development recorded in Shropshire.
- 17.10. An uplift of 15% to the baseline employment land need from 250ha to 290ha would require a further 40ha of employment land. This would provide a further 2,683 jobs (40 x 67.07jobs/ha) increasing the jobs growth forecast to 19,383 jobs.
- 17.11. A contribution of 30ha of employment land towards unmet employment land needs in the Black Country would provide a further 2,012 jobs (30 x 67.07jobs/ha) increasing the baseline jobs growth forecast to 21,395 jobs as shown in Table 17.2.

Table 17.2: Projected Jobs Growth in Shropshire to 2038

| Components of Employment Land Requirement | Employment Land (hectares) | Jobs per hectare | Projected Jobs (number) |
|--|-----------------------------------|-------------------------|--------------------------------|
| Experian Baseline Forecast | 249 | 67.07 | 16,700 |
| Uplift to Requirement 15% | 40 | | 2,683 |
| Contribution to Black Country | 30 | | 2,012 |
| TOTALS | 320 | | 21,400 |

- 17.12. The primary employment land uses for Class B and equivalent land uses identified in Draft Policy SP13, will require the greater proportion of the employment land supply but comprise only part of this jobs growth forecast.
- 17.13. The baseline forecast for 16,700 jobs indicates 6,590 jobs would be provided in Class B or equivalent jobs. This is equal to 39.46% where 6,590 jobs are divided by 16,700 jobs. An uplift of 15% to the employment land need for a further 40ha of land would deliver a total of 2,683 jobs with 1,058 jobs in Class B or equivalent jobs. This would deliver 7,648 jobs in Class B or equivalent uses.
- 17.14. A contribution of 30ha of land towards unmet employment land needs in the Black Country would provide a total of 2,012 jobs with 794 jobs in Class B or equivalent uses.
- 17.15. Class B or equivalent land uses would provide for around 8,440 jobs from the overall jobs growth forecast as shown in Table 17.3.

Table 17.3: Projected Class B & Equivalent Jobs Growth in Shropshire to 2038

| Components of Employment Land Requirement | Projected Jobs (number) | Proportionate Provision (%) | Projected Class B Jobs |
|---|-------------------------|-----------------------------|------------------------|
| Experian Baseline Forecast | 16,700 | 39.46 | 6,590 |
| Uplift to Requirement 15% | 2,683 | | 1,059 |
| Contribution to Black Country | 2,012 | | 794 |
| TOTALS | 21,400 | | 8,440 |

Labour Force Growth

- 17.16. The EDNA (EV043) identifies in Table 8.11 the demographic population modelling outputs for the three future labour supply scenarios tested in the needs assessment.
- 17.17. These three scenarios assessed the:
- 2014-based Sub-National Population Projections (SNPP) which anticipated the provision of 19,975 dwellings to increase the labour supply by +1,979 persons seeking employment in Shropshire.
 - Standard Methodology to calculate the local housing need anticipated +5,919 dwellings would be provided to deliver 25,894 dwellings to increase the labour supply by +7,538 persons seeking employment in Shropshire.
 - Proposed housing requirement in the draft Submission Local Plan for 30,800 dwellings would provide +4,906 dwellings and increase the labour supply by +12,145 persons seeking employment in Shropshire.

17.18. The Council now propose to uplift the housing requirement to 31,300 dwellings to provide an additional +500 dwellings. Table 17.4 shows how the projected labour supply increases to +12,615 persons who are seeking employment in Shropshire.

Table 17.4: Projected Labour Supply to 2038

| EDNA Future Labour Supply Scenarios | Dwelling Provision 2016 - 2038 | Net Dwelling Growth | Net Dwellings to Net Labour | Net Labour Growth | Projected Labour Growth |
|--|--------------------------------|---------------------|-----------------------------|-------------------|-------------------------|
| 2014-based SNPP | 19,975 | | | | 1,979 |
| Local Housing Need from Standard Methodology | 25,894 | 5,919 | 0.94 | 5,559 | 7,538 |
| Housing Requirement 2022 | 30,800 | 4,906 | 0.94 | 4,607 | 12,145 |
| Updated Housing Requirement 2024 | 31,300 | 500 | 0.94 | 470 | 12,615 |

17.19. The proposed employment land requirement for 320ha would now seek to deliver a jobs growth forecast for 21,400 jobs to 2038. This reflects the aspirations in the (EV044) Shropshire Economic Growth Strategy to deliver a 'step change' in the performance and productivity of the local economy, as set out in (GC4n) Employment Strategy Topic Paper. These objectives are important, although projected labour force growth at +12,615 persons would not entirely support the jobs growth forecast at 21,400 jobs.

17.20. The EDNA (paragraphs 8.47 – 8.57) recognised this challenge to align jobs growth and projected labour force growth. The EDNA recognised that in-migration would largely drive population growth in Shropshire. Further, the 2014-based SNPP indicated this would attract significant numbers in the 65+ age cohorts. This would mean that increasing the housing supply would offer limited returns to the size of the working age population in Shropshire.

17.21. In recognising the challenge to align jobs growth with future labour supply, the Council consider this challenge cannot simply be addressed through managing the number, size, type and mix of dwellings delivered by the housing requirement in the hope of attracting more working age migrants.

17.22. In Shropshire, the means to address this challenge will extend to the existing resident and working populations and the ageing demography of the County. In turn, this also captures broader challenges with the ageing population of the United Kingdom.

Ageing Demography of the United Kingdom

- 17.23. In December 2022, the House of Lords Economic Affairs Committee published their report *'Where have all the workers gone'*. This addressed the impacts of the pandemic on economic inactivity, with an additional 565,000 persons leaving the national workforce. This Report highlighted the four key causes of increasing sickness, changes in the structure of migration, increasing early retirement and the ageing UK population. This showed how the increase in worklessness among older people reversed the pre-2020 UK trend.
- 17.24. The House of Lords report followed preceding reports on the economic implications of the ageing population of the UK:
- UK Government - Fuller Working Lives (2017):
 - a. This identified around 1 million people aged 50 – 64 years were workless but were willing to work but this 'missing million' were not being 'encouraged' to seek employment nor 'enabled' to enter the workplace.
 - CIPD (Chartered Institute of Personnel and Development) - Megatrends Report: *'Ageing Gracefully: the opportunities of an older workforce'* (2019):
 - a. Identified that in 2019, the 'missing million' aged 50 – 64 years reduced by 175,000 persons to 825,000 persons as a result of these age cohorts taking a disproportionate number of jobs within the increasingly tighter labour market from 2017.
 - b. Identified a longer term trend for a greater contribution of labour from older age cohorts of 65+ years. By 2019, an additional 570,000 older people entered employment and 65+ years contribute up to 400,000 persons. This indicated the 'missing million' were likely part of a group that was three times larger.
 - c. In benchmarking strategic objectives for developing people and employer organisations, the CIPD conclude that an ageing population may be a good problem to have, offering experienced, knowledgeable and qualified people able to bring a premium to the performance, productivity and value of a local economy.
 - The House of Lords report indicates the Covid pandemic slowed the effects of the changes identified by the CIPD. An additional 565,000 persons have become workless and the CIPD have set out the challenge of capturing the potential of the existing labour supply.

Managing Shropshire's Labour Force – the resident population

- 17.25. Shropshire is the largest local authority in the West Midlands and whilst it has an ageing population, the County also has a significant

'economically active' resident population of 154,421 people with a significant number of qualified workers at NVQ3+ levels.

17.26. A challenge for the County is to retain more resident workers within the employment market and to address key areas of worklessness that reduce the economic activity of the resident population. Table 17.3 briefly describes these opportunities.

Table 17.3: Worklessness by Age Cohort in Shropshire

| Worklessness Categories | Worklessness by Age Cohort (persons) | | | | | TOTALS |
|-------------------------|--------------------------------------|--------------|--------------|---------------|---------------|----------------|
| | 16-24 | 25-34 | 35-49 | 50-64 | 65+ | |
| Unemployed | 1,548 | 1,161 | 1,190 | 1,660 | 184 | 5,743 |
| Students | 8,565 | 547 | 328 | 174 | 73 | 9,687 |
| Carers | 462 | 1,792 | 2,865 | 3,703 | 992 | 9,814 |
| Retired Persons | 12 | 13 | 104 | 8,556 | 68,868 | 77,553 |
| Long Term Sick | 454 | 1,117 | 2,268 | 4,373 | 1,363 | 9,575 |
| Other Reasons | 1,115 | 1,327 | 1,553 | 2,129 | 588 | 6,712 |
| TOTALS | 12,156 | 5,957 | 8,308 | 20,595 | 72,068 | 119,084 |

Census 2021.

Economic Activity - Unemployment

17.27. Census 2021 records unemployment at 5,743 persons or 3.72% of the resident working age population of 154,421 people. These people are seeking work and waiting to enter the workforce in the County. Although this is a low rate of unemployment, it is high for Shropshire. This compares with a 3.0% rate recorded in the NOMIS Labour Market Profile 2021. The current rate of 3.72% at 5,743 persons would be expected to fall to 3.0% at 4,633 persons as the local economy recovers its stability. This fall in unemployment from 3.7% to 3.0% would be expected to release around 1,110 resident workers to the local labour supply.

Economic Inactivity – Mature Students

17.28. Census 2021 records a robust student population totalling 9,687 persons in Shropshire. This covers a broad range of age cohorts including 1,050 mature students of working age from 25 to 64 years and over 70 mature students of 65+ years. Mature students are considered to be largely seeking retraining and re-employment opportunities and largely resident in the County. Where mature students of working age return to the local labour market or defer their retirement this would deliver around 1,050 workers back into the local labour supply.

Economic Inactivity – Young Carers

- 17.29. Census 2021 records an extensive resident 'carer' population of 9,814 persons from 16 to 65+ years. In later life, many people adopt caring roles in the home or for dependents as a lifecycle choice or responsibility. For young carers, the role of caring should be a temporary life choice leading on to employment in due course. Young carers from 16 to 34 years would be expected to follow this pathway during the period to 2038, returning up to 2,250 people back into the local labour supply.

Economic Inactivity – Early Retirees

- 17.30. Census 2021 records 8,556 persons in early retirement in Shropshire aged between 50 – 64 years, despite national policy to defer the state pension age to 67 years. Whilst early retirement may arise for a number of reasons, including occupational restrictions on the length of careers or structural changes with the business sector, the proposed employment growth in Shropshire may offer some people an opportunity to continue their career in a different business sector or occupation. Where only 10% of early retirees return to work in this way, this would return around 850 persons back into the local labour supply.

Economic Inactivity – Deferred Retirement: extending the state pension age in an ageing population

- 17.31. Census 2021 records a significant retired population of 68,868 persons 65+ years in Shropshire. This reflects the significant ageing population in Shropshire. This is a significant issue and financial burden on both the public sector and family resources as people enter retirement, old age and make later life choices.
- 17.32. For younger age cohorts in retirement from 65 - 74 years, opportunities may still exist to seek alternative occupations and remain active in the local economy. This is expected to be an increasingly popular choice through the period to 2038. The current levels of inactivity in these age groups where individuals had worked within the last 12 months indicates the possible levels of deferred retirement in Shropshire.
- 17.33. Individuals aged 65 – 69 years who had worked in the last 12 months but were currently economically inactive were found to number around 1,223 persons. Individuals aged 70 – 74 years who had worked in the last 12 months but were currently economically inactive were found to number around 655 persons. From the total economically inactive retired population of 68,868 persons the proportion of deferred retirees likely to seek further employment would be around 1,880 persons equal to 2.73%.

Managing Shropshire's Commuting Relationships – the working population of Shropshire

- 17.34. Shropshire is the largest local authority in the West Midlands and provides housing, employment and service opportunities that support communities within and beyond the County boundary. This includes the Black Country with the West Midlands region and across the English border into Wales within the area known as 'The Marches'.
- 17.35. These extensive functional relationships bring a significant working population into the County to complement the working population. Shropshire Council particularly recognises the importance of this strong functional relationship between the County and the Black Country Local Authorities.
- 17.36. In seeking to assist the Black Country Authorities with their unmet employment needs, it will be important to sustain the capacity of the Black Country to continue to meet their own labour needs in accordance with NPPF, paragraph 81. Seeking to support their employment need through commuting to Shropshire, in addition to migration, will help to achieve this important objective. This seeks to relieve the pressures on the Black Country, from businesses in need of development opportunities and from labour in need of employment, without causing an irreversible migration of labour into neighbouring areas to the detriment of the Black Country economy.
- 17.37. Shropshire Council considers there are two closely related scenarios to encourage changes to the commuting patterns from the Black Country to achieve this outcome: Scenario 1 - Encouraging an increase in the rate of out-commuting from the Black Country to Shropshire currently of 2,200 persons by achieving a doubling of this rate through the provision of sufficient employment land to provide a further +2,200 jobs in Shropshire; Scenario 2 - Encouraging an increase in the rate of out-commuting from the Black Country to Shropshire currently of 2,200 persons to achieve an equilibrium with the out-commuting from Shropshire into the Black Country currently of 4,615 persons through the provision of sufficient employment land to provide a further +2,400 jobs in Shropshire.
- 17.38. Shropshire Council would intend that the commuting relationship between Shropshire the Black Country Authorities would move towards an equilibrium in these two counter flows by Shropshire attracting or retaining around +2,300 commuters. Indeed, data from the Council's Strategic Housing Market Assessment (SHMA) Part 1 (EV097) (page 16) would indicate this is a general trend already occurring in Shropshire, with a notable reduction to the level of net out migration occurring between 1991 and 2011.

Marches Forward Partnership – cooperation and functional relationships across national borders

17.39. Shropshire Council has now formed a partnership with Herefordshire Council, Powys and Monmouthshire County Councils to seek investment and co-ordinated policy and initiatives within The Marches. This partnership will help to support our functional relationships these other authorities and with their communities who use the services of Shropshire or work in this County.

17.40. These four local authorities enclose the national border between England and Wales. This captures different regulatory and policy frameworks but the partnership has formed around shared interests and common issues in challenging times, where Covid-19 among other influences calls for new ways of working.

17.41. The landscapes, communities, functional market areas and common experiences of living in The Marches provides a mutuality which is advocated in NPPF paragraph 81 to build strong and competitive economies where (our emphasis):

"Planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future."

17.42. Shropshire has strong relationships with Welsh Authorities through the availability of employment and labour. This commuting relationship provides 4,651 persons from Shropshire working in Wales and 6,883 persons working in Shropshire from Wales.

17.43. The Council considers that the aspiration in the strategy for the Submission Local Plan will help to support this functional relationship. It is considered that this support will help to balance Shropshire's commuting relationships with the capacity to increase in-commuting from Wales to Shropshire.

17.44. A reasonable growth in this relationship of +15% would bring an additional labour supply of 1,030 working age people to Shropshire.

Conclusion

17.45. Shropshire's future labour force will be derived from a number of sources to 2038; housing growth being one area but likely to be complemented by structural changes to the county's existing resident

population and continuing trends towards providing an 'equilibrium' in commuting patterns.

17.46. Table 7.4 summarises this considered position using the reasonable adjustments outlined above to identify a future labour supply of up to 25,420 persons to meet a projected jobs growth of 21,400 jobs including Class B or equivalent jobs of around 8,440 jobs.

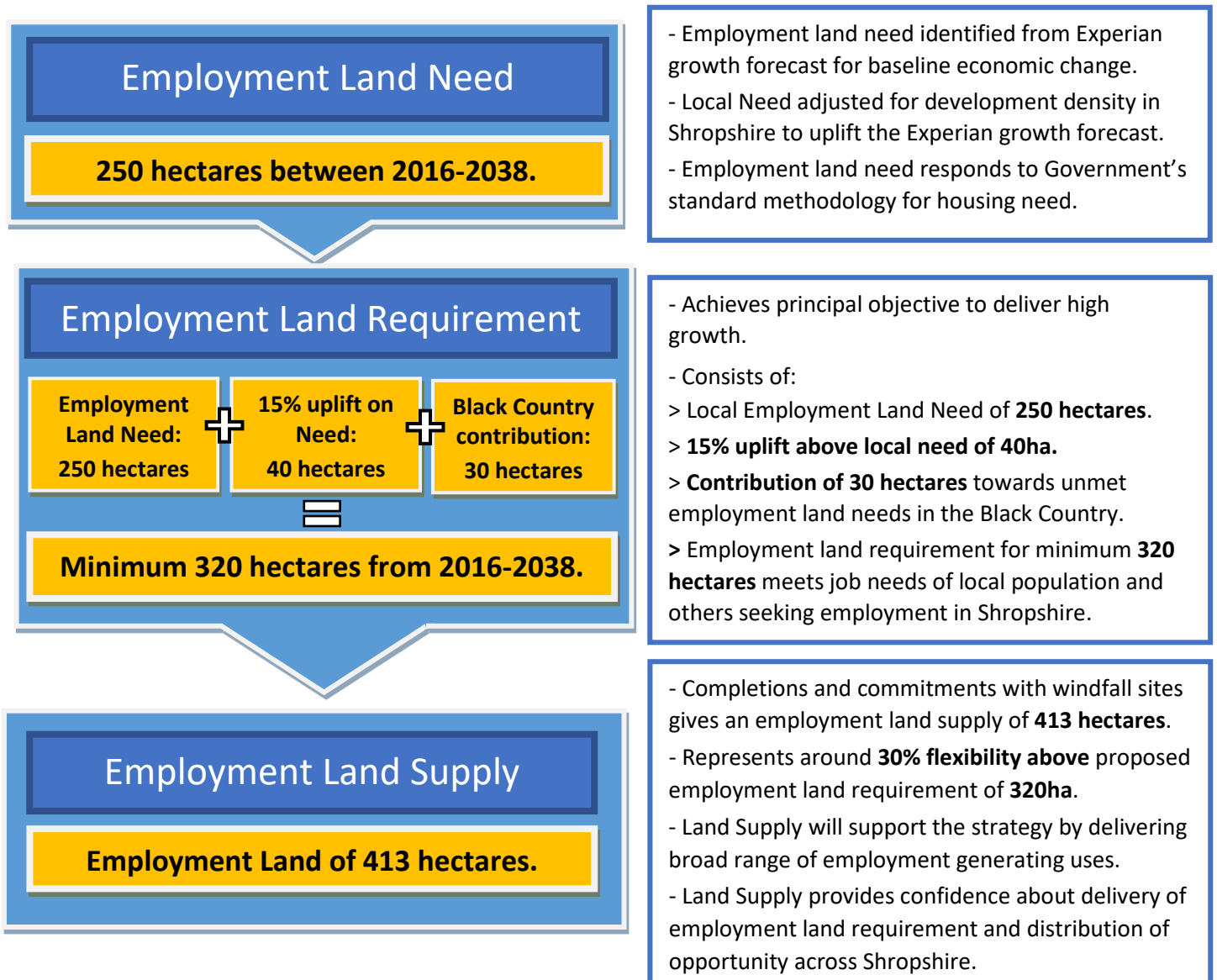
Table 7.4: Shropshire Labour Supply Balance 2024

| Factors | Influences | Experian Baseline uplifted 15% PLUS 30ha |
|---|--|--|
| | | numbers |
| PROJECTED EMPLOYMENT GROWTH | Overall Employment Generation | 21,400 |
| | - Office, Industrial, warehousing/logistics | 8,440 |
| PROJECTED LABOUR FORCE GROWTH Migrant Labour Force Growth | - working age migrants from anticipated trends including: in-migration from ABCA through meeting 1,500 dwellings of unmet housing need | 12,615 |
| Managing Shropshire's Commuting Relationships with Neighbouring and Closely Related Authorities | - to influence commuting patterns by 5,665 persons towards equilibrium | 2,335 |
| | - PLUS commuting between Shropshire and ABCA through meeting 30 hectares of unmet employment land need | 2,300 |
| | - PLUS commuting from Wales by +15% from current 6,883 persons through the Marches Forward Partnership | 1,030 |
| Managing Unemployment and Economic Inactivity | - Unemployment 2021 reduced by 0.7% (5,743 persons at 3.72% reduced to 4,633 persons at 3.0%) | 1,110 |
| Census 2021 | - Mature Students 25 - 64 years seeking employment (from total of 9,687 persons) | 1,050 |
| | - Young Carers 16 - 34 years seeking employment (from total of 9,844 persons) | 2,250 |
| | - Early Retirees 50 - 64 years seeking employment (8,556 persons at 10%) | 850 |
| | - Retirees 65 - 74 years seeking employment (68,868 persons at 2.73%) | 1,880 |
| Labour Force Premium | - employment growth attracting more in-commuters | |
| | - improving housing choice attracting more working migrants | |
| TOTAL LABOUR SUPPLY | | 25,420 |

18. Summary: Employment Land Need, Requirement and Supply

18.1. Figure 18.1 summarises employment land need, a contribution towards unmet employment land need in the Black Country and an uplift of 15% in the proposed employment land requirement above need. Figure 18.1 also identifies the total employment land supply.

Figure 18.1: Summary of Employment Land Need, the proposed Employment Land Requirement and Employment Land Supply



19. Strategic Distribution of Planned Development

Introduction

19.1. This section of the updated Topic Paper addresses the proposed strategic distribution of planned development, which establishes the overarching approach to the distribution of development across Shropshire. The proposed strategic distribution of planned development forms an important component of the proposed spatial strategy.

Initial Identification: Reasonable Options for the Strategic Distribution of Planned Development and the Preferred Option

- 19.2. Within the Issues and Strategic Options Consultation Document prepared to inform the draft Local Plan, three reasonable options for the strategic distribution of planned development were identified: 'Rural Rebalance'; 'Urban Focus'; and 'Balance Growth'.
- 19.3. These reasonable options were identified based on various approaches to the distribution of the total proposed development between three broad 'settlement categories'. In effect, category 1 consisted of Shrewsbury; category 2 consisted of the other urban settlements; and category 3 consisted of the rural settlements and wider rural area.
- 19.4. These options and the associated SA assessment of these options informed identification of the proposed approach to the strategic distribution of planned development within the draft Shropshire Local Plan: 'urban focus'.
- 19.5. 'Urban focus' constitutes a significant proportion of development being directed towards the urban settlements that have the infrastructure available to best support development. This is complemented by development in rural areas (particularly the larger rural settlements) to maintain and enhance rural sustainability.
- 19.6. The overall process undertaken to identify the strategic distribution of planned development proposed within the draft Shropshire Local Plan is summarised within the Housing Topic Paper (GN4i) and the Strategic Employment Topic Paper (GC4n).

Updated Identification: Reasonable Options for the Strategic Distribution of Planned Development

19.7. It is acknowledged that the decision to propose an increase to the housing requirement and the proposed mechanism for accommodating this increase should be considered in the context of the strategic distribution of planned development.

- 19.8. It is also acknowledged that the identification of sites to accommodate the proposed contribution to the unmet needs forecasts to arise in the Black Country should be considered in the context of the strategic distribution of planned development.
- 19.9. As such, as part of the updated additional SA assessment work undertaken in order to positively respond to ID28, ID36 and ID37 the reasonable options for the strategic distribution of planned development were re-appraised.
- 19.10. This updated additional SA assessment applies a methodology consistent with that utilised to identify reasonable options for the strategic distribution of planned development within earlier stages of the SA assessment already undertaken to inform the draft Local Plan. Thus, identified reasonable options for the strategic distribution of planned development within this updated additional SA assessment work were based on variations of the distribution of the total development between three identified 'settlement categories'.
- 19.11. It is important to note that the SA assessment of these options was entirely independent of conclusions reached regarding the proposed housing requirement and the mechanism for accommodating the proposed increase to the housing requirement.
- 19.12. It was similarly independent of conclusions reached regarding the proposed sites to accommodate the proposed contributions to unmet needs forecast to arise in the Black Country.

Updated Reasonable Options for the Strategic Distribution of Planned Development

- 19.13. The three reasonable options for the strategic distribution of planned development assessed were:

Table 19.1: Reasonable Strategic Distribution of Planned Development Options

| Option | Strategic Distribution of Planned Development | Summary |
|--------------------------------------|---|---|
| Option A: Rural Rebalance | Around 25% of housing in the Strategic Centre of Shrewsbury. Around 40% of housing in the Principal Centres, Key Centres and Strategic Settlements. Around 35% of housing in the rural area. Employment development to reflect the principles of this distribution, with a significant component in the rural areas. | 'Rural rebalance' is underpinned by the principle of allowing a high proportion of planned development within the rural area (particularly the larger rural settlements) to enhance the sustainability of rural settlements. This is complemented by development within 'urban areas'. |

| Option | Strategic Distribution of Planned Development | Summary |
|----------------------------------|---|--|
| Option B: Urban Focus | Around 29% of housing in the Strategic Centre of Shrewsbury. Around 45% of housing in the Principal Centres, Key Centres and Strategic Settlements. Around 26% of housing in the rural area. Employment development to reflect the principles of this distribution, with the majority concentrated in urban areas. | 'Urban focus' is underpinned by the principle of accommodating a significant proportion of development within the urban settlements that have the infrastructure available to best support development. This is complemented by development in 'rural areas' (particularly the larger rural settlements) to maintain and enhance sustainability. |
| Option C: Balanced Growth | Around 30% of housing in the Strategic Centre of Shrewsbury. Around 40% of housing in the Principal Centres, Key Centres and Strategic Settlements. Around 30% of housing in the rural area. Employment development to reflect the principles of this distribution, approximately balancing provision across the three broad categories. | 'Balanced growth' is underpinned by the principle of seeking to evenly distribute development across all categories of settlement in Shropshire in order to support their long term sustainability. |

The Proposed Strategic Distribution of Planned Development

19.14. The decision regarding which of the reasonable options for the strategic distribution of planned development should form the basis for the distribution of development within the spatial strategy of the draft Shropshire Local Plan is ultimately one of planning judgement.

19.15. Shropshire Council has carefully considered the extensive range of information available in undertaking this planning judgement, including the evidence base produced to inform the draft Shropshire Local Plan (particularly the updated additional SA assessment work) and consultation responses received during the various stages of consultation undertaken to inform preparation of the draft Local Plan.

19.16. In conclusion, the Council considers the proposed strategic distribution of planned development within the draft Shropshire Local Plan should continue be underpinned by: **Option B: 'Urban Focus'**.

19.17. 'Urban focus' means the majority of development is directed towards urban areas. Urban areas consist of the Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements.

19.18. Development within urban areas is complemented by appropriate development within rural areas.

19.19. Appropriate development in rural areas will primarily be directed towards proposed Community Hubs, which represent significant rural service centres, and to a lesser extent proposed Community Clusters, which consist of settlements with aspirations to maintain or enhance sustainability.

19.20. Other development in rural areas will consist of specific forms of development within the wider rural area, which constitutes 'countryside' for planning policy purposes.

Reasons for the Proposed Strategic Distribution of Planned Development

19.21. The proposed approach is considered appropriate for a number of reasons, including:

- a. It positively responds to the Council's understanding of housing needs across the area, with development being concentrated within those settlements considered to form part of the 'urban area' that have the largest populations and availability of services, facilities and infrastructure, whilst also allowing complementary development within settlements considered to form part of the 'rural area' that have smaller populations.
- b. It is considered this option responds to the Council's understanding of need; the size and characteristics of our settlements; and the need to support availability of services, facilities and infrastructure across the range of communities in Shropshire.
- c. It is responsive to and aligns with the Council's understanding of the economic growth needs and opportunities in Shropshire, as well the economic aspirations identified in the Council's Economic Growth Strategy
- d. It is considered responsive to the geographic size, diversity, demographics and characteristics of Shropshire (including the presence of the Shropshire Hills National Landscape and West Midlands Green Belt).
- e. It is responsive to cross-boundary relationships and interactions with adjacent and closely related areas. In particular, it allows for an appropriate level of development in sustainable locations in central and eastern parts of Shropshire – supporting proposed contributions to unmet housing and employment land needs forecast to arise in the Black Country.
- f. It is considered to align with the principles and requirements of the National Planning Policy Framework (NPPF).

- g. It is positively responsive to past housing delivery trends and existing housing commitments.
 - h. It is responsive to the various policy objectives and opportunities identified during preparation of the draft Shropshire Local Plan.
- 19.22. Importantly, the proposed approach to the strategic distribution of planned development is supported by the conclusions of the updated additional SA assessment, which concluded that *"focusing a higher proportion of development within urban areas achieves more positive impacts on social, economic and environmental factors."*
- 19.23. Furthermore, it also concluded that *"On balance, it is considered that Option B: Urban Focus is the most sustainable of the three reasonable options for the strategic distribution of planned development."*
- 19.24. Option B (Urban Focus) was considered unlikely to result in any strongly negative effect on SA objectives, but conversely was *"likely to result in a strongly positive effect on SA objectives:*
- 2: Encouraging a strong and sustainable economy throughout Shropshire.*
 - 3: Providing a sufficient amount of good quality housing which meets the needs of all sections of society.*
 - 4: Promoting access to services for all sections of society.*
 - 5: Encouraging the use of sustainable means of transport.*
 - 6: Reducing the need of people to travel by car.*
 - 7: Supporting active and healthy communities."*

Implications of the Proposed Approach to the Strategic Distribution of Planned Development

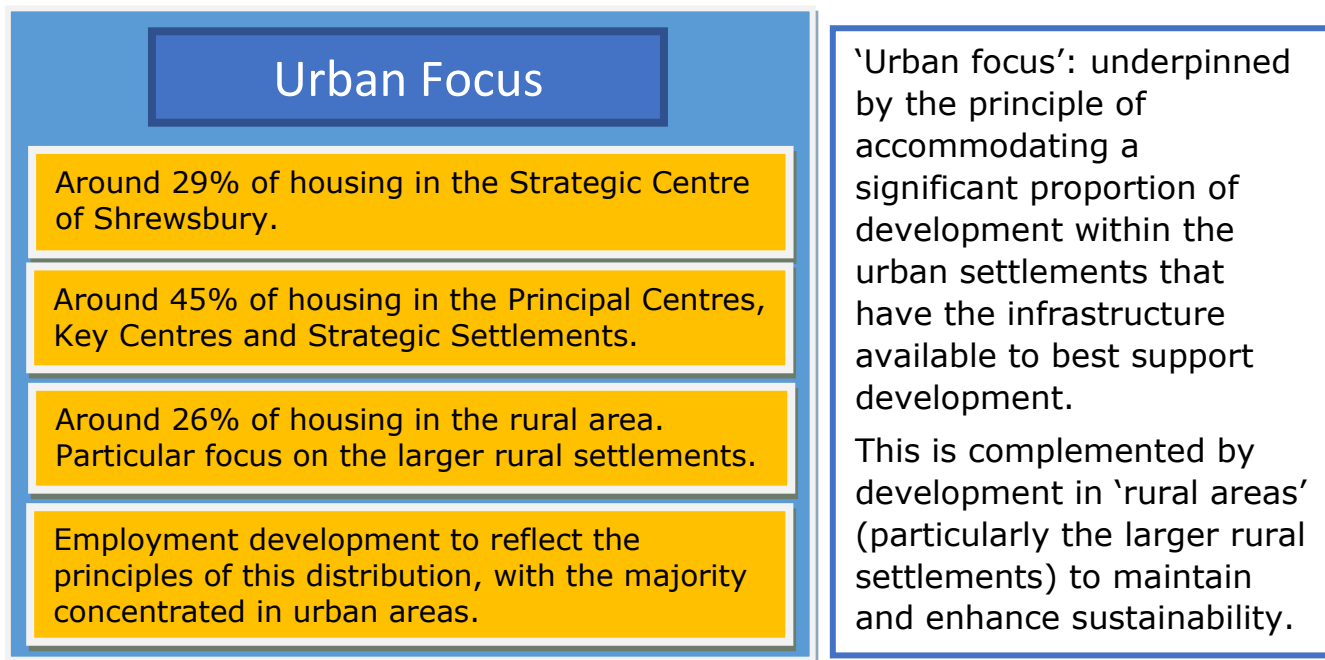
- 19.25. This proposed approach to the strategic distribution of planned development is generally consistent with that which was previously proposed within the draft Shropshire Local Plan.
- 19.26. The only distinctions are:
- a. The proposed modifications to settlement guidelines and windfall allowances at Shrewsbury; Whitchurch; and the Former Ironbridge Power Station, sufficient to accommodate the proposed uplift to the housing requirement.
 - b. The proposed modifications to site guidelines for proposed allocations BRD030; SHF018b & SHF018d; SHR060, SHR158 & SHR161; and IRN001 to specifically indicate that they accommodate proposed contributions to unmet housing need forecast to arise in the Black Country.

- 19.27. It is not considered that these distinctions significantly affect the principle of urban focus; indeed all these locations are classified as urban. No other main modifications are required to support the achievement of the proposed approach to the strategic distribution of planned development.
- 19.28. The housing and employment land supply identified to achieve the proposed housing and employment land requirements are also summarised within this Topic Paper. It is considered the housing and employment land supply is consistent with the proposed approach to the strategic distribution of planned development.

20. Summary: Proposed Strategic Distribution of Planned Development

20.1. Figure 20.1 provides a summary of the proposed approach to the strategic distribution of planned development:

Figure 20.1: Overarching Summary of the approach to the strategic distribution of planned development:



21. Spatial Strategy

Overview

- 21.1. The spatial strategy provides a high-level spatial framework for achieving the vision and objectives of an area. It therefore underpins and is in turn achieved by the policies within the Local Plan.
- 21.2. The proposed spatial strategy for the level and distribution of development across Shropshire is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan, which is then expanded upon within wider draft Policies.
- 21.3. The key components of any spatial strategy are the level and distribution of development.

The Proposed Spatial Strategy

- 21.4. Earlier sections of this Topic Paper address the proposed housing and employment land requirements, which form the basis for the proposed level of development within the spatial strategy.
- 21.5. This Topic Paper also addresses the proposed strategic distribution of planned development, which establishes the overarching approach to the distribution of development within the spatial strategy.
- 21.6. Reflecting the conclusions summarised within this Topic Paper, the revised spatial strategy for the level and distribution of development across Shropshire proposed to be set out in Draft Policy SP2 includes:
 - a. **Over the proposed plan period from 2016 to 2038, a minimum of 31,300 new dwellings and a minimum of 320 hectares of employment land will be delivered, of which 1,500 dwellings and 30ha of employment land are to contribute towards the unmet needs forecast to arise within the Black Country. The proposed housing and employment land requirements equate to around 1,423 dwellings and around 14.5ha of employment land per annum.**
 - b. **To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the 'urban areas', which consist of Strategic Centre of Shrewsbury, proposed Principal Centres, proposed Key Centres and proposed Strategic Settlements.**
 - c. **Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in 'urban areas' will be complemented**

by appropriate new development within Community Hubs, which are considered significant rural service centres; and to a lesser extent Community Clusters, which consist of settlements with aspirations to maintain or enhance their sustainability. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.

- 21.7. This proposed spatial strategy is generally consistent with that previously proposed within the draft Shropshire Local Plan. The key distinctions are:
- a. The proposed uplift of 500 dwellings to the proposed housing requirement from 30,800 dwellings to 31,300 dwellings over the proposed plan period from 2016 to 2038.
 - b. The associated proposed uplift to the settlement housing guidelines and associated windfall allowances in Shrewsbury (from 8,625 dwellings to 8,975 dwellings); Whitchurch (from 1,600 dwellings to 1,675 dwellings); and the Former Ironbridge Power Station (from 1,000 dwellings to 1,075 dwellings) over the proposed plan period from 2016 to 2038.
 - c. The proposed uplift of 20ha to the proposed employment land requirement from 300ha to 320ha over the proposed plan period from 2016 to 2038.
 - d. Reference is included to the proposed housing (1,500 dwellings) and employment land (30ha) contributions to the unmet housing and employment land needs forecast to arise within the Black Country (already referenced within the explanation to the policy) in order to provide greater clarity.
 - e. The associated identification of specific sites to accommodate the proposed contributions to the unmet needs of the Black Country. These are BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings; SHF018b & SHF018d - Land east of Shifnal Industrial Estate, Upton Lane, Shifnal: 30ha of employment land; SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings; and IRN001 - Former Ironbridge Power Station: 600 dwellings.
- 21.8. As such, Shropshire Council considers that:
- a. The proposed spatial strategy is consistent and complementary to the draft policies within the submitted draft Local Plan.
 - b. The policies within the draft Local Plan will contribute to the achievement of the proposed spatial strategy.

- c. The proposed spatial strategy establishes an appropriate framework for the achievement of the vision and spatial objectives for Shropshire within the draft Shropshire Local Plan.

Summary:

21.9. Table 21.1 provides a summary of the level and distribution of development across Shropshire:

Table 21.1: Distribution of Development Resulting from the Proposed Spatial Strategy

| Settlement Category | Residential Development Guidelines | Employment Land Allowances* |
|---|---|--|
| Strategic Centre: | 8,975 dwellings (around 29.0% of the proposed Housing Requirement) | 100ha (around 33.0% of the proposed Employment Land Requirement) |
| Principal Centres: | 7,575 dwellings (around 24% of the proposed Housing Requirement) | 172ha (around 46.0% of the proposed Employment Land Requirement) |
| Key Centres: | 5,150 dwellings (around 16.5% of the proposed Housing Requirement) | 91ha (around 24.0% of the proposed Employment Land Requirement) |
| Strategic Settlements: | 1,425 dwellings (around 4.5% of the proposed Housing Requirement) | 12ha (around 3.0% of the proposed Employment Land Requirement) |
| Community Hubs** | 4,988 dwellings (around 16.0% of the proposed Housing Requirement) | 0ha (no specific allowance) |
| Community Clusters & Wider Rural Area** | No specific guidelines (around 10.0% of the proposed Housing Requirement) | 0ha (no specific allowance) |

Please Note: Percentages are approximate and rounded.

**The approach to settlement employment land allowances varies dependent on the role and function of a settlement in Shropshire, the nature of existing employment opportunities, and the nature of the employment land supply in a settlement. Specifically:*

-Larger settlements which perform a strategic role in Shropshire include an indication of land made available for employment uses, rather than specific development guidelines as exist in smaller settlements which perform a less strategic role.

-Settlements with large employers with potential growth aspirations include allocations solely for their future expansion. Such land will be retained for this purpose and as such is not available for other employment opportunities.

-Employment land allowances in some instances include land to offset anticipated future losses, meaning net employment land provision is lower than the specified allowance.

***No specific employment land allowances are made in Community Hubs, Community Clusters or the wider rural area. However, the draft Shropshire Local Plan provides flexibility for appropriate employment provision to meet local needs.*