

Part B: Your Response

Please complete a separate **Part B form** for each response that you wish to make. One **Part A form** must be enclosed with your **Part B form(s)**.

To assist in making a response, separate **Guidance** is available on the Council's website.

Responses should be returned by **5:00pm on Tuesday 11th June 2024**.

Name and Organisation:	CPRE Shropshire (ref: A0410)
------------------------	------------------------------

Q1. To which document(s) does this response relate?

a. Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.	<input checked="" type="checkbox"/>
b. Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.	<input checked="" type="checkbox"/>
c. Updated Housing and Employment Topic Paper.	<input checked="" type="checkbox"/>
d. Updated Green Belt Topic Paper.	<input checked="" type="checkbox"/>

Q2. To which paragraph(s) of the document(s) does this response relate?

Paragraph(s):

Q3. Do you consider the document(s) are:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:

Q4. Please detail your comments on the specified document(s).

Please be as precise as possible.

(Please continue on a separate sheet if necessary)

Please succinctly provide all necessary evidence and information to support your response. After this stage, further submissions may only be made if invited by the Planning Inspectors, based on the matters and issues identified for examination.

Q5. Do you consider it necessary to participate in relevant examination hearing session(s)?

Please note: This response provides an initial indication of your wish to participate in relevant hearing session(s). You may be asked to confirm your request to participate.

- No, I do not wish to/consider it necessary to participate in hearing session(s)
- Yes, I consider it is necessary/wish to participate in hearing session(s)

The Inspectors will determine the most appropriate procedure to consider comments made during this consultation.



The countryside charity
Shropshire

Examination of Shropshire Local Plan 2016-2038

**Further Consultation Focusing on Additional Material
Prepared in Response to the Planning Inspectors'
Interim Findings**

CPRE Shropshire Submission

Representor unique Part A Ref: A0410

11 June 2024

Contents

	Page
1. Introduction	3
2. GC44: Additional Sustainability Appraisal Report	5
<i>Scoring of options - housing</i>	6
<i>Scoring of options – employment land</i>	9
<i>Conclusions on scoring of options</i>	10
<i>The 5%, 10% and 15% uplifts</i>	10
<i>Accommodating the uplift</i>	15
<i>Identification of sites to accommodate unmet need in the Black Country</i>	15
<i>Overall conclusions on GC44</i>	15
3. GC45: Updated Housing and Employment Topic Paper	17
<i>Black Country unmet need</i>	17
<i>Windfalls</i>	19
<i>Overall conclusions on GC45</i>	21
4. GC46: Updated Green Belt Topic Paper	23
5. GC25: Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation	24
Appendix 1a: Table 8.7 revised – Comparison of Housing Requirement Options.....	25
Appendix 1b: Table 9.7 revised – Comparison of Employment Land Requirement Options	26
Appendix 2: Comparison of Housing Need / Requirement : April 2024 Additional Reports and Regulation 19 Submission	27
Appendix 3: Figure 9.1 corrected and amended - Contemporary Employment Land Options 2016 - 2038.....	28
Appendix 4a: GC44 April 2024 Housing and Employment Topic Paper: summary of guidelines and allocations	29
Appendix 4b: GC44 April 2024 Housing and Employment Topic Paper: guidelines and allocations for Community Hubs.....	30
Appendix 5: Report to CPRE Shropshire on Telford Plan Housing and Employment Need and Supply, January 2024.....	31

1. Introduction

- 1.1 We welcome the opportunity to comment on the current consultation documents, including a third version of the Sustainability Appraisal. The four documents consultees are asked to comment on are:
- a) GC44: Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report
 - b) GC45: Updated Housing and Employment Topic Paper
 - c) GC46: Updated Green Belt Topic Paper
 - d) GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation
- 1.2 We are submitting a parallel Part A Consultation Response Form with this submission, giving the standard details requested. We are also submitting a part B Consultation Response Form, but are also including it in summary form at the front of each relevant section of this consultation response.
- 1.3 As this is the first opportunity we have had to submit material to the Draft Plan/Examination process since the submission of our hearing statement(s) on 31 May 2022 we take the opportunity to comment on some other matters that have arisen since then.
- 1.4 Throughout the consultation process we have consistently put forward detailed arguments in support of our position, which can be summarised as that the plan:
- i) has a flawed consultation process, which is undemocratic;
 - ii) seeks growth well in excess of demographic need, which is not truly sustainable, because it is at odds with both the climate emergency and the ecological emergency;
 - iii) has targets for both housing and employment land that are unreasonably high, based on figures that are questionable; and
 - iv) won't get the right sort of houses, particularly affordable houses, built in the right places.
- 1.5 Shropshire Council has had well over a year in which to produce documentation to satisfy the Inspectors' concerns. A second version of the Sustainability Appraisal was produced in July

2023 but the Inspectors and other commentators considered that it did not properly address matters raised in ID28 dated 15 February 2023.

- 1.6 In contrast to the time Shropshire Council has had to assemble its mountain of repetitive documentation, respondents to this consultation have had just six weeks to analyse it. With our limited resources, we have had to focus on particular aspects only of that material.
- 1.7 Shropshire Council did hold two identical online sessions on 22 May 2024 in which they helpfully summarised the extensive documentation, primarily for Town and Parish Council representatives. However, it was notable that that was half way through the 6-week consultation period rather than at the beginning of it. It also did not cover all the documents subject to the consultation.

Next steps

- 1.8 The last slide from the above-mentioned online sessions outlined the following seemingly optimistic timetable for the future of the Examination Process:

Late June 2024	Responses to this consultation analysed and submitted
Early summer 2024	Inspectors prepare MIQs
Oct/Nov 2024	Stage 1 mop-up and Stage 2 hearings
Autumn 2024	Consultation on Main Modifications
Winter 2024	Inspectors' report
Spring 2025	Adoption

- 1.9 We assume that a revised Local Development Scheme will be published showing this timetable.
- 1.10 We trust that, as well as analysing the responses to this consultation and then publishing a consultation response summary, Shropshire Council will also, before that, publish all responses on its website immediately after the close of the consultation.

2. GC44: Additional Sustainability Appraisal Report

Part B Response
Q1: This response relates to: GC44: Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report
Q2: It relates to the paragraphs as specified below
Q3: We consider the document to be A: legally compliant, but B: not sound
Q4: Our comments on the document are as below
Q5: We wish to participate in any related hearing sessions

- 2.1 We consider that Document GC44: Additional Sustainability Appraisal Report is not sound for the reasons as set out below in this section 2 of our submission.
- 2.2 GC44 carries the same weaknesses as the previous two versions of the Sustainability Appraisal that have been submitted to the examination process¹. Some of those weaknesses listed in our Regulation 19 submission² are:
- i) The scoring system used in the stage 2a Excel spreadsheets should use absolute scores, not scores that are relative only to other sites in that particular settlement.
 - ii) In order to assess the CO₂ emissions saving potential of a site, it seems insufficient only to consider the items within Criteria 4/5 and 6. Other factors could have included the propensity of the site for solar gain (e.g. north facing or south facing), or the distance from a supermarket.
 - iii) The whole methodology as summarised in Diagram 1.1 at page 5 of the original SA is undermined when it is possible to override a highly negative sustainability score, as is the case with the Ironbridge site, by proposing mitigation measures. The implication is that the site has been allocated for other reasons than sustainability, and in spite of the sustainability appraisal process.
- 2.3 Even though GC44 supersedes GC29 (and SD006.01), these weaknesses remain.
- 2.4 The current GC44 being consulted on, in apparent accordance with the Inspectors' guidance³, essentially initially assesses the sustainability of scenarios that are 5%, 10% and 15% above

¹ These two previous versions are Core Document SD006.01 and its appendices, dated December 2020, and Examination Stage document GC29, dated July 2023

² At paragraph 3.1 on page 10

³ At paragraph 5.7 of Examination Stage document ID37

the Baseline⁴, having first concluded, unsurprisingly, that accepting some of the unmet need from the Black Country is itself a sustainable option. We comment further on this methodology below in the section headed “The 5%, 10% and 15% uplifts”.

2.5 The conclusions reached as to sustainability are essentially subjective, at the level of “*it is considered that*”, a phrase that appears in the document no less than 395 times⁵, rather than being driven objectively by evidence (for instance, the phrase “*planning balance*” appears only four times, all within Appendix 9, the Updated Stage 3 Site Assessment: Shrewsbury Strategic Centre).

Scoring of options - housing

2.6 Although the tables showing relative scores for the sixteen numbered sustainability objectives⁶ purport to inject a measure of objectivity into the process, ultimately the conclusions on them remain subjective.

2.7 Furthermore, the two scoring systems adopted are not fully explained and are themselves somewhat simplistic.

2.8 The document does say that it is not appropriate to total-up the scores⁷. If that is the case, there seems little point in adopting any scoring system, if the potential objectivity of a scoring system is to be over-ridden by subjectivity.

2.9 The reasons given for not carrying out any totalling-up appear to be three-fold⁸:

- i) because performance against each of the SA objectives requires consideration in and of itself;
- ii) because the SA objectives cannot be directly compared because they address different objectives; and

⁴ Deemed to be equivalent to the original ‘moderate’, ‘significant’ and ‘high’ growth options offered at the Issues and Strategic Options stage in early 2017

⁵ Including “*it is also considered that*” and “*it is therefore considered that*”

⁶ Tables 6.1 to 6.3, 7.1 to 7.3, 8.1 to 8.7, 9.1 to 9.7, 10.1 to 10.5, 11.1 to 11.5, 13.1 to 13.4, and 14.1 to 14.4

⁷ Paragraphs 6.26, 7.25, 8.71 and 13.43

⁸ Identical wording and reasoning is set out in each of the above four paragraphs

- iii) because balance should be achieved across the three pillars of economic, social and environmental aims, and that balance would be tipped towards environmental factors because there are more of them in the list of SA objectives.

2.10 That last reason surely goes to the heart of what the SA is all about. There are more environmental factors in the list of the sixteen SA objectives precisely because those are what are most important for sustainability, in a world faced with both a climate emergency and a biodiversity emergency.

2.11 What Shropshire Council has done instead in its Additional Sustainability Appraisal Report is to give undue weight to the economic factors (and social factors) and diminished weight to the environmental factors in this time of dual crises, when it is environmental factors that should be paramount.

2.12 This is demonstrated clearly in Appendices 1a and 1b, in which we have re-grouped the sixteen SA objectives into the three pillars of economic, social and environmental aims.

2.13 Appendix 1a for housing demonstrates, within the confines of Shropshire Council's own simplistic scoring mechanism that, based on Environmental factors, Option 1a is quite clearly the most sustainable option, and Option 3b, the one SC has favoured, is quite clearly the least sustainable.

2.14 Appendix 1a is also a reminder of some weaknesses and inconsistencies in the "illustrative" scoring in Table 8.7:

- i) No scoring has been attempted for environmental SA objectives 8, 9, and 11 and only partial scoring for SA objective 12, reduction of CO₂ emissions. In a climate emergency the last of these seems a dereliction of duty.
- ii) SA objectives 5 and 6 (encouraging sustainable transport, and reducing car dependency) are in some respects, two sides of the same coin, namely the move towards less carbon dependent transport. It seems inconsistent therefore that the preferred option 3b can be scored 1 (the best) for one of those objectives and 6 (the worst) for the other.
- iii) The relative value of SA objectives 5 and 6 are also not considered. They, like for the other SA objectives, are simply subjectively scored 1 to 6. The encouragement of

sustainable transport is an aspiration based on the provision of as yet unidentified schemes, with unknown actual patronage. On the other hand, an increase in car dependency in the high growth scenarios is almost self-evident, as people in less well supported locations seek to access the Black Country and other centres. This would certainly outweigh the gains from any sustainable transport opportunities. It is, therefore, hard to conclude that the identification of Option 3b as the most likely to reduce carbon emissions is credible given that the chief way development patterns can influence greenhouse gas emissions is through their transport implications.

- 2.15 As already noted, Shropshire Council, in striking a “planning balance” in favour of Option 3b, has given greater, and undue, weight to Economic and Social factors over and above Environmental factors, even though it has listed far more Environmental factors in its list of 16 SA objectives.
- 2.16 Shropshire Council has concluded, subjectively, that Option 3b is the most sustainable and appropriate option, even though the evidence they themselves have produced points against that.
- 2.17 It is difficult for us to avoid the conclusion that “high growth” (and therefore Option 3b) was what Shropshire Council wanted all along, and that the Sustainability Appraisals have been engineered to appear to support that desire, in spite of evidence to the contrary.
- 2.18 We remind the Inspectors that at the Issues and Strategic Options stage, when the ‘moderate’, ‘significant’ and ‘high’ growth options were first proposed, 88% of Members of the Public and 74% of Town and Parish Councils preferred a low growth option⁹. Shropshire Council, of course, regardless of this, pursued its desired high growth option.
- 2.19 An inescapable conclusion from this is that ordinary people grasped what Shropshire Council has not accepted, that the lower growth options are, of course, more sustainable than the higher growth options. Hopefully, the Planning Inspectorate will recognise the paramount importance of giving due weight to the options that will help to minimise the adverse effects of climate change.

⁹ See paragraph 2.5 and Appendix 2 of our Regulation 19 submission

Scoring of options – employment land

- 2.20 Appendix 1b sets out a similar regrouping exercise for employment land. Here, we have highlighted in yellow where scores differ from those given for housing on Appendix 1a/Table 8.7.
- 2.21 Most scores are identical to those given for housing, but some of the differences bring out further inconsistencies in approach.
- 2.22 The chief of these inconsistencies is that for employment land, scores have now been given for SA Environmental objectives 8, 9, 11 and 12. If that is possible in the case of employment land why was it not possible in the case of housing?
- 2.23 For instance, for SA objective 8 (protect and improve soil quality), the earlier tables acknowledge that some options *“could negatively impact the soil resources and best and most versatile agricultural land”*¹⁰ and an *“illustrative”* relative score has been attached to each option for this in Table 9.7. The scores given in the earlier tables for these options were the somewhat enigmatic *“-/?”*.
- 2.24 In contrast, for housing, despite stating eight separate times for SA objective 8 that *“a focus on the rural area is likely to affect best and most versatile agricultural land more than development in the urban areas”*¹¹, no *“illustrative”* relative score has been attached to any option for this in Table 8.7. The scores given in the earlier tables for these options were the seemingly meaningless *“?”*.
- 2.25 There will be a greater land take for housing than for employment land, most of it of greenfield land, so it is anomalous, to say the least, that no allowance was taken of this loss of this potentially BMV land in the *“illustrative”* scoring in SA Table 8.7 for housing.
- 2.26 Another anomaly in the scoring in Table 9.7 compared with Table 8.7 is for SA objectives 7 and 13, where identical scores have been offered for several options, rather than the 1 to 6 scoring offered for all scored objectives for housing.

¹⁰ Table 9.4, page 135, Table 9.6, page 148

¹¹ Pages 17, 25, 63, 70, 77,84, 89 and 95

2.27 In the case of Appendix 1b/Table 9.7 it is even more apparent than for housing that Option 3b, the one that Shropshire Council prefers, is far and away the worst option on the Environmental indicators.

2.28 Yet Shropshire Council has again chosen to believe that the Economic and Social indicators outweigh this huge Environmental adverse impact.

2.29 The overall total “indicative” scores shown on Appendix 1b clearly show that Option 1b is vastly more sustainable than Option 3b in the case of employment land. It is true that Appendix 1a, based on Table 8.7, does show overall totals that indicate little difference between the six options for housing, but if SA objectives 8, 9, 11 and 12 had been scored as they were in Table 9.7, the inevitable conclusion is that they also would have shown that Option 1b is also vastly more sustainable than Option 3b in the case of housing too.

Conclusions on scoring of options

2.30 The conclusions from the above are that:

- i) the scoring system is over-simplistic and internally inconsistent;
- ii) the evidence above indicates that Shropshire Council has drawn the wrong conclusions from the SA; the most sustainable options are those closest to the Baseline as set by the Government’s standard method formula.
- iii) Shropshire Council’s approach appears to be a further long-winded attempt at justifying the approach taken by them all along.

The 5%, 10% and 15% uplifts

2.31 The Inspectors’ guidance in paragraph 5.7 of ID37 was:

What the SA should do is test options based on the 2020 baseline with 2 extra years, but only look at the growth options tested in the original SA, so a 5, 10 and 15% uplift and look at this with the Black Country unmet needs of 1,500 homes and without it.

2.32 Shropshire Council has taken this at face value and literally tested 5%, 10% and 15% uplifts to the Baseline. That Baseline is defined as “*the local housing need for Shropshire of 25,894 dwellings over the 22-year plan period from 2016-2038 (equating to an annual average of*

1,177 dwellings), as calculated using Government's Standard Methodology with a 2020 base date".¹²

2.33 However, the Inspectors' guidance was ambiguously stated. On the one hand it said "*only look at the growth options tested in the original SA*", but on the other hand it equated this with "*a 5, 10 and 15% uplift*". The growth options tested in the original SA were NOT actually 5%, 10% and 15% uplifts to the Baseline.

2.34 In document GC29, the second version of the SA produced in July 2023 in response to ID28, Shropshire Council tested five options, which the Inspectors stated in ID37 was too complicated. These five options all proposed a certain percentage uplift over the Baseline figure of 25,894 houses, plus the 1,500 unmet need from the Black Country. The percentage uplifts proposed for the five options, and the resulting total housing requirement were:

- i) **Option 1: Moderate Growth:** around a 5% uplift; total 28,700
- ii) **Option 2: Significant Growth:** around a 10% uplift ; total 30,000
- iii) **Option 3: High Growth (Variation 1):** around a 13% uplift; total 30,800
- iv) **Option 4: High Growth (Variation 2):** around a 15% uplift; total 31,300
- v) **Option 5: High Growth (Variation 3):** around a 19% uplift; total 32,300 total

2.35 On that basis, the Inspectors could have said not "*so a 5, 10 and 15% uplift*" but instead "*so around a 5% uplift, around a 10% uplift, and around a 13% uplift*".

2.36 A small difference in the percentage uplift makes a critical difference to the outcome.

2.37 In Appendix 2 we show the difference by way of bar charts. These also continue to show the "elements" making up the Baseline, as explained in our Regulation 19 submission¹³. This is by way of a reminder of the contentious anomalies inherent within the Government's Standard Methodology. Perversely, in the case of Shropshire Council, the SM requires 25,894 houses for a population projected to increase by only 28,380 in the plan period i.e. the equivalent of

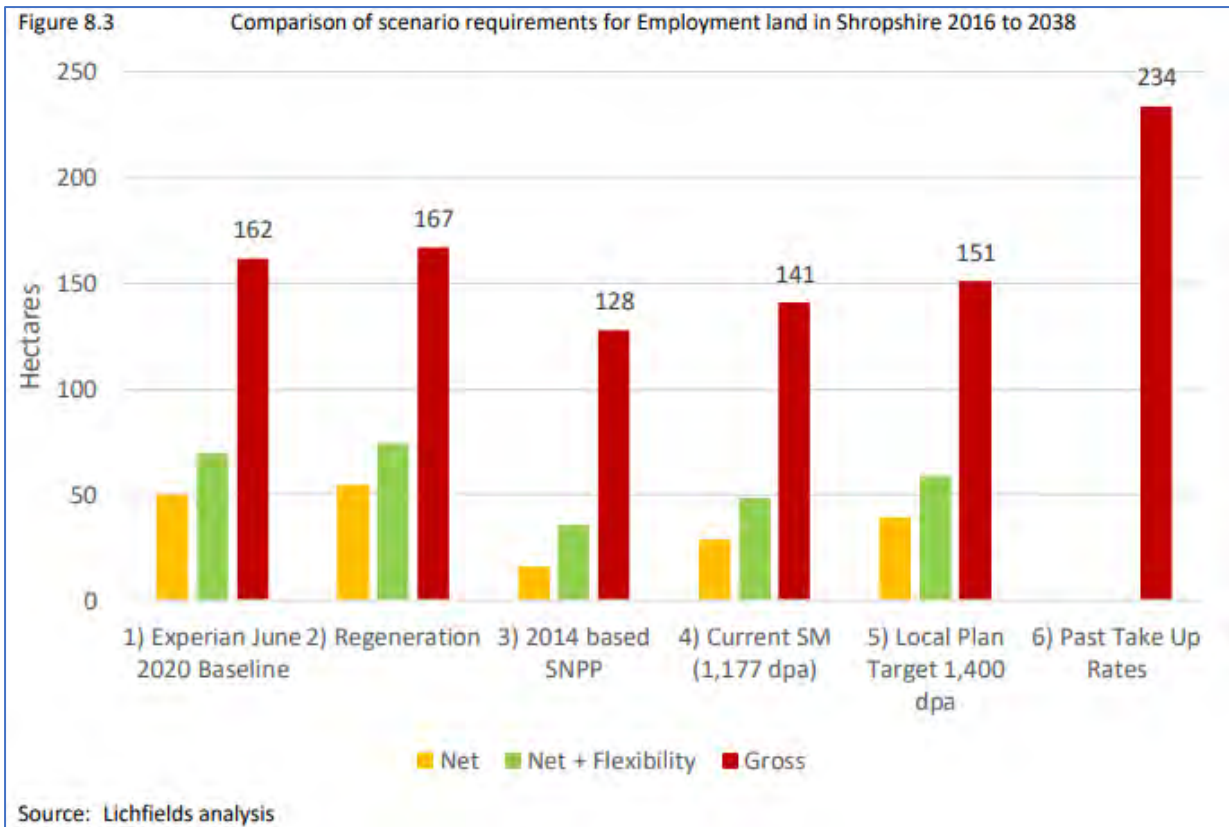
¹² Additional SA paragraph 8.2

¹³ Paragraphs 5.20 to 5.25

1.1 people per house, rather than the expected norm of double that at around 2.2 people per house.

- 2.38 Appendix 2 brings out the difference between the two approaches. On the left is what Shropshire Council has now done in GC44. The red “further aspiration” blocks of 1,306 for Option 1b, 2,606 for Option 2b and 3,906 for Option 3b do indeed represent uplifts over Baseline of 5%, 10% and 15% (allowing for a small element of rounding), to give the overall requirements of 28,700, 30,000 and 31,300 respectively.
- 2.39 On the right is the position at Regulation 19 stage, which relied on the original SA, set out on the same basis. Here, the red “further aspiration” blocks of 706 for “Moderate”, 2,106 for “Significant” and 3,406 for “High” in fact represent uplifts over Baseline of only 2.7%, 8.1% and 13.1% respectively. Including the BC contribution they represent uplifts of 4.2%, 9.2% and 14.1% respectively over the original Baseline figure of 25,178 at that time (when the plan period was for 20 years).
- 2.40 Shropshire Council’s approach complies with the Inspectors’ guidance as to the 5%, 10% and 15% uplifts on Baseline, but that does not quite comply with the guidance to “*only look at the growth options tested in the original SA*”, because of these different percentages as demonstrated above.
- 2.41 It can be argued that, in carrying out the extensive exercise recorded in pages 12 to 160 of the Additional SA, Shropshire Council has, in effect, carried out the “*only look at the growth options tested in the original SA*” part of the Inspector’s guidance”. It seems unlikely that, had the options tested been “Moderate”, “Significant” and “High”, as the first part of the Inspectors’ guidance implies, the conclusions as to their sustainability would have been any different to what was tested, i.e. Options 1, 2 and 3.
- 2.42 The rider that “*so a 5, 10 and 15% uplift*” has confused the position because, as demonstrated, that is not what was done in the original SA.
- 2.43 That being the case, it is only the belief that the Inspectors’ guidance required that “*a 5, 10 and 15% uplift*” be assessed, coupled with the subjective preference for Option 3b, that has resulted in the spurious conclusion that a further 500 houses are required.

- 2.44 If the guidance to “*only look at the growth options tested in the original SA*” had been carried out (which the options tested could be considered to have done anyway), then no extra 500 would have been found to be required.
- 2.45 It is only by deciding to prefer option 3b in the case of housing, with its literally applied 15% uplift, that Shropshire Council has now arrived at a revised housing requirement figure of 31,300, being 500 houses higher than the figure of 30,800 put forward in the submitted Draft Plan.
- 2.46 The position on employment land is more opaque. Figure 9.1 on page 112 of the Additional SA sets out the figures that were tested for sustainability. Page 113 states that “*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*”.
- 2.47 The Shropshire EDNA is Evidence Base document EV043 dated 9 April 2021, which is after the end of the Regulation 19 consultation and is therefore a new evidence base document which has not been consulted on within this Examination process. It does indeed show the figure of 161.91 ha in its Table 8.17 on page 115; that appears to be the only place within the document that it is so stated. That Table 8.17 also shows other figures, the maximum of which is 233.82ha. At paragraph 8.93 it then says, based on this table, that “*the overall range is therefore between 128 ha and 234 ha gross of employment land between 2016 and 2038*”. That statement is repeated in bold in the conclusions in paragraph 10.9. That range is also shown graphically in Figure 8.3 on page 116, as reproduced below:



2.48 It is therefore difficult to see where the figure of 250ha comes from. It certainly does not appear to have been set out anywhere in the EDNA itself.

2.49 Instead, it seems that the maximum Baseline figure that should have been used in Figure 9.1 of the Additional SA was 234ha, not 250ha. Even this figure may be on the high side, because the average of the above figures is only 164ha.

2.50 If the 234ha figure had been used, and if the same 5%, 10% and 15% uplifts had been applied as they were for the housing Baseline figure, then the results would have been as set out in our Appendix 3. The section headed *“Original Fig 9.1 corrected”*, shows the figures used by Shropshire Council, having corrected them for some mathematical errors that had crept into their original table. The section headed *“Fig 9.1 amended”* then shows the figures arising from using that more correct EDNA baseline figure of 234ha.

2.51 As shown, the maximum resulting requirement is only 299ha, even for Option 3b with the BC 30ha. That means that there is in reality no need for any overall uplift to the existing stated requirement for 300ha of employment land.

Accommodating the uplift

- 2.52 As stated above, it appears that the proposed uplift of 500 in the housing requirement has arisen because of ambiguity in the Inspectors' guidance. There is no need for that uplift.
- 2.53 Had there been a need, we would not have objected to its having been accommodated, as proposed, through a more realistic approach to windfalls. However, we do object to the under counting of windfalls which, as we set out below, is likely to have a much more significant impact on Shropshire's housing supply than is being allowed for.
- 2.54 As stated above for employment land, the application of the correct Baseline of 234ha means that there is also no need for any uplift in the figure for employment land either.

Identification of sites to accommodate unmet need in the Black Country

- 2.55 ID28 paragraph 21 (as noted in paragraph 12.11 of the Additional SA) stated that
- "...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".*
- 2.56 However, paragraph 7.7 of ID37 acknowledges that this work had already been done, by stating that:
- "Your clarification on this matter is helpful that all available sites were assessed as part of the additional work and not just those sites that are allocated in the Plan. We do not consider that a new 'call for sites' exercise is warranted in this case."*
- 2.57 Because we have concluded above that there is no need for any uplift to the previously submitted housing and employment land requirements, it appears that section 12 of the Additional SA is not required.

Overall conclusions on GC44

- 2.58 Based on the above evidence, we conclude that:
- i) Shropshire Council has come to the wrong conclusion as to the most sustainable option, both for housing and for employment land;

- ii) There is therefore no need for the proposed uplifts of 500 houses or of 20ha of employment land.

2.59 Some Local Authorities are mandated to calculate whole-life carbon emissions through a nationally recognised methodology and to demonstrate actions taken to reduce emissions¹⁴. Shropshire Council does not do this, nor does it require developers to build to net zero standards. An average new house will increase the effects of climate change to the tune of around 150 tonnes of CO₂e¹⁵; the average emissions per person in Shropshire are around 12.6tonnes CO₂e per year¹⁶.

2.60 That means that every new house built will significantly add to net greenhouse gas emissions, rather than contributing to the drive for net zero emissions.

2.61 Yet despite this fact, and despite having declared a climate emergency, Shropshire Council in GC44 argues, perversely and illogically, that the highest of its potential Options is the most sustainable.

2.62 We trust that the Planning Inspectorate's protocols require due regard to be taken of the need for measures contributing toward net zero emissions, and not to regard as sound plans that will actually significantly increase greenhouse gas emissions.

¹⁴ Paragraph 62 of House of Commons Environmental Audit Committee report "Building to net zero: costing carbon in construction", May 2022 [Building to net zero: costing carbon in construction - Environmental Audit Committee \(parliament.uk\)](#)

¹⁵ Embodied carbon of new build is estimated at 1,200 kgCO₂e/m² (page 4, [08748 NZC Homes Summary Report.indd \(ukgbc.org\)](#)). An average house is assumed to be 125sq m.

¹⁶ Zero Carbon Shropshire Plan, page 16 [The Zero Carbon Shropshire Plan](#)

3. GC45: Updated Housing and Employment Topic Paper

Part B Response
Q1: This response relates to: GC45: Updated Housing and Employment Topic Paper
Q2: It relates to the paragraphs as specified below
Q3: We consider the document to be A: legally compliant, but B: not sound
Q4: Our comments on the document are as below
Q5: We wish to participate in any related hearing sessions

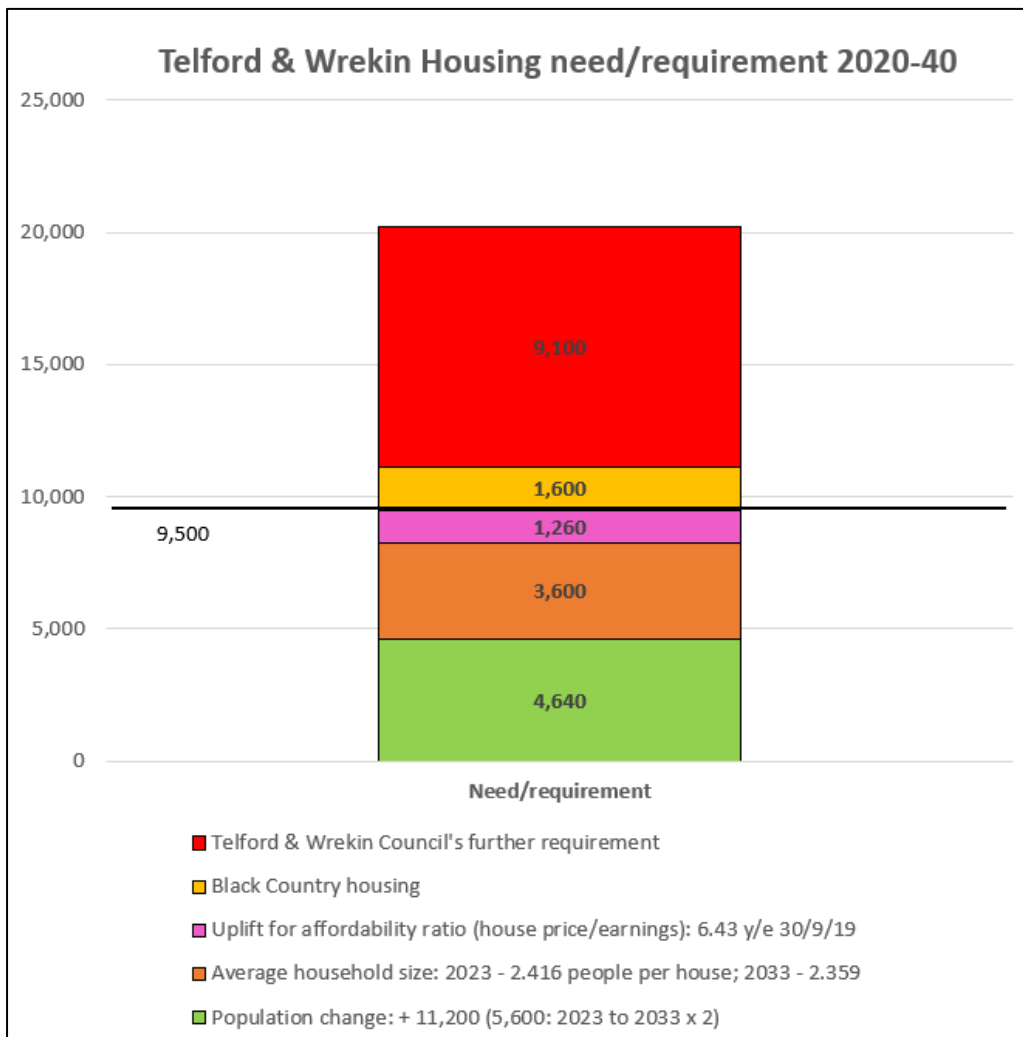
- 3.1 Much of what is set out in GC45: Updated Housing and Employment Topic Paper derives from the questionable work in GC44, the Additional SA Report.
- 3.2 The conclusions we have arrived at above in our section 2 therefore also apply equally to this section 3. In addition we make the following comments.

Black Country unmet need

- 3.3 Subsequently to Shropshire Council agreeing with the Association of Black Country Authorities to take a proportion of its unmet need (1,500 houses and 30ha of employment land) Dudley Council withdrew from ABCA in around November 2022 and work on a joint ABCA Draft Plan therefore ceased. Instead, the individual authorities of Dudley, Sandwell, Walsall and Wolverhampton are now producing individual plans, none of which are yet beyond Regulation 18 consultation or Issues and Options stages and Walsall has not yet published its first consultation draft. Although the ABCA Draft Plan has been abandoned, there is still a Black Country Executive Joint Committee (BCJC) comprising the same four authorities.
- 3.4 The quantum of combined Black Country unmet need is therefore still uncertain. There is evidence from the 2021 Census and from more recent Office for National Statistics (ONS) data which may call it into question as the plans progress. Significant opportunities for additional supply on brownfield/windfall land have also been suggested in responses to the current consultations by CPRE West Midlands.
- 3.5 Indeed, the fundamental approach of a figure to meet Black Country need under the Duty to Cooperate appears to us to be significantly flawed, as the need should now be identified in each of the four boroughs and any assessment of cross-boundary assistance should relate specifically to those authorities.

3.6 Whilst the Shropshire Council area has the closest functional relationship and proximity with Wolverhampton, it is Sandwell, further away and less well linked, that has the greatest unmet need. Moreover, the unmet need in Wolverhampton, in as much as it may exist, is to a significant degree a result of the 35% uplift in housing, which paragraph 62 of the updated NPPF makes clear authorities should seek to accommodate in their own area for obvious sustainability reasons.

3.7 The position of Telford & Wrekin Council should also not be ignored in assessing whether Shropshire Council is taking a sound quantum of Black Country unmet need. Telford & Wrekin Council published its own Draft Plan and held a Regulation 18 consultation on it ending on 31 January 2024. The housing need/requirement is summarised by the chart below, which is produced in the same format as the charts in our Appendix 2.



- 3.8 The requirement is stated as 20,200 houses but the Baseline, i.e. the Government's Standard methodology figure, is for only 9,500 houses. The officially stated contribution to Black Country unmet need is 1,600 houses.
- 3.9 However, when it is considered that there is a stated requirement for 20,200 houses, when the Telford & Wrekin population is projected to increase by only 11,200 in the plan period, it is clear that the stated requirement includes a large number of houses being built in the expectation that they will be lived in by people from outside the Telford & Wrekin area, most likely from the Black Country.
- 3.10 This is underlined by the reliance Telford & Wrekin place on more recent ONS housing projections and the interim 2021 Census results to justify their high level of growth. That same evidence would show lower housing projections for the Black Country. The inconsistency of approach, where local authorities can easily add to the ONS2014 projections but require special justification to go below them, is fundamental to this mismatch, as shown in the report we commissioned to support CPRE Shropshire's objection to the Telford & Wrekin plan. This report is added to this submission as Appendix 5.
- 3.11 What is clear therefore is that a large element of Black Country unmet need is planned to be met within the Telford & Wrekin area, even though the "official" figure is only for 1,600 dwellings. This again casts doubt on the soundness of the quantum of Black Country need in the currently proposed Shropshire Council figures.
- 3.12 This should also have fed back into consideration of the sustainability and infrastructure implications of the high growth approach in Shropshire, because the housing proposed in and around Telford, if it actually accommodates out-migrants from the Black Country, would have compounding effects with the growth in parts of Shropshire, for example on the growth of traffic into the conurbation.

Windfalls

- 3.13 Shropshire Council's currently proposed guidelines and allocations are summarised in Appendices 4a and 4b, based on the tables in GC45. In these appendices, the yellow

highlighting identifies anomalies in the figures¹⁷, or changes from the original guidelines and allocations.

- 3.14 The windfalls shown there in the “Windfall Allowance – revised” column are arrived at arithmetically as the balance remaining from the columns to the left. This clearly demonstrates that, for some settlements (most notably Broseley, Pontesbury, Weston Rhyn, Baschurch, Shawbury and Prees), there is now an overprovision within the figures.
- 3.15 Figure 8.1 of GC45 shows that there have been 4,683 windfall completions in the five year period from 2018/19 to 2022/23. Astonishingly, that would be equivalent to windfalls of 20,605 over a 22-year period.
- 3.16 Even if one considers windfalls from 2023-2038 and discounts three years, for windfalls already in the system, as normal, this would amount to 11,239 dwellings (pro-rata over 12 years), of which there would be 4,006 on small sites based on the 1,669 completions shown in Figure 8.1.
- 3.17 To this would potentially need to be added the windfalls which have been completed between 2018 and 2023 if one was including it in the 2018-2038 supply, which would mean a total of 15,922.
- 3.18 This compares with a total provision of only 2,682 for windfall allowances in the whole of the 22-year plan period (which includes windfalls already completed), as derived from Appendix 5 of the submission version of the Draft Plan.¹⁸ These figures are shown in the “Windfall Allowance – original” column of our Appendix 4a.
- 3.19 In the Housing Topic Paper dated February 2022 (GC4i), the windfall allowances shown totalled even less, at only 1,817.
- 3.20 It is therefore apparent that windfalls within the Draft Plan have been massively under-accounted for. This is true, even if only small windfalls are included, where the most conservative approach to windfalls would add 1,323 from 2023. However, the NPPF does not

¹⁷ There are some errors in the relevant tables in GC45

¹⁸ See Table 4.1 on page 16 of our Regulation 19 submission. Shropshire Council unhelpfully did not total the figures in Appendix 5 of their Regulation 19 Pre-Submission Draft (Core Document SD002)

make a distinction in its definition of windfalls, and the evidence would seem to us to suggest that all windfalls should be considered, which would add between 8,557 and 13,240 dwellings.

- 3.21 The approach taken in GC45 is not to consider completions across the county, but to identify individual settlements and their windfall patterns and then to identify in paragraph 8.91 three settlements which are likely to have additional windfalls. The 500 additional houses identified are then simply divided between those settlements using a methodology which is opaque.
- 3.22 This is clearly a flawed approach. It may well be that the evidence suggests specific locations where windfalls are likely to occur, but by their nature, the location of windfalls is going to vary, with some locations exceeding expectations. Considering that the overall performance across Shropshire is more likely to balance these effects out, we consider that approach is likely in the end to be more robust.
- 3.23 Moreover, the evidence should be considered on its merits and not 'shoehorned' into meeting the figure of 500. If there is good evidence of additional housing from windfalls, that means it is simply not necessary to make as many allocations as are proposed.
- 3.24 This conclusion should loop back to impacts on the sustainability assessment of options for meeting housing need but does not because a more realistic windfall allowance is not factored in.
- 3.25 The position is even more anomalous for employment land. The most anomalous aspect is that the settlement guidelines, totalling 375ha, are significantly more than the currently stated revised requirement of 320ha. That in itself is inconsistent, and therefore unsound.
- 3.26 This is further highlighted, as with the housing figures, by the negative figures in the "Windfall Capacity" column, showing the overprovision for particular settlements.

Overall conclusions on GC45

- 3.27 Based on the above evidence, we conclude that:
- i) Following on from the conclusions on GC44, there is no evidenced need for the extra 500 house requirement, and therefore no need for the addition to the guideline figures

for Shrewsbury (350), Whitchurch (75) and the Ironbridge former Power Station site (75).

- ii) Similarly, there is no evidenced need for the addition of 20ha to the employment land guideline figure.
- iii) There is clearly a severe under allowance for windfalls and therefore a likely overprovision of both housing numbers and employment land.
- iv) Taking into account the clear imperative to keep greenhouse gas emissions to a minimum, and therefore not to aim for unsustainably high levels of development, the housing guideline should be kept at the baseline figure of 25,894 plus any fully evidenced BC contribution; for the same reason, the employment land guideline should be kept at the baseline figure of 234ha, again plus any fully evidenced BC contribution.

4. GC46: Updated Green Belt Topic Paper

Part B Response
Q1: This response relates to: GC46: Updated Green Belt Topic Paper
Q2: It relates to the paragraphs as specified below
Q3: We consider the document to be A: legally compliant, but B: not sound
Q4: Our comments on the document are as below
Q5: We wish to participate in any related hearing sessions

- 4.1 The logical conclusion from our above reasoning on documents GC44 and GC 45 is that there is no further requirement for additional release of Green Belt land. To that extent, GC46 puts forward an unsound position.

5. GC25: Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation

Part B Response
Q1: This response relates to: GC25: Draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation
Q2: It relates to the paragraphs as specified below
Q3: We consider the document to be A: legally compliant, but B: not sound
Q4: Our comments on the document are as below
Q5: We wish to participate in any related hearing sessions

- 5.1 We welcome the main provisions of the proposed draft policy with the following caveats:
- i) Whilst there is no doubt that the elderly and disabled prefer to be cared for in their own homes for as long as possible, even without the demographic effect of increased numbers of older people, there are not currently either the staff or the funding for this to happen on any greater scale than at present.
 - ii) The assumption that more 'sheltered flats' and other such developments is unnecessary is therefore illogical.
 - iii) Additionally, the movement of, particularly, the elderly into purpose built flats and other developments, would free up housing which could be used for families and create a more flexible housing market than simply relying on newbuilds.
- 5.2 The policy should be reconsidered with a view to including provision for purpose built housing for the elderly in new housing developments.

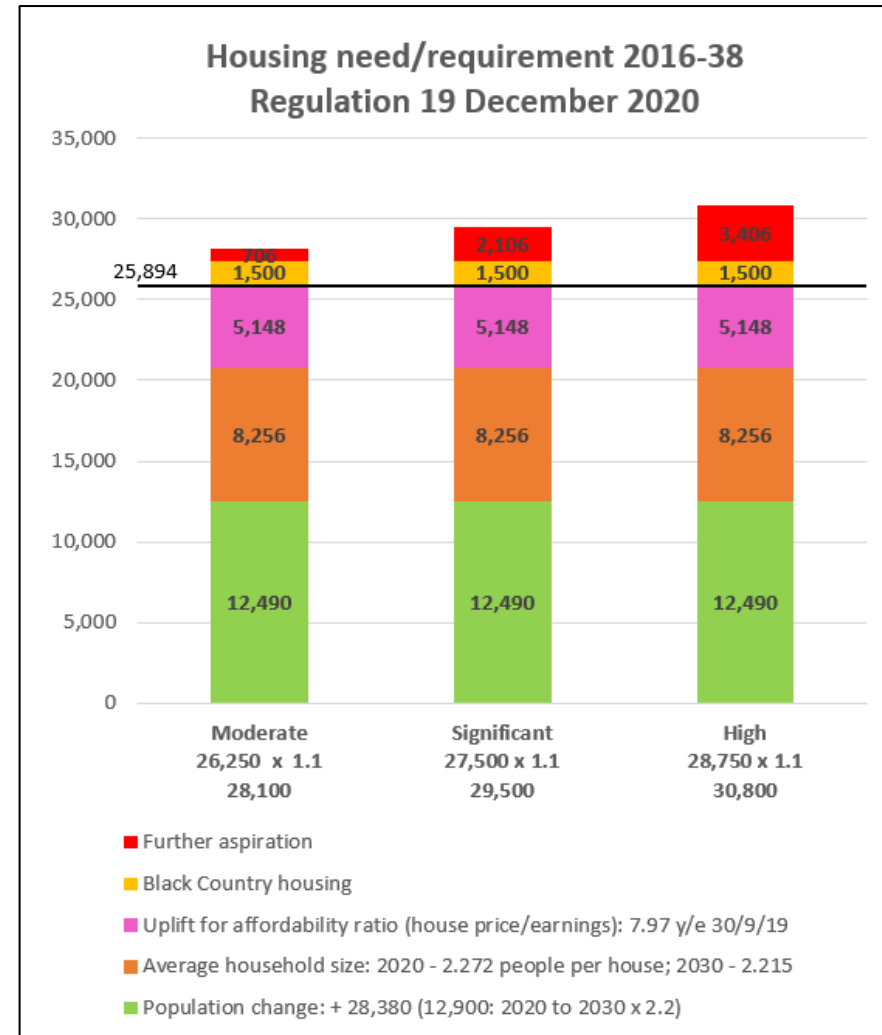
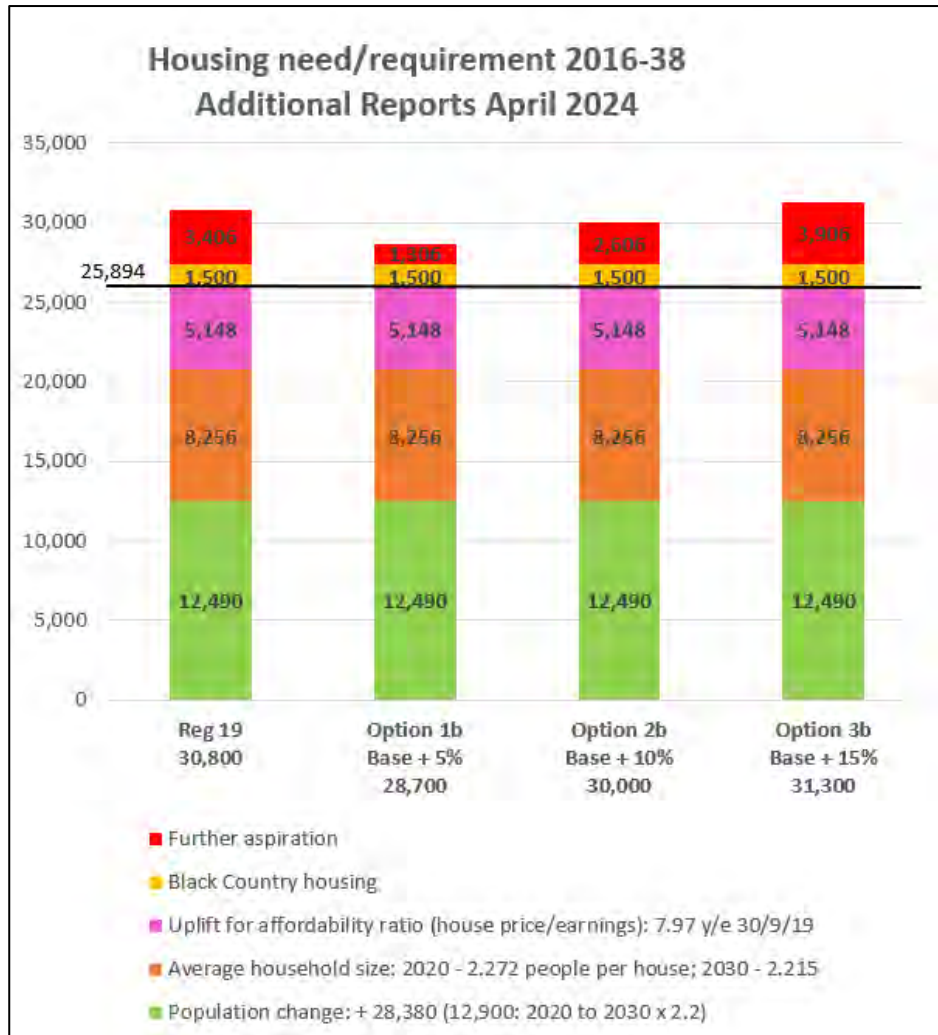
Appendix 1a: Table 8.7 revised – Comparison of Housing Requirement Options

Sustainability Objective	Option 1a: Moderate Growth	Option 1b: Moderate Growth + 1,500 Contribution to the Black Country	Option 2a: Significant Growth	Option 2b: Significant Growth + 1,500 Contribution to the Black Country	Option 3a: High Growth	Option 3b: High Growth + 1,500 Contribution to the Black Country
Economic						
2: Encourage a strong and sustainable economy throughout Shropshire	6	4	5	2	3	1
3: Provide a sufficient amount of good quality housing which meets the needs of all sections of society	6	4	5	2	3	1
Sub-total	12	8	10	4	6	2
Social						
4: Promote access to services for all sections of society	6	4	5	2	3	1
7: Support active and healthy communities.	6	4	5	2	3	1
Sub-total	12	8	10	4	6	2
Environmental						
1: Protect and enhance the range of plants and animals in Shropshire and the quality and extent of wildlife habitats.	1	3	2	5	4	6
5: Encourage the use of sustainable means of transport	6	4	5	2	3	1
6: Reduce the need of people to travel by car	1	3	2	5	4	6
8: Protect and improve soil quality	?	?	?	?	?	?
9: Conserve and enhance water quality in Shropshire and reduce the risk of water pollution	?	?	?	?	?	?
10: Reduce flood risk and improve flood management	1	3	2	5	4	6
11: Conserve and enhance Shropshire's air quality and reduce the risk of air pollution	?	?	?	?	?	?
12: Reduce carbon dioxide emissions	?	?	?	2	3	1
13: Promote adaptation and mitigation to climate change	6	4	5	2	3	1
14: Promote efficient use of natural resources	1	3	2	5	4	6
15: Conserve and enhance features and areas of heritage value and their setting	1	3	2	5	4	6
16: Conserve and enhance landscape character and local distinctiveness	1	3	2	5	4	6
Sub-total	18	26	22	36	33	39
Overall total	42	42	42	44	45	43

Appendix 1b: Table 9.7 revised – Comparison of Employment Land Requirement Options

Sustainability Objective	Option 1a: Productivity Growth	Option 1b: Productivity Growth + 30ha Contribution to the Black Country	Option 2a: Significant Growth	Option 2b: Significant Growth + 30ha Contribution to the Black Country	Option 3a: High Growth	Option 3b: High Growth + 30ha Contribution to the Black Country
Economic						
2: Encourage a strong and sustainable economy throughout Shropshire	6	4	5	2	3	1
3: Provide a sufficient amount of good quality housing which meets the needs of all sections of society	6	4	5	2	3	1
Sub-total	12	8	10	4	6	2
Social						
4: Promote access to services for all sections of society	6	1	5	3	4	2
7: Support active and healthy communities.	2	2	2	2	2	1
Sub-total	8	3	7	5	6	3
Environmental						
1: Protect and enhance the range of plants and animals in Shropshire and the quality and extent of wildlife habitats.	1	2	3	5	4	6
5: Encourage the use of sustainable means of transport	4	3	6	2	5	1
6: Reduce the need of people to travel by car	2	1	3	5	4	6
8: Protect and improve soil quality	1	2	3	5	4	6
9: Conserve and enhance water quality in Shropshire and reduce the risk of water pollution	1	2	3	5	4	6
10: Reduce flood risk and improve flood management	1	2	3	5	4	6
11: Conserve and enhance Shropshire's air quality and reduce the risk of air pollution	1	2	3	5	4	6
12: Reduce carbon dioxide emissions	1	2	3	5	4	6
13: Promote adaptation and mitigation to climate change	3	3	3	2	3	1
14: Promote efficient use of natural resources	1	2	3	5	4	6
15: Conserve and enhance features and areas of heritage value and their setting	1	2	3	5	4	6
16: Conserve and enhance landscape character and local distinctiveness	1	2	3	5	4	6
Sub-total	18	25	39	54	48	62
Overall total	38	36	56	63	60	67

Appendix 2: Comparison of Housing Need / Requirement : April 2024 Additional Reports and Regulation 19 Submission



Appendix 3: Figure 9.1 corrected and amended - Contemporary Employment Land Options 2016 - 2038

Option Ref:	Description of Option	Original Fig 9.1 corrected					Fig 9.1 amended				
		Uplift	Employment Land Options 2038		Options with Black Country 30ha Contribution		Uplift	Employment Land Options 2038		Options with Black Country 30ha Contribution	
			%	ha	ha/yr	ha		ha/yr	%	ha	ha/yr
	Baseline		250	11.4				234	10.6		
1a	Shropshire Productivity Growth	<i>0</i>	250	11.4			<i>5</i>	246	11.2		
2a	Shropshire Significant Growth	<i>10</i>	275	12.5			<i>10</i>	257	11.7		
1b	Shropshire Productivity Growth with Black Country Contribution	<i>0</i>			280	12.7	<i>0</i>			276	12.5
3a	Shropshire High Growth	<i>15</i>	290	13.2			<i>15</i>	269	12.2		
2b	Shropshire Significant Growth with Black Country Contribution	<i>10</i>			305	13.9	<i>10</i>			287	13.0
3b	Shropshire High Growth with Black Country Contribution	<i>15</i>			320	14.5	<i>15</i>			299	13.6

Appendix 4a: GC44 April 2024 Housing and Employment Topic Paper: summary of guidelines and allocations

Settlement	Place Plan Area	Housing										Employment land		
		GC44 Tables 10.1 & 10.2										GC44 Table 15.2		
		Estimated dwellings from Hierarchy of Settlements	% Increase in houses	Residential Development Guideline	Completions	With planning permission	Existing commitments and allocations	Local plan allocations	Windfall Allowance - revised	Windfall Allowance - original	Employment Land Guideline	Urban Land Supply	Windfall Capability	
Shrewsbury		33,597	27%	8,975	3,891	1,938	467	2,410	269	505	100	105.0	-5.0	
Principal centres		30,387	25%	7,575	1,583	2,074	1,518	2,185	215	635	172	155.0	17.0	
Key centres		20,658	25%	5,150	2,256	699	843	840	512	882	91	84.5	6.5	
Strategic sites		107		1,425	-	1,075	-	350	-	-	12	12.0	0.0	
Community Hubs		19,217	26%	4,988	1,962	805	383	1,483	355	660	-	-	0.0	
Totals		103,966	27%	28,113	9,692	6,591	3,211	7,268	1,351	2,682	375	356.5	18.5	
Therefore unidentified / balance				3,187							-55			
Total guidelines in Draft Local Plan policy SP2				31,300							320			
Total dwellings (2014-based projections for 2016)		135,511												
Total households (2021 Census)		139,579												
Shrewsbury	Shrewsbury	33,597	27%	8,975	3,891	1,938	467	2,410	269	505	100	105.0	-5.0	
Oswestry	Oswestry	8,797	22%	1,900	437	818	343	240	62	105	57	47.0	10.0	
Bridgnorth	Bridgnorth	6,189	29%	1,800	132	61	550	1,050	7	160	49	39.0	10.0	
Market Drayton	Market Drayton	5,449	22%	1,200	307	334	64	435	60	206	35	31.0	4.0	
Ludlow	Ludlow	5,404	19%	1,000	339	585	0	10	66	82	11	12.0	-1.0	
Whitchurch	Whitchurch	4,548	37%	1,675	368	276	561	450	20	82	20	26.0	-6.0	
Shifnal	Shifnal	3,215	47%	1,500	1,186	16	0	230	68	92	41	41.0	0.0	
Wem	Wem	2,879	21%	600	188	108	0	210	94	89	6	9.0	-3.0	
Broseley	Broseley	2,416	10%	250	174	73	20	0	-17	50	3	2.0	1.0	
Albrighton	Albrighton	2,205	23%	500	140	76	83	180	21	48	5	-	5.0	
Church Stretton	Church Stretton	1,987	10%	200	39	77	0	0	84	121	2	1.5	0.5	
Ellesmere	Ellesmere	1,930	41%	800	188	232	250	0	130	170	9	9.5	-0.5	
Highley	Highley	1,462	17%	250	131	10	0	100	9	31	3	1.0	2.0	
Cleobury Mortimer	Cleobury Mortimer	1,306	15%	200	56	24	125	0	-5	120	2	1.0	1.0	
Craven Arms	Craven Arms	1,210	41%	500	61	28	325	0	86	94	15	15.0	0.0	
Much Wenlock	Much Wenlock	1,118	18%	200	43	30	0	120	7	27	2	1.5	0.5	
Bishop's Castle	Bishops Castle	930	16%	150	50	25	40	0	35	40	3	3.0	0.0	
Tem Hill - Clive Barracks	Market Drayton	107		350				350	0		6	6.0	0.0	
Ironbridge Former Power Station	Much Wenlock			1,075		1,075		0	0		6	6.0	0.0	

Appendix 4b: GC44 April 2024 Housing and Employment Topic Paper: guidelines and allocations for Community Hubs

Settlement	Place Plan Area	Housing									
		GC44 Tables 10.1 & 10.2									
		Estimated dwellings from Hierarchy of Settlements	% increase in houses	Resid rep/ Dev in Corporate Guideline	Completions	With Planning Permission	Existing commitments and allocations	Local plan allocations	Winds if Allowance - revised	Winds if Allowance - original	
Cosford/Donington	Albrighton	423									
Bucknell	Bishops Castle	368	30%	110	6	7	70	20	7	8	
Chirbury	Bishops Castle	92	49%	45	0	0	40	14	-9	1	
Clun	Bishops Castle	393	24%	95	5	2	60	20	8	8	
Worthen and Brockton (joint)	Bishops Castle	148	37%	55	3	4	0	45	3	4	
Alveley	Bridgnorth	718	18%	130	40	7	0	70	13	22	
Ditton Priors	Bridgnorth	342	19%	65	24	2	0	40	-1	0	
Dudleston Heath	Ellesmere	205	29%	60	13	20	0	0	27	19	
Burford	Ludlow	517	37%	190	35	3	0	140	12	46	
Clee Hill	Ludlow	403	19%	75	52	3	0	20	0	3	
Hinstock	Market Drayton	314	49%	155	105	2	0	35	13	15	
Hodnet	Market Drayton	274	38%	105	5	62	0	40	-2	11	
Woore/Irelands Cross	Market Drayton	342	26%	88	39	23	0	0	26	38	
Minsterley	Minsterley &	670	23%	155	96	28	14	20	-3	5	
Pontesbury	Minsterley &	850	21%	175	127	70	0	2	-24	2	
Cressage	Much Wenlock	335	24%	80	8	1	0	62	9	8	
Gobowen	Oswestry	1,361	26%	360	114	115	90	25	16	16	
Kinnerley	Oswestry	146	41%	60	21	18	0	0	21	21	
Knockin	Oswestry	77	71%	55	22	3	0	25	5	5	
Llanymynech	Oswestry	228	55%	125	41	0	32	50	2	0	
Pant	Oswestry	533	9%	50	14	3	0	25	8	12	
Ruyton XI Towns	Oswestry	385	32%	125	19	7	0	65	34	34	
St Martins	Oswestry	971	37%	355	161	102	0	60	32	36	
Trefonen	Oswestry	324	11%	35	6	0	0	0	29	50	
West Felton	Oswestry	300	43%	130	65	-22	0	60	27	6	
Weston Rhyn	Oswestry	779	20%	155	28	45	0	100	-18	0	
Whittington	Oswestry	649	31%	200	92	35	0	70	3	15	
Baschurch	Shrewsbury	686	52%	360	212	120	0	55	-27	40	
Bayston Hill	Shrewsbury	2,204	9%	200	34	30	0	100	36	14	
Bicton	Shrewsbury	128	23%	30	3	5	0	15	7	12	
Bomere Heath	Shrewsbury	592	19%	110	53	5	0	55	-3	0	
Cross Houses	Shrewsbury	328	27%	90	85	0	0	0	5	9	
Dorrington	Shrewsbury	291	52%	150	69	4	15	0	62	71	
Ford	Shrewsbury	307	41%	125	37	4	0	75	9	11	
Hanwood	Shrewsbury	506	10%	50	30	3	0	0	17	19	
Longden	Shrewsbury	135	37%	50	25	2	0	0	23	27	
Nesscliffe	Shrewsbury	83	139%	115	90	22	0	0	3	13	
Clive	Wem	237	13%	30	0	2	0	20	8	18	
Hadnall	Wem	269	46%	125	73	0	0	40	12	12	
Shawbury	Wem	877	17%	150	78	7	0	80	-15	0	
Prees	Whitchurch	426	40%	170	32	61	62	35	-20	29	

Appendix 5: Report to CPRE Shropshire on Telford Plan Housing and Employment Need and Supply, January 2024

The above report, the heading of which is shown below, is being submitted as a separate document. The report was incorporated as Appendix 1 within CPRE Shropshire’s overall submission to the Regulation 18 Consultation on Telford & Wrekin Local Plan Review – Draft Plan 2020 – 2040. It is submitted here with that “Appendix 1” heading on each page, and with its original page numbering, but with this page added as a front sheet to it, identifying it as Appendix 5 to this submission.

Telford Plan (Regulation 18)
Housing and Employment Need and Supply
Report to CPRE Shropshire by *Gerald Kells*
January 2024

Examination of Shropshire Local Plan 2016-2038
Further Consultation Focusing on Additional Material
Prepared in Response to the Planning Inspectors’
Interim Findings

CPRE Shropshire Submission

Representor unique Part A Ref: A0410

11 June 2024

**Appendix 5: Report to CPRE Shropshire on Telford Plan Housing and
Employment Need and Supply, January 2024**

The above report, the heading of which is shown below, is being submitted as a separate document. The report was incorporated as Appendix 1 within CPRE Shropshire’s overall submission to the Regulation 18 Consultation on Telford & Wrekin Local Plan Review – Draft Plan 2020 – 2040. It is submitted here with that “Appendix 1” heading on each page, and with its original page numbering, but with this page added as a front sheet to it, identifying it as Appendix 5 to this submission.

Telford Plan (Regulation 18)

Housing and Employment Need and Supply

Report to CPRE Shropshire by *Gerald Kells*

January 2024

Appendix 1 – Housing and Employment Need and Supply

Telford Plan (Regulation 18)

Housing and Employment Need and Supply (Draft)

Report to CPRE Shropshire by *Gerald Kells*

January 2024

1. Introduction

1.1 My name is Gerald Kells. I work as an Independent Policy and Campaigns advisor, having been the West Midlands Policy Officer for CPRE up to 2012. I have since advised both organisations and local residents on housing, transport and employment issues, and in particular presented evidence at a number of Local Plan Inquiries, including Shropshire.

1.2 I was asked by CPRE Shropshire to review the housing and employment need and supply underpinning the Regulation 18 Telford Plan.

1.3 I have considered the Plan itself as well as Part One of the Economic and Housing Development Needs Assessment (EHDNA Oct 2020) which considers employment needs. Part two relates to housing need but appears to have been superseded by the Housing Requirement Technical Paper (H RTP October 2023) and the Strategic Housing and Employment Land Availability Assessment (SHELAA October 2023).

1.4 One particular aspect of the Plan is a housing requirement far in excess of the Standard Methodology. This is justified by reference both to employment needs and to the very much higher 2018 housing projections from the Office for National Statistics (ONS2018), as well as the 2021 CENSUS results for Telford.

1.5 A key concern I have is that, even if that increase were justified, much of it would offset housing needs from other areas of the Midlands, notably the Black Country, for which the Telford Plan is currently only proposing to making a small contribution of 1,600 homes.

1.6 Including so much more in the requirement, rather than as a separate contribution to meet neighbouring authorities' needs, risks serious double counting.

1.7 CPRE Shropshire will be aware from the debate currently on-going at the Shropshire Plan Examination that, an uplift in housing numbers to meet 'additional' needs within a local authority is likely to include housing which relies on in-migration from neighbouring areas. But even so, the Inspectorate may

Appendix 1 – Housing and Employment Need and Supply

conclude that this is only the ‘local requirement’ and seek further allocations to meet the needs elsewhere.

1.8 In other words, even though Telford’s higher requirement is essentially based on in-migration it may only count marginally towards shortfalls in other districts, (such as those in the Black Country, notably Sandwell¹⁵).

1.9 The new NPPF (Para 61) has changed the Duty to Cooperate requirement and now says:

In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

1.10 This suggests the underlying problem identified above will persist since the ‘local housing need figure’ will be assumed not to include housing from neighbouring areas, even when, as in this case it clearly does.

1.11 The HRTP in Para 4.21 asserts that:

The continuation of any given trends in population and formation for Telford & Wrekin as a standalone local planning authority may - when considered alongside elements relevant to establishing full objectively assessed housing needs as an alternative to the standard method - be relevant to identifying the scope to contribute towards part of the unmet needs of neighbouring authorities. This does not, however, reflect the extent of unmet needs declared by neighbouring authorities or the strength of their relationship with Telford & Wrekin.

1.12 However, this will only be possible if the local housing need does not mask those relationships.

1.13 I also note that that EHDNA is now out of date and some of its evidence, for example, relating to COVID and BREXIT, may now be better understood. However, its economic analysis plays a key role in both the employment land assumptions and also the justification for that very significant uplift in the housing requirement beyond the Standard Methodology.

1.14 I do also have questions as to the scale of employment land need, relying as it does on the highly ambitious LEP strategy. It is certainly necessary to consider its assumptions as well as looking at housing need.

1.15 A further issue is that some of the housing supply data is difficult to interpret. With that in mind, it appears to me that the plan takes no account of windfall supply in its calculations (although this would need to be confirmed). There also appears to be considerable over-supply. This includes a reliance on slower delivery of housing, particularly on Urban Extensions, than might be considered desirable.

¹⁵ See my December 2023 reports for WM CPRE on the Dudley and Sandwell Plans.

Appendix 1 – Housing and Employment Need and Supply

Housing and Employment Need

2.1 Standard Methodology

2.1.1 The calculation of housing need using the Standard Methodology for Telford is set out below.

Table 1: Need Calculations for Telford/ONS Figures (2022 affordability)

Telford Need 2022-2041 (including 2022 affordability uplift)	Annual rate (2021 affordability in brackets)	Demographic Increase	Plan Period (19 Years)
SM ONS 2018	909 (930)	790	17,271
SM ONS 2016	580 (597)	503	11,020
SM ONS 2014	475 (492)	412	9,025

2.1.2 The SM result, based on the ONS2014 figures, would be 475 dwellings per annum (9,025 over the Plan Period).

2.1.3 This would rise using the ONS2016 figures, although looking more widely the ONS2016 figures reduce housing need across both the Black Country, and the wider West Midlands, because the ONS2016 figures make arguably more realistic assumptions about future household growth.

2.1.4 The most recent ONS household projections for the UK (2018) show the population reaches 72.4 million by mid-2043, an even slower growth rate than in the 2016-based projections, that is to say a reduction of 0.9 million in mid-2043. However, those projections also substantially alter the distribution of houses.

2.1.5 A key reason for that is changes in the underlying NHS registration data which means the 2018 figures rely on only two-year trends.

2.1.6 Telford's need rises more dramatically in the ONS2018 figures, in line with that redistribution of housing from the ONS2016 calculations.

2.1.7 Since then, the interim 2021 CENSUS results have been published and Table 2 compares the baseline CENSUS results with the three ONS projections.

Table 2: Comparison of CENSUS and ONS Projections for Telford

Population				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	185,600	174,800	179,100	183,627
Difference to Census		-10,800	-6,500	-1,973
Household				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	76,500	72,014	71,255	72,881
Difference to Census		-4,396	-5,245	-3,619
Household Size				
2021	Census	ONS2014	ONS2016	ONS2018
Telford	2.43	2.43	2.51	2.52
Difference to Census		0	0.08	0.08

2.1.8 Pending new ONS figures (expected in 2024), the 2021 CENSUS could be argued to support the use of the ONS2018 figure for Telford as its population and household figures exceed all the existing ONS figures but are closest to the ONS2018 figures. However, it is worth noting that the household size in Telford corresponds best to the ONS2014 figures.

2.1.9 It is also worth noting that across the West Midlands the best household match with the CENSUS is the ONS2016 figures.

2.1.10 A good reason for suggesting the higher CENSUS figures in Telford reflect migration into the Borough is to consider the housing target in the existing Telford Local Plan.

2.1.11 That target is set at 864 dpa (17,280 from 2011-2031). Peter Brett Associates (PBA) undertook the Housing Needs work at the time¹⁶ and their report suggested an annual need of 483-497 dpa (para 3.25) and then considered a scenario of 750 dpa. The higher figure was predicated on a deliberate attempt to boost the population of Telford to support economic growth and specifically to reach Telford’s planned size of 225,000 population, as opposed to 167,000 at the 2011 CENSUS.

2.1.12 The 864 dwellings per annum in the Plan clearly exceeds even PBA’s suggestion. It has also been exceeded in delivery terms, especially since 2015 (perhaps when the impact of the 2008 financial crash began to wear off). As a result, by 2021, the Council had delivered 1,244 more houses than the Plan

¹⁶ Telford & Wrekin Objectively Assessed Housing Need Final Report, Peter Brett Associates, March 2015

Appendix 1 – Housing and Employment Need and Supply

required (according to the 2022 Housing Land Supply Statement in Table 1.1). That is even allowing for a dip in 2020-2021, possibly reflecting the impact of the Coronavirus pandemic.

2.1.13 I have not considered in detail all the evidence supporting the previous plan, but taking the Peter Brett figure as a proxy for a demographic base, would suggest a planned over-supply of some 360 dpa, or 3,600 up to 2021, and 4,800 when one includes the additional actual supply. This would be consistent with the difference in the CENSUS.

2.1.14 I have used a simplistic calculation but it does illustrate how the deliberate over supply of housing in Telford is likely to have contributed to its comparative high growth and why projecting that forward is likely to exacerbate the trend. If that is a policy decision then it should be reflected in the housing which is considered to meet needs outside the Borough.

2.2 Housing Requirement Technical Paper

2.2.1 The Housing Requirement Technical Paper (H RTP) starts from the figures given in the previous EHDNA and supports the EHDNA's view that Telford should be considered a single and separate Housing Market Area.

2.2.2. Table 1 shows the outputs from 2020.

Table 1. Summary of Part 1 EHDNA Consultation Options

Scenario (2014-Return)	Dwelling Change (Annual)
	2020-2040
Employment-led Experian Growth	848
SNPP-2018	964
Dwelling-Led 1150dpa	1,150

Source: Telford & Wrekin Part 1 EHDNA (2020) (DLP for T&W Council)

2.2.3 Their SNPP2018 figure is out of date as it would be 909 using the current SM calculation. The higher dwelling-led figure relies on the same basic ONS2018 figures but returns the household size (measured by headship rates) to the 2014 figure.

2.2.4 The employment-led Experian growth rate is also the most buoyant of the employment calculations (as I consider later.)

Appendix 1 – Housing and Employment Need and Supply

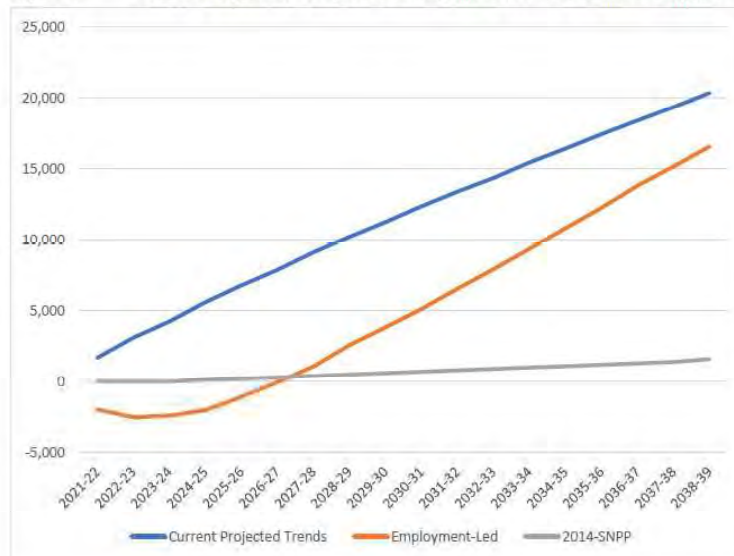
2.2.5 The Technical Paper seeks to ‘rebase’ the figures based on the CENSUS and this leads to an increase to 1,010 dpa (including a small adjustment for non-household-based housing need).

Table 4. Summary of SNPP-2018 Current Trends Projection Scenarios

Scenario	Equivalent Dwelling Change (Annual)			
	2020-2040		2021-2040	
	Household Population	Non-Household Adjustment (+13)	Household Population	Non-Household Adjustment (+13)
SNPP-2018	964	977	953	966
SNPP-2018-Rebased2021	1,063	1,076	997	1,010

2.2.6 More details are set out in Table 6 of the H RTP. What is striking is the key role migration into the county plays in this scenario. Of the 26,427 population increase, 21,299 (81%) comes from net-migration, 5,128 from other sources as shown in Figure 4.

Figure 4. Total Net Migration – Projected Demographic Trends and Market Signals



2.2.7 In other words, this is a scenario which heavily relies on migration into the district (presumably facilitated by additional housing provision). Even their SM2014 approach would assume migration of between 7,467 and 10,165 in the same time-period.

Appendix 1 – Housing and Employment Need and Supply

2.2.8 This adds weight to my concern that such a high adjustment in the SM result in Telford should be counteracted by lower housing need in adjacent authorities. However, as it stands, many of those are relying on the higher ONS2014 figures.

Table 6. Outputs of Updated EHDNA Scenarios

Scenario	Change 2021 - 2040			Average per year		
	Population Change	Population Change %	Households Change	Households Change %	Net Migration	Dwellings
SNPP-2018-Rebased2021 (HH-14 RR)	26,427	14.2%	18,366	24.0%	1,121	997
SNPP-2018-Rebased2021 (HH-14 R)	26,427	14.2%	14,880	19.5%	1,121	808
Experian-led Employment Growth (HH-14-R) ('Market Signals')	23,068	12.4%	11,833	15.5%	958	642
+12,420 Population Growth Dwelling-Equivalent (HH-14-RR) (inclusive of LHN Step 2 Affordability Adjustment and Population Growth)	12,420	6.7%	11,654	15.2%	513	633
Dwelling-led LHN (HH-14-R) (LHN Step 2 comprising additional population growth)	12,418	6.7%	8,748	11.4%	535	475
Dwelling-led LHN (HH-14-RR) (LHN Step 2 comprising improved household formation)	4,732	2.5%	8,748	11.4%	179	475
Dwelling-led LHN no uplift (HH-14-R) (LHN Step1)	9,345	5.0%	7,588	9.9%	393	412

Figure 3. Updated EHDNA Scenarios - Total Population

2.2.9 The H RTP goes on to consider the council's alternative approach to housing need which it calculates as amounting to 930 dpa, and compares this with its own total of 1,010. The 80 dpa difference, it considers, could be accounted for as housing to meet Black Country need, that is to say 1,600 dwellings over the plan period.

2.2.10 However, as was shown from the net-migration trends in Figure 4, this is only a small fraction of the anticipated in-migration to the authority suggesting this is a somewhat arbitrary approach.

2.2.11 The components of the Housing requirement are set out in the Table on Page 7 of the H RTP. This shows, not only the reliance on an uplift in household formation (a return to the 2014 household formation assumptions), but also a massive 'market signals' adjustment. Since this cannot come from existing residents it must rely on in-migration from other authorities far in excess of the 1,600 contribution to the Black Country.

Appendix 1 – Housing and Employment Need and Supply

Housing Requirement Component	Annual Net Dwellings	Total Net Dwellings (2020-2040)
Dwelling-led LHN (step 1)	412	8,240
Dwelling-led LHN (step 2 - uplift)	63	1,260
Market signals adjustment	253	5,060
Improved household formation	189	3,780
Non-household population adjustment	13	260
Total housing need³	930	18,600
Contribution towards Black Country's unmet needs ⁴	80	1,600
Total housing requirement	1,010	20,200

2.3 Employment Assumptions (EHDNA)

2.3.1 The EHDNA is now somewhat dated, having been completed in October 2020 during the pandemic. A more-up-to-date assessment, including a review of the outputs from the modelling work, should probably be undertaken before the next stage of the plan to confirm the evidence is still robust.

2.3.2 The EHDNA first seeks to identify the Functional Economic Market Area (FEMA) for Telford and concludes, based on the level of self-containment, that Telford can be considered a separate FEMA. The evidence, however, is mixed because Travel to Work (TTW) evidence suggest strong linkages with parts of Shropshire and there is a clear link to the M54 corridor, as well as TTW evidence from the Black Country which would suggest a significant relationship with Telford.

2.3.3 The EHDNA then considers completions data and other background data from which it projects forward to get an estimate of future employment needs, as set out in Table 22. One particular element of note is the very large one-off development at MOD Donnington, which increases the need dramatically if included.

Appendix 1 – Housing and Employment Need and Supply

Table 22. Employment Land Needs Based on Past Completions Trends, 2020-40

MOD Donnington Assumption	Open Storage Assumption	B1a/b	B1c/B2	B8	Total
Excluded	No	19.1	81.3	24.8	125.2
Excluded	Included	19.1	81.3	35.5	135.9
Included	No	20.9	81.3	75.6	177.8
Included	Included	20.9	81.3	86.3	188.5

2.3.4 The report goes on to examine three different models for future economic growth, Cambridge, Oxford Econometrics (OE) and Experian.

2.3.5 It is worth noting the different demographic assumptions behind these models (Paras 7.5-7.23) which may explain their very different outputs.

2.3.6 Cambridge Econometrics (CE) is an unrestrained model which assumes labour supply will meet demand and does not restrict it demographically. OE bases its assumptions on the ONS2016 figures, which are, as we noted above, considerably lower for Telford than the ONS2018 figures.

2.3.7 Experian relies on the ONS2014 figures, and so one might expect it to result in lower projections of employment. However, it is to be noted that it uses regionally based figures and the ONS2014 regional figure is higher (some 44,000 higher across all West Midlands authorities in 2021 between ONS2014 and ONS2018).

2.3.8 The result is that CE shows a job growth for the period 2020-40 of 12,130 jobs, Experian shows a growth of 13,900 jobs, and OE shows a net loss of 770 jobs over this period. While CE and Experian are broadly similar overall the demographic basis is different, but it is probably fair to say that both rely on more unrestrained growth and on either in-migration or commuting.

Appendix 1 – Housing and Employment Need and Supply

Table 24. Jobs Growth by Broad Sector, 2020-40

	CE	Experian	OE
Agriculture, Forestry & Fishing	-20	-500	-70
Extraction & Mining	-40	0	-40
Manufacturing	-700	-1,300	-5,000
Utilities	-30	100	-200
Construction	400	500	200
Wholesale & Retail	20	1,700	-500
Transport & storage	800	1,300	-60
Accommodation, Food Services & Recreation	2,700	800	300
Information & communication	1,800	1,200	500
Financial, Professional & Business Services	3,600	6,000	3,700
Public Services	3,600	4,100	400
Total	12,130	13,900	-770

2.3.9 Moreover, it can be seen in Table 24 that the Experian and CE projections have very different sectoral profiles. Para 7.41 suggests this is explained by different assumptions on a post-COVID boost.

2.3.10 The EHDNA goes on to examine potential growth sectors based on the Marches Local Economic Partnership's (LEP's) Local Investment Strategy. Para 7.91 suggests this approach is in line with the PPG. However, there has been criticism in the past of reliance in Plan Making on LEP aspirations which are, just that, aspirations and tend, understandably, to set high goals.

2.3.11 The result for Telford is shown in Table 34, and includes growth forecast beyond any of the projections. It relies on an additional 3,200 jobs above the highest figures given by the three projections, and so would require even greater commuting or in-migration and could impact further on the work force in neighbouring areas.

Table 34. Comparison of Forecasts for Telford & Wrekin

	Jobs Growth 2020-40	Annual Growth Rate 2020-40
CE	12,063	0.61%
OE	-923	-0.05%
Experian	13,900	0.70%
Growth Forecast	17,100	0.80%

2.3.12 When one looks further on at Table 36 one sees these totals broken down by sector. It is clear that the Telford growth strategy most clearly matches the

Appendix 1 – Housing and Employment Need and Supply

Experian output with lower growth in accommodation and much higher growth in financial services.

2.3.13 What is also noticeable is the assumption of growth in manufacturing where the LEP is aiming in its LIS for growth which exceeds the most optimistic projection by 2,200 (with all the three projections showing a decrease). Given the risks relating to BREXIT (and perhaps to a lesser extent to COVID) the LIS growth for manufacturing seems highly aspirational.

Table 36. Sectoral Brexit Risk Rating, Telford & Wrekin

Sector	Total Jobs 2020	Forecast Jobs Growth 2020-40				Brexit Risk
		CE	OE	Experian	Growth	
Agriculture and mining	800	-200	-200	-500	0	Med
Manufacturing	14,200	-700	-5,000	-1,100	1,500	Med
Electricity, gas & water	1,200	0	-200	100	100	Low
Construction	5,200	400	300	400	400	Med
Wholesale and retail trade	15,300	0	-500	1,700	1,700	High
Transport & storage	4,300	700	0	1,300	1,300	High
Accommodation & food services	2,900	2,700	300	700	700	High
Information & communications	3,900	1,800	500	1,100	1,100	Med
Financial & business services	19,700	3,600	3,400	5,600	5,600	Med
Government services	22,400	3,600	400	4,200	4,200	Low
Other services	3,800	0	300	300	300	Low
Total	93,700	11,900	-700	13,800	16,900	

2.3.14 These job figures are then converted into Net Employment Land Needs.

2.3.15 Two additional requirements for land are then added. The first is for replacement need. This is based on past employment land losses to other uses. The extent of those is set out in Table 54. A notable fact is the very high B2 losses in 2015/16, over 25,000 sq. m, nearly 30% of the ten-year total.

2.3.16 The average is given as 10,561 sq. m per annum, but if that outlier year were excluded, would be closer to 7,000 sq. m (it is impossible to calculate exactly without the figures behind the graph). The replacement demand, set at 52.8 hectares in Table 55, might then be closer to 35 hectares.

2.3.17 The report does not examine whether there are exceptional reasons for this loss although it may relate to changes in legislation.

2.3.18 A further 10.7 hectares is identified in Table 56 for Open Storage. Again, this is based on past completions since it does not relate specifically to employment growth. While this seems justified it is not explained whether the expected sectoral growth justifies a continuation of past trends.

Appendix 1 – Housing and Employment Need and Supply

Figure 54. Employment Floorspace Losses – 2011-19



Source: SPRU analysis of local authority data

2.3.19 Lastly a margin of 5 years completions is added. It should be noted that the 5-year margin is not only the top of the required range, but is also based on completions including MOD Donnington which is acknowledged to be a one-off development.

Table 60. Total Employment Land Needs (ha) – Comparison of Labour Demand Scenarios, 2020-40

Stage	Description	CE	OE	Experian	Growth Scenario
i-iv	Net Growth Needs	29.3	-48.2	46.2	72.8
v	Net to Gross			52.8	
vi	Demand for Open Storage			10.7	
vii	Changing Trends in Working from Home	-14.6	-9.7	-13.2	-14.1
viii	Margin of Flexibility			44.5	
ix	Total Employment Land Needs	122.7	50.1	141.0	166.7

Appendix 1 – Housing and Employment Need and Supply

Table 61. Total Employment Land Needs (ha) – Comparison of Labour Demand Scenarios, 2020-40

	B1a/b	B1c/B2	B8	Total
CE	38.0	38.3	46.4	122.7
OE	24.9	-5.2	30.4	50.1
Experian	32.3	36.4	72.2	140.9
Growth Scenario	32.3	62.2	72.2	166.7

2.3.20 Not surprisingly, given the bullish view of manufacturing, the Growth Scenario includes a large amount more B1c/B2 development and both the Experian projection and the Growth Scenario include much more B8.

Table 64. Total Employment Land Needs (ha) 2020-40 – Comparison of Scenarios

	B1a/b	B1c/B2	B8	Total
Labour Demand – Experian	32.3	36.4	72.2	140.9
Labour Demand – Growth Scenario	32.3	62.2	72.2	166.7
Completions Trend – Excluding MOD Donnington	19.1	81.3	35.5	135.9
Completions Trend – Including MOD Donnington	20.9	81.3	86.3	188.5

2.3.21 The EHDNA goes on to compare these scenarios together (but eliminates the CE and OE projections). The results are set out in Table 64. The EHDNA considers that the completions trend acts as a ‘useful comparison’ and concludes that the employment land provision should be somewhere between 167 and 189 hectares (Para 10.32).

2.3.22 The EHDNA suggests the difference in the Growth scenario and the higher Completions Trend (10.31) can be at least partly explained by the 14 hectares discounted in the Growth Scenario due to a forecast uptake in home working. This does not make immediate sense given the B1a/b completions are much lower than the labour demand trends.

2.3.23 The role of MOD Donnington also raises some questions. Its inclusion is discussed in Paras 6.55 to 6.22. The reason for it is cited as being so as not to:

‘risk restricting the supply of available land such that future opportunities for inward investment or expansion of existing employers might be constrained.’

Appendix 1 – Housing and Employment Need and Supply

2.3.24 However, investment in such a large site for a single use is clearly unusual and may reflect specific circumstances relating to the MOD. Future investment in such a large distribution unit would be of regional significance and would need to be considered in a wider context, notably taking account of the West Midlands Rail Freight Interchange and other proposals across the West and even East Midlands.

2.3.25 Lastly, it is not clear to me that the level of replacement need is justified. If 2015/16 is considered an outlier year for employment land losses, that projection might actually be 15-20 hectares lower.

2.3.26 This would suggest a lower provision for employment land should be adopted and land should only be identified, if needed for a Regionally/Nationally significant site following a wider study of large-scale logistics need.

3. Supply

3.1 Housing Supply

3.1.1 The housing supply evidence is not entirely clear. According to Table 4 there are 11,378 homes currently in the system. These come from commitments (sites with permission not expired), sites with resolution to grant existing housing, planning approval and remaining Local Plan housing allocations.

3.1.2 A further 8,822 homes, it says, will be provided to meet the 20,200 requirement, (although that figure is not exactly broken down anywhere, and appears to be derived to match the 20,200 requirement).

3.1.3 Para 3.37 refers to a windfall supply of 60 dpa, which would amount to a further supply of 1,020 (based on 17 years, discounting the first three years). The plan reads as if this is additional to the 20,200 but that is not explicit.

3.1.4 That windfall figure, I note, is also at odds with the SHELAA which identifies an average small site completion rate of 72 dpa since 2012 which would normally have been the figure adopted in the Plan, giving 1,224 over the Plan Period.

3.1.5 Nor is there any assessment of the potential for larger windfalls (also included in the NPPF definition of windfalls) although this can provide significant new development in many authorities.

3.1.6 In particular, as discussed in Paras 2.3.18-2.3.20 above the Employment Need evidence assumes some 52.8 hectares of Employment Land will be lost over the Plan Period. While this may be an exaggeration, it is also likely that this will be partly due to change of use and usually on sites of more than 10 dwellings. If half that figure were released for housing it would result in a further 26.4 hectares of

Appendix 1 – Housing and Employment Need and Supply

land, at least 792 additional homes at only 30 dph from that source alone. More may, of course, come from retail closures and new mixed use new developments.

3.1.7 The tables in the Plan Appendix include a list of Proposed Housing Sites (3,554), Mixed Use Sites (1,110) and Sustainable Urban Extension (SUE) Sites (7,900). This totals a supply of 12,564. It is not explicit, but I assume these are all new allocations which would create an excess of 3,742.

3.1.8 I suspect the potential high level of over-provision results from low assumptions on delivery rates. Para 5.27 of the SHELAA sets out its assumed delivery rates, which amount to 50 dpa for large sites with some higher where there are multiple outlets.

3.1.9 Assuming the difference between the plan figure and the total supply was entirely accounted for on the larger SUE sites, those three sites would only be assumed to deliver together 53% of their capacity within the plan period. There is, of course, nothing to stop delivery being increased on those sites if it suits the developer.

3.1.10 There is only vague reference to this being the case in Policy HO2 where Part 2 includes the aim that each SUE is to provide 1,000 homes. Using this figure for each SUE reduces the overall new supply to 7,656, giving a shortfall of 1,166 on the Table 4 assumptions for the Plan Period.

3.1.11 There are no detailed policies which explicitly outline the intention for each SUE so it also isn't made clear why the figure of 1,000 homes is applicable.

3.1.12 Taking a modest amount of windfalls into account, along with the over-supply, there is likely to be at least a further 5,758 (3,742 + 1,224 + 792) homes in the supply, depending on how quickly large sites are built out and without taking any account of large windfalls.

3.1.13 The other relevant supply-side issue is density. The plan has no density policy. In reference to Town Centres Para 6.42 says:

Well designed, higher density major mixed use development schemes that include residential development will be supported.

3.1.14 The SHELAA has a table (Table 3) of assumed densities but these are not transferred into a policy. Moreover, the densities in Telford seem lower than many authorities are seeking to achieve in urban areas. Notably central locations often aim for 100 dph. Of course, there may be limiting factors in Telford but these are not made explicit. It is unclear to me if the potential to increase densities has been considered and what impact that might have on supply.

Appendix 1 – Housing and Employment Need and Supply

Table 3: Housing site density assumptions

Site location	Density assumption range
Newport	45 - 55 dwellings per hectare (dph)
Telford less than four hectares	35 - 45 dph
Telford four hectares and above	30 - 40 dph
Central Telford (in and around Telford Town Centre)	45 - 75 dph

3.1.15 It may be that a forensic examination of housing sites in the supply information could confirm some of these issues but the plan and the background information should, in my view, be clearer so that the reader can understand precisely what assumptions have been made, and what elements are included in each calculation.

3.2 Employment Supply

3.2.1 The plan adopts an employment figure of 167 hectares in Policy Strategy S3 split in line with the Growth Scenario Table 3.3. The appendix B gives a list of sites.

3.2.2 According to Para 3.1:

To date the Council has an existing supply of 76.5ha and the Plan allocates land to deliver a minimum of 90.5ha of new employment land.

3.2.3 A list of new sites is given in Table 11 of the Appendix to the Plan which amounts to 91.6 hectares, marginally above the figure in Policy S3.

3.2.4 It is not clear from the Plan, however, how much of the land is suitable for the desired employment split, in particular, how much would meet the 32 hectares for offices and whether some of that could be supplied at new mixed use (some identified around Telford centre) or other town centres redevelopments.

3.2.5 The other obvious fact about the supply table is that most of the sites are relatively small mostly under 12 hectares with only two at 18.8 and 17.5 hectares respectively.

3.2.6 This suggests the Council is not seeking a large regionally significant site (of the MOD Donnington size) which again brings into question the size of the overall

Appendix 1 – Housing and Employment Need and Supply

requirement and whether it is skewed by the inclusion of MOD Donnington in the completions evidence.

4. Conclusion

4.1 Housing

4.1.1 Having considered all the evidence it seems to me that the large-scale increase in housing above the SM calculation can only be justified if one assumes very large scale in-migration into Telford from surrounding areas, notably the Black Country.

4.1.2 The CENSUS confirms that Telford population is higher than projected but this most likely reflects the current over-supply of housing and a reliance on in-migration. It is counter-balanced by population and housing shortfalls elsewhere in the region.

4.1.3 Telford also cries in aid the ONS2018 figures, but other authorities continue to rely on the ONS2014 figures, leading to a risk of double-counting, which is supported by Telford's migration assumptions.

4.1.4 Moreover, the Telford housing supply-side figures suggest there is a potential for significant over-supply, even above the high requirement for Telford.

4.1.5 This has also to be seen in the light of the over-supply in neighbouring Shropshire (particularly the M54 corridor) which would be exacerbated if, under pressure, they identified the land at Jn3 of the M54 for development.

4.1.6 It seems to me there is a strong case for arguing that the ONS2016 figures represent a reasonable need for Telford but that any additional housing (particularly the SUEs identified in the Plan) should be specifically identified to meet need arising in other local authority areas.

4.1.7 In this regard, I note that the plan currently does not include a figure for how much housing is meeting need elsewhere. Even the 1,600 referred to in the H RTP as meeting Black Country needs is not separately identified in the plan.

4.1.8 I also cannot see the justification for the lack of windfall inclusion in the plan figures or policy. A specific density policy with robust justification for density targets should be considered. Further detailed policies for each of the SUEs, including targets for development within the plan period, should also be included.

Appendix 1 – Housing and Employment Need and Supply

4.1.9 Most fundamentally one has to ask if in-migration to Telford is desirable, and also if it is more desirable than elsewhere, in particular rural parts of Shropshire and/or the M54 corridor.

4.2 Employment Land

4.2.1 The employment evidence seems bullish, based on aspirational LEP targets, with the completions data skewed by the large one-off MOD Donnington site.

4.2.2 I think there is a case for a lower requirement, and any regionally significant site to be considered as part of a wider study. It may be that there is a case for a proportion of the employment land being identified as meeting adjacent needs.