

SHROPSHIRE LOCAL PLAN EXAMINATION: CONSULTATION ON ADDITIONAL EVIDENCE

Response on behalf of Taylor Wimpey UK Ltd
ID. A5098

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REPORT

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1 INTRODUCTION

- 1.1 The purpose of this consultation is to provide those parties engaged in the examination of the Shropshire Local Plan (SLP) with an opportunity to respond a number of new evidence documents prepared and issued by Shropshire Council on key matters of soundness. This response is made by RPS on behalf of Taylor Wimpey UK Ltd (ID. A5098) and its land interests at Albrighton.
- 1.2 The new documents have been produced by the Council in response to issues identified by the Local Plan Inspectors on a number of separate occasions with regards to the soundness of the SLP as submitted in 2022 (set out in exam documents ID38, ID36, and ID37).
- 1.3 The new documents issued as part of this consultation are:
- Updated Housing and Employment Topic Paper - April 2024 – HETP - (GC45)
 - Updated Green Belt Topic Paper - April 2024 (GC46)
 - Shropshire Local Plan Updated Additional Sustainability Appraisal Report - April 2024 (GC44)
 - The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation (GC25)
- 1.4 This submission provides a response regarding the soundness matters raised in these new documents.

2 APPROACH TO THE REVISED HOUSING REQUIREMENT

Local Housing Need

- 2.1 Chapter 5 of the HETP deals with local housing need.
- 2.2 In terms of the starting point, paragraph 5.3 of the updated HETP says 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. RPS does not seek to challenge this figure as a starting point for the annual requirement.
- 2.3 Nonetheless, the SLP is based on an end date of 2038, which is likely to result in a plan that looks ahead less than 15 years. This is important and relevant to this consultation because the SLP is progressing a 'high growth plus' strategy (over and above the minimum need) that also makes provision for housing and employment needs from outside Shropshire, which in principle RPS also supports. However, in this context, we are strongly of the opinion that the SLP should look ahead at least a minimum of 15 years from adoption. This would roll the plan period forward another two years, to 2040 (assuming adoption in 2025). This modification would ensure the SLP is in accordance with national policy¹.
- 2.4 **The effect of this modification would be to increase the minimum level of housing need that should be planned for in the SLP by 2,354 dwellings (1,177 over two years), resulting in an increase in local housing need from 25,894 to 28,248 dwellings over the period 2016-2040. This has implications for the spatial strategy and the strategic distribution of growth in the SLP. The increase in the minimum need would also need to be tested through the Sustainability Appraisal.**
- 2.5 We address the implications of this for the SA in section 6 of this submission.

Proposed Housing Requirement

- 2.6 Chapter 7 of the HETP deals with the proposed (revised) housing requirement.
- 2.7 In line with the Local Plan Inspector's request (ID37), the Council has appraised six options for the housing requirement (each with and without a proposed contribution to the unmet housing need forecast to arise in the Black Country) within the updated additional SA assessment work (GC44). The six options are defined in Table 7.1 of the HETP, but are summarised for reference below (Figure 2.1).
- 2.8 Paragraph 7.27 of the HETP explains that the updated additional SA assessment work ultimately concluded that on balance, the 'High Growth Plus' (15% uplift) a 1,500 Dwelling Contribution to the

¹ NPPF 2021, para 22

Black Country Authorities Unmet Housing Needs (Option 3b) represents the most sustainable of the reasonable options for the level of housing growth identified.

Figure 2-1 Summary of SC housing requirement options – HETP 2024

Option	Baseline LHN	Percentage uplift	BBCHMA contribution?	Total dwellings
1a. (Moderate Growth)	2020 Assessment of Local Housing Need (25,894 dwellings)	5%	No	27,200
1b. (Moderate Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs)	2020 Assessment of Local Housing Need	5%	Yes (1,500 dwellings)	28,700
2a. (Significant Growth)	2020 Assessment of Local Housing Need	10%	No	28,500
2b. (Significant Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs)	2020 Assessment of Local Housing Need	10%	Yes (1,500)	30,000
3a. (High Growth)	2020 Assessment of Local Housing Need	15%	No	29,800
3b. (High Growth Plus a 1,500 Dwelling Contribution to the Black Country Authorities Unmet Housing Needs)	2020 Assessment of Local Housing Need	15%	Yes (1,500)	31,300

2.9 The Council’s preference is for Option 3b (High Growth Plus) and totals 31,300 dwellings. This represents a 500 dwelling uplift to the housing requirement submitted by the Council for examination (30,800). RPS welcomes the Council’s intention to retain the preferred uplift (proposed at 15%) over and above the minimum local housing need in the SLP. This will, as the Council recognise, help to support the delivery of more family and affordable housing, support the delivery of more specialist housing, help to foster and support the local labour force and support wider aspirations for economic growth and productivity (HETP, para 7.28).

2.10 However, as highlighted above, the Council has not considered the housing requirement options against the need for the SLP to look ahead at least 15 years from adoption, contrary to national policy. If the SLP does look forward over a 15-year period on adoption, then the minimum housing need figure is greater than the minimum figure tested in the HETP and additional SA. The Council has not tested the implications of this in respect to any housing requirement options that are based on a 15-year post adoption period. This is a significant flaw in the HETP. This also has implications for the proposed spatial strategy and strategic distribution of development, which is informed by the Council’s preferred ‘high growth plus’ requirement option (Option 3b. 31,300 dwellings). This is because in order to reject any reasonable alternatives to Option 3b, the Council must demonstrate that looking ahead to 2040 would not support the achievement of sustainable development. The Council has not done this.

2.11 Based on the above analysis, **RPS recommends that an alternative housing requirement option should be appraised at this stage. We define this as ‘High Growth Plus 2040’ option (Option 4). This option would comprise the minimum local housing need figure (28,248), plus 15%**

(increased to 32,485) plus 1,500 dwelling contribution (final revised figure 33,985). This new requirement option is summarised below (Figure 2.2).

Figure 2-2 Additional alternative housing requirement option ('High Growth Plus 2040')

Option	Baseline LHN	Percentage uplift	BBCHMA contribution?	Total dwellings
4. (High Growth Plus 2040')	2020 Assessment of Local Housing Need over 24-years (28, 248 dwellings)	15% (+4,237)	Yes (+1,500)	33,985

2.12 Our alternative housing requirement option equates to an uplift of 3,185 dwellings over the Council's original submitted housing figure of 30,800 (this differs markedly to the Council's figure of 500)². This alternative housing requirement option would equate to 1,416 dpa over the entire plan period to 2040. This rate of planned growth is lower than recent completion rates observed in Shropshire between 2016 (the base date of the SLP) and 2023 is summarised in Figure 7.1 of the HETP. This shows that completions averaged 1,680 dwellings each year during that period³. This represents a significant level of delivery in Shropshire. Similarly, the rate growth we recommend is below the projected rate of completions proposed by the Council in the HETP (1,423 dpa) based on Option 3b (HETP, para 7.57). On this basis, RPS considers that an annual average rate of 1,416 dwellings is appropriate and deliverable over the plan period which includes the additional two years.

2.13 **RPS recommends that the HETP (and additional SA) is revisited to ensure that the 'High growth plus 2040' option that looks ahead to 2040 is properly assessed. Once completed, the updated assessment work should be issued for consultation, where views would be invited on this new option before any revised housing requirement figure is taken forward and tested at examination.**

Accommodating the Council's 500 dwelling housing requirement uplift

2.14 Para 7.64 of the HETP says that because the proposed housing requirement figures is now 31,300 dwellings, this would result in an increase or uplift to the housing requirement of some **500 dwellings** over the period from 2016 to 2038 Chapter 8 of the HETP outlines how the Council proposes the accommodate this uplift⁴.

2.15 To do this, the Council identifies four options to facilitate more housing, 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

² 33,985 minus 30,800 (the submission version housing requirement) is 3,185

³ Figure 7.1 of HETP (Housing Completions 2006/7 – 2022/23) indicates total net completions in Shropshire between 2016 and 2023 were 11,761 dwellings. This equates to 1,680 dpa.

⁴ 31,300 minus 30,800

d. Option 4: A Combination of Two or More of the Other Options (HETP, para 8.3)

2.16 The Council concludes that Option 1 should be preferred. Paragraph 8.62 of the HETP says that:

“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.”

2.17 Paragraph 8.63 of the HETP expands on this, stating:

“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.”

2.18 RPS objects to the Council's preference for option 1 as the favoured means by which the uplift is to be accommodated.

2.19 **First**, in the reasons given for selecting option 1 (and rejecting all other options) the Council say in paragraph 8.64 of the HETP that:

“ Option 1: increasing settlement guidelines and windfall allowances represented the ‘most sustainable’ option for accommodating the uplift. “

2.20 Windfall sites are, by definition, unknown until they are brought forward for development as they have not been previously allocated in a development plan. However, it is not possible to say with any certainty whether the windfall sites that are brought forward are the ‘most sustainable’ or not until the details of those proposals are presented. Conclusions on whether windfalls are the most sustainable cannot be predicted. The Council's reasoning is erroneous and makes no sense.

2.21 **Second**, the lengthy commentary provided in the HETP to support the Council's preferred approach to accommodating the uplift is absent of any consideration of the intention to accommodate a proportion of the unmet housing needs of the Black Country (1,500 dwellings). This is significant because, when favouring housing requirement Option 3b, the Council accepts (at paras 7.36, 7.59n, and 14.56f of the HETP) that in making a contribution towards the unmet need this can also ‘...address wider identified issues and achieve identified opportunities in Shropshire’, ‘...contribution to address issues and opportunities in the Black Country to further support the achievement of the Shropshire strategy’. This is helpfully referred to in the HETP as the ‘overlap’ in terms of the benefits to Shropshire and the Black Country to be secured resulting from both the uplift to local housing need and the contribution made towards the unmet need respectively. This is particularly relevant when considering the benefits of identifying specific, additional sites that can assist in addressing the unmet need (and which would fit under Option 3). However, the Council makes no reference to this ‘overlap’ in respect to cross-boundary benefits as part of its consideration of any of the options identified to accommodate the planned uplift to the requirement.

2.22 **Third**, in rejecting Option 3 (Increasing Site Allocations) paragraph 8.64i of the HETP says:

“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. “

- 2.23 The Council seem to be suggesting that windfall sites provide more ‘certainty of delivery’ than would specific allocations identified in the SLP. If the objective is to ‘ensure certainty of delivery’ then the most logical and appropriate action would be to identify additional site allocations in the SLP. RPS cannot understand the logic in what the Council is saying here. Their summation of Option 3 is also completely unsubstantiated and erroneous.
- 2.24 **Fourth**, given the Council is (wrongly) taking forward a plan that does not look forward at least 15 years post-adoption, the Council has woefully underestimated the uplift to be accounted for in the revised spatial strategy. Based on our assessment discussed earlier the uplift is 3,185 dwellings, not 500 dwellings.
- 2.25 On this basis, **the reasoning and basis for the selection of Option 1 (Increasing Settlement Guidelines and Windfall Allowances) is not soundly-based as it is not justified, whilst the rejection of Option 3 (Increasing Site Allocations) is based on flawed logic**. The Council should make positive site allocations that properly respond to the uplift (which, in our view, is 1,685 dwellings based on our assessment). This should include making additional site allocations to address the increase in local need, in addition to assisting in meeting some of the unmet need from the Black Country. This, in our view, provides a strong case for more growth should be allocated at Albrighton, acknowledged as a settlement most appropriately located for sustainably delivering a quantum of the unmet needs of the Black County. Furthermore, any future windfall development that does come forward should be considered an addition to the overall ‘planned’ supply. Our position is justified regardless of whether the uplift is 1,685 or 500 dwellings.

3 APPROACH TO ADDRESSING THE BLACK COUNTRY UNMET HOUSING NEED

3.1 Chapters 6 and 9 of the HETP deals with the unmet housing need emanating from the Black Country.

Unmet housing need forecast to arise in the Black Country

3.2 Notwithstanding RPS previous comments regarding the total housing requirements being under represented in the SLP, paragraph 6.6 of the HETP explains the Council's decision to retain the 1,500 dwelling contribution towards the unmet housing need from the Black Country. RPS does not challenge the inclusion of this contribution level in the SLP.

3.3 Nonetheless, RPS does object to how the Council proposes to accommodate this contribution in the SLP, as explained below.

Accommodating the unmet housing need arising from the Black Country

3.4 Paragraph 9.2 of the HETP makes reference to the Local Plan Inspector's letter to the Council (ID28), saying 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."

3.5 RPS welcomes the Local Plan Inspectors comments and recommendation made to the Council regarding the need to specify those sites that will address the unmet housing need. This was a matter raised by RPS in its submission to the Pre-submission version of the SLP in 2022 made on behalf of TW. However, the Council did not respond positively to our comments at the time and they now find themselves in this situation and which has delayed progress on the SLP.

Reasonable options for accommodating the unmet housing need

3.6 The Council has taken a broadly two-stage approach to the identification, assessment, and selection of the proposed site options that have been specifically identified to accommodate the 1,500 dwelling contribution (as requested by RPS, and subsequently requested by the Local Plan Inspectors). These follow:

- Firstly: defining an appropriate geography
- Secondly: assessment of all available sites within the appropriate geography, applying the site assessment process (Stage 1, 2a , 2b, and 3) used previously to select the proposed site allocations for the Pre-Submission (Reg 19) SLP, but has been updated to include an assessment of sites for their relationship with the Black Country (HETP, para 9.7d).

3.7 The HETP provides limited explanation on the appropriate geography or the site-specific assessment work carried out. Paragraph 9.9 of the HETP points to the updated SA (GC44) for this explanation. Chapter 12 of the updated SA provides a summary of SA and site assessments for

accommodating the 1,500 dwelling towards the unmet housing needs arising from the Black Country. We set out more detailed responses to the updated SA and site assessment work in section 6 of this submission and provide our initial concerns with the approach below.

Identification of a Reasonable Assessment Geography

- 3.8 The Council effectively defined an ‘area of search’ from which to draw the long-list of potential sites, based on a number of factors: geographic proximity and relationship to the road and rail network; migration patterns; commuting patterns; and extent of Travel to Work Areas (TTWAs) penetration to and from the Black Country and Shropshire.
- 3.9 Paragraph 12.30 of the SA identifies seven geographies (based on ‘Place Areas’) as those areas where potential sites to accommodate the 1,500 dwellings unmet need should be located. These areas are located within either the central or eastern parts of Shropshire. Specifically, within one or more of the following Place Plan Areas:
- a. Albrighton
 - b. Bridgnorth
 - c. Broseley
 - d. Highley
 - e. Much Wenlock
 - f. Shifnal
 - g. Shrewsbury
- 3.10 Paragraph 12.31 of the SA describes all these areas as having the strongest functional relationship to the Black Country. RPS agrees that the functional relationship is the most important factor in the consideration of specific sites, and this should frame the overall assessment process. However, our first concern with the approach is that is not clearly explained why these areas have been selected. No comparative exercise has been presented to help the reader understand why certain areas have been selected and why some have been excluded. The Council’s approach however, means the selected geography, in totality, is drawn very widely and includes areas that are not obviously related or connected to the Black Country i.e. Much Wenlock, Broseley and Highley.
- 3.11 The second concern relates to first problem with the approach, which is that the seven selected areas have not been ranked against each other to determine which areas perform better relative to any other. This is important because the SA indicates that the extent of the functional relationship with the Black Country Authorities varies across various settlements within Shropshire (SA, para 12.14). This is clearly evident from the Council’s own evidence on migration and commuting patterns (SA, Figs. 12.1-12.4) which demonstrates the ‘variability’ across the selected geographies, with key settlements including Albrighton clearly performing better in functional terms than other areas. Without a clear understanding of the relative strength in functional relationship of these separate areas to the Black Country, it is difficult to judge with any clarity which locations firstly and then

site(s) secondly located within those areas should be selected ahead of any other site located in a different area. **These are major flaws in the Council's assessment and selection process, even before we look at the site assessments.**

- 3.12 RPS notes that against the four factors used to inform the appropriate geographies, the assessment (SA, paras 12.17-12.28) consistently highlights Albrighton as performing better relative to other areas. RPS agrees that Albrighton is clearly relatively well located in comparison with other place areas in terms of its proximity and connectivity (in particular by public transport) to the Black Country and which are clearly important factors that should be given significant weight in the assessment and selection of specific sites. It follows that Albrighton is a logical choice ahead of other place areas for accommodating the unmet housing need from the Black Country.

Site Selection for accommodating the unmet housing need

- 3.13 Paragraph 9.10 of the HETP lists the sites the Council has selected to accommodate the proposed contribution of 1,500 dwellings towards the unmet housing need forecast to arise within the Black Country, along with the dwellings numbers allotted to each site. These sites are as follows: a. BRD030 - Tasley Garden Village, Bridgnorth: 600 dwellings; b. SHR060, SHR158 & SHR161 - Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings; and c. IRN001 - Former Ironbridge Power Station: 600 dwellings
- 3.14 The Council's justification for the selection is set out in Table 9.1 of the HETP (which repeats verbatim Table 12.3 of the updated SA).
- 3.15 RPS is supportive of Bridgnorth and Shrewsbury as logical locations in identifying sites (largely due to their relative connectivity to the Black Country along a mainline rail route) to fulfil both Shropshire's indigenous needs and an element of the Black Country's needs.
- 3.16 However, it is very unclear why the Ironbridge Power Station site (IRN001) (located in the Broseley Place Area) should be specifically assigned a proportion of the unmet need from the Black Country in preference to other more appropriate locations i.e. Albrighton. Whilst RPS has raised no soundness concerns regarding the redevelopment of the Power Station and it might well be an appropriate location for delivering a quantum on Shropshire's own housing needs. As this high level, there is no clear basis given as to why any site within the Broseley Place Area, especially the Ironbridge site, should be preferred to sites located within the Albrighton Place Area for addressing any element of the Black Country's needs. This confusion stems from our initial concerns above regarding the lack of any comparative assessment of the relative strength in functional relationship of each Place Area to the Black Country
- 3.17 Similarly, the Council's justification for the Ironbridge Power Station site is also problematic to say the least confusing. The Council suggests the site '*...benefits from road access to the M54 / A5 corridor link to the Black Country via either the A4169 / A5523 or A4169 / A442...*' and that the '*...site can accommodate a sizeable contribution towards the unmet housing needs forecast to arise in the Black Country.*'

- 3.18 Under the test of soundness⁵, strategic policies should provide a strategy that is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. Furthermore, national policy also advises the planning system should actively manage patterns of growth in support of opportunities to promote walking, cycling and public transport use, whilst significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes⁶.
- 3.19 The Ironbridge Power Station site is not directly served by a rail connection and is located approximately five miles away from the nearest rail station (Telford Central). Any journey to the rail station would involve a circuitous route arguably much longer than five miles. Given Telford was originally laid out as a New Town, the transport network across the town is largely designed and laid out to prioritise motorised (car) travel. In identifying the Ironbridge site, the Council is favouring the movement of people by means other than public transport, which is in direct contradiction to national policy and the need to promote and support sustainable modes of travel. It is our view that it is highly unlikely any (or very few) journeys will ever be made to and from the Black Country via public transport. The site has no obvious connectivity to the Black Country. The selection of the Ironbridge is confusing and illogical and is clearly inconsistent with national policy. RPS suggests the Council consider more appropriate locations and sites where accommodating the unmet housing needs of the Black Country whilst also capable to achieving sustainable travel patterns and growth. RPS suggests that Albrighton offers such opportunities and is plainly a more logical choice for sites.
- 3.20 This links to our third concern, which is why no sites (either currently proposed for allocation or not) have been selected at Albrighton. In contrast to the Ironbridge site, Albrighton has a much stronger relationship to the Black Country in terms of its proximity and connectivity to the Black Country. This is typified by its location on the mainline railway running between Shrewsbury and Wolverhampton, which provides a regular and convenient sustainable travel option for people living or commuting to / from the Albrighton area.
- 3.21 The relative strength of this relationship is evident from the Council's own evidence (HETP, Figs 12.1-12.4). We consider there is a logical economic as well as a sustainability argument for more housing growth in Albrighton, a proportion of which would assist in addressing the unmet housing needs from the Black Country. This is because Albrighton has the strongest inflows of in-commuters of any settlement in Shropshire (more so than Shrewsbury) based on the latest data⁷ who access employment in the area. These existing commuters could have the option of living in Albrighton, and thus support more sustainable travel patterns as well as supporting the local economy. This would help to achieve the 'overlap' in strategies highlighted by the Council in terms of supporting the Shropshire Local Plan strategy whilst also supporting the wider needs from the Black Country. These

⁵ NPPF 2021 para 35

⁶ NPPF 2021, paras 104-105

⁷ Census 2011

positive arguments have not, in our view, been considered to any extent in selecting the Ironbridge Power Station site ahead of sites at Albrighton.

- 3.22 Taken together, RPS agrees that the retention of the 1,500 dwelling contribution towards the unmet housing needs from the Black Country is appropriate. However, the way the Council intends to assign that unmet need to specific sites, which excludes any sites at Albrighton Place Area, is illogical. It is also not consistent with national policy which promotes sustainable patterns of growth and promotes the integration of housing and transport.
- 3.23 RPS recommends that the Ironbridge Power Station and the assignment of 600 dwellings to this site as a proportion of the total Black Country contribution is not justified and should be assigned to alternative site(s) in more appropriate and logical locations with far stronger connections to the Black Country, notably at Albrighton. We discuss this matter in more detail in our response to the updated SA and site assessment work in section 6 of this submission.

4 PROPOSED STRATEGIC DISTRIBUTION OF PLANNED DEVELOPMENT

- 4.1 Chapter 19 of the HETP deals with the strategic distribution of planned development. Paragraph 19.16 of the HETP highlights that the Council will retain its preferred option (**Option B: Urban Focus**). This retains Albrighton's status as a 'Key Centre' in the settlement hierarchy.
- 4.2 RPS does not object in principle to the continuation of the 'urban focus' approach for the strategic distribution of development and the identification of Albrighton as a Key Centre in the SLP.
- 4.3 Nonetheless, paragraph 19.26 of the HETP proposes further amendments to the approach to align with the specific assignment of the unmet housing need from the Black Country to the three specified sites, including Ironbridge Power Station. Accordingly, any such proposed modifications with respect to Ironbridge Power Station and the unmet housing need from the Black Country should not be taken forward, for the reasons set out in this submission.

5 SPATIAL STRATEGY

- 5.1 Paragraph 21.6 of the HETP proposed an amended spatial strategy (Policy SP2) to reflect the Council's updated evidence. Criteria a. refers to the overall housing requirement (31,300 dwellings) to be delivered between 2016-2038, and the 1,500 dwelling contribution towards the unmet housing needs from the Black Country.
- 5.2 However, the strategy should clarify how this contribution is to be met through specific allocations. In line with our submissions, RPS recommends that specific sites at Albrighton should be specifically identified as contributing towards the Black Country's unmet housing need.
- 5.3 In addition, the overall housing requirement should be modified to 33,985 dwellings, to be delivered over the plan period 2016-2040.

6 ADDITIONAL SUSTAINABILITY APPRAISAL AND SITE ASSESSMENTS

- 6.1 The Council says the purpose of the Additional Sustainability Appraisal Report April 2024 (April 2024 SA) is to provide a summary of the updated additional SA assessment work undertaken in order to positively respond to the conclusions reached by the Planning Inspectors within ID28, ID36 and ID37. The updated Stage 2a SA and site assessment work and the updated Stage 3 site assessments are provided in Appendices 1-10 of the April 2024 SA report. It should be noted that the update to Stage 3 of the assessment methodology includes specific criteria for assessing the site's relationship to the Black Country (a factor we agree is fundamental to this exercise).
- 6.2 RPS has reviewed the key appraisal and assessment findings and has a number of concerns with the information provided, and which also relate to the concerns with the Housing and Employment Topic Paper (HETP) we have already discussed.
- 6.3 For the avoidance of doubt, the Council also say that the April 2024 SA supersedes the previous Additional Sustainability Appraisal Report (GC29).

SA Assessment: Reasonable Options for the Housing Requirement

- 6.4 Chapter 8 of the April 2024 SA provides a commentary on the appraisal of reasonable alternative options for the housing requirement.
- 6.5 Paragraph 8.8 describes the six housing requirement options that have been appraised. However, as discussed earlier, none of these options would address the housing needs of the area covering a plan period looking forward at least 15 years from adoption, contrary to the NPPF. A housing requirement that looks forward over at least 15 year period on adoption is clearly constitutes reasonable alternatives that should be tested through the SA process. No reasons have been presented by the Council that demonstrate why it would be inappropriate to do so. The housing requirement options selection process in the April 2024 SA is contrary to national policy and is not justified or effective.
- 6.6 Accordingly, the Council should appraise reasonable alternatives that are consistent with national policy. We have identified a suitable alternative housing requirement option that looks forward to 2040 (a 'High Growth Plus 2024' option; 33,985 dwellings) assuming adoption of the SLP during 2025, and which should then underpin the subsequent re-appraisal of reasonable alternatives for the scale and distribution of growth in the area. This should specifically include an appraisal of the higher housing uplift to address Shropshire's native growth (1,685 dwellings, not 500 as suggested by the Council) based on our alternative option.

SA Assessment: Reasonable Options for Accommodating the Uplift to the Proposed Housing Requirement

- 6.7 Chapter 10 of the April 2024 SA provides a commentary on the appraisal of three options for accommodating their preferred housing requirement option and which includes the 500 dwelling

uplift figure (Option 3b; 31,300 dwellings). In terms of the options for accommodating the uplifted requirement, the Council's preference is 'Increasing Settlement Guidelines and Windfall Allowances' (Option 1). RPS has set out why it objects to this option earlier in this submission (section 2).

- 6.8 Table 10.5 of the April SA 2024 provides a 'comparison of reasonable options'. This is achieved by 'ranking' the performance of each reasonable option from the *best* performing (1) to the *poorest* performing (4) against each SA objective. Paragraph 10.47 explains that 'professional judgement' has been used to determine whether the increasing scale of growth proposed in the option (including more site allocations) would be more likely to have a positive or negative effect on that SA objective. The scoring of each option has not been added up due to the risk of 'bias' towards environmental factors (over economic or social objectives).
- 6.9 Nonetheless, it is clear from the table that preferred Option 1 has triggered the fewest 'poor (3 or 4) scores and the most 'best' scores (1 or 2) compared to the other options. This is highly convenient, given the Council's stated preference for that option. However, the Council has not explained the criteria or assumptions that have been used to inform their application of planning judgment as a basis for the scoring. Similarly, paragraph 10.60 of the April 2024 SA also highlights 'deliverability' as being an important consideration for accommodating the uplift (which RPS would agree this in principle) but how deliverability has been taken into account is also not been explained. It is therefore very difficult to understand the Council's reasoning for the scoring, and thus the basis for its preference for Option 1, that has been applied in the SA.
- 6.10 Taken together, the lack of clarity regarding how these three options have been appraised undermines the credibility of the overall SA process. Furthermore, in line with our position on the level of uplift, we strongly recommend that the April 2024 SA is revisited in order to appraise our alternative uplift figure (1,685 dwellings).

SA and Site Assessment: Site(s) to Accommodate Proposed 1,500 Dwelling Towards the Unmet Needs Forecast to arise within the Black Country

- 6.11 Chapter 12 of the Additional Sustainability Appraisal Report (April 2024) provides a commentary on the Council's appraisal of options to accommodate the 1,500 dwellings towards the unmet needs arising from the Black Country. To reiterate our position, RPS agrees that Shropshire should make a contribution towards these needs and is suitably placed to accommodate and deliver such contributions in a manner that can also achieve sustainable patterns of growth.
- 6.12 That said, as we have highlighted already, we have some concerns with the approach to site selection, in particular the inclusion of sites in Ironbridge and the exclusion of any sites at Albrighton. This includes the Land at Cross Road, Albrighton (ALB014).

Summary of preferred sites

- 6.13 As discussed previously, through the updated SA site assessment process, the Council has identified three 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; and c. IRN001 - Former Ironbridge Power Station: 600 dwellings.

6.14 Appendix 1 of the April 2024 SA provides details on the updated Stage 2a: housing sustainability appraisal site assessments for these sites. The assessment conclusions on overall settlement sustainability and Black Country sustainability are summarised below.

Settlement/ Place Area	Site ref.	Overall settlement sustainability	Overall contribution	Black Country
Bridgnorth	BRD030	Fair	Fair	
Shrewsbury	SHR060, SHR158 and SHR161	Fair	Fair	
Broseley	IRN001 (Former Ironbridge Power Station)	Poor	Poor	

Source: April SA 2024, Table 12.4; RPS

6.15 It is clear, at an early stage in the assessment process, that the Council accepts at the outset that the Ironbridge Power Station site performs poorly with regards to contributing towards the unmet housing need from the Black Country. Neither does it achieve wider sustainability objectives.

6.16 Appendix 10 provides further commentary under Stage 3 of the updated assessment, in particular with regards to the relationship of these sites to the Black Country. For the Ironbridge site, under ‘Relationship to the Black Country’, the Council says:

“Located in eastern Shropshire, an area with a functional relationship to the Black Country. The site is located on the A4169 which links to the A5 / M54 corridor and the A458 corridor. However, the site is some distance from these corridors. Nearest railway stations providing direct links to the Black Country is at Telford and Wellington and would likely require some other form of transport to access them (it is noted that the site contains a former railway station and active investigations are ongoing regarding establishing a passenger service).”

6.17 The Council claim the site is located in eastern Shropshire with a functional relationship to the Black Country. That could be said of all the sites assessed in the April 2024 SA.

6.18 Under ‘strategic considerations’, the Council says:

“Whilst the site does not directly adjoin the A5 / M54 or A458 strategic corridors it is connected to them by an A road (A4169). There is also an opportunity to provide railway links to Telford, which would allow onward connections to the Black Country and even without this Telford station is accessible via A roads. As such, given the sites location (proximity to the Black Country) and connectivity it could be an appropriate location to meet cross-boundary needs arising in the Black Country.”

6.19 And under ‘known Infrastructure Opportunities’, it then says:

“Opportunity to provide a railway station and re-use the existing rail link from the site.”

- 6.20 The Council is suggesting that there is a potential opportunity to develop a rail link between Ironbridge Power Station / Gorge to Telford Central or Wellington rail stations, which would provide the public transport access for people travelling between the site and the Black Country. However, the Council provides absolutely no evidence that any such proposals have been devised, or are being prepared, as part of the assessment in the April 2024 SA.
- 6.21 The site is also located over five miles away from those stations, with only road connections providing convenient transport links between them (A4169/A442). In reality, it is clear that based on the current situation, the vast majority of travel movements between the site and the Black Country would involve private car journeys.
- 6.22 Consequently, movements on this scale would promote unsustainable patterns of development and not lead to the effective integration of homes and public transport provision. This is contrary to paragraph 104-105 of the NPPF. No new evidence has been provided by the Council to address this problem.
- 6.23 Similarly, there are obvious questions regarding the suitability and viability of any such scheme, particularly given that the Ironbridge Power Station Site lies to the south of the River Severn and would need to cross the river northwards, and is also located in a World Heritage Site. Given the sensitivity of the location, this would mean any such project would take many years (even decades) before it is even agreed on paper, let alone granted consent and actually built out, even if funding became available.
- 6.24 Taken together, on any reasonable assessment of the evidence presented, the Council's assessment is spurious and unjustified. There is a significant lack of any evidence to substantiate their position on the suitability of the Ironbridge Power Station Site as contributing towards the unmet needs of the Black Country. As indicated previously, this site could meaningfully contribute towards Shropshire's indigenous housing needs, but we would respectfully request the removal of this site from those sites specifically identified as contributing towards the Black Country's needs. Accordingly, the 600 dwellings assumed at the site should be reassigned to other, suitable sites that do have a functional relationship and significantly better connectivity to the Black Country, notably at Albrighton.

A suitable alternative location – Albrighton

- 6.25 As a reasonable alternative to the Ironbridge Power Station site, we would recommend consideration is given to 'Land at Cross Road, Albrighton' (site ref. ALB014).
- 6.26 Appendix 3 of the April 2024 SA provides the Council's assessment of ALB014. Under 'Relationship to the Black Country' the Council says:

"The site is located to the south of Albrighton. Albrighton is located in east Shropshire on the A5/M54 Corridor - an area with a strong functional relationship to the Black Country. Albrighton benefits from strong road links to the Black Country (around 4 miles to the list) via both the M54/A5 corridor and the A41 corridor. Albrighton benefits from a railway station, which is a

regular stop on the Shrewsbury to Wolverhampton line. This railway station is within reasonable walking distance for the majority of the town.”

6.27 Under ‘Potential to Accommodate Housing As Part Of Proposed Contribution to Black Country’ there is further support for the site:

“Given Albrighton’s proximity and strong transport links to the Black Country, this site could be suitably located to accommodate some of the proposed contribution to the unmet development needs forecast to arise within the Black Country, should it be identified as a proposed site allocation.”

6.28 As a result, the overall core for the site is ‘good’. This is significantly better score than that applied to the Ironbridge Power Station Site (Poor).

Settlement/ Place Area	Site ref.	Overall settlement sustainability	Overall contribution	Black Country
Albrighton	ALB014	Good	Good	

Source: April 2024 SA, Appendix 3

6.29 However, under ‘Reasoning’, the Council provides its reasons for excluding the site. It says:

“Whilst the site’s 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, it is considered that there are other more appropriate sites upon which to accommodate these proposed contributions. Development of the alternative sites identified to accommodate the proposed contributions to the unmet needs forecast to arise within the Black Country is considered to constitute sustainable development and accommodating parts of these proposed contributions on them would contribute to the achievement of the wider spatial strategy for Shropshire. The site is therefore not proposed for inclusion within the draft Shropshire Local Plan.”

6.30 We strongly disagree with the Council’s position. We dispute the suggestion that there are other ‘more appropriate sites’ to accommodate some of the unmet need (specifically in the context of the Iron Bridge assessment), given the strong functional relationship that Albrighton shares with the Black Country. One of the Council’s preferred sites, notably Ironbridge Power Station site (IRN001) has a significantly weaker relationship both in term of its proximity and connectivity to the Black Country, compared to the Land at Cross Road (ALB014). We have also shown that promoting the Ironbridge Power Station site as means to address the Black Country unmet need would most likely result in unsustainable travel patterns based largely on the private car. In contrast, the Land at Cross Road offers clear potential to support and promote more sustainable movement patterns for all travellers, given its proximity to the main east-west rail line that links Shropshire to the Black Country, which accords with national policy. Similarly, the Council accepts that exceptional circumstances exist to justify safeguarding the site from the Green Belt for future development (we have already submitted to evidence to this examination which supports the release the site from the Green Belt for development in this Plan).

- 6.31 Taken together, it is both logical and reasonable that the Land at Cross Road, Albrighton should be specifically identified (and allocated) in preference to the Ironbridge Power Station site towards meeting a proportion of the unmet housing need from the Black Country.

7 GREEN BELT

- 7.1 The Planning Inspectors have requested a further Green Belt Topic Paper to document the exceptional circumstances for releasing Green Belt to meet Shropshire needs and separately the exceptional circumstances for releasing Green Belt to accommodate any of the proposed contributions to the housing and employment needs forecast to arise within the Black Country. The Council has issued a number of iterations of the topic papers on Green Belt matters (GC4g, GC30, EV051) with the stated intention of positively responding to the Inspector's concerns with the submitted SLP.
- 7.2 The latest version of the Green Belt Topic Paper (GBTP) April 2024 is referenced GC46. An important conclusion relevant to the updated GBTP is the additional SA and site assessment work undertaken to identify the sites considered appropriate to accommodate proposed contributions to the unmet need forecast to arise within the Black Country.
- 7.3 RPS has reviewed the latest GBTP (GC46) is provides a response set out below.

Sites to Accommodate Proposed Contributions to Unmet Needs Forecast to Arise in the Black Country

- 7.4 Paragraph 4.15 of GBTP says that within ID28 the Planning Inspectors concluded 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, and this should be informed by additional SA and site assessment work.
- 7.5 Nonetheless, the Inspector's advice did not preclude the release of Green Belt land to address this unmet need. We note that, of the four sites the Council proposes to address the unmet needs from the Black Country, one site is within the Green Belt (at Shifnal) and is identified to accommodate all 30 hectares of unmet employment land need⁸ (GBTP, Table 4.1). Identifying land in the eastern part of Shropshire to address the unmet need is appropriate as this part of Shropshire is relatively well-located and connected to the Black Country compared to other parts of the plan area.
- 7.6 However, the Council has discounted completely any sites currently in the Green Belt but which are similarly well-placed to accommodate the unmet housing needs from the Black Country. This includes all sites located at Albrighton, which is the closest and (in our view) the most sustainably connected settlement in Shropshire to the Black Country (Albrighton is located on a main rail line with connections to Wolverhampton and beyond). The Council's decision to exclude Albrighton sites as contributing towards the unmet housing needs from the Black Country is illogical and undermines the wider achievement of sustainable patterns of growth and the integration of housing and public transport objectives, as required by national policy⁹. This, in our view, also represents exceptional

⁸ Land east of Shifnal Industrial Estate, Shifnal (SHF018b & SHF018d)

⁹ NPPF 2021 para 104-106

circumstances required to justify the release of Green Belt land at Albrighton. Shropshire has a history of utilising safeguarded land and it is imperative that the most sustainable settlements within the Green Belt are maintained consistent with national policy¹⁰ on maintaining the vitality of sustainable rural settlements.

Albrighton

- 7.7 The Council does, at least, recognise that the proposed allocations within the draft Shropshire Local Plan will exhaust the supply of safeguarded land that exists around the settlement (GBTP, para 6.7-6.8). Accordingly, the Council proposes three areas of land to be removed from the Green Belt and 'safeguarded' in the SLP for future development at Albrighton.
- 7.8 One of these sites is Land at Cross Road (ALB014). Further information on these areas is provided within paragraph 5.19 of the Green Belt Revised Exceptional Circumstances Statement (EV051). We broadly agree in principle that exceptional circumstances do exist to justify the release of the site from the Green Belt. Nonetheless, based on our submission to this consultation and our earlier submission to the Regulation 19 consultation, we submit that this site should be released now and specifically allocated in the SLP for residential development. This includes the contribution the Site can clearly make towards the unmet housing needs from the Black Country.
- 7.9 The Council provides its reasons for discounting Albrighton from making any contribution toward the unmet needs (housing or employment) from the Black Country, summarised at paragraph 6.12 and 6.13 of the GBTP:

"Whilst proximity and connectivity to the Black Country could suggest that Albrighton is an appropriate location to meet cross-boundary needs arising in the Black Country, due to the settlement's size and role within the proposed spatial strategy, it is unlikely that it could make a significant contribution.

Through the additional SA and site assessment work, it was ultimately concluded that there were more appropriate locations and sites upon which to accommodate proposed contributions to the unmet needs forecast to arise within the Black Country. "

- 7.10 The reference to 'settlement size' as a reason to exclude any sites at Albrighton is completely at odds with the Council's own assessment of site ALB014 (April 2024 SA, Appendix 3), which says:

"The site is situated in Albrighton, which benefits from proximity to the Black Country and strong transport links via the M54/A5 corridor, A41 corridor and a railway station on the Shrewsbury to Wolverhampton line. The site is also of a sufficient scale to accommodate a meaningful proportion of the proposed contribution to the unmet need of the Black Country, should it be identified as a proposed allocation." (RPS emphasis)

¹⁰ NPPF Para 74 and 83

- 7.11 We would agree with this element of the Council's assessment. The Council's reasoning highlighted above is erroneous and ignores its own evidence. What is clear is that Albrighton (and site ALB014) has a strong functional relationship with the Black Country, which the Council accepts in its own evidence on migration and commuting patterns and the strong transport links between these area set out in the HETP and the GBTP (para 6.11-6.12).
- 7.12 Furthermore, the Council asserts there are '*more appropriate locations and sites*' than those available at Albrighton to accommodate proposed contributions to the unmet needs. These include the Ironbridge Power Station site (IRNN001) which (as discussed earlier in our submission) is located outside Broseley settlement and which exhibits a much weaker relationship and connectivity to the Black Country compared to Albrighton. Again, the Council's stance is erroneous and lacks credibility.

Exceptional Circumstances: Green Belt Releases to Contribute to Meeting Shropshire Housing and Employment Land Needs.

- 7.13 Paragraph 6.17-6.18 of the GBTP says there are a number of exceptional circumstances which support the proposed release of three areas of land from the Green Belt at Albrighton (including Land at Cross Road) to be 'safeguarded' for future development beyond the draft Shropshire Local Plan period. We would agree that exceptional circumstances do exist, but we contend the SLP could go further and release the Site now and allocate it for housing now.
- 7.14 Paragraph 6.19 lists the Council's exceptional circumstances relevant to Albrighton and the safeguarded sites. However, no reference is made to the Council's own assessment which highlights the strong functional relationship Albrighton has to the Black Country, which is another exceptional circumstance that should be taken into account either in this plan for future plans.
- 7.15 Similarly, the Council argues that promoting sustainable patterns of development and not restricting the potential for more growth in Albrighton in the future constitutes an exceptional circumstance. We would agree, but this factor seems to have been ignored when considering Albrighton as a potential location to accommodate the unmet housing need from the Black Country. This is another example of the confusing and illogical nature of the Council's updated evidence.

8 DRAFT DP POLICY: HOUSING PROVISION FOR OLDER PEOPLE AND THOSE WITH DISABILITIES AND SPECIAL NEEDS

- 8.1 The Inspectors consider (ID28, para 38-41) that as there is clear evidence of a higher-than-average need for such accommodation in this particular instance, either the SLP should include indicative figures, or the Plan should contain a specific policy to deal with specialist housing.
- 8.2 To inform the examination of the draft Shropshire Local Plan, the Planning Inspectors have requested that Shropshire Council undertake a public consultation on the following document (GC25) Draft Policy: Housing Provision for Older People and those with Disabilities and Special Needs, and its explanation.
- 8.3 Whilst there may exist an in-principle need for specialist housing in Shropshire, national policy nonetheless makes clear that policies should not undermine the deliverability of the plan¹¹. Practice guidance also says that planning policies for accessible housing need to be based on evidence of need, as well as viability and a consideration of site specific factors¹², and should also be informed by a proportionate assessment of viability that takes into account all relevant policies and local and national standards, including the cost implications of Community Infrastructure Levy and section 106¹³.
- 8.4 Criteria 16 of the draft policy says:
- “On site allocations for 150-249 dwellings and all development sites for 150-249 dwellings (irrespective of whether such sites are brought forward through a series of phases or planning permissions), at least 15% of houses must constitute a form of specialist housing for older people and/or those with disabilities and special needs documented within Paragraph 8 of this Policy. At the lower end of this category, it is likely that this provision will consist of age-restricted housing or retirement/sheltered housing in the form of apartments or a small group of bungalows which can be delivered in smaller numbers, as they generally have lower operational and staffing costs and requirements.”*
- 8.5 The draft policy focuses almost entirely on setting standards for the provision of specialist housing. However, it provides no advice to applicants on how viability considerations are to be taken into account, as required in national policy. Furthermore, the policy wording and the supporting text does not point to any specific evidence which has tested the viability implications of the specific standards proposed. This includes a lack of evidence to justify setting ‘minimum’ standards in the specific criteria highlighted above.

¹¹ NPPF 2021, para 34

¹² Paragraph: 009 Reference ID: 63-009-20190626 Revision date: 26 June 2019

¹³ Paragraph: 015 Reference ID: 63-015-20190626 Revision date: 26 June 2019

- 8.6 This is relevant because the Council accepts that specialist housing provision must remain affordable to occupants, given that specialist housing occupiers will have to pay both service-charges and care-costs in addition to any rent and / or mortgage (GC25, para 71). This increases the risk that such provision cannot be delivered on a particular site in accordance with the policy, alongside all the other policy standards and requirements set out in the SLP.
- 8.7 Taken together, we object to the draft policy on the grounds that it is not sufficiently evidenced and is inconsistent with national policy. Specifically, it fails to acknowledge that the provision of specialist housing is likely to impact on the viability of development where such provision is sought, in terms of accessibility, adaptability, as well as potential financial implications for developers and those occupying the units whose needs are intended to be met. It also provides no guidance for applicants or decision-makers when viability considerations do come to light or how such considerations are to be taken into account.

9 CONCLUSIONS

9.1 This submission provides a response to additional evidence issued by Shropshire Council on matters relating to unmet housing and employment needs (GC45), sustainability appraisal (GC44), green belt (GC46), as well as a draft policy on provision of specialist housing (GC25). This additional evidence has been requested by the Local Plan Inspectors who identified soundness concerns with the Shropshire Local Plan (SLP).

9.2 RPS has reviewed the additional evidence and has a number of concerns, summarised as follows:

- The local housing need figure for Shropshire derived from the standard method is 1,177 dwellings per annum. RPS does not seek to challenge this figure as .
- The SLP should look ahead at least a minimum of 15 years from adoption. This would roll the plan period forward another two years, to 2040 (assuming adoption in 2025). This modification would ensure the SLP is in accordance with national policy¹⁴. There has been no testing in the SA of extending the Plan period (as a reasonable alternative) by these additional two years.
- The effect of this modification would be to increase the minimum level of housing need that should be planned for in the SLP by 2,354 dwellings (1,177 over two years), resulting in an increase in local housing need from 25,894 to 28,248 dwellings over the period 2016-2040.
- RPS recommends that an alternative housing requirement option should be appraised at this stage. We define this as 'High Growth Plus 2040' option (Option 4). This option would comprise the minimum local housing need figure (28,248), plus 15% (increased to 32,485) plus 1,500 dwelling contribution (final revised figure of 33,985 dwellings).
- Our alternative housing requirement option equates to an uplift of 3,185 dwellings¹⁵ over the Council's original submitted housing figure of 30,800 (this differs markedly to the Council's figure of 500). This alternative housing requirement option would equate to 1,416 dpa over the entire plan period to 2040. RPS considers this annual average rate of delivery to be appropriate and deliverable over the plan period, including the additional two years. The spatial strategy and the overall housing requirement should be modified to 33,985 dwellings to be delivered over the plan period 2016-2040.
- RPS recommends that the HETP (and additional SA) is revisited to ensure that the 'High growth plus 2040' option that looks ahead to 2040 is properly assessed.
- The Council favours a reliance on windfall sites in order to address the uplifted housing requirement. In our view, the reasoning and basis for the selection of Option 1 (Increasing

¹⁴ NPPF 2021, para 22

¹⁵ 33,985 minus 30,800 (the submission version housing requirement) is 3,185

Settlement Guidelines and Windfall Allowances) is not soundly-based as it is not justified, whilst the rejection of Option 3 (Increasing Site Allocations) is based on flawed logic.

- RPS agrees that the retention of the 1,500 dwelling contribution towards the unmet housing needs from the Black Country is appropriate. However, assigning 600 dwellings to Ironbridge Power Station site is unjustified and contradicts the Council's own sustainability appraisal and site assessment which shows the site performs poorly in terms of its sustainability and relationship to the Black Country. Noting RPS raises no objections to the site addressing an element of Shropshire's own indigenous needs within the plan period.
- In contrast, there is a strong case that more growth should be specifically allocated at Albrighton, both in terms of addressing local housing need over a 15-year period on adoption of the SLP and also in making a contribution towards the unmet housing needs from the Black Country. The Land at Cross Road, Albrighton (AL014) offers clear potential to support and promote more sustainable movement patterns for all travellers, given its proximity to the main east-west rail line that links Shropshire to the Black Country, which accords with national policy.
- The updated Green Belt Topic Paper (GBTP) says there are a number of exceptional circumstances which support the proposed release of three areas of land from the Green Belt at Albrighton (including Land at Cross Road) to be 'safeguarded' for future development beyond the draft Shropshire Local Plan period. We would agree that exceptional circumstances do exist, but we contend the SLP should go further and release the Site now and allocate it for housing now.

9.3 Taken together, it is logical and reasonable that the Land at Cross Road, Albrighton is safeguarded and the Plan has the opportunity of specifically identifying (and allocated) it towards meeting a proportion of the unmet housing need from the Black Country.

9.4 RPS also raises some concerns with the approach taken in the draft policy dealing with specialist housing provision for older people and those with disabilities (GC25), primarily on the grounds the draft policy has not adequately addressed viability considerations.