



Shropshire Council  
Local Plan Examination

**Matter 2 – Development Strategy (Policies SP1-  
10 & SP12-15)**

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01260 288888

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## 1 MATTER 2 – DEVELOPMENT STRATEGY

Question 1: Do any of the policies in the Plan require updating as a result of changes in national planning policy since the previous hearings in July 2022?

- 1.1.1 Since the Stage 1 hearings took place in July 2022 and January 2023, a consultation on the proposed reforms to the National Planning Policy Framework (NPPF), published by the Ministry of Housing, Communities and Local Government, took place between 30<sup>th</sup> July – 24<sup>th</sup> September 2024. As per the Inspectors’ Note to the Council and representators dated 19<sup>th</sup> August 2024 (ID44), the emerging Shropshire Local Plan is still to be considered under the July 2021 Framework.
- 1.1.2 It is pertinent to note that if the consultation draft of the NPPF is adopted in its current form, the Council would be required to undertake an immediate early review of the Plan at the ‘earliest opportunity’ to address the shortfall in housing need, as set out under the transitional arrangements chapter. As set out in paragraph 1.13 below, Shropshire’s emerging housing requirement (if adopted) would be more than 200 dwellings lower than the proposed standard method figure so therefore paragraphs 226c) and 227 of the revised Framework would be applicable. There is no definition provided which clarifies what ‘at the earliest opportunity’ means or how long such a review should take, however this is anticipated to be clarified through future updates to the Planning Practice Guidance.
- 1.1.3 The Council is currently planning for a housing requirement of 1,423 dwellings per annum (dpa) through the Plan, which is significantly lower than the proposed new standard method figure for Shropshire of 2,059dpa. Gladman recommend that if the proposed revised NPPF is adopted as per the draft consultation version, a commitment for an immediate early review of the Shropshire Local Plan should be inserted into draft Policy SP1 to ensure a positive proactive approach is undertaken and to commit the Council to address its future housing needs.

Question 2: Is it proposed that the overall spatial strategy and broad distribution of growth set out in Policy SP2 will remain the same following the additional work? If not, how would it change and are the changes justified, effective and consistent with national policy? Are any consequential changes to Policy SP2 or the supplementary text required?

1.1.4 It is anticipated that the overall spatial strategy will remain the same following the additional work undertaken by the Council in its updated Housing and Employment Topic Paper (GC45), albeit for the key updates outlined in paragraph 1.15 below. Shrewsbury, as the top tier settlement within the county, has been allocated 350 of the 500 additional units to meet the unmet needs of the Black Country. An additional 75 dwellings will be allocated to Whitchurch (Principal Centre) and a further 75 dwellings increase to the Former Iron Bridge Power Station (Strategic settlement) site.

1.1.5 Gladman recommend that main modifications are required to reflect the proposed changes to draft Policy SP2 and its supporting text, as well as those draft policies relating to those Place Plan Areas which are to accommodate some of the unmet housing and employment needs from the Black Country. These include:

- the proposed uplift of 500 dwellings to the minimum overall housing requirement to 31,300 dwellings (1,500 dwellings contribution towards the unmet housing needs forecast to arise in the Black Country) over the 2016-2038 plan period, equating to around 1,423 dwellings per annum. The specific sites to accommodate the proposed contributions to the housing need will be explicitly set out within the draft policy.
- the proposed uplift of 20ha of the proposed employment land requirement to 320ha (30ha contribution towards the unmet employment needs forecast to arise in the Black Country) over the 2016-2038 plan period, equating to around 14.5ha of employment land per annum. in order to provide greater clarity.
- updates associated with the increase to the minimum overall housing requirement to the settlement guidelines and associated windfall allowances – Shrewsbury (from 8,625 dwellings to 8,975 dwellings), Whitchurch (from 1,600

dwellings to 1,675 dwellings); and the Former Ironbridge Power Station (from 1,000 dwellings to 1,075 dwellings).

- 1.1.6 In addition, the supporting explanatory text to draft Policy SP2 will require updating to reflect the changes outlined within the Housing and Employment Topic Paper (GC45).

Question 3: Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?

- 1.1.7 Although Gladman does not take issue with the areas identified by the Council to meet the unmet housing and employment needs arising in the Black Country, we wish to highlight the imbalance of approach in Market Drayton. The town of Market Drayton has been allocated to deliver 1,200 dwellings over the plan period, 3.9% of the overall emerging local plan housing requirement, however it will deliver 35 hectares of employment land equating to 11.6% of the overall employment land requirement for the Local Plan.
- 1.1.8 Gladman propose that Market Drayton could and should accommodate further residential development of a level which is commensurate to the proposed economic growth of the town. Focussing additional housing growth in Market Drayton would help keep employment and housing growth in balance, minimising the need to commute and securing a sustainable pattern of development. In this regard, the proposed policy framework in relation to development beyond the settlement boundary of Market Drayton appears to conflict with the positive consideration of housing growth to support economic growth outlined in draft Policy SP10.
- 1.1.9 Whitchurch has been allocated a number of proposed draft housing allocations to deliver over the plan period, yet the Council have opted to increase its associated windfall allowance by 75 dwellings. The correlation between Whitchurch’s proposed housing growth (1,675 dwellings) and its proposed employment growth (20 hectares) over the plan period is more appropriately balanced in comparison to that of Market Drayton.

Question 4: Has meeting some of the housing and employment needs of the Black Country led to the need to release or safeguard more land from the Green Belt? If so, what are the exceptional circumstances for doing this?

- 1.1.10 As set out in the Updated Housing and Employment Topic Paper (GC45), the additional 500 homes to meet the Black Country's unmet housing needs has not resulted in the need to release or safeguard any additional sites from the Green Belt.
- 1.1.11 The Council concluded that Option 1: Increasing Settlement Guidelines and Windfall Allowances was the most sustainable option and therefore would not result in the need to identify any further housing allocations to accommodate the proposed uplift. The uplift to the overall housing requirement of 500 dwellings will be delivered at the following locations; Shrewsbury which will have its settlement guideline increased by 350 dwellings, Whitchurch will have its settlement guideline increased by 75 dwellings and the Former Iron Bridge Power Station (Strategic Settlement) quantum on the site will increase to 1,075 dwellings over the 2016-2038 plan period.
- 1.1.12 In relation to employment, an uplift of 20ha was proposed to meet the minimum employment land requirement of 320ha. Similarly to the housing element, the SA process concluded that Option 1: Utilising Settlement Guidelines and Windfall Allocations is the most sustainable option and therefore, the Council concluded that it was not necessary to identify any further employment allocations to accommodate the proposed uplift.
- 1.1.13 The proposed 30 hectare employment land contribution to accommodate the unmet employment needs arising from the Black Country will be delivered on land east of Shifnal Industrial Estate, Upton Lane, Shifnal (site references: SHF018b & SHF018d). As identified in the updated Green Belt Topic Paper (GC46), the sites have been recommended for removal from the Green Belt. As prescribed by paragraph 146 of the Framework, the Council have undertaken a detailed consideration of all other reasonable options and the exceptional circumstances exist to justify the release of this land for employment. This process was undertaken as part of the updated additional SA and site assessment work undertaken by the Council.

