



The countryside charity Shropshire

Examination of Shropshire Local Plan 2016-2038

Stage 2 Matters, Issues and Questions

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

CPRE Shropshire Submission

Representor refs: A0410 and B-A127

20 September 2024

1. Our Hearing Statement for Matter 2 follows the MIQs as set out in document ID40.

Matter 2 – Development Strategy (policies SP1-10 & SP12-15) – see various MMs Issue

Whether the Development Strategy is justified, effective and consistent with national policy.

Questions

2. We comment on selected questions only.

Q1. 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?

3. We do not consider there is a need to change the Plan based on changes to National Planning Policy. The current consultation on Planning Reform is open and may be subject to change so it is too early to rely on that. There has been further work on plans for adjacent authorities, particularly urban authorities, most recently Birmingham, which consulted on a new plan in August. They have found substantial additional supply easing the conurbation's overall shortfall.

Q2. 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?

Q3. Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?

4. As we said in our response to the recent consultation the shortfall (in as much as it genuinely exists) in the Black Country should now be considered at an individual authority level. The additional supply identified by Birmingham (32,156 on their Preferred Option figures) would substantially impact on the need for housing to be exported out of the conurbation.
5. Moreover, this does not include additional supply identified by CPRE in commenting on both emerging Black Country and Birmingham (including from windfalls and current over-supply) It also remains the assumption that the 35% add on is included, which if removed would be likely to put Birmingham into a surplus.
6. 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 reproduced from page 18 of our submission dated 11 June 2024 on the Additional Material.



7. 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.
8. 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.

9. This is underlined by the reliance Telford place on more recent ONS housing projections and the Interim 2021 CENSUS results to justify their high level of growth. That same evidence shows lower housing projections for the Black Country.
10. What is clear is that a large element of Black Country unmet need is going to actually be met within the Telford & Wrekin area, which again casts doubt on the soundness of the quantum of Black Country need in the currently proposed Shropshire Council figures.
11. 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.
12. Given the level of uncertainty about this and the overarching aim to ensure a brownfield first approach, which reduces travel, delivers on climate change and protects the Green Belt we consider the justification for meeting Black Country needs is no longer tenable and this requirement should be dropped.
13. However, as we have said before, this should be done in concert with reducing the overall housing requirement. The arguments in our Hearing Statement for Matter 1 are also relevant here.
14. We remain of the view that the Black Country Employment Needs can be met without use of land in Shropshire, including a more appropriate allowance from the West Midlands Rail Freight Terminal in South Staffordshire.
15. We note that Shropshire Council's response in GC52 on these points is simply to reiterate (under A127) that it undertook extensive discussions with neighbouring authorities before agreeing the duty to cooperate figures of 1,500 homes and 30 hectares of employment land. However, our point is that those discussions were undertaken in very different circumstances and with very different assumptions about shortfalls and evidence and cannot still be relied upon.

16. Shropshire Council do not respond in detail to our substantive and more up-to-date evidence on this matter.

Q4. 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?

17. The Housing and Employment paper sets out three sites which are identified as meeting Black Country Needs for housing and makes significant play of the fact that all three are not in the Green Belt. However, the land released from the Green Belt in the plan in SP11.1, notably the large sites at Shifnal, are closer to the Black Country than sites identified in the paper.
18. This is highlighted by the inconsistency in the logic for housing and employment land. The justification for land at Shifnal meeting employment needs in 16.30 of GC45 would seem equally true of housing but the council treats the two differently.
19. So, in practice, it does appear that Green Belt land would be lost to support Black Country needs. Given the doubts set out above about the justification for the contribution, even before one considers other aspects of Green Belt policy, we do not consider that exceptional circumstances have been demonstrated.
20. The lack of exceptional circumstances is even more so in regard to employment land. The Council's own evidence (GC45 para 15.30) is that it has 413 Ha of identified employment land and an overall need for 320 Ha, including the Black Country contribution of 30 hectares (also more than the 375 Ha in the settlement breakdown). This suggests a surfeit of supply, albeit there is a need to provide some choice. In these circumstances, it is hard to see how exceptional circumstances can be demonstrated.