

**Shropshire Local Plan
Examination Stage 2 hearings
Response to Matter 2:
Development Strategy**

Land at Wolverhampton Road, Shifnal

Catesby Estates

19 September 2024

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1.0 Introduction

1.1 This statement to Matter 2 (Development Strategy) of the examination of the Draft Shropshire Local Plan (‘DSL’P) is submitted by Lichfields on behalf of Catesby Estates Limited (representations formerly submitted under L&Q Estates).

1.2 It follows the submission of representations to the Shropshire Local Plan Examination Stage 1 hearings (June 2022) in respect of land north of Wolverhampton Road, Shifnal, in which Catesby Estates has land interests. For reference, the representations comprising these proposed changes were identified under Representation Reference **A0148**.

1.3 The National Planning Policy Framework (‘NPPF’) outlines that during the examination process a Local Plan must demonstrate that it has been positively prepared, is justified, is effective and is consistent with national policy. Outlined below are responses to a select number of the Inspectors’ questions which set out why we consider changes to the DSL’P are necessary to ensure the soundness of the Plan.

2.0 **Development Strategy**

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?

Policy SP5 (Health and Wellbeing)

- 2.1 Catesby Estates supports the Council's proposed approach to Policy SP5 (formerly Policy SP6), and particularly the requirement that '*new development should ensure the health and well-being of individuals, communities and places.*'
- 2.2 In this respect, Catesby Estates considers that its land interests at Shifnal are well situated to accommodate residential development, as new dwellings would be located close to existing green spaces and the proposed site layout will promote walking and cycling.
- 2.3 Additionally, the proposed development is well located to existing and future planned employment opportunities, community facilities and transport connections, and should therefore be considered favourably in the context of Policy SP6(3). Therefore, greater consideration should be given to releasing the 'Land between Revells Rough, Lamledge Lane and the eastern rail line' to help meet the shortfall of Black Country's unmet needs as discussed later in this statement.
- 2.4 The main modifications has been updated to require a Health Impact Assessment screening to be undertaken for major developments rather than a full assessment. Only where this Health Impact Assessment screening concludes that there is a potential significant effect, then a full Health Impact Assessment must be undertaken. This amendment is considered to likely expediate the development management process which is welcomed.

Policy SP10 (Green Belt and Safeguarded Land)

- 2.5 Supporting text to Policy SP10 (formerly policy SP11) in paragraph 3.115 reduces the provision of safeguarded land in Shifnal from 92.8 ha to 82.4 ha. Instead the main mods document now makes reference to Land between Revells Rough, Lamledge Lane and the eastern rail line in brackets within the policy wording by stating "*(to complement the 10.4 ha of safeguarded land that exists at Shifnal and is not proposed to be allocated within this Local Plan)*".
- 2.6 Although the wording has been amended to differentiate the safeguarded employment land and the safeguarded housing land, the level of safeguarded land in Shifnal is maintained and it is not considered to adversely impact the future role of Land between Revells Rough, Lamledge Lane and the eastern rail line.
- 2.7 Nevertheless, Catesby Estate's still maintain their position raised within the previous representations that the safeguarded land at Land between Revells Rough, Lamledge Lane and the eastern rail line should be released to help meet the Black Country's unmet needs. This matter is explored throughout this matter statement.

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?

- 2.8 Principally, Catesby Estates supports the Council's choice to pursue the principle of a higher growth option to deliver around 31,300 new dwellings over the plan period, an increase of 500 dwellings from the local plan at hearing 1 stage. However, there is still significant concern regarding the plan period between 2016 and 2038 for which the housing requirement is based upon.
- 2.9 Paragraph 22 of the National Planning Policy Framework (NPPF) sets out that 'strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.' The plan period is now outdated and is less than the minimum requirement of 15 years from the date of adoption which would fail to anticipate and respond to the long-term need for new homes in Shropshire. Furthermore, it is noted the plan went to examination during September 2021 which was over two years ago. The Planning Practice Guidance states the following:
- "Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.*
- The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.*
- However, local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination."* (Paragraph 008 Reference ID 2a-008-20190220)
- 2.10 As such, as the submitted plan exceeds the two year period since submission to the Secretary of State, has a plan period less than the required 15 years and no agreement has been made with the planning inspector for an extension, it is considered the identified housing requirement is out-of-date and a revised calculation is required to address the changing climate on the delivery of housing across the West Midlands, a matter particularly prevalent considering the changing landscape of the Black Country Authorities (BCA) following the collapse of the Black Country Core Strategy in October 2022 and the identified housing shortfall since the submission of the local plan for examination. The plan period should also be extended to at least 2040 assuming the plan is adopted in 2025 at the earliest.
- 2.11 In addition, Policy SP2 of the main modifications document identifies a contribution of 1,500 dwellings towards the Black Country's unmet needs. However, it is considered a

higher contribution beyond the 1,500 dwellings would be appropriate considering the likely rising demands from the Black Country in the future.

- 2.12 As currently presented, no explicit evidence has been provided which robustly demonstrates whether this quantum of uplift is sufficient in addressing said recognised needs. Moreover, the Council has failed to demonstrate how a contribution of 1,500 dwellings to meet the Black Country shortfall is appropriate or justified, particularly in the absence of any detailed analysis into the functional economic relationship between Shropshire and the Black Country.
- 2.13 NPPF paragraph 11b is clear that strategic policies should, as a minimum, provide for housing needs and other uses *‘as well as any needs that cannot be met within neighbouring areas.’* It is also clear that Local Plans should be *‘based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground’* (paragraph 35c).
- 2.14 Principally, Catesby Estates welcomes the Council’s recognition of its functional relationship with the Black Country and commends the positive dialogue undertaken between the relevant bodies through preparation of the draft Local Plan. However, the BCAs consider a quantum of 3,000 dwellings would be an appropriate contribution. Despite the BCAs Black Country Plan Review [BCPR] no longer proceeding, the acute unmet housing needs still need to be addressed and each of the BCA authorities still requires assistance separately.
- 2.15 A review of the BCA’s separate emerging LPRs suggests that the authorities’ supplies have reduced, which suggests that the stated supply and unmet housing need conclusions out in the BCPR (i.e. c.28,000) has markedly increased to c.37,000 dwellings. Whilst the needs of the BCAs are already quite acute in and of themselves, Birmingham City Council’s latest Issues and Options consultation also identified an emerging c.78,000 dwelling unmet need between 2022 and 2042 (Para 5.13).
- 2.16 In the absence of a statement of common ground confirming any of the BCA’s agreement to this quantum of contribution, the Council risks its plan being considered unsound by failing to satisfy NPPF paragraph 35c requiring *‘joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.’*
- 2.17 Therefore, it is considered the Council’s approach to its housing requirement and unmet housing need is unsound and further growth is required within the District to meet these needs. Catesby Estates considers that the Council should introduce a mechanism into the draft local plan to trigger an early review of the Local Plan in order to address the ongoing unmet needs, in order to ensure soundness of the draft local plan in the context of NPPF paragraph 35(c).
- 2.18 The requirement for a higher provision towards the BCA’s is explored in greater depth within Catesby Estates’ Matter 3 Statement.

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

- 2.19 **No**, the draft Local Plan seeks to address the identified Black Country unmet housing needs via intensifying the numbers of dwellings on existing allocations. These sites are identified through allocations BRD030 (within Bishop's Castle), SHR060, SHR158 & SHR161 (within Shrewsbury Strategic Centre) and the Former Ironbridge Power Station Strategic Settlement (S20).
- 2.20 These allocations are not considered appropriate to deliver these unmet needs due to the considerable distance and poor connectivity of these sites to the Black Country. In particular, allocation BRD030 in Bishop's Castle is considered entirely inappropriate to accommodate 600 dwellings of the Black Country's unmet needs. The settlement of Bishop's Castle is not considered sustainable due to the lack of a functional relationship and the geographic separation from the Black Country which will lead to unnecessary travel, contrary to paragraph 109 of the NPPF which requires '*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 modes. This can help to reduce congestion and emissions, and improve air quality and public health.*' The settlement of Bishop's Castle does not contain a train station with the closest being Craven Arms approximately 11.8km away. Similarly, there are only two bus routes which operate through this village which only operate seven times a day. This is considered significantly insufficient to support the distribution of the Black Country's unmet needs.
- 2.21 Although allocations SHR060, SHR158 & SHR161 in the Shrewsbury Strategic Centre are supported by good transport infrastructure which provides connectivity to the Black Country, the settlement is situated a considerable distance from the Black Country and is also likely to lead to an increase in car travel.
- 2.22 Instead of these allocations, it is considered the settlement of Shifnal is more appropriate to accommodate the Black Country's unmet needs as the settlement is considered qualitatively and locationally better suited to the east of Shropshire in close proximity to the Black Country and has good transport infrastructure with a railway line connecting with Wolverhampton and has direct access to the M54 road links.
- 2.23 The current evidence is unclear as to why the Council have not selected sites in Shifnal to accommodate contributions to the Black Country unmet housing needs, but have done so for employment. Noting the Council released employment land from the green belt to accommodate the Black Country's employment unmet needs in Shifnal, there is an opportunity to align strategies for allocating sites to accommodate housing and employment contributions together in Shifnal, supporting the ambitions of paragraph 110a of the NPPF which looks for planning policy to minimise the number and length of journeys needed for employment.
- 2.24 The justification for the Black Country's unmet needs to be delivered via allocations SHR060, SHR158 & SHR161 in the Shrewsbury Strategic Centre is reliant on the Shrewsbury-Wolverhampton Railway Line to provide a migration to the Black Country. However, Shifnal is also located on this route, as such, given the proximity of Shifnal to the Black Country is less than Shrewsbury, greater consideration should be placed on the role of Shifnal in meeting the unmet housing needs of the Black Country.

- 2.25 Paragraph 12.38(f) of the Sustainability Appraisal which informs the local plans development strategy concludes that Shifnal is one of the most sustainable locations to locate residential development given its close proximity to the Black Country. However, this stance has not been translated into the main modifications document for housing, with limited considerations given towards Shifnal despite its connectivity and proximity to the Black Country.
- 2.26 As such, it is considered the site at ‘Land between Revells Rough, Lamledge Lane and the eastern rail line’ in Shifnal should be removed as safeguarded land and allocated for housing as it is considered to be a more appropriate location to facilitate the Black Countries unmet needs than the allocations identified within the plan as detailed in the below question.

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?

- 2.27 Aforementioned, it is considered that not only is a significantly higher housing requirement sought to accommodate the rising unmet needs of the Black Country but the current approach taken by the Council to direct these needs to large allocations which are not sustainably located to support the Black Country as inappropriate. Therefore, it is required further land should be released from the green belt to support the Black Country, in particular, land which is sustainably located, in close proximity to the Black Country and well connected to transport infrastructure.
- 2.28 The Green Belt Topic Paper and Sustainability Appraisal (SA) were supportive of this approach as a conclusion was reached in the SA that Shifnal has a functional relationship to the Black Country. It also benefits from strong road links to the Black Country via the M54/A5 corridor and strong rail links to the Black Country via the Shrewsbury-Wolverhampton railway line.
- 2.29 Meanwhile the Green Belt Topic Paper refers to the ‘Green Belt Release Exceptional Circumstances Statement’ (December 2020) (Ref: EVO51) which recognise that the settlement of Shifnal will play a key role in addressing the Black Country’s unmet need given its sustainability credentials:

“Those people in housing need whose demands will be met in Shropshire currently would secure a home in the Black Country. This indicates that the needs of these people are most likely to be met within or close to the M54/A5 strategic corridor. This area is therefore most likely to contain their key areas of search for housing beyond the Black Country.” (paragraph 8.96)

“The settlements located along the M54/A5 strategic corridor and those located in the east of Shropshire are therefore likely to play key roles in the delivery of housing to satisfy this ‘unmet’ need in Shropshire.” (paragraph 8.97)

“Shifnal as the primary settlement in Shropshire, located on the strategic corridor is therefore likely to play a key role in the satisfying this need, and its proximity to the Black

Country is likely to promote the town within the migrant's key areas of search.”
(paragraph 8.98)

- 2.30 Noting the above, it is considered Shifnal will be an appropriate location to fulfil these requirements, in particular, the safeguarded land between Revells Rough, Lamledge Lane and the eastern rail line which has been considered appropriate for development given that the site has been safeguarded within the extant SAMDev Plan 2006-2026 (adopted 2015) and the draft Local Plan.
- 2.31 The safeguarded site is considered suitable, available and deliverable for housing as a vision document has been produced which sets out how the site can be delivered respecting the surrounding environment and following the sustainable principles outlined within the draft Local Plan.
- 2.32 Therefore, it is considered exceptional circumstances, as required by paragraph 145 of the Framework, exist as documented within paragraphs 8.88-8.149 of the Green Belt Revised Exceptional Circumstances Statement (EVO51) and paragraphs 8.30-8.37 of the initial Green Belt Topic Paper (GC4g). These exceptional circumstance that allow for the release of green belt involves the sustainable patterns of development in line with NPPF paragraph 147, the release will support the role and function of Shifnal, support the community vitality of Shifnal and change the dormitory character of Shifnal to support growth for the settlement.

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