

# HEARING STATEMENT ON BEHALF OF TAYLOR WIMPEY UK LTD (ID.A0598)

Shropshire Local Plan Examination Stage 2 Matter Statement 2:  
Development Strategy (Policies SP1-10 & SP12-15)

794-PLN-MNP-JBB8335  
September 2024

## REPORT

---

### Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
Draft	Matter Statement	DRO	PH	PH	18.9.24
Final					18.9.24

---

---

### Approval for issue

Paul Hill

19.9.24

---

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by R P S Group Limited, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

---

**Prepared by:**

**RPS**

**Prepared for:**

**Taylor Wimpey UK Ltd**

---

## MATTER 2: DEVELOPMENT STRATEGY

### Issue

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

*(N.B. Detailed issues concerning the individual proposed site allocations will be dealt with under matters 7-24)*

**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 No.

The Local plan was submitted for examination on 3<sup>rd</sup> September 2021, according to the key dates on the examination calendar website<sup>1</sup>. In line with the relevant transitional arrangements in place at the time of submission<sup>2</sup>, the submitted plan (and any subsequent changes to draft policies proposed through main modifications) should be tested for soundness against the policies in the July 2021 version of the Framework.

**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?**

1.2 In terms of the strategic distribution of development, the Council is continuing with the 'urban focus' based strategy proposed in the Regulation 19 version of the Plan as stated in the updated Housing and Employment Topic Paper (HETP) (GC45, para 2.34-2.36). Consequently, in broad terms this aspect of the strategy remains unchanged.

1.3 Nonetheless, following the additional work carried out and consulted on earlier this year, the Council has proposed a number of changes to the overall spatial strategy and broad distribution of growth under draft Policy SP2.

1.4 Firstly, as stated in paragraph 2.9 of the HETP, the Council proposes an uplift of 500 dwellings on the housing requirement proposed in the submission version of the Plan (from 30,800 to 31,300 dwellings over the plan period 2016-2038). This figure forms the basis for subsequent changes proposed specifically relating to how this uplift is to be accommodated. For the reasons set out in paragraphs 2.1-2.13 of our submissions on the additional consultation, we contend the scale of the uplift is not soundly-based and which we recommend should be significantly greater than 500

---

<sup>1</sup> <https://www.shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-calendar/>

<sup>2</sup> NPPF July 2021, paras 218-220

dwellings. We contend that the housing requirement should be uplifted to 33,985 dwellings in order to be soundly-based. We address this issue in more detail in our Matter 3 statement.

- 1.5 Secondly, as summarised at paragraphs 2.10-2.12 of the HETP, the Council proposes changes to the strategy in order to accommodate the contested 500 dwellings uplift. Their preference is for '*Increasing Settlement Guidelines and Windfall Allowances*' (option 1). Specifically, this would be addressed by increasing the guideline figures for three locations; Shrewsbury (Strategic Centre) by 350 dwellings; Whitchurch (Principal Centre) by 75 dwellings, and Former Ironbridge Gorge (Strategic Settlement) also by 75 dwellings, thus totalling 500 dwellings. These changes are shown in the main modifications (GC4m, MM 261 and MM263). On this basis, the Council has determined '*it is not considered necessary to identify any further site allocations to accommodate this proposed uplift*' (para 2.11). For the reasons set out at paragraphs 2.19-2.25 of our submissions on the additional consultation, we contend this approach is not soundly-based.
- 1.6 To ensure the Plan is soundly-based we contend that the modifications proposed to the housing requirement (MM001, MM002, and MM003 and any other changes related to these modifications) should be further modified to read 'a minimum of 33,985 dwellings'. In line with our submissions, we contend the Council should accommodate this uplift by allocating further sites in the Plan rather than by relying on increasing notional settlement guidelines and / or windfall allowances for specific settlements.

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

- 1.7 In part, no.
- 1.8 As we stated in our submissions at the Regulation 19 stage, whilst we were broadly supportive of the Council's intention to contribute to the housing shortfall emanating from the Black Country (para 9.1.33) we nonetheless raised concerns regarding the lack of any clear strategy in the Plan to address that shortfall, including the assignment of specific sites suitably-located and capable of making such a contribution. This is clearly a topic that has caused the Council considerable difficulty during the plan preparation and we welcome the Inspectors for highlighting this issue in their interim findings (ID28), which has necessitated the remedial work ongoing since then and the additional consultation held earlier this year.
- 1.9 To be clear, we accept the contributions to the unmet need from the Black Country proposed at Shrewsbury and Bridgnorth, which includes the Tasley Garden Village allocation also being promoted by Taylor Wimpey. These locations are clearly well-connected to the Black Country due to their proximity and accessibility to the conurbation, and so their selection is justified and appropriate. We have nonetheless identified significant concerns with how the Council proposes to accommodate a proportion of the Black Country's housing shortfall contribution. This is set out in section 3 of our submission to the additional consultation. Our principal concerns centre around the area of search applied and the site assessment process.

- 1.10 The Council has identified sub-areas that, in planning terms, are not obviously related or connected to the Black Country, notably Much Wenlock, Broseley and Highley (GC44, para 12.30). The connectivity and accessibility of these areas (and thus their suitability and appropriateness as locations to address the unmet need) differ markedly to those of Shrewsbury, Bridgnorth and also Albrighton. This is recognised in the updated SA (GC44, para 12.14) but no comparative exercise or assessment of the relative strength in functional relationship of these separate areas to the Black Country has been carried out in the SA or the updated housing topic paper to inform the choice of sites. This is a significant flaw in the additional evidence because the third site selected as appropriate and justified location for this purpose is the Ironbridge Power Station site (which is located in the Broseley sub-area).
- 1.11 In terms of the selected sites, we have highlighted in section 3 of our additional consultation submission concerns with the Council's preference for the Ironbridge Power Station site as an appropriate and justified location for contributing towards the Black Country's unmet needs figure of 1,500. The Plan would allocate 1,000 dwellings on the Ironbridge Power Station site to be delivered during the plan period, with a proposed contribution of 600 dwellings towards the unmet need. This equates to 60% of the allocation, and 40% of the unmet need quotient.
- 1.12 For the scale of such a contribution to be sound, we would expect the preferred location to accord with national policy objectives, notably promoting 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 modes<sup>3</sup>. As we set out in our additional consultation submission (3.19) Ironbridge Power Station site is not served by any direct rail service to the Black Country 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. 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. Consequently, 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. No transport infrastructure measures have been identified in the Plan to address these problems. The selection of the Ironbridge is confusing and illogical and is clearly inconsistent with national policy.
- 1.13 To be clear, we do not consider the Ironbridge Power Station site is either appropriate or justified in preference to other sub-areas (Albrighton) for the reasons we have set out in our submissions. We recommend 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

---

<sup>3</sup> NPPF 2021, paras 104-105

Black Country, notably at Albrighton which is well-served and relatively well connected to the Black Country.

**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?**

- 1.14 Table 5.1 of the Regulation 19 Local Plan identifies those areas of Green Belt the Council has proposed for either release for allocation, or safeguarding. None of this land has been subsequently assigned to meeting any of the unmet housing need from the Black Country (though some Green Belt land is proposed to be release for employment use is assigned for that purpose, at Shifnal) following the additional evidence gathering exercise.
- 1.15 We set out our detailed response to the additional consultation material on this topic in section 7 of our additional consultation submission. We have argued throughout the preparation of the Local Plan that the strategy should address the wider unmet housing needs from the Black Country, and that land should be released from the Green Belt to achieve this is justified (our preference being Green Belt land at Albrighton) – see paragraph 9.1.28-9.1.32 of our submission at the Regulation 19 stage. Whilst the Council has taken forward the former element, it has resisted the release of Green Belt land at Albrighton towards meeting those unmet needs, despite the clear logic of doing so. It does though propose to safeguard three sites, including Land at Cross Road, at the settlement for future release through the next plan review.
- 1.16 We do not agree that this approach is soundly-based. As set out in our submissions, we contend that the above site should be released in this Plan (and not at a later date) in order to not only to assist in addressing the unmet housing needs from the Black Country, but also to contribute towards the uplift in the housing requirement we also argue is appropriate and justified (and which we discuss in our Matter 1 and 3 submissions in more detail).
- 1.17 We also contend that strategic and local exceptional circumstances clearly exist to justify the release of land at Albrighton (Cross Road), notably the 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 Green Belt Topic Paper (GC46, para 6.11-6.12). We agree with the Council that the site itself does not make a significant contribution towards the Green Belt purposes and would not undermine openness of the wider Green Belt were it to be release for development.
- 1.18 In considering those sites that can potentially contribute towards the unmet housing needs from the Black Country (as is the request from the Inspectors to do so) the Council has unduly focused on resisting any positive contribution that land in the Green Belt can make toward addressing that issue (or to meet the uplifted housing requirement) or even to reassign the Green Belt land proposed for safeguarding. This has resulted in the Council favouring a site (Ironbridge Power Station) which has a very limited functional relationship with the Black Country and which is likely only to promote fewer sustainable travel journeys between those areas compared to other

locations, notably Albrighton, that are better connected and more accessible to the Black Country. As a result, the Council's approach is not soundly-based.