

## Matter 2 - Development Strategy

### Introduction

- 1.1.1. This representation should be read in conjunction with the previous Regulation 19 representations, Stage 1 Hearing Statements and representations to the additional Local Plan Examination consultation made by the Raby Estate (ref: A0149).
- 1.1.2. The Raby Estate is promoting one site for development, the Land at Shore Lane in the village of Cressage. The Estate is concerned that Shropshire Council have not sufficiently demonstrated that the proposed spatial strategy and distribution of growth are suitable for the development needs of Shropshire or the Black Country and therefore suggest that the strategy is reconsidered.

**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?**

- 1.1.3. As detailed in our Hearing Statement for Matter 1 and our representations to the consultation on additional material (ref: A250), there was a failure to comprehensively review and update the SA. This has resulted in the proposed spatial strategy and broad distribution of growth to be unchanged outside of the clearer separation between the housing requirements of Shropshire and the contribution towards the Black Country (per MM001 within GC4m).
- 1.1.4. Section 13 of GC44 concludes that the plan will continue to have an ‘Urban Focus’, while relying on continuing policies from the adopted SAMDev (with a rural focus), and windfall sites (Section 10) to deliver this. Therefore, this aspect of the draft Local Plan is inconsistent with NPPF Paragraph 35 in that it is not based on appropriate evidence, rendering it ineffective and unjustified.
- 1.1.5. Section 10 of the SA recognises the potential to achieve the proposed uplift in Shropshire’s housing requirement by 500 dwellings through Option 3 (allocating new sites), however indicate that it was not selected due to the increased certainty regarding the urban focus of development with Option 1 (increasing windfall allowances). We dispute this, particularly as it is the option that offers the least certainty; Annex 2 of the NPPF defines windfall sites as those “not specifically identified in the development plan”, therefore meaning there is no certainty that they will come forward.
- 1.1.6. We note that the Council justify this via the historic delivery of windfall sites being strong. This was due to the previous rural focus of the spatial strategy which provided a favourable environment to bring forward windfall development. With an urban focus and restrictive policy position towards the rural areas and smaller settlements, the spatial strategy will constrain the amount of windfall sites that can come forward for development.
- 1.1.7. Given the noted positive potential contributions of Option 3, Option 4 (a combination of two or more of the other options) should at least be considered, in recognition that that none of the reasonable options would result in a significant effect or would require mitigation measures (paragraph 10.63 of GC44).

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

- 1.1.8. As outlined in our representations to the consultation on additional material in June 2024 (ref. A250), the Council’s reassessment of all available sites within a reasonable assessment geography (to

identify suitable sites to meet the unmet housing needs of the Black Country) has not clearly justified that these sites are suitable for the Black Country need, rather than the most suitable of the sites already identified to meet Shropshire's housing need.

- 1.1.9. Despite the additional work carried out in GC44, the conclusions made do not target the concerns of the Inspectors in paragraph 15 of ID36. Although the sites are reassessed for the purpose of meeting a separate housing need (the Black Country) to that of Shropshire, the conclusions remain the same as in GC29, with little rationale given for this.
- 1.1.10. The Raby Estate raised significant concerns regarding the reasonable assessment geography identified to consider which site(s) would meet the need of the Black Country within paragraphs 2.2.54 to 2.2.68 of the representations to the additional material (ref. A250). Figures 12.1-12.4 of GC44 used Place Plan Areas to understand spatial variation in factors indicating dependencies between Shropshire and the Black Country, resulting in overgeneralised conclusions which identify whole Place Plan Areas as suitable. This is particularly the case for the Shrewsbury Place Plan Area, where the likely dependencies between the Black Country and the area to the east of Shrewsbury have been assumed for the whole Place Plan Area, including the areas closest to the Welsh border. This is an inappropriate assumption, and conclusions of suitable sites should not be based on a geography of this scale.
- 1.1.11. Within GC52 the Council disregarded this concern, citing the Inspectors' approval of the reasonable assessment geography chosen within paragraph 7.1 of ID37. The Council also note that no objection to the consultation was received from ABCA. While the general methodology may not be a concern, the use of this methodology has not been linked to the overall Site Assessment process; it appears a convenience that sites previously identified in GC29 fall within the broad assessment geography, thus seeming reasonable for the sites to be concluded as the most suitable within GC44. This is particularly the case due to the relatively poor Site Assessment conclusions for the chosen sites in meeting the unmet housing needs of the Black Country; it is unclear what particular merit these sites present compared to alternatives.
- 1.1.12. The exercise of assessing against a reasonable assessment geography has been carried out, but the nuance of the conclusions that should be made from this have not been carried forward to the overall conclusion of the sites to contribute towards the unmet needs of the Black Country.
- 1.1.13. Therefore, there is a need for Shropshire to reinterpret the conclusions of the Site Assessment, as currently given within Section 12 of GC44, to clearly identify the most suitable sites to meet the unmet housing needs of the Black Country, and explicitly carry out this assessment separate to that of the housing needs of Shropshire.

**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?**

- 1.1.14. While meeting some of the housing and employment needs of the Black Country has/will lead to a need to find more sites, Shropshire has an abundance of viable alternative sites before Green Belt release needs to be considered. A significant gain in alternative sites, outside of the Green Belt, could be found if the Council re-examined how settlement boundaries had been drawn.
- 1.1.15. GC46 currently outlines the justification for Green Belt release in Shropshire; and identifies that Green Belt will be released to meet both Black Country need, and Shropshire's need for both employment uses and housing. The additional material does not justify that there are no reasonable



alternatives to allocating this site to meet this need, proposing it to be removed from the Green Belt. This is particularly the case as the exceptional circumstances given to allocate SHF018b and SHF018d relate to Shropshire's own need, despite most of the allocation being proposed for the Black Country's unmet employment land need (30 hectares of a total capacity of 39 hectares).

- 1.1.16. Therefore, Shropshire should be required to look at reasonable alternatives first, including amending proposed settlement boundaries, ahead of settling on Green Belt release, to ensure that this approach is justified, per paragraph 35 of the NPPF.

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