

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 2 Hearing Statement

Representor ID: B-A139

Representor: Harrow Estates

Matter: 2

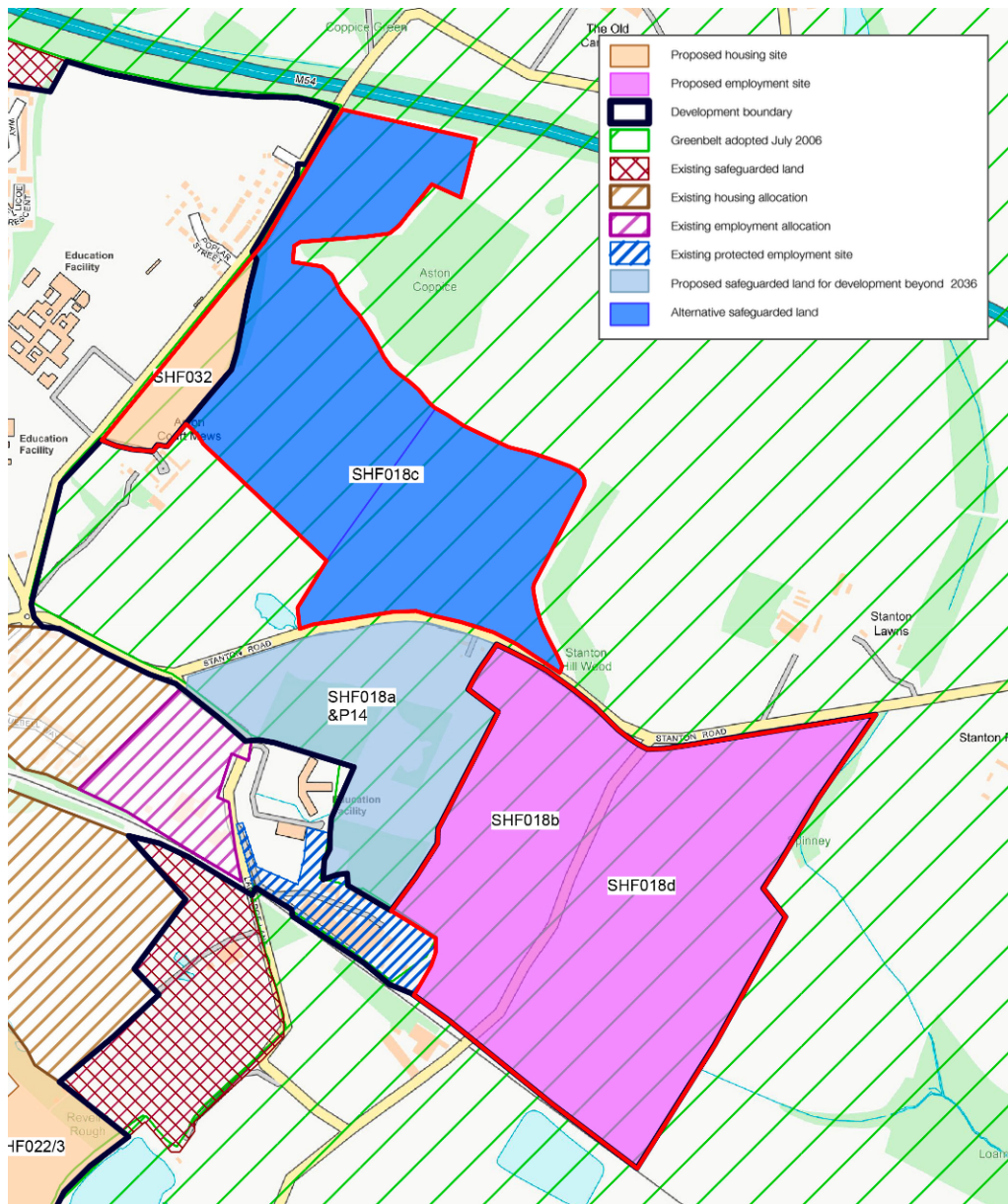
Development Strategy

Date: 20 September 2024

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1.0 Introduction

- 1.1 This examination Hearing Statement has been prepared by tor&co on behalf of Harrow Estates (Representor ID: B-A139) in respect of **Matter 2 – Development Strategy** of the Shropshire Local Plan examination in public.
- 1.2 The comments made herein respond directly to the questions set out in the Stage 2 Matters, Issues and Questions (ID40).
- 1.3 This Statement should be read in conjunction with the Harrow Estates Regulation 19 representations and Stage 1 Hearing Statements. Note that Harrow hold an interest in employment allocations referenced SHF018b and SHF018d, and in the former draft housing allocation at SHF032. They also hold an interest in omission site ref SHF018c, which has potential to form part of the safeguarded land area. For ease of reference, the plan below shows the relevant land parcels.



2.0 Response to the Inspectors Questions

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?

- 2.1 Whilst it is understood that under transitional arrangements the plan remains to be examined for soundness under the 2021 NPPF, local policies that cover areas protected by the NPPF, in particular footnote 7 policies such as Green Belt, do run the risk of becoming inconsistent with national policy on adoption of the plan. The current consultation on the draft NPPF highlights the issue, where a clear shift in policy regarding Green Belt development and release, including with the introduction of Grey Belt, is indicated.
- 2.2 Simply, rather than repeat the current national policy position on such matters, Policy SP.11 'Green Belt and Safeguarded Land' should state at point 3. *"The Green Belt will be protected against inappropriate development, as defined by national policy."* The remaining part of point 3. together with points 4., 5. and 6. are unnecessary and can be deleted. In terms of placing the Green Belt policy into a local Shropshire context (see para 3.104) it is unnecessary to cross-reference Policy SP11 to other policies in the plan, these policies are part of the development plan and can be considered where 'relevant' to a development proposal.
- 2.3 This would ensure that Green Belt protection remains part of the development plan, rather than as a material consideration in national policy, but will remain consistent with national policy through the lifetime of the plan.

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?

- 2.4 The additional work has only served to further support and justify the overall spatial strategy for growth within the plan period.

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

- 2.5 No comment.

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?

Housing

- 2.6 As confirmed in the Council's Green Belt Topic Paper (GC30, Table 4.1) none of the housing sites identified to meet unmet need requires Green Belt release, noting the geographical scope and SA in relation to this matter. The accommodation of Shropshire's needs, in accordance with the principles of sustainable development and the overarching spatial strategy of the plan is unaffected by this approach.

- 2.7 In relation to safeguarded land, at the present time the level of Shropshire’s need and unmet housing need from the Black Country is an unknown factor. It is too early to say how much land will be required to be released, including to help accommodate any unmet housing need through the next local plan review. However it is clear that the housing need is extensive and only likely to increase, particularly if the amended standard methodology to calculate local housing need is adopted later this year.
- 2.8 Whilst this new methodology is not relevant to the soundness of this local plan per se, it is relevant to the question over safeguarded land, which is intended to meet longer-term development needs well beyond the plan period.
- 2.9 The current indication is that the development needs, with respect to housing, will increase significantly as follows:

Authority	Current SM LHN (annual)	Revised SM LHN (annual)	Difference
Shropshire	1,070	2,059	989
Sandwell	1,550	1,509	-41
Walsall	906	1,294	388
Wolverhampton	1,096	1,227	131
Total			1,467

- 2.10 In this context, specifically noting the almost doubling of Shropshire’s local housing needs and comment in Topic Paper GC30 that, *“At this time, it is expected that any future development on the ‘safeguarded’ land (which should only occur once it is allocated for development within a future Local Plan) would be to meet the needs of Shropshire.”* (para 5.24), whilst it is clear that additional land will need to be released from the Green Belt in due course, at this point in time it is unclear how much. 105 ha over 9 sites is unlikely to be sufficient.
- 2.11 Additionally, and in any event, there are questions over the site selection process for safeguarding. In brief, and as covered by previous representations, land to the south-west of Shifnal was selected in the early stages of plan promotion (at preferred sites consultation stage - 2019) because of the opportunity to deliver a new strategic highway link from the A464 south to the A464 west, Priorslee Road. However the area required to complete the link, i.e. the stretch between the railway line and Priorslee Road, was omitted at Reg 18 stage. The safeguarded land therefore falls short of this potential, and in any event, the new link does not feature in the investment plan (gc54). The reasoned justification for the scale and location of safeguarded land has been undermined during the plan production process.
- 2.12 Three clear options therefore present themselves:
1. Delete the safeguarded land provisions in this local plan (SP.11), and include a clear statement of intent to review the Green Belt again through the local plan review (potentially a partial review to address this matter alone and supplement this local plan), which would maintain consistency with the NPPF;

2. Designate all sustainably located, currently Green Belt land, as safeguarded land to address the uncertainty. However this would require significant further work and Sustainability Appraisal, and cause further delay in adopting this local plan.
3. Retain the safeguarded land in the draft plan but acknowledge that the approach will need to be reviewed, as per point 1. Above.

Employment

- 2.13 The methodology the Council has used to establish the quantum of unmet need that Shropshire will accommodate has a sound basis. There is a close and significant functional relationship between Shropshire and the Black Country with overlapping economic and social areas, with migration and commuter pattern flows between the two.
- 2.14 The Council has recognised the geographical and functional relationship between Shropshire, the Black Country and wider West Midlands conurbation and in particular the relationship between east Shropshire and the adjacent Black Country authorities of Wolverhampton, Dudley, Walsall and Sandwell.
- 2.15 Of key importance is the significance of the M54 Corridor, which is identified in the emerging Local Plan as a major corridor linking the county with the West Midlands conurbation, and thereby the Black Country.
- 2.16 Further, given that Shropshire is accommodating part of the Black Country unmet need for housing, it is appropriate to align this with the accommodation of part of the unmet employment land need, to provide increased self-containment, also noting the current 'dormitory' character of the settlement (GC30 para 9.23). This alignment represents a sustainable pattern of development, as a matter of principle, and assists to support the exceptional circumstances case.
- 2.17 In this context, it is important to highlight that not all of the land proposed to be released from the Green Belt at Shifnal as an employment allocation, is required for the Black Country; of the draft allocation 30ha is for the Black Country and 9ha is for Shropshire. The latter is released under exceptional circumstances, acknowledging a number of factors such as the lack of brownfield options, the lack of existing outstanding commitments where densities could be increased, the type of employment land required (relevant to the density of development) and representing a sustainable pattern of development. These factors are further explored under Matter 26. However, the point being made is that land is, in any event, being released from the Green Belt under exceptional circumstances to meet local employment needs in accordance with the principles of sustainable development, and the co-location of accommodating this local employment need with that of the Black Country has strategic advantages. It is appropriate to review the Green Belt in this location, and in doing so, help to meet both needs.
- 2.18 As such, geographically, given the importance of the M54 corridor and significant benefits and advantages of development around Shifnal, which has an existing and planned additional resident labour force, can rightly play a strategic and significant role in accommodating cross-boundary need, in accordance with the Duty to Cooperate.

2.19 Whilst it may have been possible to accommodate the employment need outside the Green Belt, this could not have been achieved in accordance with the aims of achieving a sustainable pattern of development:

- There is an obvious pressing need to identify more employment land, a need that the Black Country Authorities cannot meet
- The Council has undertaken a rigorous testing exercise of the options and alternatives available
- That process has led to a clear spatial vision and logic, related to the existing settlement pattern, geographical and market principles, as well as securing additional benefits in terms of sustaining Shifnal as a key and economically active settlement
- The release of land in the location proposed would not harm or undermine the wider Green Belt, and its purpose
- Sites / land outside the Green Belt would not relate as well to the Black Country or the strategic transport links, and would not represent sustainable development

2.20 The economic functionality of Shifnal as part of the M54 corridor and its potential role in helping to accommodate identified unmet needs therefore represents a positive approach to planning and supports the legal soundness of the Plan through the satisfaction of the Duty to Cooperate.