

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0673
Matter	3 – Development Strategy (Policies SP1 – SP15)
Relevant questions nos	1, 4, 19

1. How do the strategic policies in the Local Plan accord with paragraphs 20-23 of the Framework?

4. Should Policy SP2 define the scale of development expected in the various urban locations and rural settlements?

Walsall is a signatory both to the Statement of Common Ground and the representation from the Association of Black Country Authorities (ABCA) (A0377). Walsall's representation is largely identical to that from ABCA but it contains additional comments in relation to housing and employment. To assist the inspectors and other parties we set out these additional comments in italics below:

In respect of housing, the proposed housing allocations at Bridgnorth and Shifnal are not strategic and do not benefit from direct access and visibility from the M54 corridor.

Walsall requests that the Shropshire Local Plan should increase its housing requirement by 3,000 to incorporate up to 4,500 dwellings to support the housing needs of the emerging Black Country Plan. Some 1,500 of this could be met by the proposed housing allocations in the Plan around Shifnal and Bridgnorth, with the addition of up to 3,000 dwellings to be met at Land to the north of Junction 3 of the M54 as part of a new Strategic Settlement. Land to the north of Junction 3 of the M54 was strongly supported by ABCA during the Strategic Sites consultation in 2019.

In respect of employment, the 2015 West Midlands Strategic Employment Sites Study defines 'strategic sites' as those sites that provide at least 25ha that can bring net additional activity and jobs to the region and attract nationally or internationally mobile business activity. The Study found that the Black Country and Southern Staffordshire has a severe lack of strategic employment land on sites of a minimum of 25ha in size to meet demand for large industrial type units.

The 2017 West Midlands Land Commission report similarly concluded that "the shortfall of land for employment space is at least as pressing as the shortage of land for new homes, and possibly more so" (paragraph 5.20).

The increase to the employment land contribution should also reflect qualitative factors which in this case includes the significant and increasing demand for advanced logistics premises in locations with good accessibility to the M54. Further consideration of the qualitative factors is outlined below.

The employment sites in Shifnal and Bridgnorth could be assumed to be capable of contributing towards non-strategic needs arising in the Black Country given their size and distance from the motorway network. This in turn would limit the range of occupiers who are likely to be attracted to them and so would be unlikely to be attractive to large scale and footloose inward-investment requirements. This is consistent with the findings of the EDNA, which acknowledges that demand for 'Big Box' units (10,000 sqm plus) has been generally limited within Shropshire. However, this is in part as a result of there being no readily available supply of suitably located, high quality larger stock to offer recently. Furthermore, the EDNA concludes that newly developed modern stock has largely catered to smaller occupiers and trade counter uses, and much of the existing larger stock is dated and in need of refurbishment in order to meet the requirements of modern occupiers.

From the evidence, it is clear that there will continue to be a significant quantitative and qualitative shortfall of land in the Black Country and neighbouring areas. The M54 Growth Corridor has been identified in the Strategic Options Study (2019) as a "key strategic gateway for both Shropshire and its neighbours" and a "key growth Corridor for both employment and residential development, resulting from the strong transport links present and critical mass from the presence of nationally significant education, training and employment opportunities". The provision of just 30ha towards Black Country employment needs is not considered sufficient to respond positively or effectively to cross-boundary strategic matters and the alternative locations for such developments primarily along the M6 and M54 transport corridors is extremely limited; there are only so many junctions that could accommodate further growth.

Given the scale of the quantitative and qualitative shortfall and the size of Shropshire relative to its neighbours, we request that the Shropshire Local Plan should increase its employment requirement to provide for significantly more than the 30ha of employment land identified so far. In view of the headroom referred to above, there is a need for strong evidence as to how much land could sustainably and practically be delivered on the sites identified in the Regulation 19 document (e.g. at Shifnal and Bridgnorth) and through continuing consideration of strategic sites. In particular, land to the north of M54 Junction 3 has been promoted as a potential Strategic Employment Site, with potential to provide 75ha of employment land. This could complement development at Shifnal and take up opportunities that might arise at Cosford. The potential for employment, and housing, development in the area north of Junction 3 was strongly supported by ABCA in its September 2019 response to Shropshire's consultation on Strategic Sites. We remain in support of this proposal and take the view the Shropshire Local Plan should support a strategic settlement (which as referred to below) would also help to meet the housing needs of the Black Country.

Schedule SP2.1 attached to policy SP2 lists the areas, described as 'urban locations', where new development will be focussed. More detail of the size and scale of development expected in each location is contained in chapters 5, 6 and 7. Including this information in policy SP2 would result in duplication.

The two largest proposed allocations that are closest to the Black Country are Bridgnorth and Shifnal, which are referred to in settlement policies S3 and S15. Policies S19 and S20 refer to two strategic settlements, Tern Hill and Former Ironbridge Power Station.

Bridgnorth is described as delivering around 1,800 dwellings and 49ha of employment land, whilst Shifnal is described as delivering around 1,500 dwellings and 41ha of employment land. Tern Hill is described as around 72ha with capacity for around 750 dwellings and 6ha of employment land, whilst Ironbridge is described as around 140ha with capacity for around 1,000 dwellings and 6ha of employment land.

Paragraphs 3.7 and 3.18 of the Shropshire Plan states that 1,500 of the proposed dwellings and 30ha of the proposed employment land are to meet the needs of the Black Country. This amount of development is equivalent to nearly the whole of the allocation for either Bridgnorth or Shifnal, and would mean that none of the allocation for one other or these locations would be available for local needs. As noted in Walsall's representation, neither of these locations nor the scale of development proposed are strategic or sufficient to make a sufficient contribution to the needs of the Black Country. The two strategic settlements at Tern Hill and Ironbridge are also too remote from the Black Country.

The scale of development required to serve as a contribution to meet the needs of the Black Country is such that an additional strategic settlement in a sustainable location should be explicitly identified. This would need to be larger than the two already identified in the Plan. In the absence of such a settlement, the Plan fails to make sufficient provision for housing and employment, so is contrary to NPPF paragraph 20. It is not positively prepared so is also contrary to NPPF paragraph 35.

19. Is Policy SP14 justified effective and consistent with national policy? Should the corridors be marked on a map or plan? Is this policy consistent with other policies in the Local Plan? Is it the purpose of this policy to allow for significant growth in addition to that allocated in the Local Plan, including development in the Green Belt?

The revised boundaries of the Green Belt are defined by policy SP11 and table SP11.1. Policy SP13 allows development of employment generating uses in the Green Belt where there are very special circumstances. Policy SP14 states that development on 'strategic corridors' will be located in accordance with a sequential preference that includes 'on appropriate windfall development sites which are ... Greenfield sites in exceptional circumstances'.

The reference to windfall development in policy SP14 implies that the policy is intended to apply to sites that come forward as planning applications outside the development plan process. However, it only refers to development on greenfield sites not Green Belt. The term exceptional circumstances is used in the NPPF in relation to changes to Green Belt boundaries (paragraphs 140 and 141). If the policy is intended to refer to Green Belt sites either instead of or as well as greenfield, the term very special circumstances should be used instead (NPPF paragraph 147).

Strategic employment uses have particular location requirements, including large unconstrained sites and good access to the motorway network. Given the quantity of employment development proposed, including that to serve the needs of the Black Country, such sites should be identified in the Plan rather than expected to come forward through windfall development outside the development plan process.