

# SHROPSHIRE LOCAL PLAN EXAMINATION

## Stage 1 Hearing Statement

Representor unique Part A Ref *	A0377
Matter	3 – Development Strategy
Relevant questions nos	19
<p><b>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?</b></p> <p>The Black Country Authority's (BCAs) are <b>broadly supportive</b> of the spatial strategy which underpins the Plan, particularly the inclusion of Strategic Corridors to ensure alignment with the Economic Growth Strategy for Shropshire as referenced in para 3.28, Policy SP12 and with their role set out in more detail in Policy SP14.</p> <p>The <b>Plan would benefit from these corridors being shown on a Plan</b>, potentially on Figure SP2.1. In this context we consider that Figure SP2.1 could form the basis of a <b>Key Diagram</b> to articulate the overall strategy and include other strategic proposals including key infrastructure projects. The inclusion of a Key Diagram would also ensure consistency with para 23 of the National Planning Policy Framework (NPPF).</p> <p>The BCAs particularly welcome the inclusion of the Eastern Belt strategic corridor (Corridor (a)) as a focus for investment – this being the principal link between the County and the West Midlands conurbation. The scale, type and location of proposed growth and infrastructure investment in this corridor including in Bridgnorth, Shifnall, Cosford and Ironbridge builds on existing functional and physical links with the Black Country. The development proposals are therefore well-placed to form the basis of the contribution contained in the Plan towards meeting housing and employment land needs arising in the Black Country which cannot be met within the administrative area.</p> <p>We also welcome the potential for additional proposals to come forward within the strategic corridors through Part 3(c) of the Policy. This element of the Policy is critically important to the BCAs given the strong possibility of a strategic shortfall of housing and employment land needs to serve the Black Country arising following the current round of Local Plan reviews across the West Midlands, and the programme of work which is being designed to address it as set out in our response to Matter 4. The proposed follow-on work to address the recommendations of the 2021</p>	

West Midlands Strategic Employment Sites Study is key here. As set out in our Statement to Matter 4, it is critical that the Local Plan does not preclude the delivery of strategic employment opportunities which could provide significant benefits to the Shropshire economy, help to address unmet needs arising in the Black Country and to enable the West Midlands to provide a competitive supply of high-quality investment opportunities.

In this context we are concerned that Policy SP14 lacks clarity and could be overly restrictive. Part 3 of the Policy 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. This may include sites currently located in the green belt. If it is the intention of the Policy to limit such windfall development to greenfield and brownfield sites in non-green belt locations, then this approach is overly restrictive and pre-judges the outcome of the proposed follow-on work to the 2021 West Midlands Strategic Employment Sites Study.

To further assist with the interpretation of the Policy, we suggest that **para 3.149 of the Plan would benefit from a reference to such sites meeting strategic needs including needs arising in neighbouring areas** which those areas are unable to accommodate. These needs being established through Local Plan reviews and / or evidence commissioned across multiple local authority areas.