

Matter 3: Development Strategy

Representor A0137



SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0137
Matter	3 – Development Strategy
Relevant question nos	1,3,4,5,17,18,19,20

1. Q1. How do the strategic policies in the Local Plan accord with paragraphs 20-23 of the Framework?

- 1.1.1. The strategic policies should address cross boundary issues as required by NPPF para 21. Bradford Rural Estates (**BRE's**) representations as a whole are focused on the failure of the Plan to adequately address Black Country Authority (**BCA**) needs for housing and employment in quantitative and qualitative terms. Please refer to BRE's statements to Matters 1 and 2.
- 1.1.2. The strategic policies make no specific provision in quantitative terms for housing or employment to meet BCA needs. The stated provision of 1,500 dwellings and 30ha of employment land is simply an accounting function, notionally identifying parts of the strategic targets which were set to meet Shropshire's needs for BCA needs. Please refer to BRE's statement for Matter 2 Q1 for the current position on BCA unmet needs.
- 1.1.3. The targets in SP2 reflect extrapolation of previous rates of land take-up for housing and employment which the Council considers it needs for Shropshire's benefit. Housing targets based upon annual take-up were set at the Preferred Scale and Distribution of Development (**PSDD**) stage in 2017 before the cross boundary need for BCA was known. Planned provision for housing and employment has remained broadly the same through the Plan evolution. However, provision for both housing and employment is marginally less at Regulation 19 when supposedly accommodating Black Country Authority (**BCA**) needs, than it was at PSDD when it did not include (notionally) for BCA needs. Annual housing targets have dropped from 1,437 to 1,400. Annual employment targets have dropped from 15ha to 13.6ha. (Total targets have marginally increased for housing reflecting the extension of the Plan period from 2036 to 2038. For employment the total has remained at 300ha). There is no specific accommodation of BCA needs within the SP2 targets.
- 1.1.4. The failure of SP2 to make specific provision for BCA needs quantitatively is reflected in the strategic approach to the distribution of development, which makes no provision for strategic sites in the M54 Strategic Corridor between J2 and J4 where development would be able to effect the step change which the evidence base calls for and which the Council states in the Plan it is seeking to achieve. Strategic site provision in the eastern end of the M54 corridor is what is required to achieve the recommendations of the Shropshire Economic Growth Strategy (**SEGS**), Marches Strategic Economic Plan (**Marches SEP**), and Economic Development Needs Assessment (**EDNA**) whilst at the same time it would meet BCA needs and would deliver objectives for the West Midlands Combined Authority Strategic Economic Plan (**WMCA SEP**), Midlands Engine and WM Land Commission recommendations. At present the strategic policies do not support development of land in the required location or development of the required scale to achieve the strategic priorities which the evidence base identifies.
- 1.1.5. This failure to plan for the strategic priorities is most starkly highlighted by the omission of the strategic site at J3 which the Council stated in the Strategic Sites Consultation document to represent a:

“once in a generation opportunity to meet cross-boundary needs, through delivery of nationally significant employment opportunities, high quality housing and a local centre to provide services, facilities and infrastructure as part of a planned new settlement within an important strategic corridor.”¹

- 1.1.6. Whilst it may appear that the RAF Cosford Strategic Site S21 is proposed to perform the function of creating step change linkage with the WMCA and address the housing and employment land needs it should be noted that the site proposed for removal from the green belt is not a development site and its removal is not based upon the expectation of significant development. Whilst 221 ha will be removed from the green belt the site offers no general employment or housing development opportunity. The site is allocated for military development and for intensification of the RAF museum, and a new headquarters for the Midlands Air Ambulance. Railway station improvements are also supported. The allocation of RAF Cosford does not therefore do anything towards addressing the BCA needs in quantitative or qualitative terms. This is confirmed by Table SP11.1.
- 1.1.7. The strategic policies most particularly SP2 also fail to address the strategic priorities for the area as required by para 21. The Employment Topic Paper (**ETP**) sets out the strategic economic objectives. These include:
- attract inward investment (1.1)
 - promoting strategic development opportunities (1.2)
 - ensuring the strategy can respond to additional needs not already anticipated and rapid changes in economic circumstances (1.3)
 - deliver economic growth in strategic corridors and development in strategic corridors served by the principal road and rail network to work towards a step change (1.5)
 - implement the SEGS and provide solutions to deliver on the County’s economic growth potential (1.7)
- 1.1.8. The SEGS identifies a commitment to work with the WMCA and to link with its SEP. The SEGS commits to working with WMCA on the key areas of collaboration set out in the SEP to accelerate economic growth, employment and productivity and focus on mutual priority actions including the West Midlands Land Commission and Growth Company. The SEGS strategy is to be bold ambitious and forward thinking to build upon the M54 / A5 strategic corridor reinforcing Shropshire’s close proximity to the West Midlands and the growth potential that will develop from the West Midlands Land Commission².

¹ Consultation on Strategic Sites July 2019 – 3.26

² Shropshire Economic Growth Strategy 2017-2021 pages 2 - 9

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- 1.1.9. The Housing Topic Paper does not identify strategic objectives and hence the strategic priorities for housing are harder to discern. It is clear from the SEGS however, that housing priorities include 1,375 homes per annum, and achieving the right type, quality and cost of housing in the right location to make Shropshire an attractive place to live. Housing delivery through a plan led approach with allocation of strategic sites³.
- 1.1.10. The spatial approach to development set out by SP2 does not address the above strategic priorities. The spatial approach is to continue existing patterns of development by distributing employment development around the urban areas in accordance with their position in the hierarchy. That approach will not attract significant inward investment as it does not produce development opportunities of a scale and quality or in a location where they are demanded by the market (see Savills Market Report Update appended to Matter 2). The Plan fails to make provision for growth and development in strategic corridors and particularly the M54 corridor which is the strategic corridor also with rail links. The strategy of the Plan will not deliver step change and does not focus on priority actions for the WMCA and Land Commission.
- 1.1.11. We note the West Midlands Land Commission Report (**WMLCR**) is not currently in the evidence base. It can be viewed here: <https://www.wmca.org.uk/media/1412/wmlc-final-report.pdf>.
- 1.1.12. The LCR makes recommendations for WMCA regarding how to achieve the growth ambitions of the WMCA SEP both in relation to housing and employment land. The stated strategic priority of the Council is to collaborate with WMCA to prioritise the actions recommended by the LCR. Those actions include:
- Prioritisation of opportunities
 - Aligning development and infrastructure, particularly strategic transport infrastructure
 - Single agreed vision responding to the needs of business and the housing market
 - Designating Action Zones, including identifying strategic employment sites and large concentrations of new homes in strategic transport corridors
 - Unity of purpose to be achieved through collaboration across public and private sectors to deliver SEP objectives
 - Strategic review of green belt, acknowledging that without green belt release achievement of SEP objectives is unlikely
- 1.1.13. Engagement to support WMCA (including BCA) in achievement of all of the above LCR actions is stated to be a priority for the Council. Those LCR recommendations the delivery of the WMCA SEP objectives, all point towards allocation of a strategic site for employment and housing in the M54 corridor between J2 and J4. SP2 and the strategic approach of the Plan is deficient in not planning to meet these strategic priorities.
- 1.1.14. Please refer to Matter 1 Q17 for comments in relation to para 22 and the time period for the Plan.

³ Ibid pages 6 & 21

2. Q3. What is the basis for the overall spatial strategy and broad distribution of growth set out in Policy SP2? What options were considered and why was this chosen?

- 2.1.1. The spatial distribution set out in Policy SP2 and schedule SP2.1 does not positively or effectively respond to the strategic priorities of the area as we have set out above in response to Matter 3 Q1.
- 2.1.2. Neither the Housing Topic Paper (**HTP**), Employment Topic Paper (**ETP**) or the Sustainability Appraisal (**SA**) provide an explanation of what alternative growth options were considered or why other potential growth options were dismissed and why the proposed spatial strategy was selected.
- 2.1.3. BRE's responses to Q1 above and Matters 1 and 2 highlight the lack of any justification for the spatial strategy and how the urban focused approach which distributes development according to the settlement hierarchy, will not deliver the 'step change' in economic growth that is a strategic priority.
- 2.1.4. The final level of housing provision that Shropshire should provide to support the Greater Birmingham and Black Country Housing Market Area (**GBBCHMA**) shortfall is a long way from being concluded. The baseline position that we have identified from reviewing ONS data on out migration from the Black Country confirms that the minimum offer should have been 2,000 dwellings. If Shropshire had taken this as its starting position and then appropriately factored in the known limitations / restrictions placed on key local planning authorities elsewhere (e.g. Birmingham, Black Country, Tamworth) then upward adjustment would be necessary. The spatial distribution does not address the need to attract and retain a younger and more widely skilled population, nor the strategic priority of working alongside the WMCA to deliver its growth targets and mutual priority actions which would include taking housing need from BCA and using it to grow the working population in the location accessible to both Shropshire and BC travel to work areas.

3. Q4. Should Policy SP2 define the scale of development expected in the various urban locations and rural settlements?

- 3.1.1. Yes – the plan should contain a schedule setting out the level of housing and employment proposed in each settlement to allow appreciation of the distribution of development which is proposed by the Plan which is currently somewhat difficult to see clearly. This would highlight the limitations of new opportunities currently planned for housing and employment in the M54 Strategic Corridor which we consider is critical to meeting Black Country Authority (BCA) needs. Clear breakdowns for each settlement and strategic site would clarify for example that RAF Cosford is not proposed to make any contribution to housing or employment delivery.
- 3.1.2. S15.1 states that Shifnal will be the focus for investment, employment, housing and development on the M54 / A5 Strategic Corridor. However, Shifnal is proposed for just 230 additional dwellings and 15.6ha of employment land. This serves to highlight that the spatial approach does not respond to the BCA needs and the Plan does not do what it purports to do in delivering step change. The Plan does not prioritise growth in the M54 Strategic Corridor to deliver mutual benefits for Shropshire and WMCA. In accordance with SEGS priorities.
- 3.1.3. In order to understand the land supply in each location it is necessary to review each Place Plan Policy, plus appendices 2, 5 and 6.
- 3.1.4. There is a lack of clarity over what is being relied upon from the previous plan, what is expected to come forward as a new allocation and what land is being safeguarded for future release. Whilst some details of employment land are set out at appendix 6 of the Plan, the employment land areas listed do not tally with the totals at the top of the table for new allocations and total supply. Housing supply requires review of appendices 2 and 5.
- 3.1.5. For example S15 (Shifnal Place Plan Area) refers to the town delivering around 1,500 dwellings and 41ha of employment land. However schedule S15.1 only lists 230 dwellings and 15.6ha of net employment land to be allocated in this plan being the new allocations. The proposed use and capacity of safeguarded land in Schedule S15.1(iii) is unclear. Proposed to be saved SH1 (Plan appendix 2) identifies 4 sites: 004A 115 dwellings, 004B 100 dwellings, 006A 250 dwellings, ELR 021 2ha employment
- 3.1.6. Appendix 5 suggests that the 3 saved housing sites (total 465 dwellings as allocated) have total planning permission totalling 573 dwellings. It therefore appears that the 1,500 total for Shifnal comprises: 605 completions 2016 – 2019, 573 committed, 230 new allocations, and 92 windfall (at a rate 11.5% of dwellings yet to be delivered). This information should be presented clearly in the Plan for each settlement / component of housing and employment land supply. There should be a complete schedule of all housing and all employment sites with respective development capacities so that proper assessment can be made of what is proposed to be allocated.

4. Q5. The spatial strategy in the Core Strategy has a rural focus, while the submitted Local Plan's spatial strategy is urban focussed. The latter holds a list of 'saved sites' in appendix 2 which the Council intends to rely upon to meet the new spatial strategy and development requirements. Do the 'saved sites' accord with the spatial distribution of the submitted Local Plan? What will be the policy basis for these 'saved sites'? By relying upon such an approach, is the Local Plan positively prepared, justified, effective and consistent with national policy?

4.1.1. The apparent conflict between the stated urban focus strategy of the Plan and rural focus of the allocations proposed to be saved, highlights the lack of consideration to a strategy which will deliver strategic priorities. The inclusion of allocations for apparently opposing strategic reasons illustrates that the strategy does not do in practice what it purports to at face value. The proposed new allocations and saved allocations provide a lack of opportunity and focus in the M54 Strategic Corridor in the east of the County. The eastern end of the M54 Strategic Corridor should be the focus for accommodating cross boundary needs of the BCA and delivering the SEGS objectives of collaborating with the WMCA SEP, accelerating and maximising economic growth and prioritising the mutual priority actions (with the WMCA) of the West Midlands Land Commission and Growth Company.

5. Q17. Is Policy SP12 justified effective and consistent with national policy?

- 5.1.1. SP12 part 1 does not adequately reflect the strategic priorities identified in the evidence base which we have set out at Matter 3 Q1, and Matter 2 Q1. As such it is not consistent with NPPF para 21.
- 5.1.2. Parts 2 and 3 outline a spatial strategy which will not deliver the strategic priorities as we have set out at Matter 3 Q1, and Matter 2 Q12, Q14. The failure to plan for and allocate sufficient sites and sites of the right quality and location to deliver the strategic priorities including the needs of the BCA, contravenes NPPF paras 11b, 23, 82a and 35.
- 5.1.3. Part 4 could be interpreted to support employment development on sites other than those allocated. Whilst BRE would support a windfall policy of this nature, it does not appear to be part of a clear strategy for bringing forward sufficient land and at sufficient rate to address objectively assessed needs of Shropshire or BCA. Accordingly Part 4 does not accord with NPPF para 23.
- 5.1.4. Rather than leave delivery of the strategic priorities to chance, the Plan should identify strategic sites for inward investment to match the strategy (SEGS, Marches SEP, WMCA SEP, WM Land Commission) and meet anticipated needs including BCA needs, over the plan period, as required by NPPF para 82. In its current form SP12 does not comply with NPPF paras 82 and 35.
- 5.1.5. Part 5 supports a range of non-employment uses. It is not clear whether this is simply a strategy statement to be borne out by the allocations made by the Plan, or whether is intended to support those uses on employment sites. The range of uses identified to complement employment development are generally consistent with the strategic priorities identified by the evidence base. The need for those additional elements to support the economic growth strategy supports the allocation of a strategic site in the M54 Strategic Corridor which would deliver employment development aligned with the strategic priorities and the supporting housing and infrastructure identified in Part 5.
- 5.1.6. In order for SP12 to comply with national policy it must deliver the strategic priorities of the evidence base, which requires allocation of a strategic site in the M54 Strategic Corridor which is able to meet the needs of both Shropshire and BCA. The evidence indicates that can only be achieved by allocating a strategic site between J2 and J4.
- 5.1.7. A reasonable alternative to the strategy advocated by SP12 and SP13 is to allocate a strategic site at J3 which has been subject to consultation for that specific purpose.

6. Q18. Is Policy SP13 justified effective and consistent with national policy? Should figure SP13.1 text be included within Policy SP13?

- 6.1.1. For the reasons set out in Matter 3 Q1 and Matter 2 Q1, Q11, Q12, Q13, policy SP13 does not seek to deliver adequate land in quantitative or qualitative terms to meet objectively assessed needs including BCA needs. As such it conflicts with NPPF paras 11b, 23 and 35.
- 6.1.2. The broad approach to the definition of employment uses at Part 2 provides the opportunity for a significant proportion of allocated employment sites to effectively leak to non-core employment uses (E(g), B2, B8). If the Council considers it reasonable that employment sites be developed for such uses, it serves to underline that the employment sites allocated will not deliver the step change for economic growth which is required. It would appear that Figure SP13.1 should be part of the policy.
- 6.1.3. Part 3 is a criteria based windfall policy. For the reasons set out in Q17 in respect of SP12, whilst such an approach may be a welcome opportunity, it does not represent a clear strategy. The Plan should make explicit provision of land to meet objectively assessed needs and to deliver the strategic priorities including for BCA needs. As set out in response to Q17, that requires allocation of a strategic site in the M54 Strategic Corridor.
- 6.1.4. Please refer to our response to Q17 for requirements which apply equally to SP13.

7. Q19. 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?

- 7.1.1. The M54 Strategic Corridor is defined by the Council at M54 Strategic Growth Corridor Options Study (**M54 Study**) figures 1.1 and 1.2. It comprises the M54 between J2 and J4. The northern boundary takes in the A5 which is a secondary east / west strategic highway corridor. The rationale for the extent of the corridor north and south is unclear, as it includes locations which are not easily accessible to the M54 and A5. It is however notable that the M54 Study did not identify opportunities further in travel terms from the M54 than Shifnal. The Shifnal sites including the proposed allocation of 39ha to provide 15.6ha of employment land are not well related to the M54. Access to that Shifnal site (SHF018b & SHF018d) is either via J3 through the Bradford Rural Estate site at J3, or it is via J4 through the urban area of Shifnal. In both cases the access is narrow, constrained and unattractive to serve major employment development.
- 7.1.2. Strategic Corridors should be defined in the Plan which are appropriate to the function they are intended to serve. That requires regard to the economic evidence base. The Strategic Corridor are intended to be foci for economic development and housing development to support the attainment of economic objectives from the SEGS, and SEPs and WM Land Commission.
- 7.1.3. Strategic Corridors should not be broadly defined with the purpose of including settlements which do not contribute to meeting the economic strategic priorities of the evidence base. With the Plan unmodified in other respects, Strategic Corridors have little benefit, as they could be expected to be broadly defined to include the settlements proposed to be the focus for development through the urban focus. If the Strategic Corridors are defined to achieve the economic objectives by being tightly defined and including only locations which are attractive to business occupiers in the markets they are intended to attract (see Savills employment market report appended to Matter 2), it will demonstrate that the SP2 and SP12 approach does not deliver development where it is needed. The Savills market report defines a market area which the BRE site at J3 would serve, this is illustrated at figure 5.1 p18. It shows that the JK3 site with immediate access to the M54 is well placed to serve business links to Shrewsbury (and Telford) and all of the BCA area. The Savills Market report advises that sites on the western side of the market area, at the western end of the M54 Strategic Corridor, will not serve the Black Country and West Midlands markets (see Savills Market report 5.2.8 and figure 5.1 appended to Matter 2).
- 7.1.4. Whilst the criteria based approach to windfall development proposed by part 3 of SP14 is welcome, such an approach does not provide certainty or adequately plan for meeting the objectively assessed needs of Shropshire or BCA. Please refer to our responses to Matter 3 Q17 and Q18.

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- 7.1.5. Rather than a criteria based policy, the Plan should make specific provision through allocation of land within the Strategic Corridors to identify land of sufficient quantity, quality, accessibility and size to meet the strategic priorities for the economy and housing including specifically to meet BCA needs. As set out in Matter 2 Q1, Q3, Q6, Q11, Q12, and Matter 3 Q17, that requirement indicates strongly that the BRE site at J3 should be allocated as a strategic site for employment and housing and supporting uses.

8. Q20. What is the national planning policy basis for Whole Estate Plans (Policy SP15)? What will be the process for endorsement and what will be their purpose? Should SP15 be a non-strategic policy?

- 8.1.1. BRE is a substantial estate of approximately 4,850ha spanning the Shropshire and Staffordshire border. It comprises agriculture, forestry, residential (approx. 145 let houses across multiple villages) commercial and leisure property. A policy which promotes estate wide dialogue to take account of overall objectives and overall alignment with the Plan, rather than every potential development being considered in isolation, is therefore welcome.
- 8.1.2. Such an approach in theory, aligns with the principles of planning for sustainable development in accordance with NPPF 11a.
- 8.1.3. Consistent with our responses to Q18 and Q19, whilst BRE welcomes the opportunity for a merits based case to be made for major development through SP15, it is a highly uncertain route to planning permission which ultimately serves no one's interests. As set out at Q18 and Q19, specific provision for strategic sites to meet objectively assessed needs and the strategic priorities should be made through site specific allocation. BRE considers that allocation of the J3 site as a strategic site to meet employment and housing needs of the BCA would be consistent with the Plan objectives (as BRE suggests they should be amended) such that the thrust of SP15 is embraced.
- 8.1.4. Although it is our preference for strategic needs to be explicitly met through the Plan, if they are not, then opportunities which whole estate plans could present to do so, would rightly be strategic policies.

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