

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 2 Hearing Statement

Representor ID: B-A139

Representor: Harrow Estates

Matter: 4

Employment Land Need, Requirement
and Supply

Date: 20 September 2024

tor
&CO

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 4 - Employment Land Need, Requirement and Supply** of the Shropshire Local Plan examination in public.
- 1.2 The comments made herein respond directly to the questions set out in the Planning Inspectors 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, and in the context of Harrow's land interests as set out in response to Matter 2. It is also supported by information from Stoford's: the 'Delivery Statement (June 2024)' submitted with the recent consultation on the Council's additional work; and 'Supplementary Update (September 2024)' attached to this Matter Statement. Both documents are also relevant for Matter 26.

2.0 Response to the Inspectors Questions

Question 1: Is the updated approach to the employment land requirement and supply set out in the Council's Updated Housing and Employment Topic Paper – April 2024 (GC45) of minimum of 320 ha of employment land over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

- 2.1 Shropshire Council has continued to acknowledge the need to progress a high growth and urban focused approach to the spatial strategy. This approach, conforms with national guidance as set out in the National Planning Policy Framework (NPPF), it is positively prepared and supported.
- 2.2 The approach which displays commitment and ambition to grow the local economy of the County and compete with its Black Country neighbours will help Shropshire become a location to invest in and to locate businesses in.
- 2.3 The revised spatial strategy for the level and distribution of development across Shropshire, as proposed to be set out in draft Policy SP2 of the Local Plan, identifies an employment land requirement of a minimum of 320ha for the period between 2016 and 2038. This includes a contribution to support the unmet needs forecast to arise in the Black Country.
- 2.4 This employment provision, in terms of both quantum and distribution, seeks to implement the positive economic growth aspirations of the County, take optimum advantage of the geographical relationship with the Black Country and economic potential embedded there, and achieve a sustainable balance of sufficient jobs with the housing requirement.
- 2.5 The sufficient supply of employment land, which is focused within and adjoining sustainable urban areas, will deliver a diverse location, size and form of sites which will provide range of provision to meet the needs of different employers, whilst providing choice and competition within the market.

- 2.6 The urban areas which have been identified as suitable and sustainable locations to accommodate employment growth will support the employment needs of the County, strengthening their economic roles and reinforcing the settlement pattern / hierarchy and character of Shropshire. Whilst with the level of employment land provision proposed within the County will clearly foster greater self-containment in that the smaller settlements and communities in the rural areas will also be supported with a wider choice of local employment opportunities located at the main towns, which in turn will reduce the need for outward migration or commuting to employment opportunities further afield, outside the County, and particularly in the Black County.
- 2.7 As previously stated, the high growth option is supported and is based on sound evidence and approach, including using identified scenarios based on labour supply and demand. The Economic Development Needs Assessment (EDNA) has been appropriately used and is supported by National Planning Policy Guidance (NPPG). The baseline information and scenarios used have helped identify appropriate and realistic employment requirements which are reflected within the draft Shropshire Local Plan.
- 2.8 Indeed the West Midlands Strategic Employment Sites Study 2023/24 which is a study about strategic employment sites intended to inform local plan making, identifies a supply shortfall of strategic employment land across the region. Accordingly the provision within the County will help to address this issue.
- 2.9 The Study, as noted in its Executive Summary (Para 1.10) identifies that the *“...vacancy rates for large units have remained sub optimally low since 2014, putting pressure on rents and land values and reducing choice for business growth and inward investment. Whilst a restricted supply can have the benefit of supporting brownfield recycling, the market has typically been so over occupied that there is insufficient space to allow for redevelopment.”*
- 2.10 The Study goes on to note that *“...market evidence points to a strong need for additional investment sites to be brought forward across the region to support growth”* (Para 1.11).
- 2.11 Accounting for existing supply, the residual need identified within the report is 548-841ha of land for road needs (Para 1.16). Based on the minimum typical site size for consideration of 25ha this equates to the need to provide 22 to 34 sites (Para 1.17) which is considered to be considerable.
- 2.12 The Study concludes that *“Achieving the levels of supply recommended in this report will be challenging in the context of Local Plan making including the wide range of policy considerations, not least Green Belt. However without a portfolio of investment opportunities, the region will continue to turn away occupiers and constrain economic growth.”* (Para 14.3)
- 2.13 Of the supply, the Study estimates that around 30% of land supply will be required by manufacturing and 70% by logistics based on ratios of stock, take up and market sentiment (Para 1.19). Shropshire, together with Staffordshire, are also identified as an important industrial market and a strategic location for logistics operators (Para 4.25).

- 2.14 Of the Road Based Opportunity Areas (OAs) Area 3, the M54 Shropshire, is located within the top 50% scoring areas. The OAs are noted within the Study as providing a guide on optimum locations for future (road based) strategic employment sites (Figure 1.1 and Para 1.30). Within this area 1 to 2 additional strategic sites are noted as being required for B8/mixed c.50ha; E(g)/ B2 c.25ha, with the OA noted as also including overspill from the Black Country (Table 1.2).
- 2.15 The strategy is supported by the evidence base, and the recently published West Midlands Strategic Employment Sites Study 2023/24, is justified and represents a positive response to the challenges facing Shropshire across the plan period.

Question 2: What provision is made within the Plan to fulfil the identified unmet employment needs of the Black Country, and will the Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?

- 2.16 The revised spatial strategy for the level and distribution of development across Shropshire is set out in draft Policy SP2 of the Local Plan. This identifies an employment land requirement of a minimum of 320ha between 2016 and 2038, which includes a contribution of 30 hectares of employment land to support the unmet needs forecast to arise in the Black Country.
- 2.17 The Updated Additional Sustainability Appraisal appropriately assesses options relating to the unmet employment needs forecast to arise in the Black Country. With the conclusion reaching that a contribution of 30 hectares was the most appropriate due to the following reasons:
- Positively responds to the geographic, infrastructure and commuting relationships between Shropshire and the Black Country.
 - Contributes to the unmet employment needs of the Black Country and supports the growth of the west of the region.
 - Achieves positive sustainable impacts.
 - Any potential negative sustainable impacts can be reduced through mitigation.
 - Positively responds to the Duty to Cooperate process.
- 2.18 The reasons summarised in the Updated Housing and Employment Topic Paper, as noted above, are considered to be sound and are strongly supported.
- 2.19 To inform identification of the site or sites to accommodate the unmet employment land need from the Black Country, the Council undertook additional assessment work. This work appropriately included consideration of the geographical context; migration and commuting patterns between the County and the Black Country; and the extent to which Travel to Work Areas associated with the Black Country penetrate into Shropshire and vice versa. Also considered is the potential to deliver joint benefits, to the Black Country in meeting some of its need and to Shropshire in promoting sustainable development patterns and supporting its own economic growth needs.

- 2.20 This approach is considered robust and appropriate, particularly given the locational relationship the County has with the Black Country. The assessment concluded that the most appropriate options for such a site are in the east and central parts of Shropshire, at the larger settlements where employment growth is proposed and where there are strategic settlements and sustainable sites. This conclusion is entirely consistent with the NPPF and its economic objective to ensure that sufficient land is available in the right locations.
- 2.21 Following identification of this geographical parameter, the Council then completed a re-assessment of all available sites within the area through an updated additional Sustainability Appraisal site assessment. It is understood that this involved considering approximately 350 sites, with approximately 160 sites considered at the following stage. The scope of and conclusions are provided within the updated additional Sustainability Appraisal.
- 2.22 Given that all but a small section of the eastern boundary of the County is located within the West Midlands Green Belt it is unsurprising that the most appropriate site is located within the Green Belt. The Site identified is SHF018b & SHF018d (Land east of Shifnal Industrial Estate, Upton Lane, Shifnal), located on the edge of a sustainable, accessible, settlement within the eastern area of the County, close to the M54, and County border.
- 2.23 Given the Sites location within the Green Belt, consistent with the NPPF, all other reasonable alternatives were explored with appropriate and justifiable reasoning provided, as noted in the Updated Housing and Employment Land Topic Paper (GC45).
- 2.24 Shifnal is located in the east of the County and as such is one of the Shropshire settlements in closest proximity to the Black Country. This proximity, enhanced by its location in the M54 corridor, means that as a location it is well-suited to accommodate an employment land contribution to the Black Country.
- 2.25 The town and Site are considered ideally suited to accommodate the proposed contribution to the unmet employment land need forecast to arise in the Black Country. Shifnal is identified as a Key Centre within both the existing adopted Development Plan and the draft Local Plan. It has a good level of existing services, facilities and infrastructure and is suitably accessible by both public transport, including rail, and by road. Located on the M54 / A5 strategic corridor this connectivity provides direct road and rail links to the Black Country.
- 2.26 The town is sustainable, and has also been identified to meet some of the employment needs of Shropshire (9ha to meet Shropshire's need and 30ha to meet the unmet needs of the Black Country). Co-locating this provision has particular advantages in terms of infrastructure provision and delivery. Further, Shifnal can provide support services and together with the housing allocations, the overall sustainability of Shifnal, currently a dormitory town, will be enhanced.
- 2.27 The town has expanded considerably over recent years. However, the majority of this growth has been residential development, without a corresponding increase in employment provision. This imbalance has created a significant labour resource without the corresponding employment opportunity. Through the provision of additional employment land this will help to address the imbalance.

- 2.28 Shifnal is an attractive location to the modern employment market, equipped to provide for the modern economy, both with respect to local and strategic needs. Located within the M54 corridor in close proximity to the Black Country, the Site is in an excellent position to benefit and spring-board from the links to the economic investment, new opportunities and growth which has been experienced to the east.
- 2.29 Recent history has confirmed a strong market interest in, and demand for, the area. This, together with the lack of current supply, including brownfield opportunities, has led to a keen interest in the site from Stoford.
- 2.30 Stoford is one of the UK's leading commercial development companies, its role is to fund the infrastructure works and deliver the development as a Development Partner.
- 2.31 Stoford has provided additional evidence to the examination of need, demand, market attraction and site suitability (as a matter of principle with respect to its capacity and location) with respect to the allocated site. This evidence has been included within the submitted Shifnal Delivery Statement, appended to Harrow Estate representations to the updated evidence base in June 2024. In response to matters now raised for the hearing sessions it has been supplemented by further information, appended to this matter statement as a Supplementary Update note. It is also relevant to the response with respect to Matter 26.
- 2.32 As highlighted above, the location and scale of the allocation facilitates an employment provision which contributes towards meeting both elements of need: part to meet the needs of Shropshire (9ha) and part to meet the unmet needs of the Black Country (30ha). Clearly, it isn't necessary to meet local and strategic needs on separate and distinct sites within the County, the requirements and uses are compatible and there are clear advantages and efficiencies (during construction and operation) to co-location for example, with respect to infrastructure provision, creating a high-quality environment, site maintenance, shared services, delivery, widening market demand, flexibility and so on.
- 2.33 There is demand for employment provision at Shifnal; with access to rail, the strategic highway network and with the added advantage of a local labour force within the town. The economic functionality of Shifnal as part of the M54 corridor and its potential role in helping to accommodate identified unmet needs represents a positive approach to planning and supports the legal soundness of the Plan through the satisfaction of the Duty to Cooperate.

Question 3: Should the employment land requirement be also expressed in terms of the number of jobs expected to be provided?

- 2.34 In order to conform to the NPPF, it's not essential for the employment land required to be expressed in these terms. The NPPF calls for sufficient land to be allocated, and for the effective use of land. With respect to decision-taking it references 'policies for the supply of land' (NPPF 11 d). The jobs to be provided have formed part of the evidence base but the allocation and monitoring requirements relate to the provision of land alone.

Draft Shropshire Local Plan

Consultation Response

Shifnal Delivery Statement – Supplementary Update (September 2024)

Harrow Estates

Produced by Stoford – Development Partner

tor
&CO

STOFORD

SHIFNAL EAST | S54, Shifnal, Shropshire

Harrow Estates | Supplementary Update

SEPTEMBER 2024

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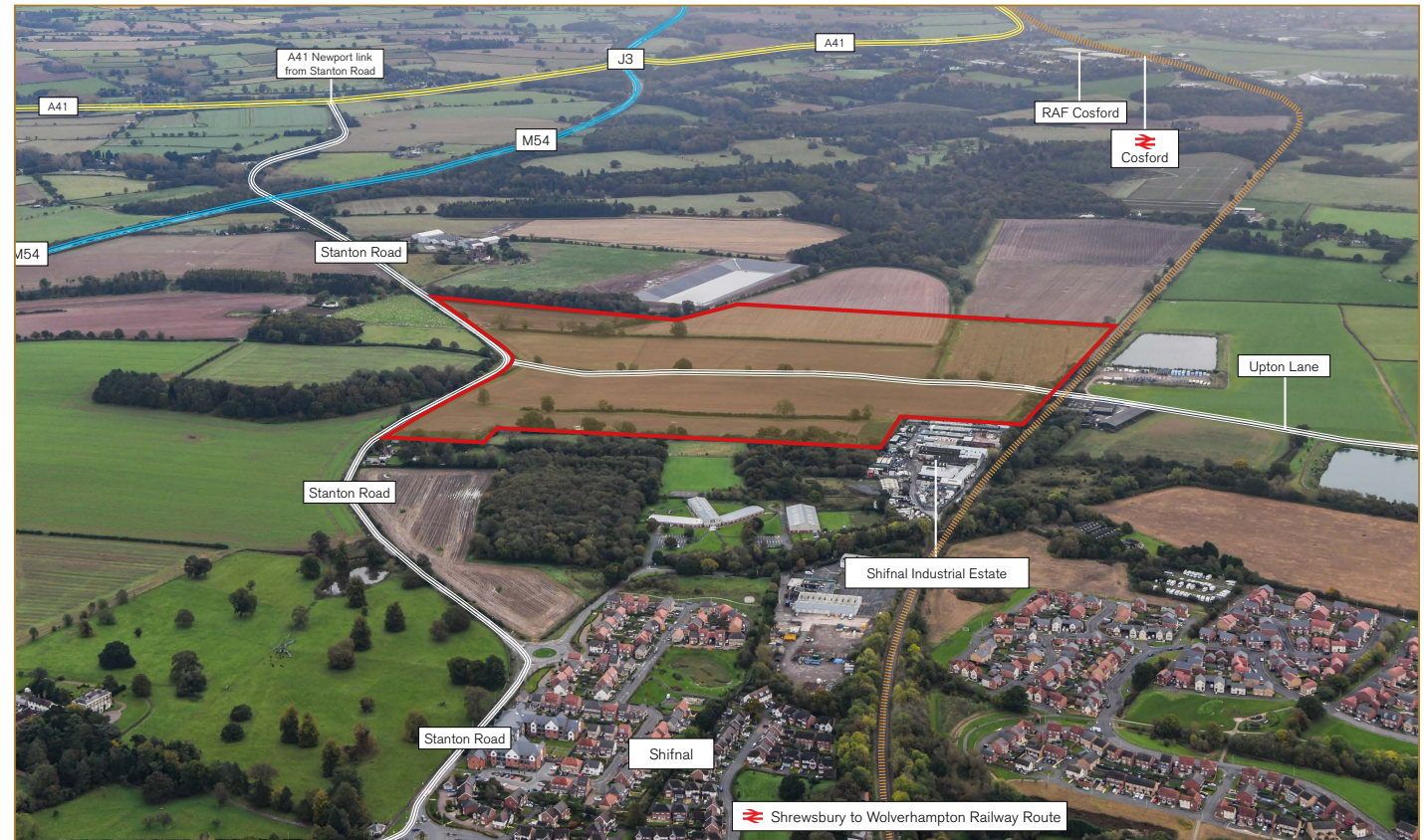
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Introduction

This Supplementary Update has been prepared and should be read alongside the Delivery Statement (June 2024) that accompanied Harrow's consultation response to the additional material and was submitted in June 2024.

This Supplementary Update accompanies Harrow's Matters Statements that have been submitted for the upcoming Autumn Examination sessions.

Since the submission of the Delivery Statement, Main Modifications have been published by the Council. Within this Update, we comment on these in so far as how they relate to our opportunity to be Harrow's Development Partner and the delivery of the allocation at S54.



Planning Reform

The Inspectors have issued a Note, dated 19 August 2024, confirming that they will continue to examine the Local Plan against the July 2021 National Planning Policy Framework (NPPF). It will be for a future Local Plan review to consider the implications that might arise from a revised NPPF and Revised Standard Methodology for calculating housing numbers.

Alongside the Government's proposed changes to the NPPF that are currently the subject of public consultation, a Ministerial Statement was issued on 30 July 2024. This is capable of being a material consideration – (see Cala Homes 2011, EWCA Civ 639 Case no. C1/2011/0297).

Within her first Ministerial Statement, the Secretary of State reiterated that the Government's manifesto had been clear; and she stated;

'that sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people.' [our underlining]

There can be no single sentence that can make the point clearer. Economic growth, and therefore the delivery of new employment, investment and jobs, is at the heart of securing prosperity for this country. Our proposals to deliver new employment floorspace at Shifnal are on equal footing with the Ministerial Statement.

At this stage, there are no firm proposals for the nature of what type of employment development might be delivered on site. It is notable that within the Ministerial Statement that commercial development is seen positively.

"With respect to commercial development, the Government is determined to do more to support those sectors which will be the engine of the UK's economy in the years ahead. We will therefore change policy to make it easier to build growth-supporting infrastructure such as laboratories, gigafactories, data centres, electricity grid connections and the networks that support freight and logistics."

Stoford's recent developments within the Black Country - (the needs of which this site will also support) have delivered on these growth sectors with schemes at Pantheon Park; ERA Home Security, i54; and Moog, i54 Wolverhampton. There are opportunities for a variety of sectors to be delivered within the S54 site and this will be led by market/occupier interest at the time of a planning application being made.



Inspectors Matters, Issues & Questions

The following considerations are offered in respect of 'Matter 26 Employment Allocations' and the questions in so far as they relate to SHF108b and SHF108d, Land East of Shifnal Industrial Estate, Upton Lane, Shifnal. We also comment on the proposed modification MM109.

Background to the allocation

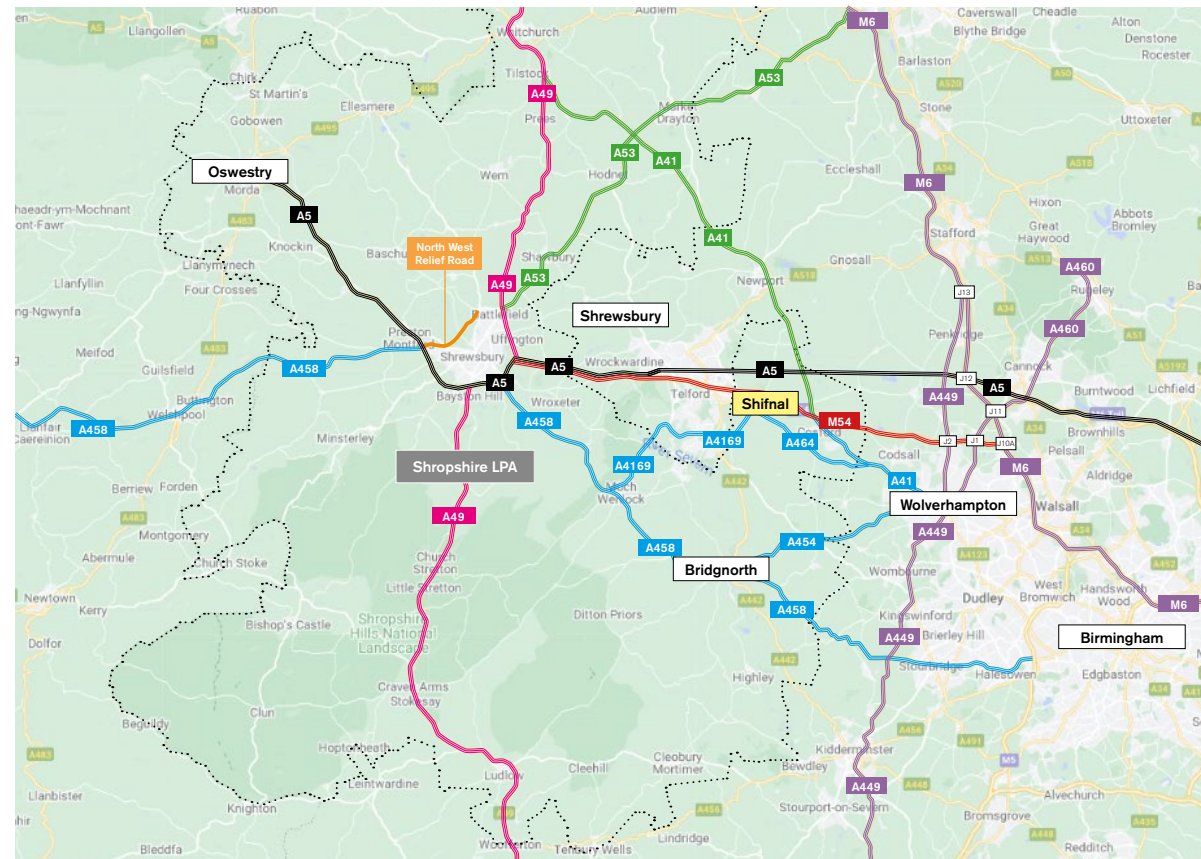
The Inspectors request details relating to the background to the site's allocation, how it was identified and what options were considered. The updated Housing and Employment Topic Paper, GC45 (paragraphs 16.10 to 16.13, and 16.49 onwards) set out the Council's response to this question. Stoford concur that the location of Shifnal, being to the east of the County, is ideally suited to accommodate the proposed contribution to the unmet employment need forecast to arise in the Black Country. This reference to the site location and the Black Country needs, now forms part of the policy text at pages 260-262 of the Local Plan (MM109) and is fully supported.

Shifnal is a Key Centre and identified as a focus for investment, employment and housing. Shifnal is a location that is well located in terms of accessibility to the Black Country, as the diagram here shows. In addition, Shifnal is noted within Examination Document GC45, as a locations that is sustainable and benefits from a range of services, facilities and infrastructure. The July 2021 NPPF notes that Plans should be prepared with the objective of contributing to the achievement of sustainable development and therefore allocating land to serve both local and Black Country needs here is appropriate.

The geographic proximity of Shifnal is particularly important in providing an appropriate location for the provision of a contribution in Shropshire to the unmet need forecast to arise from the Black

Country. The connectivity shown for both road and rail links on this diagram illustrates this point. Thus, the objectives of sustainable development are also supported as a result of the rail links and bus routes available (e.g. service number 891 between Wolverhampton and Shifnal).

Shifnal - Growth Corridors and Employment Land Supply (ELS)



Growth Corridor	% of ELS
M54/A5 link to Shrewsbury	25%
A41/A464 & A4169 link with the A458/A454 route between Shrewsbury, Bridgnorth, Shifnal, smaller urban centres, Ironbridge & beyond	21%
A41/A53 north bound from the M54 along the A41 & from Shrewsbury along the A53 including Clive Barracks, Tern Hill	16%
A5 West to Oswestry	12%
A49 North and South of Shrewsbury	7%

Wider Connections
- M54 connection to M6 via J10a - A449 connection to M6 (Northbound) J12/13 via M54 J2 - A460 connection to M6 (Northbound) J11 via M54 J1
Proposed Shrewsbury North West Relief Road (NWRR) - providing a new single carriageway road linking the northern and western parts of Shrewsbury. Extending the A53 to connect with the A5

Inspectors Matters, Issues & Questions

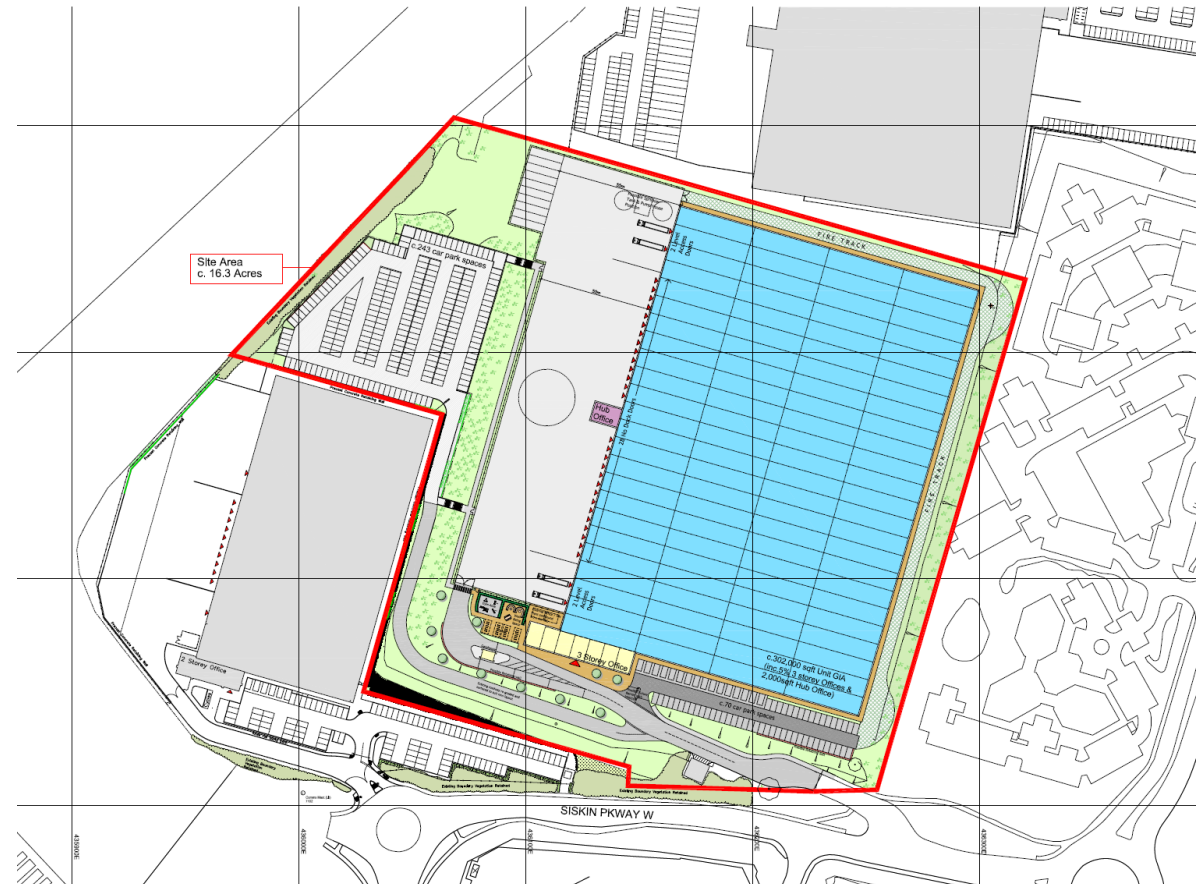
Scale, Type and Mix of Proposed Uses

The scale of allocation at 39ha provides opportunities for a range of units to be accommodated within the site. Paragraph 16.32 and 16.33 of GC45 also concurs that larger sites are generally better able to meet the needs of those seeking employment land within the Black Country market. The range of opportunity available provides more flexibility to respond to market signals and flexible plots sizes. These in turn can be sub divided should smaller plots be desired to potentially meet local needs too.

Examples of Site Layout & Design

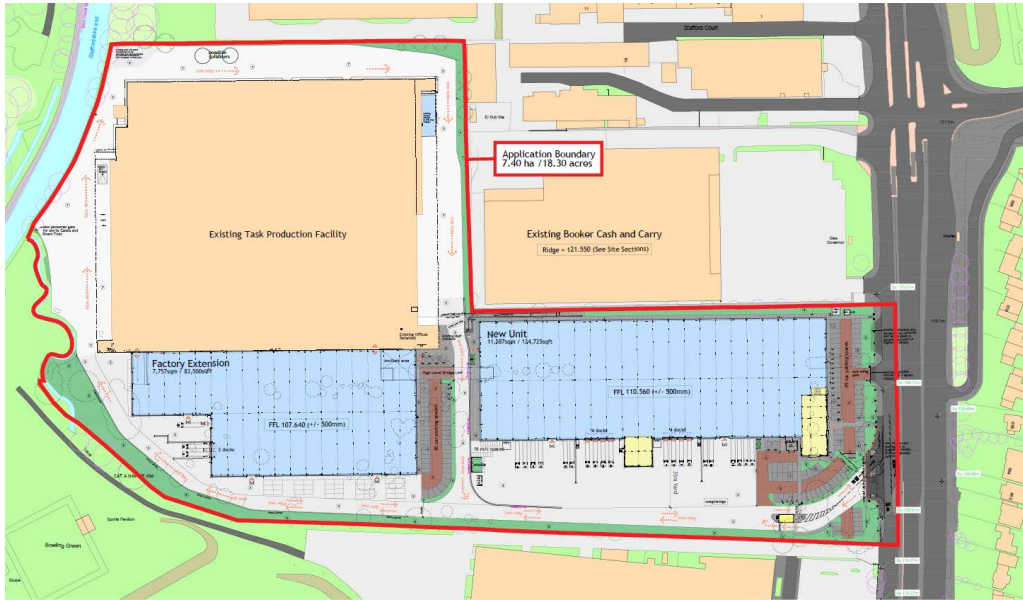


Sandvik | Halesowen | Completed Building

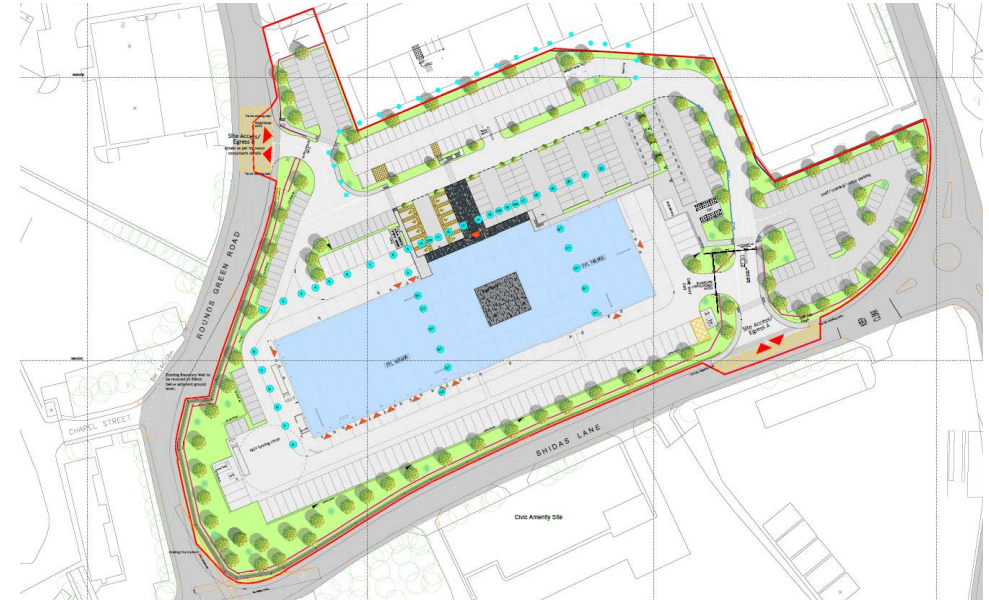


Sandvik | Halesowen | Site Layout

Inspectors Matters, Issues & Questions



Task | Wolverhampton | Site Layout



West Midlands Ambulance Service | Oldbury | Site Layout



Task | Wolverhampton | CGI



West Midlands Ambulance Service | Oldbury | CGI

Inspectors Matters, Issues & Questions

Benefits Arising and Mitigation for Development Impacts



Location served by bus connections into Shifnal and Black Country



Shifnal Rail Station (with Black Country connections) located within cycling distance



Excellent strategic road connections with opportunities for off site improvements



Proximity to growth sector locations e.g. RAF Cosford, i54 and t54



Attractive market location



Scale of site can serve a range of future occupier needs



Green infrastructure to be integrated within the masterplan to mitigate for visual impacts



Opportunities for structural planting to strengthen site boundaries shared with the Green Belt



Opportunities for off site highways improvements to mitigate for development traffic

Inspectors Matters, Issues & Questions

Infrastructure

The scale of allocation, at 39 hectares lends the development to highway improvements where Stanton Lane meets the A41. Technical work will be deployed to design improvements that serve a variety of travel modes and ensure the safe and effective operation of the development. As an experienced developer, Stoford have considered the draft allocation site and local highway network as part of early technical work with our design team and consider that there are options for delivering necessary infrastructure. This would be required to serve the development and thus can be delivered early within the construction phases.

Viability, Deliverability and Timescales

Stoford's experience of delivering strategic employment land and in addition, a range of premises within the Black Country (evidenced within our Delivery Statement, but including West Midlands Ambulance Service, Moog at i54, Sandvik at Halesowen, and locally in Telford for Portion Solutions) gives Stoford the confidence associated with market knowledge, development costs and timeframes for delivery. An indicative timeline is included within our Delivery Statement that presents a Plan led proposal that could commence development within 12-18 months of the Local Plan being adopted. It remains our intention to work positively with Harrow Estates and the Council, and submit a planning application once the current draft allocation has been formalised. The timeline presented within our Delivery Statement is therefore flexible.

Contact Us



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