

## Examination of the Shropshire Local Plan 2016 – 2038

Representor No. B-A044

Position Statement by Nurton Developments Ltd

### Matter 4 – Employment Land Need, Requirement and Supply (Policy SP2)

**Issue: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall need, requirement and supply of employment land.**

Nurton Developments Limited (NDL) does not wish to raise comment with regard to either Question 1 or 3 of Matter 4. As such, this position statement concentrates entirely on Question 2 as outlined below.

***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?***

1. The question can be divided into two concise issues as follows: -
  - Has sufficient developable employment land been allocated to meet the Black Country's unmet needs? and
  - Has a joined-up approach been taken in meeting these unmet needs with the unmet needs of the Black Country for housing?

These are dealt with in turn below.

#### **Sufficient Developable Land**

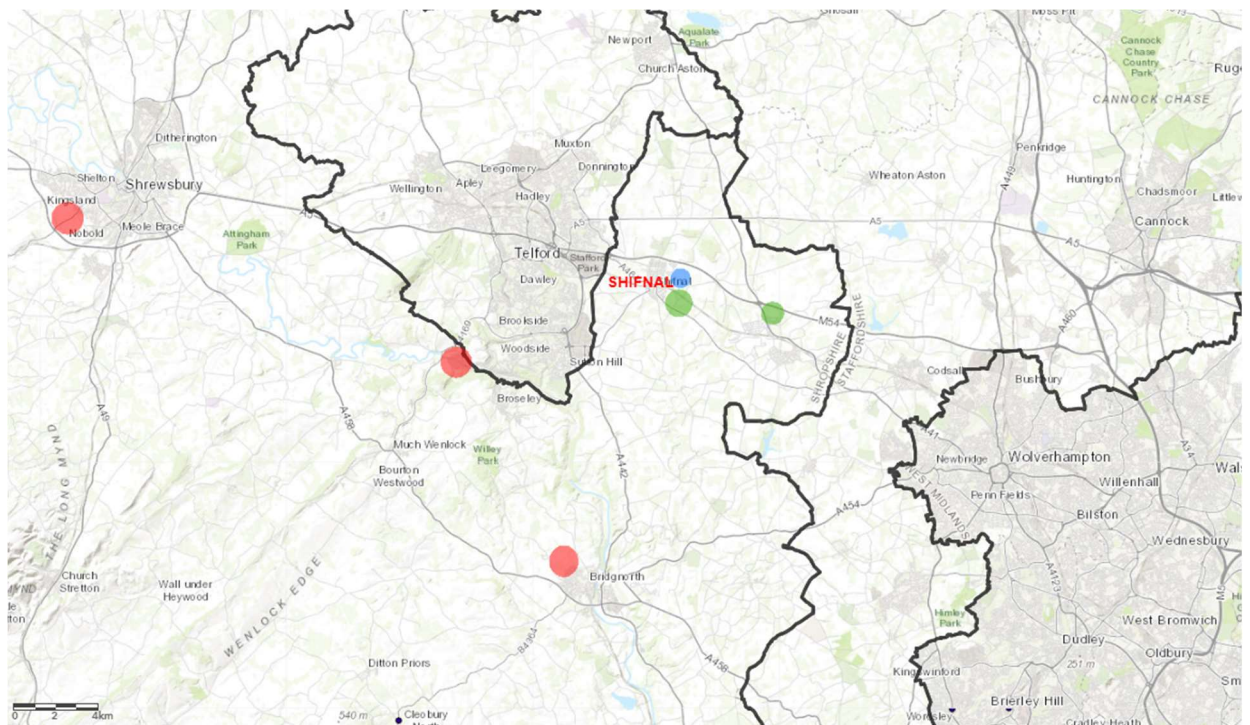
2. Provision to fulfil the identified unmet needs of the Black Country is made through the allocation of SHF018b and 018d - Land east of Shifnal Industrial Estate, Upton Lane, Shifnal. Paragraph 2.30 of the Updated Housing and Employment Topic Paper (GC45) refers to an area of "39 ha to achieve 16 ha of floorspace". Table 12.3 of the amended Sustainability Appraisal (GC44) refers to "39 ha (15.6 ha net development)."
3. It is unclear to NDL what the net development area of 15.6 ha refers and how it equates to the proportion of the unmet needs of the Black Country that Shropshire has agreed to accommodate (i.e. 30 ha). The need for employment land for the Black Country is projected by the Black Country EDNA 2023. The principal methodology for projecting need is a GVA based model. This translates GVA growth in relevant sectors to a floorspace requirement and then assumes a 40% site cover to derive a developable area.
4. The developable area of a site covers the main built areas – e.g. buildings, parking, yard space and circulation. It will not include areas required for site access, utilities infrastructure, SuDS, on-site BNG mitigation, strategic landscaping, including tree planting, and recreation areas for staff. It will also exclude those parts of the site which are not developable because they act as a physical or environmental constraint. These could include irregular shaped parts of a site, watercourses, trees and hedgerows, easements, or safety zones (e.g. for gas mains or overhead HV electricity lines). For these reasons, the developable area of a site will only be a proportion of

the gross area. In NDL's experience, the developable area will not be greater than 75% of the gross site area, and can be as low as 50%, particularly on constrained sites.

5. On this basis, NDL would question whether sufficient consideration has been given and an evidence-based approach used to establish the full developable area of either SHF018b or 018d. NDL understands that 39 ha is a gross site area for SHF018b and 018d. However, it is unclear what the developable area is. This needs to be established as a comparator against derived need – i.e. 30 ha of developable area.
6. If the developable area is less than 30 ha, as intimated by the reference to 15.6 ha net development, then consideration needs to be given to the allocation of additional land to ensure the needs of the Black Country are fully met. This could require an extension of the allocation at Shifnal (SHF018b and 018d) or the identification of another site(s) for allocation or safeguarding (if required).

### Joined-up Approach to meeting Employment Land and Housing Needs of the Black Country

7. NDL does not consider that a joined-up approach has been taken in meeting the unmet needs of the Black Country for employment land and housing in a sustainable manner; namely co-locating such allocations in geographic proximity to one another.
8. The three housing allocations to meet the unmet needs of the Black Country are located away from the Black Country and the proposed allocation of employment land at Shifnal. This is illustrated by the figure below.



9. The red dots represent the three sites allocated to meet the housing needs of the Black Country (at Shrewsbury, Ironbridge and Bridgnorth). The blue dot is the proposed employment allocation to meet the Black Country's needs at Shifnal (SHF018b and 018d). The green dots are the two sites which are being promoted by NDL for housing at Shifnal and Cosford; neither of which are allocated nor safeguarded.
10. This illustrates a misalignment of strategies in meeting housing and employment land needs for the Black Country. The proposed housing allocations (particularly at Shrewsbury and Ironbridge) are not well located to help meet the needs of the Black Country. This is primarily due to the degree of geographic separation between these locations and the Black Country.
11. In addition, there is a disconnection between these three locations, the Black Country and the proposed employment allocation at Shifnal (SHF018b and 018d). For example, Shrewsbury is over 30 miles from the nearest major centre in the Black Country, namely Wolverhampton. This will lead to unnecessary travel, particularly car-related journeys. As the Inspector will be aware, it is far more sustainable to co-locate housing and employment allocations to minimise travel and ensure growth is not disparate in its approach.
12. Conversely, Shifnal and Cosford are much better placed to meet the unmet housing needs of the Black Country. Both are closely aligned with the allocation of employment land at Shifnal (SHF018b and 018d) to meet the employment land needs of the Black Country. However, the new housing allocations at these two centres are restricted to just 230 homes (all located at Shifnal).
13. It should be recognised that the housing allocations (and associated safeguarded land) within Shifnal are identified to meet the housing need of Shropshire alone and are in response to the Housing Market Assessment that has been produced. Having Identified Shifnal as the location for employment land to meet the Black Country's unmet needs, it would be much more sustainable that further housing allocations come forward in this location, beyond that currently identified for allocation to meet the needs of Shropshire.
14. As such, it is NDL's contention that additional housing allocations within Shifnal, Cosford, or both, would present many more opportunities for sustainable travel, such as walking and cycling to work, as well as a regular train service to Wolverhampton from the existing railway stations at Shifnal and Cosford.
15. Further details on this point are provided in the Position Statement submitted by SLR on behalf of NDL in respect of Question Nos. 3 and 4 to Matter 2 – Development Strategy.

PJL

18<sup>th</sup> September 2024