

## **Matter 2 – Shropshire Local Plan Examination: Stage 2**

Representor Unique Number: A0682

Representor: Miller Homes

Matter: Matter 2 – Development Strategy (Policies SP1-10 & SP12-15)

Relevant Question Numbers: Questions 1, 2, 3, 4

# Matter 2 – Development Strategy (Policies SP1-10 & SP12-15)

## Miller Homes (A0682)

1. This Hearing Statement is submitted on behalf of Miller Homes (“Miller”).
2. This Hearing Statement should be read in conjunction with the Hearing Statement submitted on behalf of Miller Homes in relation to Stage 1: Matter 3 (Examination Document Ref: M3.43 A0682 Miller Homes), additional representations in June 2024 (Examination Document Ref: A211 - Miller Homes), and is specifically prepared here in relation to the latest position of the Examination process, and the additional information that has been published since our original statement was submitted.
3. Miller’s response to Matter 2 Questions 1, 2, 3 and 4 are set out below.

### **Context: South West Shifnal**

**1. Do any of the policies in the Plan require updating as a result of changes in national planning policy since the previous hearings in July 2022?**

and

**2. Is it proposed that the overall spatial strategy and broad distribution of growth set out in Policy SP2 will remain the same following the additional work? If not, how would it change and are the changes justified, effective and consistent with national policy? Are any consequential changes to Policy SP2 or the supplementary text required?**

4. Miller Homes continues to support, and commends, the proposed pro-active and pro-growth spatial strategy set out within the Draft Local Plan, which is underpinned by the principle of high growth and urban focus, having also committed towards accommodating a proportion of the unmet needs forecast to arise from the Black Country.
5. Miller, nevertheless, continues to argue that there is evidence of a greater housing need, as set out within our Stage 2: Matter 3 Hearing Statement, and query the Sustainability Appraisal (“SA”) considerations in terms of the distribution strategy adopted to accommodate the uplift to the proposed housing requirement, as set out within our Stage 2: Matter 1 Hearing Statement. This includes a reliance on windfall allowances which are not guaranteed and introduces a degree of risk with the delivery of housing to meet the strategy, thus considered not to be the most appropriate, proactive or sustainable way to plan for additional growth within Shropshire. This is particularly given the (to date) carefully considered spatial strategy and Plan at Examination, and the need to ensure consistent consideration of the reasonable alternatives and strategy for the unmet need forecast to arise from the Black Country Authorities (“BCA”).

6. Miller also expresses concerns with the strategy to meet the unmet need (proposed 1,500 dwelling contribution) from the BCA and which sites are considered to best suited to meet that need. This is explored further within the additional representation submitted in June 2024 (Examination Document Ref: A211 - Miller Homes), the Stage 2: Matter 1 Hearing Statement, prepared by Miller, and Question 3, set out below.
7. Miller note that the proposed Main and Minor Modifications (Examination Document Refs: GC4l and GC4m) submitted to the Examination seek to update the wording of Policy SP2, including clarification on the quantum of new dwellings to be delivered during the Plan Period, and how this relates to the quantum to contribute to the unmet needs forecast to arise from the Black Country. Miller contend that the Policy may be subject to further changes to ensure that the Plan is consistent with national policy, such as where the Plan Period should be extended (and consequently quantum of new dwellings which will be delivered), as outlined in Miller's Stage 2: Matter 1 Hearing Statement.

### **3. Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?**

8. This response relates specifically to the Updated Additional Sustainability Appraisal, consulted upon in June 2024, whereby there was a requirement to clarify the scale, nature and distribution of the unmet need from the BCA.
9. Overall, Miller Homes continue to welcome that Shropshire Council has adopted a proactive and pro-growth approach of including a contribution towards unmet need forecast from the Black Country. However, Miller does consider it necessary to query the development strategy, specifically the SA considerations, in terms of the strategy to meet the unmet need from the BCA and which sites are considered best suited to meet that need. Therefore, this Hearing Statement should be read in conjunction with Miller Homes' previously listed representations, where a response to this question is expanded upon further.
10. Miller supports the underlying principle that sites identified as meeting the unmet need are demonstrably connected to the BCA within which the needs arise, with a specific emphasis on sustainable options for travel. Miller consider it logical to ensure identified sites are therefore located within, and with access to, the road and rail corridor that connects Shrewsbury to Dudley and Wolverhampton, with the rail connection of comparably greater importance.
11. In this regard, Miller agree with the Council's conclusions that Shifnal, in particular land at "South West Shifnal," represents one of the most sustainable locations to accommodate development given its close proximity to the Black Country, its migration and commuting patterns and the fact that it contains a train station which can be accessed by all residents of Shifnal using active travel options.
12. Miller also note that site "SHF018b & SHF018d Land east of Shifnal Industrial Estate, Upton Lane, Shifnal (S15.1)," currently located within the Green Belt, is now put forward as contributing 30ha of employment land to the unmet employment need forecast from the Black Country. Indeed, this is understood to represent the entirety of the proposed provision of the unmet employment needs.
13. Justification for this, and the exceptional circumstances for the release of the land from the Green Belt, includes its functional relationship with the Black Country due to strong road and rail links via the M54 corridor and Shrewsbury/Wolverhampton railway line. Shifnal is also noted as

being a key centre and focus for investment, employment, housing and development on the M54/A5 strategic corridor, and that the site can accommodate sizeable contribution towards the unmet employment needs. It is set out that accommodating the proposed contribution to the Black Country on this site will contribute to the achievement of the wider spatial strategy for Shropshire.

14. Miller contend that where Shifnal is identified as one of the most sustainable locations and the Council now proposes additional employment land, there are therefore opportunities accommodated in the town, in particular, land at South West Shifnal, to address unmet needs that a parallel increased provision for housing to meet the associated needs would represent a more sustainable approach. This would provide the opportunity for the migrating additional labour-force access local employment opportunities which have located or relocated into the town.
15. Miller contend that the sites identified as accommodating the unmet housing needs should therefore be reviewed and should include a site(s) within Shifnal to more sustainably meet needs, land at South West Shifnal has the ability to provide homes now and to meet needs of Shropshire and/or neighbouring authorities.

**4. Has meeting some of the housing and employment needs of the Black Country led to the need to release or safeguard more land from the Green Belt? If so, what are the exceptional circumstances for doing this?**

16. It is understood that of those sites identified to accommodate the proposed contributions to the unmet needs forecast to arise in the Black Country, it is only “Land east of Shifnal Industrial Estate, Upton Lane, Shifnal” (Policy S15.1) (SHF018b and SH018d) which is presently within the Green Belt, although through the proposed allocation within the Draft Local Plan, is sought to be removed. It is noted within the updated Green Belt Topic Paper (Examination Document Ref: GC46) that “where a settlement also includes Green Belt release to accommodate part of the proposed contribution to the unmet needs forecast to arise within the Black Country.....this only applies to Shifnal....”
17. Miller Homes’ response to this question should be considered alongside the response prepared to Question 3, set out above. Shropshire Council have been clear that the delivery of employment land at Shifnal links very closely to opportunities for increased housing provision. It is therefore considered that, as referred to in Section 5 of Examination Document Ref: A211 - Miller Homes, further Green Belt land is required to meet the housing and employment needs arising. The currently proposed safeguarded designation of South West Shifnal has been identified to meet Shropshire’s needs, but given the Council's commitment to making a contribution towards meeting the BCA unmet need and evidence stated above, any allocation of land South West of Shifnal has the ability to serve both needs, as appropriate.
18. Miller note that there are no specific Matters, Issues or Questions relating directly to the designation of safeguarded land to be released from the Green Belt within the Examination. Miller would be happy to provide further information regarding land at South West Shifnal during Stage 2, including regarding the spatial strategy and Place Plans, and to attend any hearing session should one be identified. Consideration is also given to this matter within our Stage 2: Matter 21 Hearing Statement.