



SHROPSHIRE LOCAL PLAN EXAMINATION: STAGE 2 MATTERS, ISSUES AND QUESTIONS

Stage 2 Hearings – Matter 2 (Development Strategy)

Nurton Developments Limited

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Basis of Report

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Table of Contents

1.0 Introduction	1
2.0 Development Strategy.....	1
Question 3	1
Question 4	3



1.0 Introduction

- 1.1 Please treat this as a formal representation by Nurton Developments Limited (NDL) in response to the Stage 2 Matters, Issues and Questions; namely Matter 2 – Development Strategy.
- 1.2 The ‘Issue’ identified by the inspector as part of the Stage 2 Matters is ‘*whether the Development Strategy is justified, effective and consistent with national policy*’.
- 1.3 Within this Matter, NDL only wish to raise a comment regarding Questions 3 and 4 within Matter 2. These questions are dealt with, in turn, below.

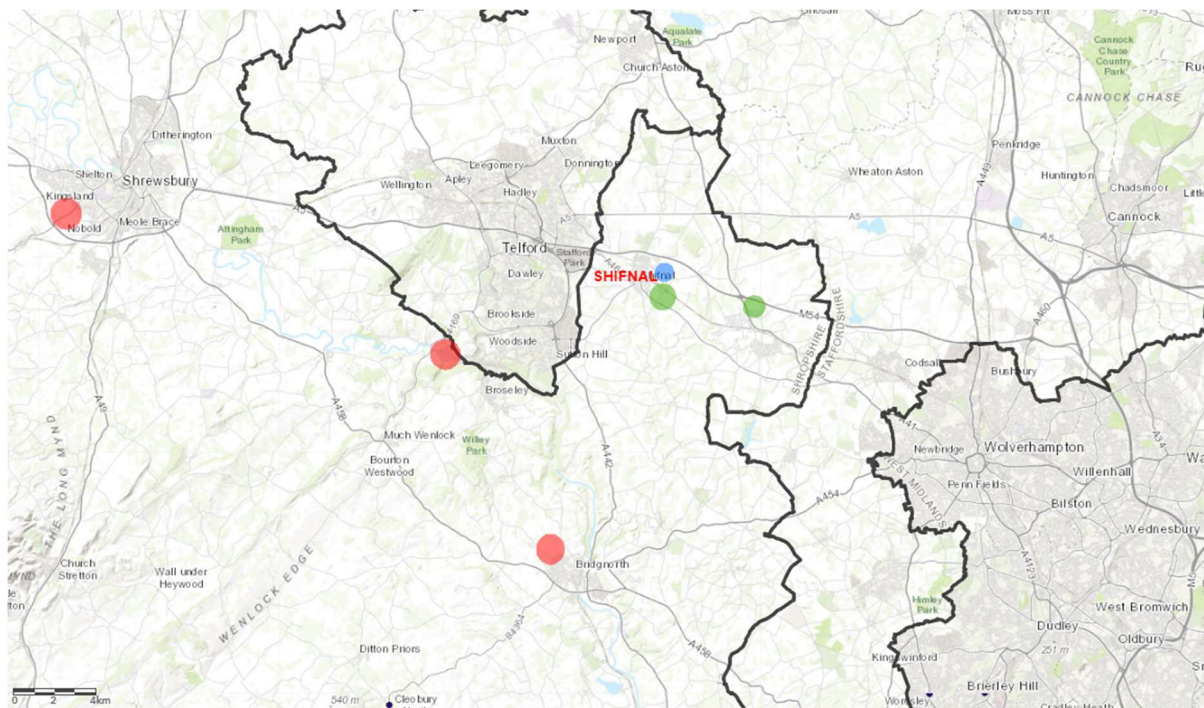
2.0 Development Strategy

Question 3

Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?

- 2.1 As identified within the Updated Housing and Employment Topic Paper (GC45), as well as the content of the Additional Sustainability Appraisal Report (GC44), Shropshire Council has identified the following sites to accommodate the unmet housing need of the Black Country:
 - BRD030 – Tasley Garden Village, Bridgnorth: 600 dwellings;
 - SHR060, SHR158 & SHR161 – Land between Mytton Oak Road and Hanwood Road, Shrewsbury: 300 dwellings; and
 - IRN001 – Former Ironbridge Power Station: 600 dwellings (of a wider 1,000 dwelling allocation).
- 2.2 An employment land allocation to meet the Black Country needs has also been identified at land east of Shifnal Industrial Estate, Upton Lane, Shifnal which would provide a total of 39 hectares to achieve 16 hectares of floorspace (SHF018b and 018d).
- 2.3 Whilst this level of housing contribution has been agreed through a Duty to Cooperate with the Black Country, **insufficient evidence has been provided as to the consideration of alternate levels of provision**. The local plan and its associated evidence base concentrates on two options; namely the ‘no contribution’ and ‘preferred option’ scenarios.
- 2.4 The adopted approach is considered too narrow and has failed to include either a mid-level scenario where ‘some’ of the Black Country unmet housing need is accommodated or an ‘in-excess of’ scenario; whereby the authority seeks to provide above the identified Black Country unmet housing need.
- 2.5 The sites identified to accommodate the unmet housing and employment land needs of the Black Country are illustrated on the figure below.





- 2.6 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.
- 2.7 As can be noted, the employment land provision has been located at Shifnal in relative proximity to the Black Country. However, **NDL is of the opinion that there has been a failure to appropriately locate the housing allocations (particularly at Shrewsbury and Ironbridge) to have a clear relationship with the Black Country.**
- 2.8 Justification of the housing sites identified for the unmet Black Country need has been based on migration and commuting data which, whilst of merit, **fails to consider the need to co-locate housing and employment uses from a demand and sustainable transport perspective.** It is also noted that the migration and commuting data utilised has not been updated from that contained within the Housing Topic Paper (2022) which utilises 2011 Census data rather than the more recent 2021 Census data.
- 2.9 **NDL has also raised concerns with regard to the Stage 2a and 3 assessments contained within the Additional Sustainability Appraisal** which is being dealt with under Matter 1 of Stage 2 of the examination. On this basis, NDL does not agree with the assessment and recommendations regarding the strategic distribution of this provision across Shropshire given that the Sustainability Appraisal has failed to



consider the need to co-locate the additional housing and employment land provision within the authority area.

- 2.10 NDL is of the opinion that there is a **clear misalignment of strategies in meeting housing and employment land needs for the Black Country**. There is a disconnection between the three proposed housing locations, the Black Country and the proposed employment allocation at Shifnal (SHF018b and 018d). 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.
- 2.11 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).
- 2.12 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 to accommodate the unmet housing need of the Black Country**, beyond that currently identified for allocation to meet the needs of Shropshire.
- 2.13 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.
- 2.14 Further details on this point are provided in the Position Statement submitted by NDL in respect of Matters 1 (Legal / Procedural Requirements), 3 (Housing Land Need, Requirement and Supply) and 4 (Employment Land Need, Requirement and Supply).

Question 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?

- 2.15 The Updated Housing and Employment Topic Paper (GC45), as well as the content of the Additional Sustainability Appraisal Report (GC44), identifies that no further sites would be allocated to accommodate the unmet housing and employment land need for the Black Country beyond those previously identified at Regulation 18 and 19 stages.
- 2.16 Whilst the overarching housing and employment land supply identified is in excess of the levels required (including a 13% uplift), **this fails to duly consider the spatial**



strategy applied in meeting the Black Country's unmet need and the sub-regional pressures this places on allocations and / or safeguarded land.

- 2.17 Justification of the housing sites identified for the unmet Black Country need has been based on migration and commuting data which, whilst of merit, fails to consider the need to co-locate housing and employment uses from a demand and sustainable transport perspective. It is also noted that the migration and commuting data utilised has not been updated from that contained within the Housing Topic Paper (2022) which utilises 2011 Census data rather than the more recent 2021 Census data.
- 2.18 As can be noted, the employment land provision has been located at Shifnal in relative proximity to the Black Country. However, **NDL is of the opinion that there has been a failure to appropriately locate the housing allocations (particularly at Shrewsbury and Ironbridge) to have a clear relationship with the Black Country.**
- 2.19 The Sustainability Appraisal has identified that neither the Shrewsbury nor Ironbridge sites are especially sustainable from a transport perspective given their distance from the Black Country conurbations. These sites are also a significant distance from the proposed employment land allocation for meeting the Black Country's unmet need within Shifnal. **This disparity in approach has not been adequately considered or assessed within the Sustainability Appraisal.**
- 2.20 In this regard, it is noted that the proposed allocation of the Ironbridge site (IRN001) would take part of the Black Country need; namely 600 of the 1,000 units proposed on this site. It is unclear as to the reasoning to part utilise this site for the unmet Black Country need rather than retain the full 1,000 units to meet the existing need for Shropshire. **A new alternate site(s), in a more appropriate location in proximity to the proposed employment land allocation at Shifnal, should have been identified.**
- 2.21 It is also noted that the Updated Housing and Employment Topic Paper (GC45) identifies that along with accommodating the unmet housing and employment land needs of the Black Country there is a requirement to accommodate an additional 500 dwellings across the plan period.
- 2.22 The Council has sought to justify the provision of this additional 500 dwellings through increasing settlement guidelines and windfall allowances rather than through either densification of existing proposed site allocations or increasing the number of site allocations. **This is a step change from the previous Housing Topic Paper (2022) which identified that a precautionary approach would be applied to making allowance for those types of sites within the housing land supply.**
- 2.23 Whilst anticipating 500 units to be delivered through settlement guidelines and windfall allowances is not unrealistic, **it would be more appropriate to allocate further land for the delivery of 500 more units and to utilise the delivery of**



windfall sites to counter any delays in the delivery of allocated sites during the plan period.

- 2.24 Given the existing pressures placed upon site allocations, and the concerns that **the three sites identified for meeting the Black Country housing needs are not in the correct location / spatial strategy**, NDL is of the opinion that the Council has duly failed to appropriately identify further sites for allocation; namely within Shifnal or Cosford.
- 2.25 Any additional allocations **would necessitate the safeguarding of further land within this sub-regional location to meet the needs of subsequent plan periods.** This would duly accord with national policy in regard to only undertaking Green Belt Reviews when necessary and ensuring sufficient land is safeguarded for future plan periods.
- 2.26 As set out within the Updated Housing and Employment Topic Paper, there are clear exceptional circumstances for releasing Green Belt land to meet the needs of the Black Country, as well as ensuring sufficient land is safeguarded for future plan periods.
- 2.27 Whilst the Green Belt Topic paper identifies a significant release or safeguarding of sites within Shifnal, these are related to either historic allocations, previously safeguarded sites and/or the large site identified to meet the employment land needs of the Black Country (SHF018b and 018d). However, as identified within the Housing Market Assessment, **there are significant demand pressures associated with this sub-region of Shropshire which should be accounted for when either allocating sites or safeguarding sites.**
- 2.28 Finally, it is evident that the housing allocations identified to meet the unmet needs of the Black Country (as detailed in para 2.1 above) have, in part, been selected due to their location outside of the Green Belt. As previously identified above, this fails to appropriately locate these housing allocations (particularly at Shrewsbury and Ironbridge) in proximity to either the employment allocation (SHF018b and 018d) or to the Black Country itself.





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