

**LAND AT J3
REPRESENTATIONS ON
BEHALF OF BRADFORD
RURAL ESTATES LTD
PRE-SUBMISSION
CONSULTATION
(REGULATION 19)**

Quality Assurance

Site name: Land at J3

Client name: Bradford Rural Estates Ltd

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1.0 Introduction

- 1.1 These representations on the Pre-Submission (Regulation 19) draft of the Shropshire Local Plan (“Local Plan”) are prepared by Bidwells LLP on behalf of Bradford Rural Estates Ltd (“BRE Ltd”). They are prepared in respect of Land to the north of Junction 3 of the M54 (“Land at J3”). A Site Location Plan is included at **Appendix 1**.
- 1.2 Land at J3 has already been identified as a ‘potential strategic site’ within the consultation on Strategic Sites (Regulation 18) draft of the Shropshire Local Plan in July 2019. The Strategic Sites consultation had recognised that Land at J3 may ‘*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.*’
- 1.3 Land to the north of Junction 3 of the M54 was strongly supported by the Association of Black Country Authorities (ABCA) during the Strategic Sites consultation.
- 1.4 However, despite this public acknowledgement of its potential, Land at J3 is not now included as a proposed strategic site within the Pre-Submission (Regulation 19) version of the Local Plan. The purpose of these representations is to restore the soundness of the Local Plan by reintroducing Land at J3 into its proposals.
- 1.5 The sole reason given by Shropshire Council for not including Land at J3, as a potential or proposed strategic site, is to be found in the Council’s Cabinet report of 7 December 2020 as reported, at paragraph 5.28 therein, it explains that “*it is maintained that in weighing up the competing considerations, including the benefits of providing a strategic employment area, there remains insufficient justification to release this land from the Green Belt. Accordingly it remains the view of officers that land at Junction 3 should not be included in the Local Plan and that this should area should remain as Green Belt.*”
- 1.6 To the contrary, we hold that there is sufficient justification to include Land at J3 within the Local Plan as a strategic site allocation.
- 1.7 Our starting point for drawing this conclusion is Section 33A of the Planning and Compulsory Purchase Act 2004 (“the 2004 Act”) which requires Local Planning Authorities to undertake a “duty to co-operate” in relation to the planning of sustainable development. The guidance given under section 33A of the 2004 Act is also contained in the NPPF (paragraphs 24 – 27) and further guidance is contained in the Planning Practice Guidance (PPG).
- 1.8 A decision by the Council to not include Land at J3 as a strategic allocation and to not engage effectively and on an ongoing basis with the Association of Black Country Authorities (ABCA) has resulted in a strategy which is not positively prepared or justified. As such, the duty to co-operate has not yet been fully complied with.
- 1.9 Following consideration of the duty and legal compliance, we refer to paragraph 35 of the National Planning Policy Framework (NPPF) which sets out the requirements for a Plan to be regarded as “sound” – namely that is:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

1.10 These representations identify several conflicts within the Plan both in terms of legal and procedural requirements which should be judged to render that the duty to co-operate has not been complied with and that the Plan is 'unsound'. These representations therefore:

- **Object** to the Local Plan in principle and its proposed Strategic Approach, and;
- Propose amendments to ensure that the duty to co-operate has been complied with and to ensure the soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.

1.11 In particular, BRE Ltd **object** to the following policies and propose amendments;

- Policy SP2. Strategic Approach
- Schedule SP2.1
- Explanation to Policy SP2. Strategic Approach – Paragraph 3.7
- Explanation to Policy SP2. Strategic Approach – Paragraph 3.18
- Policy SP11. Green Belt and Safeguarded Land
- Table SP11.1
- Policy SP14. Strategic Corridors
- Policy SP15. Whole Estate Plans

1.12 In addition, a new Policy 'Policy S22. Strategic Settlement: Land to the north of Junction 3 of the M54' is proposed to be included within the Plan.

1.13 Where amendments are proposed to the policy wording and supporting text they are indicated in **red bold**, whilst proposed deletions are indicated in ~~strike through~~.

1.14 These representations should also be read alongside the following documents, bound separately as appendices, that provide further background information:

- Appendix 1 : Site Location Plan

- Appendix 2 : Initial Illustrative Masterplan, incorporating 50ha Strategic Employment Area (SEA) – Bidwells, August 2020
- Appendix 3 : Employment Needs Assessment – Savills, September 2020
- Appendix 4 : Updated Illustrative Masterplan, incorporating 75ha Strategic Employment Area (SEA) – Bidwells, January 2021
- Appendix 5 : Development Principles Document, including a Green Infrastructure Strategy - Bidwells LLP, September 2019
- Appendix 6 : Archaeological Assessment – The Environmental Dimension Partnership (EDP), September 2019
- Appendix 7 : Extended Phase 1 Habitat Report - The Environmental Dimension Partnership (EDP), September 2019
- Appendix 8 : Transport Strategy – Vectos, September 2019
- Appendix 9 : Flood Risk and Surface Water Drainage Strategy - Vectos, September 2019
- Appendix 10 : Land Quality Technical Briefing Note - WSP, September 2019
- Appendix 11 : Utilities Statement - WSP, September 2019
- Appendix 12 : Employment and Housing Need Report – Bidwells LLP, September 2019
- Appendix 13 : Heritage Gazetteer - Bidwells LLP, September 2019
- Appendix 14 : Initial Heritage Impact Assessment - Bidwells LLP, September 2019
- Appendix 15 : Landscape and Visual Appraisal and Capacity Study - Bidwells LLP, September 2019
- Appendix 16 : Updated Transport Strategy – Vectos, September 2020
- Appendix 17 : Site Specific Green Belt Review – Tyler Grange, September 2019
- Appendix 18 : Letter from Savills dated 13 January 2021
- Appendix 19 : Letter from Stoford dated 28 February 2020
- Appendix 20 : Letter from Urban Splash dated 17 June 2020

1.15 It is formally requested that our recommended amendments are taken into account by the Council before the Regulation 22 submission to the Secretary of State.

2.0 Background

The Site and Emerging Proposals

- 2.1 The core proposal for Land at J3 is as consistently promoted throughout the Local Plan process and as considered by the Council as a ‘potential strategic site’ at the Regulation 18 stage. That is, a highly sustainable new community that will be capable of accommodating a Strategic Employment Area (SEA) of up to 50 hectares and a Strategic Housing Site of up to approximately 3,000 homes, together with a comprehensive range of supporting facilities and services, embedded within a wealth of green infrastructure and designed to a high quality.
- 2.2 Assessments of key constraints and opportunities informed an initial illustrative masterplan which accompanied the Regulation 18 Strategic Sites consultation in September 2019 (**Appendix 2**). These proposals included for the following:
- A **Strategic Employment Area (SEA) extending to circa 50 hectares**. This will be able to accommodate enterprises at a range of scales and will be anchored by a training and skills ‘hub’;
 - The employment provision was to be supported by a series of **four, well related neighbourhoods providing for circa 3,000 homes and enabling the potential for living and working to be closely linked together**. The neighbourhood clusters would grow organically, as the business, social and community infrastructure develops;
 - **A range of on-site facilities – including shops, community buildings, a medical centre, two two-form entry (2FE) Primary Schools and one Secondary School**; and
 - **Over 400 hectares of public open space**, including the provision of a new Country Park extending to over 60 hectares, the transformation of Lizard Wood into a publicly accessible woodland, a series of public parks, a range of play areas and formal sports provision and an **extensive informal recreation network** to promote active, healthy living.
- 2.3 Work undertaken and shared with Council Officers demonstrated that the Land at J3 proposal was likely to be viable. However, the delivery of the SEA as initially proposed above was reliant, in terms of viability, on the delivery of the wider J3 scheme.
- 2.4 A market assessment had also not been carried out at this point and the initial indicative masterplan was based on high level assumptions only. The high-level assumptions for the SEA were that it would be predominantly light industrial and research and development, with a small amount of associated heavy industry. B8 uses were specifically excluded except for ancillary storage and warehousing.
- 2.5 However, in response to the rapid changes in economic circumstances, notably the wide-ranging impacts of COVID-19, Brexit, approaches from local commercial developers with specific requirements and the commissioning of an Employment Needs Assessment by Savills (**Appendix 3**), the proposals for J3 were updated by BRE Ltd during 2020 and offered to the Council accordingly.
- 2.6 Whilst the delivery of the SEA has always been a fundamental part of the J3 proposals, it is now vital that high quality employment schemes, such as the SEA at J3, can be brought forward rapidly in order to support economic recovery. This is particularly important in the context of

delivering a strategic site in a region with an acknowledged critical undersupply of strategic employment sites capable of attracting and retaining inward and embedded investment. The need to support and build a sustainable economic recovery is also in line with UK Government Policy.

- 2.7 Key conclusions from the Employment Needs Assessment report suggest that there is a clear need for additional employment land of sufficient scale, to meet B2/B8 demand in particular. The impacts of COVID-19 have also resulted in a weakening of the office market but an increased demand for logistics/warehousing space.
- 2.8 As such, current advice is that the SEA should broadly include around 75% B2/B8 floorspace space assuming a major industrial occupier was attracted to the site and 25% of freestanding office/R&D floorspace. There is also a strong case to extend the area of the SEA at J3 enhancing its status and its attractiveness to large scale inward investors into the County.
- 2.9 The refreshed proposals for the SEA would mean that Land at J3 could now *either*:
- a) enable the SEA to be started in advance of a residential component of the wider Land at J3 proposals; or
 - b) enable the SEA to be completely 'freestanding' (if the residential component were not to be allocated at all).
- 2.10 Detailed analysis has also suggested that the SEA could readily be increased in size to up to 75 hectares within the same overall site boundary and that it is possible to be commercially viable and deliverable, at both potential sizes, in its own right as a separate, freestanding scheme or as an early phase of a wider, mixed use community with no cross subsidy needed.
- 2.11 An updated version of the illustrative masterplan has subsequently been prepared, demonstrating how a 75ha SEA could be accommodated on the site (**Appendix 4**). This would reduce the residential capacity of the site by approximately 500 dwellings, comprising of three neighbourhoods providing for circa 2,500 homes. The proposals would continue to include for a range of on-site facilities comprising shops, community buildings, a medical centre and a two-form entry (2FE) Primary School.
- 2.12 The SEA could also include for an educational campus linked to the University of Wolverhampton and aligned to their long term vision for skills and employment. Finally, the updated illustrative masterplan indicates a potential location for a solar farm to the north of the site, but within land owned by the Estates, which would be an integral part of the zero carbon strategy for J3. The University of Wolverhampton are particularly supportive of the opportunity that Land at J3 presents.
- 2.13 The Illustrative Masterplan and emerging proposals for Land at J3 are not fixed, and are expected to continue to evolve and respond as a result of engagement with the local community and stakeholders. As per our proposed amendments to the Plan, under new Policy S22, a comprehensive masterplan will be prepared for the site and then adopted by Shropshire Council. The masterplan and resultant redevelopment will need to comply with a set of site guidelines.

The Public Benefits

- 2.14 If only the SEA were to be allocated within the Local Plan, at either its 50ha or 75ha size, it would provide:
- 6,000 to 9,100 net additional jobs, for new and existing residents living in nearby towns and villages, including those leaving service at RAF Cosford. These communities would benefit from improved local accessibility to jobs, reducing the amount of out-commuting from Shropshire;
 - An injection of approximately £290m - £440m GVA per annum into the economy;
 - £4.5 million additional business rates income within Shropshire;
 - An 'educational campus', focussing on reskilling and upskilling opportunities, benefitting firms locating at J3 and those in the surrounding area, as well as the career and wage prospects of employees. It would form part of the wider educational network within the surrounding area of further and higher education and training institutions, such as i54, RAF Cosford, the University of Wolverhampton, Telford College and Harper Adams University and could complement growth potential in the Cosford area, for example, promoting employment growth linked to the increased focus of the base as the RAF's Centre for engineering and aeronautical training;
 - Support for sustainable transport improvements in the Strategic Transport Corridor including enhancing the economic business case for improvements to rail service frequency and railway station improvements within the M54 Corridor, acting as a catalyst for wider opportunities for economic growth;
 - An embedded net zero carbon strategy from the outset to ensure a positive, local response to climate change. This would be achieved through a combination of efficiency, solar generation, heat pumps, electric vehicles and energy storage;
 - A development capable of securing a Net Environmental Gain as a result of the extensive network of retained and proposed green spaces providing opportunities for an increase in natural habitat and ecological features;
 - New public transport, pedestrian and cycle links including a total of approximately 16 km/10 miles of new safe walking and high-quality cycling routes connecting with existing communities, such as Shifnal, nearby villages, and Cosford Railway Station;
 - A safeguarded, landscaped green buffer to Tong village – as the development will only be west of the A41, maintaining at least a 500m separation; and
 - Areas of retained Green Belt land with the opportunity for compensatory improvements as per NPPF requirements.
- 2.15 If the combined employment and residential scheme were released from the Green Belt and allocated for development, then additional benefits to those above would include:
- Transformation of 510 hectares of privately owned agricultural land and woodland into public open space, accessible to existing and the new local communities, including public access to the 90 has/222-acre Lizard Wood;
 - New and enhanced opportunities for informal and formal recreation, with links connecting to local towns and villages to help promote health and wellbeing;

- New and enhanced bus routes, also serving other local communities and villages, linking with Shifnal (including the railway station), Cosford (including the railway station) and Albrighton (including the railway station);
- Affordable and lifetime homes, and work from or close to home opportunities;
- New education facilities, including the potential for new primary and secondary school provision;
- New healthcare facilities;
- A new local food hub selling locally sourced food and drink; and
- New community facilities, including village halls, work hubs, playing pitches and only small shops.

2.16 Further employment opportunities would also be generated through the provision of the above services and amenities to meet the needs of residents. In doing so, this provides an economically vibrant and sustainable new community ensuring residents have access to a range of employment opportunities within easy distance.

2.17 A mixed-use proposal also provides the additional opportunity for strong self-containment of trips and a good level of self-sufficiency within the site, which will reduce car trip numbers and distances. Therefore, the impact of the development on the surrounding road network would be less significant.

Issues and Impacts and Potential Mitigation

2.18 BRE Ltd has appointed a team of consultants to undertake extensive work in relation to a comprehensive range of environmental and technical topics in support and analysis of the above proposals. This informed a 'Development Principles' document, submitted to Shropshire Council in September 2019 as part of the Strategic Sites (Regulation 18) consultation of the Local Plan (**Appendix 5**). The purpose of this summary document is to help demonstrate how Land at J3 could be delivered, based on best practice and taking into consideration the issues and impacts that might be generated by the site and how they might be mitigated and addressed.

2.19 For completeness, the supporting technical reports to the 2019 Development Principles document are included within the appendices of these representations (**Appendices 6 to 15**). These confirm that there are no 'in principle' constraints to the delivery of the site and that Land at J3 is capable of being sensitively designed so as to develop as a distinct place within its own character, responding appropriately to its landscape and heritage setting.

2.20 In addition, an updated Transport Strategy was submitted to Shropshire Council in September 2020 as part of the Pre-Submission (Regulation 18) consultation of the Local Plan (**Appendix 16**). This sets out a transport vision for the Site and how this can be transformational not only for new workers and residents but also for existing communities.

2.21 At present the proposal includes both the SEA and the residential element which will develop a sustainable community in its own right. Alongside this, the promotion of active travel connections, sustainable transport links and flexible working practices between the site and nearby residential areas have informed the master planning process to ensure a sustainable development comes

forward regardless of whether the SEA comes forward as a standalone development or as part of a wider mixed use development.

- 2.22 In addition to the technical work undertaken, BRE Ltd has also sought throughout the continuing evolution of the Illustrative Masterplan to engage with the Council, local community and a variety of key stakeholders. This included a website providing up to date information, newsletters distributed to the local community, a series of meetings with business groups and RAF Cosford Museum regarding improving transport provision in the area. BRE Ltd is committed to continued community engagement to further develop the proposals for Land at J3 and this aligns with Shropshire Council's own aspirations as expressed through emerging policy requirements.

Assessment of Harm to the Green Belt

- 2.23 A Site-Specific Green Belt Review (**Appendix 17**) of Land at J3 has been prepared. This employs the same methodology adopted by Shropshire Council and used by their consultants LUC in the Shropshire Green Belt Review. It provides a detailed analysis of the site in terms of how the land parcels within the site (11 sub-parcels in total) perform against the five Green Belt purposes set out in the NPPF and any potential harm that might arise from releasing these parcels from the Green Belt. The review also included an opportunities and constraints plan for each of the parcels to demonstrate how each parcel can contribute towards a wider scheme of preserving and enhancing the function of the overall Green Belt and create robust new, long term Green Belt boundaries.
- 2.24 The sub-parcels assessment of harm is illustrated in Figure 2.1 below.
- 2.25 The Site-Specific Green Belt Review considers Land to the south of Stanton Road (Sub- Parcel 9) would lead to 'Moderate' harm if released from the Green Belt as although development within the parcel would result in spatial encroachment of the countryside, the M54 already serves as a major urbanising influence which detracts from the parcel's rurality. This compares to the Shropshire Green Belt Assessment and Review which assessed this parcel (identified as Parcel 8) as leading to 'Moderate-High' harm if released from the Green Belt.
- 2.26 It should be noted here that the proposed employment allocation in the Plan to the east of Shifnal was identified as leading to 'Moderate-High' and 'High' harm if released from the Green Belt.
- 2.27 Land immediately to the north of Stanton Road, east of the river Worfe and extending up to Lizard Mill Farm (Sub-Parcel 8) is identified as leading to 'Low-Moderate' harm if released from the Green Belt as the A41 to the east stands as a prominent built feature which infringes on the rural characteristics of the parcel. In addition, the Review concludes that there is limited indivisibility within sub-parcel 8 and with the surrounding countryside due to the visually robust internal field boundaries and the belt of woodland planting to the west.
- The remaining sub-parcels promoted for release from the Green Belt as part of the Land at J3 proposals are identified in the Site-Specific assessment as leading to 'Moderate' harm if released from the Green Belt (Sub-Parcels 2, 3, 6 and 7).

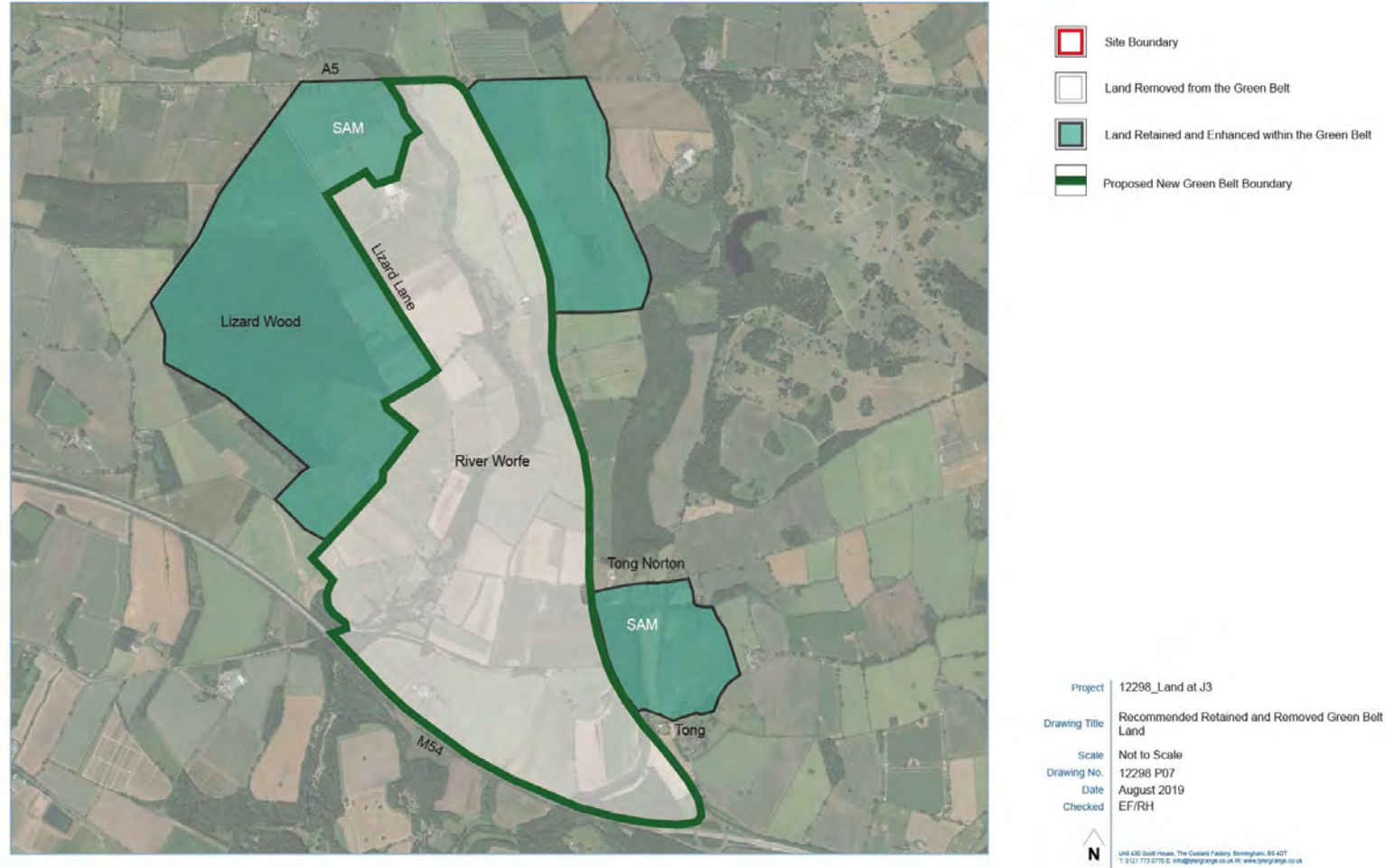
Figure 2.1: Land at J3 Sub-Parcels Assessment of Harm



Source: Junction 3, Shropshire. Site-Specific Green Belt Review, September 2019 (Plan 4)

Figure 2.2: Recommended Retained and Removed Green Belt Land

Plan 6: Recommended Retained and Removed Green Belt Land_11298_P07



Source : Site-Specific Green Belt Review, September 2019 (Plan 6)

- 2.28 The Site-Specific Green Belt Review concludes with a 'Recommended Retained and Removed Green Belt Land' Plan. This illustrates the land parcels most suitable for remaining as Green Belt land with the opportunity for compensatory improvements as per NPPF requirements. These are shown in Figure 2.2.
- 2.29 As a result, those parts of the site proposed for release from the Green Belt, shown on Figure 2.2 and on the site location plan at **Appendix 1**, total 370 hectares and comprise parcels that are contained within the boundaries of the A5 to the north, the A41 to the east, the M54 to the south and Lizard Wood to the west.
- 2.30 The M54 to the south, the A41 to the east and the A5 to the north all provide clearly defined, readily recognisable and robust boundaries which would constitute a strong new Green Belt. The western and north-western boundary of the new Green Belt edge would be formed by existing and proposed roads and hedgerows, all within the control of Bradford Rural Estates Ltd.
- 2.31 It is also worth noting that, as described above, depending on which parts of the scheme are released from the Green Belt, up to 330 ha of retained and enhanced land (the area shown in dark green in Fig 2.2) will become publicly accessible for appropriate uses, such as outdoor recreation and sport.

Viability and Deliverability

- 2.32 The NPPG advises that the role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine the deliverability of the plan¹.
- 2.33 The NPPG continues in advising it is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant means development which fully complies with up to date plan policies.
- 2.34 The Shropshire Local Plan Delivery and Viability Study (2020) has been carried out by HDH on behalf of Shropshire Council to provide the Council with evidence to assist it in drawing up the Local Plan, affordable housing policies and to consider a review of the Community Infrastructure Levy (CIL).
- 2.35 We note that the commercial assumptions within the Study consider that a blanket rate should be applied across the whole study area, although it is recognised that assumptions are dependent on transport and infrastructure connections. We consider however that the commercial rental values and yields are still overly optimistic.

¹ Paragraph: 002 Reference ID: 10-002-20190509

- 2.36 Furthermore, we would also stress that assumptions for the strategic sites should be treated differently from 'typical' sites as there are different assumptions that should be adopted to reflect the risk, scale and timescales associated with strategic sites.
- 2.37 The deliverability of Land at J3 is a critical matter. Deliverability includes being confident that a development is likely to be viable. It is recognised that ensuring these matters are properly considered from the outset is of the utmost importance and in this regard a specialist consultant team has been formed for this express purpose.
- 2.38 An initial, high level viability appraisal has been undertaken by Savills. This confirms that the site is capable of delivering a viable employment-led mixed-use scheme, together with associated community facilities and infrastructure, without the need for any Council funding. Therefore, Land at J3 would place no particular extra financial burden on the local authority, allowing them instead to focus on applying the economic and revenue benefits that would be secured.
- 2.39 BRE Ltd has however undertaken initial discussions with Homes England, amongst others, who have confirmed that Land at J3 would be a scheme which they would be willing, in principle, to loan support to assist in accelerating delivery, although only if it included a residential element.
- 2.40 Subject to a suitable Local Plan allocation, the intention is for the delivery of the strategic employment area and associated services and the delivery of housing at the site to commence early on in the Local Plan period, with options to phase delivery over time. The site is also within single ownership and has the benefit of a committed landowner.

3.0 The Economic Context

Economic Strategy and Policy Aspirations

- 3.1 The region's Strategic Growth Corridors are widely recognised as being key drivers of economic growth. The M54 is acknowledged to be one such Strategic Growth Corridor.
- 3.2 Consequently, the current Shropshire Economic Growth Strategy (2017 – 2021) seeks to deliver a 'step change' in the capacity and productivity of the local economy and to focus major employment development along the Strategic Growth Corridors. The West Midlands Combined Authority (WMCA)'s Strategic Economic Plan (SEP) has outlined ambitious plans for growth over the next 5-10 years. It aims to raise per capita GVA across the West Midlands to the national average by 2026 and to 5% above by 2030. The West Midlands Local Industrial Strategy launched by Government, in May 2019, likewise sets out the steps the West Midlands ought to take to drive growth, by strengthening the foundations of productivity, including in its role as a well-connected region.
- 3.3 To achieve these ambitions will require a large acceleration of growth from past trends.
- 3.4 The 'M54 Growth Corridor – Strategic Options Study' (June 2019), prepared by Avison Young on behalf of Shropshire Council, and forming part of the evidence base for the Local Plan, identifies the M54 corridor as a **'key strategic gateway for both Shropshire and its neighbouring local authorities and is identified as a key growth Corridor for both employment and residential development, resulting from the strong transport links present and critical mass from the presence of nationally significant education, training and employment opportunities'** (emphasis added). It also assesses the extent of the opportunities associated with the M54 corridor. It recommends that the Council should prioritise three potential locations/sites for both employment and residential development to drive economic growth in the future along the Corridor - RAF Cosford, Stanton Road, Shifnal and Land at J3.
- 3.5 The Study concludes, within the Executive Summary, that 'The M54 corridor in Shropshire is at the centre of the infrastructure network, within the hub of the West Midlands Combined Authority and Midlands Engine and with the 'book ends' of development (i54/T54) at both Junctions 2 and 4 of the M54. The timing and conditions are right given the once in a generation review of the Green Belt for Shropshire to drive forward their corporate economic growth objectives and bring forward strategic sites along the M54, a location ripe for investment.'. Furthermore, **'these potential allocations will provide 'fit for purpose' employment land that meets the needs of the modern occupier and responds to market demand. This approach will assist in diversifying the economy by attracting occupiers in higher value sectors that drive economic productivity and retain talent in the County'**. (emphasis added).
- 3.6 The Shropshire Employment Land Review (ELR) (December 2019), also prepared by Avison Young on behalf of Shropshire Council, concludes, at paragraph 2 of its Executive Summary, that *'Reflecting on the findings of this study, the M54 Growth Corridor Study, and other available evidence, it is apparent that employment land opportunities can be divided into three categories: strategic, significant local and other local opportunities.'*

- 3.7 The ELR thus concludes, at paragraph 20.4, that key locations for ‘strategic’ employment opportunities should include the Strategic Centre of Shrewsbury and/or ‘**Nodes on strategic corridors: Sites which benefit from direct access and visibility from strategic corridors, for example adjacent to strategic road junctions/roundabouts**’. (emphasis added).
- 3.8 The proposed allocations in the Plan in the east of the County at Shifnal, Albrighton, Bridgnorth and Ironbridge are not located in such key locations benefitting from direct access and visibility from strategic corridors. In comparison, Land at J3 does benefit from direct access from Junction 3 of the M54, at the heart of this important Strategic Growth Corridor, and the Strategic Employment Area is capable of extending to circa 75ha. BRE Ltd are aware of several employers with immediate requirements of between 300,000 and 600,000 sq. ft along the M54 corridor – this is more than could be accommodated at Shifnal, Albrighton, Bridgnorth or Ironbridge.

Economic Need

- 3.9 In quantitative terms, the employment land requirement identified in the Shropshire EDNA is between 164ha and 264ha between 2016 to 2038 (including the current proposed 30ha Black Country contribution). This assumes that the authority’s undeveloped employment allocations come forward in their entirety for employment development over the plan period, and that all extant B-Class employment land planning permissions will be developed.
- 3.10 Taking into account quantitative and demand-based factors, the EDNA further suggests that the following indicative split of office/industrial employment space could be appropriate for Shropshire over the period 2018 to 2038:
- 30% for office; and
 - 70% for industrial/distribution.
- 3.11 The existing supply in Shropshire is 276ha and the Plan target 300ha. This suggests therefore that there is headroom that could be attributed to meeting needs arising in the Black Country and the 30ha contribution could be increased further, particularly in light of the significant shortfall in unmet employment needs. Further detail on the unmet needs of the Black Country and the case for Shropshire to accommodate a greater level of contribution within the Local Plan as part of a new strategic allocation for Land at J3 is set out in Section 4.
- 3.12 The employment requirement in the Plan must also take into account qualitative factors, as required by guidance contained in the NPPG, which states that LPAs should assess the need for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period² (emphasis added).
- 3.13 Indeed, the Shropshire EDNA confirms, at paragraph 8.8, that ‘The ultimate judgement regarding the level of employment need that Shropshire Council should plan for is not, therefore, simply shaped by a consideration of quantitative analysis. A range of qualitative factors should also be taken into account, that would typically consider the quality and demand for existing premises,

² Paragraph: 029 Reference ID: 2a-02920190220. Revision date: 20 02 2019

the spatial distribution of supply and demand for premises, and insights from commercial property agents and local businesses.’

- 3.14 The qualitative factors in this case are outlined below.
- 3.15 The 2015 West Midlands Strategic Employment Sites Study defines ‘strategic sites’ as those sites that provide at least 25ha that can bring net additional activity and jobs to the region and attract nationally or internationally mobile business activity. The Study found that the Black Country and Southern Staffordshire has a severe lack of strategic employment land on sites of a minimum of 25ha in size to meet demand for large industrial type units.
- 3.16 The 2017 West Midlands Land Commission report similarly concluded that ‘the shortfall of land for employment space is at least as pressing as the shortage of land for new homes, and possibly more so’ (paragraph 5.20).
- 3.17 An update to the West Midlands Strategic Sites Study, commissioned by the three West Midlands LEPs and Staffordshire County Council, is anticipated to be completed in early 2021 but has not been published at the time of writing these representations. However, there remains a severe lack of strategic high-quality employment land, as evidenced by the Secretary of State decision on the proposed West Midlands Rail Freight Interchange in 2020. This refers to ‘*significant level of need for additional logistics floorspace in the region*’ and the ‘*strong market demand and shortage in the supply of large warehouse buildings and sites within the proposed WMI [West Midlands Interchange] Market Area*’.
- 3.18 The Shropshire EDNA acknowledges that demand for industrial units at the upper end of the ‘Mid Box’ scale (30,000 sq ft – 100,000 sq ft) is likely to be greater in areas with good connections to the A5 and M54. In terms of demand for ‘Big Box’ units (100,000+ sq ft), the EDNA reports that this has been generally limited within Shropshire (paragraph 7.49). However, BRE Ltd have commissioned their own Employment Needs Assessment (2020) (**Appendix 3**), undertaken by Savills, which includes a manufacturing and logistics property market overview of both Shropshire and the wider West Midlands and Savills consider this limited demand for ‘Big Box’ units is in part as a result of there being no readily available supply of suitably located, high quality larger stock to offer recently.
- 3.19 Indeed, the Savills Employment Needs Assessment confirms that Shropshire and the wider West Midlands experiences very high demand from both the logistics and manufacturing sectors with requirements for large units of Grade A quality. However, **there is only 1.64 years’ of supply in the West Midlands, a third of this is classified as Grade B or C and a significant proportion of this would not be capable of meeting modern occupier requirements as is focused within the smaller scale ranges**. The Land at J3 is well positioned to help increase this short supply promptly, both in qualitative and quantitative terms, to the benefit of both the West Midlands and Shropshire.
- 3.20 This is consistent with JLL’s high level review of employment land supply reported in the Shropshire EDNA which found that newly developed modern stock has largely catered to smaller occupiers and trade counter uses and much of the existing larger stock is dated and in need of refurbishment in order to meet the requirements of modern occupiers (paragraphs 7.32 and 7.33). Furthermore, there is a lack of ‘oven ready’ land for employment development coming to the market, particularly for B1(c), B2 and B8 uses, despite there being demand in the market and

that, as a result, '**there is a risk that those seeking employment premises within the Shropshire Council boundary may locate elsewhere**'. (emphasis added) (paragraph 9.48).

3.21 The Shropshire EDNA also advises that there is a need to deliver further employment space to facilitate the rapid recent growth in e-commerce (paragraph 9.40) and the growing trend for supply chain 're-shoring' whereby a greater emphasis will be placed on sourcing of goods and raw materials closer to the market at the point of consumption in order to reduce supply chain risk (paragraph 9.41). These recent changes suggest a need for an agile, rapid response to these acknowledged changes in economic circumstances.

3.22 The Shropshire EDNA then advises the Council, at paragraphs 9.42 and 9.43, that;

'9.42. Both of these factors are likely to have a positive impact on the demand for industrial and logistics premises going forward and presents an excellent opportunity for Shropshire to attract occupiers looking for additional floorspace or to facilitate the potential expansion of existing occupiers, particularly those linked to the food and agri-tech sectors.'

9.43. Demand for industrial and logistics premises to facilitate these uses, and regional and national demand is likely to be highest at locations with good accessibility to the A5 and M54, that is to say along the M54 Corridor as far as Shrewsbury, with some potential further demand further west along the A5 in Oswestry and surrounds, in order to serve the North Wales market.' (emphasis added).

3.23 The qualitative factors in this case can therefore be summarised as follows:

- The significant and increasing demand for advanced industrial and logistics premises in locations with good accessibility to the M54;
- The significant undersupply of good quality, larger stock available in the east of Shropshire, and the wider West Midlands to cater for this demand;
- The subsequent consequences in not meeting the growth aspirations of the Shropshire Economic Growth Strategy and the West Midlands SEP.

Housing Need

3.24 Shropshire Council has undertaken an assessment of Local Housing Need (LHN) using the Government's Standard Methodology, which indicates a housing need of 25,894 dwellings over the plan period from 2016 to 2038 (1,177 dpa), as of April 2020. This has utilised the 2014-based Sub-National Household Projections (SNHP) to establish the demographic baseline.

3.25 The Objectively Assessed Needs for housing in Shropshire is likely to be appropriate to meet the indigenous demographic-led needs. However, the unmet housing needs of the Greater Birmingham and Black Country Housing Market Area is significant and there has not been effective cooperation in meeting this cross-boundary strategic need. Furthermore, as referred to above, there is headroom above local employment needs that should enable the 30ha contribution in the Plan to be increased further and to facilitate development in a sustainable manner, it is necessary to co-locate housing and economic development.

- 3.26 As such there is a case to also consider adjusting the housing requirement upwards to support the housing needs arising in the Black Country and for both the increased employment and housing provision to be delivered as part of a new Strategic Settlement allocation within the Plan at Land at J3.

4.0 Black Country Unmet Employment and Housing Needs

Employment Need

- 4.1 Unmet need for employment land falls within two categories. The first is that necessary to service the unmet housing and effectively needs to be distributed to the same areas as the housing to facilitate sustainable patterns of development. The second, which is more complicated, is the employment land necessary to support the industrial sectors specific to the source area. In the case of the Black Country, which estimate an unmet need of 287ha – 565ha, this is large scale hi-tech manufacturing and national and regional distribution centres that have very specific location criteria.
- 4.2 Fundamentally, such developments need very close links to the strategic highway network to operate. Not only is this essential in terms of maintaining an efficient supply chain, and accessibility to a large labour force, but the high volume of HGVs associated with them inevitably cause environmental nuisance to neighbouring uses they need to pass to access the strategic highway network, add to congestion on minor roads, and degrade the roads themselves. Consequently, the ideal locations for many of these strategic scale businesses are, as identified within the Council's ELR, and its EDNA, is at motorway and major 'A' road nodal junctions. Consequently, satisfying the unmet needs for strategic employment land can prove more difficult than satisfying unmet housing because of its more specific locational requirements. Choices are limited if they are to be effective.
- 4.3 No local authorities have yet made a binding commitment in the form of the required statement of common ground to contributing towards addressing the significant unmet needs of the Black Country. Clearly it is imperative that – if the gap is to be narrowed substantially - further, reliable, and timely action must be taken.
- 4.4 Even so, if we look at the proposed employment land allocations around Shifnal and Bridgnorth, these will primarily serve the growing requirements of these settlements. They are not of a sufficient scale nor an appropriate location to be properly regarded as 'strategic' employment opportunities, such as those sought by the Council's ELR and EDNA. It is plausible that some may contribute at some smaller and more localised level to helping satisfy the Black Country's unmet needs but not in any meaningful way. This is because they are too far removed from the strategic highway network to ensure a good quality of access, and of too limited a scale, to be attractive to those employment sectors with the highest demand, the large scale hi-tech manufacturing and national and regional distribution centres.
- 4.5 Furthermore, the provision of just 30ha is simply too small, even if it were to all be used exclusively to meet the Black Country's unmet needs. The alternative locations for such developments primarily along the M6 and M54 transport corridors is extremely limited; there are only so many junctions that could accommodate further growth. Clearly i54 at Junction 2 of the M54 is one such location, but in simple physical terms there is only limited room for further expansion there. Indeed, the development of the western expansion land is already underway. Junction 1 is equally constrained.

- 4.6 On the M6, Junction 10a does not provide any recognised opportunities. To the south there are physically few opportunities until the motorway passes to the south of Dudley but even here a quick review of OS maps highlights significant practical constraints. To the north there may be limited opportunities around Junction 11 but Junction 12 is constrained by lakes created by gravel extraction. Lastly Junction 13 is located to the south of Stafford and could provide some opportunities, but these are limited by the nearby canals and railway lines.
- 4.7 Most 'A' roads in this area are single carriageway and therefore not readily suitable locations for such large employment centres. The only exception is the A449, which is for the most part constrained by existing urban areas. Some opportunities might be available around Coven but not of a significant scale.
- 4.8 With such constraints, it is unclear how these industrial sectors, which are central to the concept of the 'Midlands Engine', can expand and meet demand quickly. Ultimately without the provision of appropriate allocations these businesses will locate elsewhere, possibly outside of the UK, with significant implications for their supply chains, investment and employment.

Housing Need

- 4.9 The scale of unmet need for the wider Greater Birmingham and Black Country Housing Market Area (GBBCHNA) is also very significant. Some measures have been taken to seek to reduce it in recent years, but the gap still remains substantial.
- 4.10 Birmingham is by far the largest source of unmet need. Its local plan (adopted 2017) covers the period 2011-31 and identifies a need for 89,000 dwellings (4,450dpa). However, capacity was only identified for 51,000 dwellings (2,550dpa), resulting in an unmet need of 38,000 dwellings. If it is assumed this should be delivered between 2017 and 2031, i.e within the remaining plan period, it nominally equates to 2,714dpa. Birmingham's most recent LHNSM is 4,829 dpa, which subtracting the estimated capacity of 2,550dpa suggests an annual unmet need of 2,279dpa.
- 4.11 The Black Country (Dudley, Sandwell, Walsall and Wolverhampton) have seen a rapid rise in their housing need as a result of the LHNSM. This currently stands at 4,026dpa compared to the adopted target of 3,150dpa in their 2011 Joint Core Strategy (2009-2026). The Black Country Urban Capacity Review Update 2019 suggested that the Black Country has an urban capacity of 44,500 dwellings and in terms of the capacity of the Black Country Green Belt to 2039, the Association of Black Country Authorities (ABCA) latest estimates are that it could accommodate a further 10,000 dwellings. Assuming that these figures can be applied to the period 2021 to 2039 (18 years), this supply of 54,400 dwellings equates to 3,028dpa. Against a requirement of 4,026dpa, this suggests a continuing significant shortfall of 998dpa up to 2039.
- 4.12 Birmingham and the Black Country combined therefore have an annual unmet need of approximately 3,277dpa. That is, just over one percent of the national target of 300,000dpa. Clearly this needs to be comprehensively addressed.
- 4.13 For both economic and societal reasons, unmet housing need should be delivered as close to the source as possible. Greater distances can be justified where there are good transport links but clearly this itself can give rise to its own environmental issues.

- 4.14 Distributing unmet housing need is not something that can be distilled into a simple mathematical equation. Factors such as land availability are key, but so is the timing of delivery. Much of the unmet need is existing and results from a chronic shortfall in housebuilding over the last two decades. As such, local plans should seek to maximise the amount of unmet need they can sustainably accommodate rather than looking to later plans to resolve the issue. Deferring responses as a challenge for future plan making does not seem a satisfactory answer to meeting the national objective of significantly boosting the supply of homes.
- 4.15 It is therefore necessary to look at what the ‘doughnut’ of authorities that encircle Birmingham and the Black Country are doing to rise to the challenge. This is complicated by Coventry to the east, which has its own, overlapping calculation of unmet needs. The adopted Coventry Local Plan (adopted 2017) covers the period 2011-2031 and identifies a need for 42,400 dwellings (2,120dpa) but a capacity of only 25,000 dwellings (1,250dpa). This suggests a shortfall of 17,400 dwellings, which from 2017 onwards equates to 1,243dpa. However, Coventry’s LHNSM has increased to 2,325dpa which suggest the unmet need could be higher still. Consequently, Birmingham effectively has to share North Warwickshire, Stratford-on-Avon and Solihull with Coventry. Overall, Stratford-on-Avon and North Warwickshire contribute 2,220 dwellings to Birmingham’s unmet need, which is estimated to equate to 111dpa. North Warwickshire also contributes 500 dwellings to Tamworth’s entire unmet need.
- 4.16 To the south, Bromsgrove and Redditch have separate local plans (both adopted 2017 and covering the period 2011-2030). The Bromsgrove Local Plan helps meet the unmet needs of Redditch but does not contribute to meeting any wider needs.
- 4.17 This leaves South Staffordshire to the west and Lichfield and Cannock Chase to the north. It is understood that South Staffordshire have proposed accommodating 4,000 dwellings, Lichfield 4,500 dwellings and Cannock Chase 500-2,500 dwellings. Over the period 2021-2039, this would equate to between 500dpa and 611dpa.
- 4.18 Taking this all into account, it is estimated that the ‘doughnut’ of authorities surrounding Birmingham and the Black Country can accommodate between 611dpa and 722dpa of their unmet need of 3,277dpa. In other words, less than a quarter of the unmet housing need is currently accounted for. While there might be some expectation for these authorities to accommodate more housing in their next local plan reviews, and efficiencies to be gained through better use of previously developed land and changes of land use, it seems likely that a very significant shortfall in meeting the existing unmet need will remain. Therefore, it is crucial that the net is cast wider, particularly in terms of areas with the best transport links with Birmingham and the Black Country.
- 4.19 Realistically there are no opportunities to increase housing delivery to the east. Not only is there the substantial unmet need of Coventry but beyond is the unmet need of Derby and Leicester.
- 4.20 To the south, is the Cotswold AONB and the increasing housing pressures associated with the Cambridge to Oxford Arc. It is unlikely therefore that much of the unmet need could be distributed here.
- 4.21 To the north is Stoke-on-Trent, which has seen its LHNSM increase from 500dpa to 684dpa. The City is surrounded by a substantial Green Belt that may cause some constraints. In between is Stafford, which is a possible location for some unmet need but their local plan review is currently

only at the Issues and Options stage and is therefore likely to be at least two years away from adoption.

- 4.22 To the west there is Shropshire who are currently proposing to accommodate a modest 1,500 dwellings of unmet need, which equates to 83dpa over the 18 years of the plan period 2021-2039. Given that Shropshire is the fourth largest local authority by area in England, has land closer to Wolverhampton than much of Lichfield is to Walsall and benefits from both direct motorway and train links, this contribution is paltry. Green Belt cannot be considered a good reason for this, South Staffordshire and Lichfield are both much smaller authorities but covered by the Green Belt to a far greater extent yet they are offering to accommodate more unmet need.

Examination of All Other Reasonable Options

- 4.23 In summary and in line with guidance contained within the NPPF (paragraph 137), all other reasonable options for meeting Black Country needs have already been examined and justified in evidence, as follows:

Making as much use as possible of suitable brownfield sites and underutilised land and optimising the density of development within the Black Country

- 4.24 The Association of Black Country Authorities (ABCA) has fully explored the capacity of the Black Country urban area by making use of all suitable and deliverable land and buildings identified in the most recent Strategic Housing Land Availability Assessments (SHLAAs) and assessing the potential impact of increasing densities in accessible locations. This was set out in the Black Country Urban Capacity Study Update (2019).

Capacity of the Black Country Green Belt

- 4.25 ABCA has commissioned a Green Belt and Landscape Sensitivity Assessment to review the capacity of the Black Country Green Belt. In ABCA's response to the Shropshire Local Plan Review Strategic Sites consultation (Regulation 18), ABCA confirmed that the Black Country Green Belt is only likely to deliver circa 10,000 homes.

Informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development

- 4.26 ABCA has engaged with neighbouring authorities to determine whether there are, firstly, any non-Green Belt locations which could be brought forward to meet their needs, and secondly, through the Plan review process, whether suitably located Green Belt locations could be brought forward.
- 4.27 No local authorities have yet made a binding commitment in the form of the required statement of common ground to contributing towards addressing the significant unmet needs of the Black Country.
- 4.28 The latest position of the Black Country unmet need is outlined in tables 4.1 and 4.2 below.

Table 4.1 : Black Country Unmet Employment Need

BLACK COUNTRY NEED	EXISTING SUPPLY	POTENTIAL CONTRIBUTIONS FROM NEIGHBOURING AUTHORITIES	SHORTFALL
592 ha (baseline growth)	305 ha	Shropshire – 30ha	257 - 535
870ha (aspirational growth)			

Table 4.2 : Black Country Unmet Housing Need

BLACK COUNTRY NEED	CAPACITY OF BLACK COUNTRY URBAN AREA	INDICATIVE MARKET CAPACITY OF BLACK COUNTRY GREEN BELT	POTENTIAL CONTRIBUTIONS FROM NEIGHBOURING AUTHORITIES	SHORTFALL
71,500 (plus 5,000 as a result of new national method)	44,500	10,000	10,500 – 12,500, as follows: - South Staffs: 4,000 - Lichfield: 4,500 - Cannock Chase: 500 – 2,500 - Shropshire: 1,500	9,500 - 11,500

- 4.29 Further commercial analysis relating to employment land, undertaken by Savills, is included at **Appendix 18** which specifically reviews whether the current Local Plan proposals to include 30ha of employment land to help meet the needs of the Black Country would be effective, and whether there are other sites within the M54 corridor which separately or collectively could promptly fulfil the unmet need as well as J3.
- 4.30 This analysis concludes that none of the sites allocated for employment within the Regulation 19 Pre-Submission draft of the Local Plan truly meet the requirements of a strategic site provision; since they are relatively small-scale and local in context and likely demand. In terms of other sites within the M54 corridor, the analysis considers that whilst they could serve as potential Strategic Employment Sites in due course, the key point is in terms of comparisons and making choices in fulfilling demand. Now that the West Midlands Interchange (WMI) has been consented (albeit restricted to use as a rail freight terminal and B8) Hilton Park is in a more difficult position; it is targeted at the 'big box' market, is not yet consented, and is in broadly the same strategic market area as WMI (albeit it could possibly also offer to accommodate industrial as well as distribution space) and it would be part of a cluster of broadly similar sites around and between Junction's 1 and 2 M54 and the M6.

- 4.31 By comparison, J3 is an attractive and appropriate option for meeting Black Country and wider West Midlands needs because it offers;
- Access to an unconstrained M54 junction within a Strategic Growth Corridor;
 - A different yet still attractive market location
 - A diverse and distinctive offer (mixed uses, a full spectrum of scale, including grow-on space, embedded skills and training, plus the potential benefits of living and working within the same development)

Recommendations

- 4.32 Given the scale of the unmet need, the size of the local authority area relative to its neighbours, the lack of readily identifiable, suitable, reliable and deliverable alternatives, the development opportunity at Land at J3 is of major significance in helping satisfy the unmet needs of the Black Country and fulfilling the aims of the various economic strategies and plans.
- 4.33 The Shropshire Local Plan review represents an opportunity now to address this unmet need.
- 4.34 On this basis, **it is recommended that Shropshire seeks to increase its employment requirement to incorporate up to 90ha of employment land to support the needs of the emerging Black Country Plan.** Some 15ha of this could be met by the proposed non-strategic employment allocations around Shifnal and Bridgnorth with the residual of 75ha of strategic land being met at Land at J3 as part of a new Strategic Settlement. Thus, Land at J3 can be complementary to the proposed local employment allocation at Shifnal and assist in addressing its jobs/homes balance to 2038 as required under the Plan.
- 4.35 Furthermore, **it is recommended that Shropshire seeks to increase its housing requirement to incorporate at least 4,500 dwellings to support the needs of the emerging Black Country Plan.** Some 1,500 of this could be met by the proposed housing allocations in the Plan around Shifnal and Bridgnorth with the residual of up to 3,000 dwellings to be met at Land at J3 as part of a new Strategic Settlement.

5.0 The Exceptional Circumstances Case for Land at J3

- 5.1 There is no formal definition of what constitutes exceptional circumstances or a standard set of criteria; it is for the local planning authority to determine whether it considers exceptional circumstances exist to justify removing land from the Green Belt and to make that recommendation to the Planning Inspectorate.
- 5.2 Indeed, the case of *Compton Parish Council v Guildford BC* [2019] EWHC 3242 (Admin), in which one factor was meeting unmet need for a neighbouring authority, Woking, is relevant here.
- 5.3 This confirms that:
- (1) Exceptional Circumstances do not need to be extraordinary and are less demanding than “Very Special Circumstances”: This is also confirmed in *R (Luton BC) v Central Bedfordshire Council* [2015] EWCA Civ 537.
 - (2) There is no requirement that Green Belt land be released as a last resort. This is also confirmed in *IM Properties Development Ltd v Lichfield DC* [2014] EWHC 2240.
 - (3) There is no need for more than one exceptional circumstance; exceptional circumstances can be found in a combination of circumstances of varied natures.
 - (4) Exceptional circumstances can include general planning needs. Meeting unmet need is capable of itself to be sufficient to demonstrate exceptional circumstances, depending on the case.
- 5.4 There are a number of exceptional circumstances which support the proposed release of Land at J3. These can be summarised as follows:-

Supporting the aspirations of Shropshire’s Economic Growth Strategy and the WMCA Strategic Economic Plan

- 5.5 Land at J3 is the only sustainable, deliverable option that can provide strategic development and major inward investment in alignment with the Council’s Economic Growth Strategy and the WMCA Strategic Economic Plan (SEP) by focussing economic growth and employment within the M54 Transport Corridor. The proposed SEA can also attract key growth sectors identified in the Shropshire Economic Growth Strategy, particularly advanced manufacturing including engineering (with strong links to aviation), environmental technologies and agri-tech.
- 5.6 Indeed, the significant inward investment opportunity that Land at J3 could offer has been recognised by Shropshire Council by virtue of the Council’s submission to the Government in 2020 of Land at J3 as a potential Gigafactory site. The Department for International Trade is looking for a UK site where firms could build a Gigafactory, making lithium-ion batteries for electric cars as the market is predicated to increase dramatically in coming years.

Supporting the medium- and long-term needs of existing businesses and attract new businesses, particularly in the engineering and manufacturing sector

- 5.7 The SEA at Land at J3 has the potential to support the medium and long-term needs of existing businesses in the region who are looking for appropriate opportunities for any necessary expansion. Indeed, BRE Ltd are aware of employers with immediate requirements of between 300,000 and 600,000 sq. ft along the M54 corridor (see **Appendix 19**). The Council are aware that separate evidence has been provided by developers of the scale and immediacy of these requirements. These are for occupiers not currently located in Shropshire but have a large number of employees based locally in Telford and Wolverhampton and for this reason they cannot move outside of their preferred area of search. The proposed schemes would be regional hubs for FTSE 100 and 250 sized business. In order to secure these requirements for Shropshire, it is essential to give these occupiers a high level of certainty promptly and a likelihood of delivery within their required timescales.
- 5.8 It is envisaged that the SEA at Land at J3 would provide a centre for innovation and skills linked to Further and Higher Education establishments; principally those nearby (for example the University of Wolverhampton). The focus would be on engineering, particularly aeronautical engineering, but also other STEM related areas. For example, the i54 employment area to the east is a growing hub for the automotive industry and it may be that some spin-offs from that which cannot be accommodated at i54 could instead be located at J3.
- 5.9 BRE Ltd have also undertaken initial discussions with Urban Splash regarding the potential opportunity for them to act as their mixed use delivery partner should the site be adopted within the Local Plan (see **Appendix 20**).

Supporting strategic transport and social infrastructure investment within the M54 Corridor

- 5.10 The strategic growth opportunities of the M54 corridor are well recognised and evidenced at both a local and regional level, as already described. This recognition of the strategic growth opportunity will assist in securing any necessary additional infrastructure investment from a number of different sources.
- 5.11 There are a number of infrastructure improvement projects planned and proposed with significant benefits for the M54 corridor. This will raise the profile of the M54 corridor as a location for investment and support the objectives for growth. These include:
- The M6/M6 Toll Link;
 - West Midlands Rail Freight Interchange (WMI);
 - Birmingham to Shrewsbury Rail Service Capacity Improvements; and
 - HS2.
- 5.12 In addition to the above, the current West Midlands Mayor, Andy Street, launched in 2020 a transport plan for the West Midlands which represents a significant expansion of the West

Midland's metro and rail services. This would feature eight new Metro lines, 380 new stops and 21 new rail stations. It includes for a potential new stop at i54.

- 5.13 Transport and social infrastructure investment for further improvement projects within the M54 corridor are likely to be secured from a range of sources given the degree of alignment with regional and sub-regional economic development strategies. The inclusion of Land at J3 as a strategic settlement in the M45 Strategic Corridor would greatly assist in securing any necessary funding for these projects.
- 5.14 Furthermore, Land at J3 is viable and deliverable without the need for any Council funding. Therefore, Land at J3 would place no particular extra financial burden on the local authority, allowing them instead to focus on applying the economic and revenue benefits that would be secured, to the benefit of surrounding communities, reducing strain on existing facilities and enhancing local amenity.

Black Country Unmet Needs

- 5.15 The significant and pressing unmet housing and employment need arising in the Black Country is well evidenced and set out in Section 4 of these representations.
- 5.16 Shropshire proposes to accept a degree of unmet housing need from the Black Country equal to 1,500 dwellings and 30 hectares of employment land. In accepting this degree of unmet need, Shropshire Council has acknowledged the strong functional economic relationship between the Black Country and Shropshire.
- 5.17 However, given the scale of the unmet need, the fact that the Shropshire Local Plan review represents an opportunity now to address this unmet need, and the size of the local authority area relative to its neighbours, we recommend that the Local Plan should seek to increase the employment and housing requirement.
- 5.18 The proximity of Land at J3 to the Black Country, the wider West Midlands and the national transport networks (direct access from J3 of the M54 and Cosford railway station under 2km from the site with the potential for sustainable transport improvements in terms of cycle and bus links to the station) means that the Site would play a key role in meeting these unmet needs.
- 5.19 None of the allocations as currently drafted in the Plan are considered able to play such a key role given their distance from the strategic road and rail network and their limited size.

Supporting the Role of RAF Cosford

- 5.20 The proximity of the site to RAF Cosford presents the potential to complement its employment growth and link to the increased focus of the base as the RAF's centre for engineering and aeronautical training. To date, many highly skilled individuals who have decided to leave the RAF have been lost to the county because there is not the commensurate private sector hub. Many of these individuals have voiced their desire to remain in the Cosford area; hence why the adopted Core Strategy makes provision for 1,000 dwellings towards this.

- 5.21 Land at J3 is therefore an opportunity to enable this, retain these considerable skills in the area, generate a larger and more skilled labour force through the links to education establishments, improve earnings and improve productivity. The base also has the potential to benefit from sustainable transport measures that can be secured as part of the Land at J3 proposals which in turn could help their day to day operations.

6.0 Response to Policy SP2. Strategic Approach

- 6.1 BRE Ltd **object** to Policy SP2. Strategic Approach as currently drafted and consider that the duty to co-operate has not been complied with and that the Plan is unsound.
- 6.2 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, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a ‘step change’ in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP2 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet strategic needs of the Black Country.
- 6.3 As outlined in detail in Sections 3 to 5 of these representations, there is a significant unmet employment and housing need within the Black Country which is not currently being effectively addressed in the Plan. The incorporation of up to 30 hectares to support the employment needs of the Black Country Plan and 1,500 dwellings to support the housing needs of the Black Country Plan is simply not sufficient, both in quantitative and qualitative terms.
- 6.4 This will result in employment land provision and take-up not being as successful as anticipated with implications for meeting the employment growth and economic development aspirations and objectives of the Shropshire Economic Growth Strategy, the West Midlands Strategic Economic Plan (SEP) and the West Midlands Local Industrial Strategy.
- 6.5 Consequently, it is therefore considered that a new settlement comprising Land at J3, close to RAF Cosford and at the heart of the M54 Corridor would be an effective and sustainable form of development to support identified economic development needs. It would also be complementary to the proposed local employment offer at Upton Lane in Shifnal and assist in addressing its jobs/homes balance to 2038 as required under the Plan.
- 6.6 Land at J3 is well placed to accommodate the housing and employment needs arising within the Black Country whilst also meeting the growth aspirations of Shropshire’s Economic Growth Strategy and the WMCA SEP. It has direct access into the Black Country via the motorway and the existing railway station at Cosford, with a journey time of less than 20 minutes to Wolverhampton railway station and around 30 minutes to Sandwell and Dudley railway station. This ensures that the site provides an attractive location for commercial operations and enables close links to the other engineering firms and their supply chains across the West Midlands, including those at the i54 and T54 major employment sites, providing potential for agglomeration benefits.
- 6.7 The allocation of Land at J3 as a strategic settlement is fully justified in terms of demonstrating exceptional circumstances and also accords with the NPPF in terms of contributing to the achievement of sustainable development (paragraph 7), by performing:
- **An economic role** : providing employment opportunities across a range of uses on site and being well located to support the growth and innovation of the engineering and manufacturing sectors;
 - **A social role** : providing a mix of new homes to meet the needs of present and future generations, together with a range of new jobs and community, education, recreational,

health and retail facilities that reflect the community's needs and support its health, social and cultural well-being;

- **An environmental role** : assimilating the development into the existing landscape along with structural planting, protecting and enhancing existing ecologically valuable habitats, preserving the function of the wider Green Belt and creating robust new Green Belt boundaries and delivering net biodiversity gains and sensitive design to ensure minimal impacts on heritage assets.

6.8 Accordingly, it is proposed that the employment and housing requirement in the Plan is increased and Land at J3 is included as a Strategic Settlement allocation. Amended wording is proposed for Policy SP2 and its supporting text to reflect this and a new strategic settlement policy (Policy S22) is also proposed to set out the more detailed requirements for the site.

Proposed Amendments to Policy SP2. Strategic Approach

6.9 It is recommended that Shropshire seeks to increase its housing requirement to incorporate at least 4,500 dwellings to support the needs of the emerging Black Country Plan. Some 1,500 of this could be met by the proposed non-strategic housing allocations in the Plan around Shifnal and Bridgnorth with the residual of up to 3,000 dwellings to be met at Land at J3 as part of a new Strategic Settlement.

6.10 It is recommended that Shropshire seeks to increase its employment requirement to incorporate up to 90ha of employment land to support the needs of the emerging Black Country Plan. Some 15ha of this could be met by the proposed non-strategic employment allocations around Shifnal and Bridgnorth with the residual of 75ha of strategic land being met at Land at J3 as part of a new Strategic Settlement.

SP2. Strategic Approach

1. Shropshire will flourish, accommodating investment and new development that contributes to meeting needs and making its settlements more sustainable. New development will be supported by necessary infrastructure and be of a high-quality which positively responds to its setting, local needs and our changing climate.
2. Over the plan period from 2016 to 2038, ~~around 30,800 new dwellings and~~ **a minimum of 33,800 dwellings, incorporating a contribution of at least 4,500 dwellings towards meeting the Greater Birmingham and Black Country housing market area shortfall, will be delivered.**

Over the plan period from 2016 to 2038, ~~around 300~~ a minimum of 360 hectares of employment land, incorporating a contribution of at least 90 hectares towards meeting the employment needs of the Black Country shortfall, will be delivered.

This equates to around ~~4,400~~ **1,536** dwellings and around ~~44ha~~ **16ha** of employment land per annum. This Local Plan ensures that sufficient land in the right locations is available to achieve these growth aspirations, however the availability of land will be kept under review to ensure a continuous supply of suitable sites is available.

3. Delivery of affordable housing remains a key priority in Shropshire, as such around ~~7,700~~ **8,450** affordable dwellings (equating to around 25% of the total housing requirement) will be delivered during the plan period from 2016 to 2038.
4. Main town centre uses will be focused into the diverse network of town centres and recognisable high streets across Shropshire. It will complement their scale and character and support appropriate diversification.
5. To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas identified in Schedule SP2.1. Specifically:
 - a. Shrewsbury will bloom, fulfilling its role as a strategic centre and acting as a focus for well-designed new housing and employment development. This will be supported by the provision of supporting infrastructure, high-quality retail, leisure, transport and other public realm improvements within and on the edge of the town centre in support of the delivery of the Big Town Plan and its related masterplans.
 - b. Principal and Key Centres will accommodate significant well-designed new housing and employment development, supported by necessary infrastructure. Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential.
 - c. Strategic Settlements will form successful, well-designed and sustainable communities, delivering new housing and employment development. They will provide an appropriate mix of housing, employment, local services and facilities and infrastructure.
 - d. RAF Cosford Strategic Site will form a centre of excellence for aviation and engineering, meet military personnel accommodation needs and support the aspirations of the Ministry of Defence, the RAF Museum and the Midlands Air Ambulance
6. Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development within Community Hubs, identified in Schedule SP2.2, which are considered significant rural service centres; and to a lesser extent Community Clusters, identified in Schedule SP2.3, which consist of settlements with aspirations to maintain or enhance their sustainability. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification
7. The production of formal Neighbourhood Plans will be supported and can identify development opportunities which will complement proposals in this Local Plan. Where appropriate they can also identify additional Community Clusters.

Proposed Amendments to Schedule SP2.1 : Urban Locations

Schedule SP2.1 : Urban Locations

Strategic Centre

Shrewsbury

Principal Centres

Bridgnorth

Ludlow

Market Drayton

Oswestry

Whitchurch

Key Centres

Albrighton

Bishop's Castle

Broseley

Church Stretton

Cleobury Mortimer

Craven Arms

Ellesmere

Highley

Much Wenlock

Shifnal

Wem

Strategic Settlements

Clive Barracks, Tern Hill

Former Ironbridge Power Station

Land to the north of Junction 3 of the M54

Strategic Site

RAF Cosford

Proposed Amendments to Explanation to Policy SP2.Strategic Approach – Paragraph 3.7

- 6.11 The supporting text to Policy SP2.Strategic Approach, Paragraph 3.7, should also be amended to state that the housing requirement increases to a minimum of 33,800 dwellings and incorporates at least 4,500 dwellings to support the housing needs of the emerging Black Country Plan.

3.7 Effective and on-going joint working between strategic policy-making authorities is an important part of plan-making and delivered through the Duty to Cooperate. With this in mind, and further to discussions with the Black County Authorities as part of their ongoing plan making process, Shropshire’s housing requirement of ~~around 30,800~~ **a minimum of 33,800** dwellings incorporates ~~1,500~~ **at least 4,500** dwellings to support the housing needs of the emerging Black Country Plan, where evidence indicates housing delivery opportunities are constrained. This reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas. This cross-boundary housing need will be accommodated through the distribution of growth outlined in this policy and delivered through policies S1-S21 of this Local Plan.

Proposed Amendments to Explanation to Policy SP2.Strategic Approach – Paragraph 3.18

- 6.12 The supporting text to Policy SP2.Strategic Approach, Paragraph 3.18, should also be amended to state that the employment land requirement increases to a minimum of 360 hectares and incorporates at least 90ha of employment land to support the employment needs of the emerging Black Country Plan.

3.18 As already stated, effective and on-going joint working between strategic policy-making authorities is an important part of plan-making and delivered through the Duty to Cooperate. With this in mind, and further to discussions with the Black County Authorities as part of their ongoing plan making process, Shropshire’s employment requirement of ~~around 300ha~~ **a minimum of 360ha** of employment land incorporates ~~up to 30ha~~ **at least 90ha** of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. This again reflects a positive approach to cross boundary cooperation and responds to the functional relationship between the two areas. This cross-boundary employment land need will be accommodated through the distribution of growth outlined in this policy and delivered through policies S1-S21 of this Local Plan.

7.0 Proposed New Strategic Settlement - Policy S22. Strategic Settlement: Land to the north of Junction 3 of the M54

- 7.1 In line with the proposed amendments to Policy SP2, a new Strategic Settlement Policy (Policy S22) is proposed to be added to the Plan relating to the proposals at Land to the north of Junction 3 of the M54.

S22. Strategic Site: Land to the north of Junction 3 of the M54

1. Land to the north of Junction 3 of the M54 will be redeveloped to form a new strategic settlement which will contribute towards strategic growth aspirations in the east of the County and the M54/A5 Strategic Corridor. This site is around 370 hectares and consists of agricultural land. The location and extent of the site are identified on the Policies Map.
2. The strategic settlement will have a key role in providing homes, jobs, service and facilities to the Shifnal and Albrighton Place Plan Areas, other Green Belt communities and the M54/A5 Strategic Corridor. The Strategic Employment Area will deliver a significant, new inward investment opportunity of high quality accommodation targeted towards the manufacturing and logistics sectors but with appropriate secondary employment uses and other ancillary service uses.
3. The new settlement will be formed through a comprehensive mixed-use redevelopment of the site to provide a range of local services and facilities, up to 3,000 dwellings, up to 75 hectares of strategic employment land and extensive green infrastructure.
4. To inform this redevelopment, a comprehensive masterplan will be prepared for the site and then adopted by Shropshire Council. The masterplan and resultant redevelopment will comply with the following site guidelines:
 - a. The quantity, quality, design, mix and layout of housing provided on the site will be informed by site constraints and opportunities, identified local needs and relevant policies of this Local Plan.
 - b. Employment provision will represent an intrinsic element of the site's redevelopment, occurring alongside the provision of housing. Employment provision will be of an appropriate quantity and quality to contribute towards the objectives of the Shropshire Economic Growth Strategy.
 - c. The local centre will comprise of an appropriate range of commercial uses to serve the new settlements community. The local centre will ensure future occupiers of the site benefit from access to local facilities, as such its timely provision is an important consideration and will be directly linked to provision of housing on the site.
 - d. Green infrastructure provision will be of an appropriate quantity and quality. Its location will integrate and enhance key green infrastructure corridors and networks on and around the site. The Monarch's Way public right of way will be retained and improved with safeguarding over A41 and green corridor.

e. Appropriate community facilities and buildings will be provided on the site. 2ha of land will be provided for a Primary School to serve the needs of the new community on the site.

f. A suitable number of appropriately designed and constructed pedestrian, cycle and vehicular access/egress points will be provided to and through the site. A range of opportunities will be explored through the masterplan to provide high quality walking and cycling links, for example improving links to Cosford railway station. Any necessary improvements to the local and strategic road network, including the A41/Stanton Road junction and junction 3 of the M54, will also be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).

g. A range of opportunities will be explored through the masterplan to provide high quality public transport links, for example including bus services into Cosford, Shifnal and Albrighton.

h. The layout, height of buildings, use of Green Infrastructure with strong native tree planting to provide appropriate and substantial buffering, effective building design and materials will be used to respond to any identified landscape and visual effects,

i. Site design and layout will reflect and respect the sites heritage and heritage assets within the wider area, including Weston Park, Tong Conservation Area, Scheduled Monuments, Listed Buildings and Non-Designated Assets, and the potential for archaeological deposits which will be recorded.

j. Natural environment assets, ancient woodland and priority habitats on and in proximity of the site will be retained and an appropriately buffered. A sustainable juxtaposition will be created between built form and trees.

k. Any contaminated land on the site will be appropriately managed.

l. Mineral extraction opportunities associated with the site will be investigated and where appropriate extraction works undertaken.

m. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Development will also be excluded from the small portions of the site located in Flood Zones 2 and/or 3 and groundwater Source Protection Zone 1. Flood and water management measures must not displace water elsewhere.

n. Opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any new development proposals as set out in Green Belt Policy SP11. Compensatory provision to the Green Belt will include appropriate additional planting to improve visual amenity and biodiversity, retention and enhancement of green infrastructure networks and corridors beyond the site and improvements to public access.

8.0 Response to Other Strategic Policies

Policy SP11. Green Belt and Safeguarded Land

- 8.1 BRE Ltd **object** to Policy SP11 and consider it renders the plan unsound on the basis that it does not facilitate the strategic approach proposed in our amendments to Policy SP2 and Schedule SP2.1.
- 8.2 As such, it does not positively or effectively respond to the strategic priorities of the area, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a ‘step change’ in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP11 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet needs of the Black Country.

Proposed Amendments to Policy SP11. Green Belt and Safeguarded Land

- 8.3 In light of the requested amendments to include Land at J3 as a Strategic Settlement in the Plan and its release from the Green Belt, the following amendments are proposed to Policy SP11 and Table SP11.1 of the Plan.

1. Following review, the extent of Green Belt within Shropshire is identified on the Policies Map. This includes amendments to the Green Belt as specified within Table SP11.1 to facilitate the strategic approach to the distribution of development identified within Policy SP2. It is expected that this Green Belt boundary will not need to be altered at the end of the Local Plan period.

2. Land within the development boundaries for the settlements of: Albrighton, Alveley, Bridgnorth (which is enclosed on its eastern side by Green Belt) and Shifnal; the Strategic Site at: RAF Cosford; **the Strategic Settlement at: Land to the north of Junction 3 of the M54** and the Industrial Estates at: Alveley and Stanmore is excluded from the Green Belt. The villages of Beckbury, Claverley and Worfield are also inset in the Green Belt but function as countryside, as such Policy SP10 (Countryside) applies. Safeguarded land, being land removed from the Green Belt for future development needs beyond the current Local Plan period, is shown on the Policies Map.

3. The Green Belt will be protected against inappropriate development, as defined by national policy. As such in addition to meeting the general requirements that apply in the countryside as set out in Policy SP10, development proposed in the Green Belt must also be able to demonstrate that:

- a. It is not inappropriate development (as set out by national policy) and does not otherwise conflict with the purposes of the Green Belt; or
 - b. Very special circumstances apply.
4. Open market housing in the Green Belt will only be considered appropriate development where it:
- a. Relates to a reuse of buildings of permanent and substantial construction which preserves Green Belt openness and meets the requirements for conversions in Local Plan Policy SP10 (Countryside) or SP9 (Community Clusters) where this policy is relevant;
 - b. Is a replacement dwelling which is not materially larger than the one it replaces and otherwise meets the criteria for replacement buildings set out in Local Plan Policy SP10 (Countryside); and
 - c. Is infill development or a replacement dwelling in a settlement which becomes a Community Cluster through a Neighbourhood Plan, where it otherwise meets the criteria set out in SP9 (Community Clusters) and in all other respects meets the policy tests set out in the Local Plan.
5. Proposals on previously developed sites, which would not have a greater impact on the openness of the Green Belt than the existing development, will be restricted to development for employment or economic uses, defence uses, local community use, including outdoor sport and recreation, or affordable housing. Development to meet an identified local affordable housing need, as defined by relevant Local Plan Policies, through the reuse of previously developed land, will also be acceptable where it can be demonstrated not to cause substantial harm to the openness of the Green Belt.
6. Proposals for limited affordable housing to meet a proven local affordable housing need that is demonstrated through an up-to-date and robust local housing needs survey, in the locations identified in Policy DP4 (Affordable Exception Sites) and DP6 (Single Plot Exception Sites), which meet the other requirements of Affordable Housing Policies DP3, DP4 and DP6 and other relevant Local Plan policies will be supported.
7. RAF Cosford is a strategic site inset within the Green Belt to facilitate military and charity operational and development needs. Future additional development at this strategic site would be expected to take place within the area of land inset within the Green Belt unless it is one of the exceptions to inappropriate development within the Green Belt identified within national policy or very special circumstances can be demonstrated.
8. Proposals, including changes of uses of land, which increase the beneficial use of the Green Belt, by enhancing green infrastructure, biodiversity, visual amenity and landscapes or improving derelict land and opportunities for access, outdoor sport and recreation, will be supported where this does not conflict with Green Belt or other policy objectives.

Proposed Amendments to Table SP11.1: Green Belt Release by Location and Type

TABLE SP11.1: GREEN BELT RELEASE BY LOCATION AND TYPE						
Location	Housing (Ha)	Mixed Use (Ha)	Employment (Ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total (ha)
Albrighton	-	-	-	-	19.9	19.9
Alveley	1.4	2.4	-	-	3.6	7.4
RAF Cosford Strategic Site	-	-	-	214.2	-	214.2
Land to the north of Junction 3 of the M54 Strategic Settlement	-	-	-	370	-	370
Shifnal	-	-	39.0	-	92.8	131.8
Stanmore (Bridgnorth)	-	-	11.4	-	-	11.4
Total	1.4	2.4	50.4	584.2	116.3	754.7

Policy SP12. Shropshire Economic Growth Strategy

- 8.4 BRE Ltd **supports** Policy SP12 in terms of the aim of delivering sustainable economic growth and investment in the strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations but wish to note that BRE Ltd object to the strategic approach set out in Policy SP2 and the omission of Land at J3 as a Strategic Settlement.
- 8.5 Paragraph 3.28 and 3.142 of the Plan confirms that the 'Strategic Corridors' include the '*Eastern Belt M54/A5/A41/A464/A5 and A454/A458*'.
- 8.6 The supporting text to Policy SP12 states, at paragraph 3.117, that 'to facilitate sustainable economic growth, a 'step change' is needed in Shropshire's economic productivity because the County has the potential to do more and to do it better. Shropshire Council is focused and committed to achieving maximum economic productivity from the assets and opportunities across the County'.
- 8.7 Land at J3 is located on the M54 corridor and would deliver sustainable economic growth and support the 'step change' in the economy. The M54 corridor is the most prominent strategic corridor in Shropshire offering connectivity to the West Midlands.

Policy SP13. Delivering Sustainable Economic Growth and Enterprise

- 8.8 Policy SP13 provides further guidance on the delivery of the strategic land supply and the use of established employment areas to satisfy the economic vision and strategy for Shropshire set out in Policy SP2.
- 8.9 Policy SP13 states that the strategic supply of land and protected employment areas are identified on the Policies Map and in the Authority Monitoring Report which will monitor the delivery of the employment development.
- 8.10 BRE Ltd **support** Policy SP13 but wish to note that BRE Ltd **object** to the strategic approach set out in Policy SP2 and the omission of Land at J3 as a Strategic Settlement. Land at J3 is required to be added to the strategic supply of land in order to provide choice and competition in the market and meet an identified need in the logistics and manufacturing sector. It would support the Economic Growth Strategy and the growth aspirations of the wider area.

Policy SP14. Strategic Corridors

- 8.11 Policy SP14 states;

“The Shropshire Economic Growth Strategy seeks to deliver a ‘step change’ in the capacity and productivity of the local economy. To contribute to this aim, ‘Strategic Corridors’ along the principal rail and strategic road routes through the County will be the primary focus for major employment development especially along ‘strategic corridors’ with both rail and road connectivity”.

- 8.12 Whilst BRE Ltd support the overall aims of Policy SP14, they **object** to the current wording and consider it renders the plan unsound on the basis that it does not identify that development on the strategic corridors will be located on the identified ‘Strategic Settlements’ in the Plan.
- 8.13 As such, it does not positively or effectively respond to the strategic priorities of the area, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a ‘step change’ in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP11 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet needs of the Black Country.

Proposed Amendments to Policy SP14. Strategic Corridors

- 8.14 The following amendments are proposed to Policy SP14 to refer to ‘Strategic Settlements’ within paragraph 3 of the Policy. Land at J3 is requested to be included as a Strategic Settlement in the Plan and is located in the M54 Strategic Corridor.

SP14. Strategic Corridors

The Shropshire Economic Growth Strategy seeks to deliver a ‘step change’ in the capacity and productivity of the local economy. To contribute to this aim, ‘Strategic Corridors’ along the principal rail and strategic road routes through the County will be the primary focus for major employment development especially along ‘strategic corridors’ with both rail and road connectivity. Major employment development in the County will be expected to recognise that:

1. The strategic approach in Policy SP2 seeks to deliver significant development and infrastructure investment within the ‘strategic corridors’ served by the principal rail network and strategic and principal road networks in Shropshire.

2. Development in the ‘strategic corridors’ through the Green Belt or Shropshire Hills Area of Outstanding Natural Beauty will be subject to appropriate national and local policy. Development likely to affect an internationally designated wildlife site, through atmospheric emissions must comply with the requirements for a project level HRA in accordance with policy DP12.

3. Development on these ‘strategic corridors’ will be located in accordance with the following sequential preference:

a. In Shrewsbury or the Principal or Key Centres on an allocated site;

b. On the identified ‘Strategic Settlements’ in the Local Plan;

c. On the identified ‘Strategic Sites’ in the Local Plan;

d. On appropriate windfall development sites which are:

i. Located immediately adjoining Shrewsbury or a Principal or Key Centre; and

ii. Brownfield sites with direct access to the rail and road routes in the corridor; or

iii. Greenfield sites in exceptional circumstances where the:

- Strategic objectives of national and local policy are fully satisfied and comply with Policy SP13;
- Proposal will strengthen the role and function of strategic settlements particularly Shrewsbury and the Principal Centres;
- Proposal is a large and significant investment opportunity that cannot reasonably access sequentially preferable sites;
- Proposal will:
 - Deliver the greenfield site as a fully serviced and developed employment area,
 - Meet the needs of the proposed ‘end user’ or occupiers; and
 - Deliver off-site infrastructure investments within the ‘strategic corridor’.

4. Proposals for development in the 'strategic corridors' must satisfy the requirements of Policy SP13 and consider:
- a. The need to achieve a sustainable pattern of development particularly to balance the delivery of housing with employment growth;
 - b. The need for infrastructure investment to support the:
 - i. Delivery of the development; and
 - ii. Accessibility of the rail and road networks; and
 - iii. Further growth in the 'strategic corridor'.
 - c. The scale of the proposal in relation to the location, landscape, character of the surrounding area and the significance of the natural and historic environment;
 - d. The availability of land allocated for the proposed use in the same locality;
 - e. Other sites with long-term potential around the Strategic, Principal and Key Centres;
 - f. The policies and strategies of adopted Neighbourhood Plans, Community / Parish Plans or growth strategies for the Strategic, Principal or Key Centres.

Policy SP15. Whole Estate Plans

- 8.15 BRE Ltd support the principle of Policy SP15 but **object** to the current wording and consider it renders the plan unsound on the basis that it is not clearly written, contrary to paragraph 16 of the NPPF. For example, it is not clear how to interpret what is meant by 'meaningful' public consultation. In addition, sections (b) and (c) could easily be combined into one criteria.

Proposed Amendments to Policy SP15. Whole Estate Plans

- 8.16 Proposed amendments are included below.

SP15. Whole Estate Plans

1. Whole Estate Plans are a method by which Estates can articulate their long-term vision for their land and premises interests and how these will be achieved. In recognition of the nature of Shropshire, and the potentially important role they play in managing land within the County, Whole Estate Plans prepared by Estates will be endorsed by the Council and used as a material consideration in decision making where they have demonstrated all of the following:
- a. The objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan;
 - b. It has been prepared in collaboration with relevant external organisations, including statutory bodies, **and the local community**; ~~and~~
 - c. ~~It has been subject to meaningful public consultation~~

Policy SP16. Strategic Planning for Minerals

- 8.17 The broad extent of Mineral Safeguarding Areas (MSAs) is illustrated on Figure SP16.1.
- 8.18 Policy SP16 states that *‘Shropshire’s important and finite mineral resources will be safeguarded to avoid unnecessary sterilisation and there will be a sustainable approach to mineral working which balances environmental considerations against the need to maintain an adequate and steady supply of minerals to meet the justifiable needs of the economy and society.’*
- 8.19 Parts of Land at J3 fall within a MSA for sand and gravel. Mineral extraction opportunities associated with the site will be investigated and where appropriate extraction works undertaken.

9.0 Response to Development Management Policies

Policy DP3. Affordable Housing Provision

- 9.1 Subject to viability testing, BRE Ltd **supports** Policy DP3. There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites.

10.0 Response to Settlement Policies

Policy S3. Bridgnorth Place Plan Area

- 10.1 BRE Ltd **support** the overall aims of Policy S3 but wish to make the following comments.
- 10.2 Bridgnorth is located on the A454/A458 transport corridor but this corridor crucially does not benefit from strategic rail connections, unlike the M54 corridor. Furthermore, the Bridgnorth Place Plan identifies the upgrade of the A458 / Wenlock Road junction, the upgrade of the A454 and the upgrade of the A442 as a Priority A Project in order to increase capacity and safety in line with growth aspirations for the area. This will require the development of traffic modelling. The estimated cost and potential funding sources are currently unknown and to be confirmed.
- 10.3 The proposed allocations at Bridgnorth are small in scale and do not benefit from direct access and visibility to the strategic road network. The ability of proposed development proposals at Bridgnorth to meet strategic employment needs or play a key role in meeting the unmet needs of the Black Country are limited. Rather, the proposed allocations would meet local needs only.

Policy S15. Shifnal Place Plan Area

- 10.4 BRE Ltd **support** the overall aims of Policy S15 but wish to make the following comments.
- 10.5 Policy S15 states, under Part 1, that it 'will be the focus for investment, employment, housing and development on the M54/A5 Strategic Corridor through Shropshire with access to Junctions 4 and 3 with proximity to Wolverhampton and the i54 major investment site' .
- 10.6 The Policy continues, at Part 4, in stating that Shifnal 'will have a key role in providing homes, jobs, services and facilities to the Place Plan area, other Green Belt communities and the M54/A5 Strategic Corridor'.
- 10.7 Shifnal is proposed to deliver around 1,500 homes and make available around 41 hectares of employment land.
- 10.8 New residential development will primarily be delivered through the saved SAMDev mixed use and residential allocations and Local Plan residential allocations. Land releases to the south and west of the town are proposed to be safeguarded beyond the plan period for a strategic housing extension (92.8 hectares). This includes the provision of a new by-pass around the town.
- 10.9 New employment development is proposed to be delivered by a '*a significant, new investment opportunity*' as part of an employment allocation on land east of Shifnal Industrial Estate at Upton Lane (SHF018b and SHF018d). This is proposed to deliver 15.6ha of net development. Commercial buildings are proposed to be developed as single storey properties that are expected to largely provide Class B1c, B2 and B8 uses '*servicing the sub-regional supply chains on the A5, M54 and M6 corridors*' (paragraph 5.212).

- 10.10 Land east of Shifnal Industrial Estate at Upton Lane falls within the Green Belt and Shropshire Council consider that exceptional circumstances exist to justify its release from the Green Belt. The site comprises two separate groups of agricultural fields (Parcels P13a and P14 in the Shropshire Green Belt Review, 2018). Parcel P13a was identified as having a ‘High’ harm to the Green Belt if released. Parcel P14 was identified as having a ‘Moderate-High’ harm to the Green Belt if released.
- 10.11 The supporting text to Policy S15 states, at paragraph 5.202, that *‘the strategy for Shifnal from 2016 to 2038 is to change the business investment and employment offer in its scale, quality, range of uses and choice of premises. This will enable Shifnal to function as a sustainable investment location in the M54 corridor with the benefit of accessibility from Junction 3 and its close proximity to the i54 major investment site at Junction 2a.’*
- 10.12 The proposed employment allocation to the east of Shifnal Industrial Estate would be serviced from the A41/M54 Junction 3 but this would be via a minor rural route, Stanton Road. The Regulation 19 Pre-Submission Draft of the Local Plan acknowledges that Strategic Transport Assessment and Transport evidence will be required to assess the effects of the development and the cumulative growth of Shifnal on the M54 Junction 3 and the A41/Stanton Road junction. However, the distance from the strategic road network, the lack of available transport evidence and the fact that the site is not of sufficient scale to meet strategic regional and sub-regional need demonstrates that Shifnal is in fact not likely to be able to make a ‘significant contribution’ to regional and sub-regional strategies.
- 10.13 Rather, Land east of Shifnal Industrial Estate is likely to meet local employment needs only.
- 10.14 Land at J3 would meet sub-regional and regional needs but, importantly, would also be complementary to the local employment offer at Shifnal and assist in addressing its jobs/homes balance to 2038 as required under the Plan.

11.0 Summary and Conclusions

- 11.1 These representations on the Pre-Submission (Regulation 19) draft of the Shropshire Local Plan (“Local Plan”) are prepared by Bidwell’s LLP on behalf of Bradford Rural Estates Ltd (“BRE Ltd”). They are prepared in respect of Land to the north of Junction 3 of the M54 (“Land at J3”).
- 11.2 Land at J3 has already been identified as a ‘potential strategic site’ within the consultation on Strategic Sites (Regulation 18) draft of the Shropshire Local Plan in July 2019. The site was also strongly supported by the Association of Black Country Authorities (ABCA) during the Strategic Sites consultation.
- 11.3 A decision by the Council to not include Land at J3 as a strategic allocation and to not engage effectively and on an ongoing basis with the Association of Black Country Authorities (ABCA) has resulted in a strategy which is not positively prepared or justified.
- 11.4 These representations identify several conflicts within the Plan both in terms of legal and procedural requirements which should be judged to render that the duty to co-operate has not been complied with and that the Plan is ‘unsound’. These representations therefore:
- **Object** to the Local Plan in principle and its proposed Strategic Approach; and
 - Propose amendments to ensure that the duty to co-operate has been complied with and to ensure the soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.
- 11.5 In particular, BRE Ltd **object** to the following policies and propose amendments:
- Policy SP2. Strategic Approach;
 - Schedule SP2.1;
 - Explanation to Policy SP2. Strategic Approach – Paragraph 3.7;
 - Explanation to Policy SP2. Strategic Approach – Paragraph 3.18;
 - Policy SP11. Green Belt and Safeguarded Land;
 - Table SP11.1;
 - Policy SP14. Strategic Corridors; and
 - Policy SP15. Whole Estate Plans.
- 11.6 In addition, a new Policy ‘Policy S22. Strategic Settlement: Land to the north of Junction 3 of the M54’ is proposed to be included within the Plan.
- 11.7 The Strategic Approach of the Plan does not positively or effectively respond to the strategic priorities of the area, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a ‘step change’ in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. The Plan also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet strategic needs of the Black Country.

- 11.8 In line with guidance contained within the NPPF (paragraph 137), all other reasonable options for meeting Black Country needs have already been examined and justified in evidence. The shortfall is significant and clearly it is imperative that – if the gap is to be narrowed substantially - further, reliable, and timely action must be taken. As such, local plans should seek to maximise the amount of unmet need they can sustainably accommodate rather than looking to later plans to resolve the issue.
- 11.9 Given the scale of the unmet need, the size of the local authority area relative to its neighbours, the lack of readily identifiable, suitable, reliable and deliverable alternatives, the development opportunity at Land at J3 is of major significance in helping satisfy the unmet needs of the Black Country and fulfilling the aims of the various economic strategies and plans.
- 11.10 There is therefore a clear need to increase the employment and housing requirement within the Plan and amendments are proposed to request the requirement incorporates up to 90ha of employment land and 4,500 dwellings to support the needs of the emerging Black Country Plan.
- 11.11 To facilitate development in a sustainable manner, it is necessary to co-locate housing and economic development. Consequently, it is therefore considered that a new settlement at Land at J3, close to RAF Cosford and the M54 Corridor would be an effective and sustainable form of development to support identified economic development needs.
- 11.12 The allocation of Land at J3 as a strategic settlement is fully justified in terms of demonstrating exceptional circumstances and also accords with the NPPF in terms of contributing to the achievement of sustainable development (paragraph 7).
- 11.13 Accordingly, it is formally requested that our recommended amendments are taken into account by the Council before the Regulation 22 submission to the Secretary of State.



BIDWELLS

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Subject to viability testing, BRE Ltd supports Policy DP3. There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

BRE Ltd support the overall aims of Policy S3 but wish to make the following comments.

Bridgnorth is located on the A454/A458 transport corridor but this corridor crucially does not benefit from strategic rail connections, unlike the M54 corridor. Furthermore, the Bridgnorth Place Plan identifies the upgrade of the A458 / Wenlock Road junction, the upgrade of the A454 and the upgrade of the A442 as a Priority A Project in order to increase capacity and safety in line with growth aspirations for the area. This will require the development of traffic modelling. The estimated cost and potential funding sources are currently unknown and to be confirmed.

The proposed allocations at Bridgnorth are small in scale and do not benefit from direct access and visibility to the strategic road network. The ability of proposed development proposals at Bridgnorth to meet strategic employment needs or play a key role in meeting the unmet needs of the Black Country are limited. Rather, the proposed allocations would meet local needs only.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Please continue on a separate sheet if necessary)

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After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Office Use Only	Part A Reference:
	Part B Reference:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S15."/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p>BRE Ltd support the overall aims of Policy S15 but wish to make the following comments.</p> <p>Policy S15 states, under Part 1, that it 'will be the focus for investment, employment, housing and development on the M54/A5 Strategic Corridor through Shropshire with access to Junctions 4 and 3 with proximity to Wolverhampton and the i54 major investment site'.</p> <p>The Policy continues, at Part 4, in stating that Shifnal 'will have a key role in providing homes, jobs, services and facilities to the Place Plan area, other Green Belt communities and the M54/A5 Strategic Corridor'.</p> <p>Shifnal is proposed to deliver around 1,500 homes and make available around 41 hectares of employment land.</p>
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New residential development will primarily be delivered through the saved SAMDev mixed use and residential allocations and Local Plan residential allocations. Land releases to the south and west of the town are proposed to be safeguarded beyond the plan period for a strategic housing extension (92.8 hectares). This includes the provision of a new by-pass around the town.

New employment development is proposed to be delivered by a 'significant, new investment opportunity' as part of an employment allocation on land east of Shifnal Industrial Estate at Upton Lane (SHF018b and SHF018d). This is proposed to deliver 15.6ha of net development. Commercial buildings are proposed to be developed as single storey properties that are expected to largely provide Class B1c, B2 and B8 uses 'serving the sub-regional supply chains on the A5, M54 and M6 corridors' (paragraph 5.212).

Land east of Shifnal Industrial Estate at Upton Lane falls within the Green Belt and Shropshire Council consider that exceptional circumstances exist to justify its release from the Green Belt. The site comprises two separate groups of agricultural fields (Parcels P13a and P14 in the Shropshire Green Belt Review, 2018). Parcel P13a was identified as having a 'High' harm to the Green Belt if released. Parcel P14 was identified as having a 'Moderate-High' harm to the Green Belt if released.

The supporting text to Policy S15 states, at paragraph 5.202, that 'the strategy for Shifnal from 2016 to 2038 is to change the business investment and employment offer in its scale, quality, range of uses and choice of premises. This will enable Shifnal to function as a sustainable investment location in the M54 corridor with the benefit of accessibility from Junction 3 and its close proximity to the i54 major investment site at Junction 2a.'

The proposed employment allocation to the east of Shifnal Industrial Estate would be serviced from the A41/M54 Junction 3 but this would be via a minor rural route, Stanton Road. The Regulation 19 Pre-Submission Draft of the Local Plan acknowledges that Strategic Transport Assessment and Transport evidence will be required to assess the effects of the development and the cumulative growth of Shifnal on the M54 Junction 3 and the A41/Stanton Road junction. However, the distance from the strategic road network, the lack of available transport evidence and the fact that the site is not of sufficient scale to meet strategic regional and sub-regional need demonstrates that Shifnal is in fact not likely to be able to make a 'significant contribution' to regional and sub-regional strategies.

Rather, Land east of Shifnal Industrial Estate is likely to meet local employment needs only.

Land at J3 would meet sub-regional and regional needs but, importantly, would also be complementary to the local employment offer at Shifnal and assist in addressing its jobs/homes balance to 2038 as required under the Plan.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

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Office Use Only	Part A Reference:
	Part B Reference:

(Please continue on a separate sheet if necessary)

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Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

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Signature:

Alison Wright

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

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Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="3.7"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | |
|--|-------------------------------|---|
| A. Legally compliant | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The spatial distribution set out in Policy SP2 and its supporting text at Paragraph 3.7 does not positively or effectively respond to the strategic priorities of the area, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a 'step change' in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP2 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet strategic needs of the Black Country.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

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The supporting text to Policy SP2.Strategic Approach, Paragraph 3.7, should be amended to state that the housing requirement increases to a minimum of 33,800 dwellings and incorporates at least 4,500 dwellings to support the housing needs of the emerging Black Country Plan.

In line with the proposed amendments to Policy SP2, a new Strategic Settlement Policy (Policy S22) is proposed to be added to the Plan relating to the proposals at Land to the north of Junction 3 of the M54.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' for suggested revised wording for Paragraph 3.7 and the proposed wording for new Policy S22. Strategic Settlement: Land to the north of Junction 3 of the M54.

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text" value="3.18"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The spatial distribution set out in Policy SP2 and its supporting text at Paragraph 3.18 does not positively or effectively respond to the strategic priorities of the area, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a 'step change' in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP2 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet strategic needs of the Black Country.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

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The supporting text to Policy SP2.Strategic Approach, Paragraph 3.18, should be amended to state that the employment land requirement increases to a minimum of 360 hectares and incorporates at least 90ha of employment land to support the employment needs of the emerging Black Country Plan.

In line with the proposed amendments to Policy SP2, a new Strategic Settlement Policy (Policy S22) is proposed to be added to the Plan relating to the proposals at Land to the north of Junction 3 of the M54.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' for suggested revised wording for paragraph 3.18 and the proposed wording for new Policy S22. Strategic Settlement: Land to the north of Junction 3 of the M54.

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a 'step change' in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP2 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet strategic needs of the Black Country.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is recommended that Shropshire seeks to increase its housing requirement to incorporate at least 4,500 dwellings to support the needs of the emerging Black Country Plan. Some 1,500 of this could be met by the proposed non-strategic housing allocations in the Plan around Shifnal and Bridgnorth with the residual of up to 3,000 dwellings to be met at Land at J3 as part of a new Strategic Settlement.

It is recommended that Shropshire seeks to increase its employment requirement to incorporate up to 90ha of employment land to support the needs of the emerging Black Country Plan. Some 15ha of this could be met by the proposed non-strategic employment allocations around Shifnal and Bridgnorth with the residual of 75ha of strategic land being met at Land at J3 as part of a new Strategic Settlement.

In line with the proposed amendments to Policy SP2, a new Strategic Settlement Policy (Policy S22) is proposed to be added to the Plan relating to the proposals at Land to the north of Junction 3 of the M54.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' for suggested revised policy wording for Policy SP2 and the proposed wording for new Policy S22. Strategic Settlement: Land to the north of Junction 3 of the M54.

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

Office Use Only

Part A Reference:

Part B Reference:

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP2. – Schedule SP2.1	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a 'step change' in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP2 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet strategic needs of the Black Country.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Schedule SP2.1 : Urban Locations should include Land to the north of Junction 3 of the M54 as a Strategic Settlement

In line with the proposed amendments to Policy SP2 and Schedule SP2.1, a new Strategic Settlement Policy (Policy S22) is proposed to be added to the Plan relating to the proposals at Land to the north of Junction 3 of the M54.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' for suggested revised wording for Schedule SP2.1 and the proposed wording for new Policy S22: Strategic Settlement: Land to the north of Junction 3 of the M54.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Office Use Only	Part A Reference:
	Part B Reference:

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP11.	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

BRE Ltd object to Policy SP11 and consider it renders the plan unsound on the basis that it does not facilitate the strategic approach proposed in our amendments to Policy SP2 and Schedule SP2.1.

As such, it does not positively or effectively respond to the strategic priorities of the area, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a 'step change' in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP11 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet needs of the Black Country.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy SP11 and Table SP11.1 of the Plan are proposed to be amended to reflect the requested amendments to include Land at J3 as a Strategic Settlement in the Plan and its release from the Green Belt.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' for suggested revised policy wording for Policy SP11.

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP11. – Table SP11.1	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

BRE Ltd object to Policy SP11 and the supporting Table SP11.1 and consider it renders the plan unsound on the basis that it does not facilitate the strategic approach proposed in our amendments to Policy SP2 and Schedule SP2.1.

As such, it does not positively or effectively respond to the strategic priorities of the area, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a 'step change' in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP11 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet needs of the Black Country.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy SP11 and Table SP11.1 of the Plan are proposed to be amended to reflect the requested amendments to include Land at J3 as a Strategic Settlement in the Plan and its release from the Green Belt.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' for suggested revised policy wording for Table SP11.1.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

BRE Ltd supports Policy SP12 in terms of the aim of delivering sustainable economic growth and investment in the strategic and principal settlements, strategic corridors, new strategic settlements and sites and appropriate rural locations but wish to note that BRE Ltd object to the strategic approach set out in Policy SP2 and the omission of Land at J3 as a Strategic Settlement.

Paragraph 3.28 and 3.142 of the Plan confirms that the 'Strategic Corridors' include the 'Eastern Belt M54/A5/A41/A464/A5 and A454/A458'.

The supporting text to Policy SP12 states, at paragraph 3.117, that 'to facilitate sustainable economic growth, a 'step change' is needed in Shropshire's economic productivity because the County has the potential to do more and to do it better. Shropshire Council is focused and committed to achieving maximum economic productivity from the assets and opportunities across the County'.

Land at J3 is located on the M54 corridor and would deliver sustainable economic growth and support the 'step change' in the economy. The M54 corridor is the most prominent strategic corridor in Shropshire offering connectivity to the West Midlands.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Office Use Only	Part A Reference:
	Part B Reference:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP13.	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy SP13 provides further guidance on the delivery of the strategic land supply and the use of established employment areas to satisfy the economic vision and strategy for Shropshire set out in Policy SP2.

Policy SP13 states that the strategic supply of land and protected employment areas are identified on the Policies Map and in the Authority Monitoring Report which will monitor the delivery of the employment development.

BRE Ltd support Policy SP13 but wish to note that BRE Ltd object to the strategic approach set out in Policy SP2 and the omission of Land at J3 as a Strategic Settlement. Land at J3 is required to be added to the strategic supply of land in order to provide choice and competition in the market and meet an identified need in the logistics and manufacturing sector. It would support the Economic Growth Strategy and the growth aspirations of the wider area.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Office Use Only	Part A Reference:
	Part B Reference:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst BRE Ltd support the overall aims of Policy SP14, they object to the current wording and consider it renders the plan unsound on the basis that it does not identify that development on the strategic corridors will be located on the identified 'Strategic Settlements' in the Plan.

As such, it does not positively or effectively respond to the strategic priorities of the area, notably the Shropshire Economic Growth Strategy (2017 – 2021), which seeks to deliver a 'step change' in the capacity and productivity of the local economy and to focus major employment development along the strategic growth corridors with rail and road connectivity. Policy SP11 also does not positively or effectively respond to relevant cross-boundary strategic matters which includes the significant unmet needs of the Black Country.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amendments are proposed to Policy SP14 to refer to 'Strategic Settlements' within paragraph 3 of the Policy. Land at J3 is requested to be included as a Strategic Settlement in the Plan and is located in the M54 Strategic Corridor.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' for suggested revised policy wording for Policy SP14 and the proposed wording for new Policy S22. Strategic Settlement: Land to the north of Junction 3 of the M54.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Bradford Rural Estates Ltd are seeking modifications to the Regulation 19 Pre-Submission Draft which relate to the Plan in principle and its Strategic Approach. Technical evidence has been submitted which will need to be reviewed in detail. Modifications sought include the amendment to the proposed housing and employment land requirement and the inclusion of a further strategic site allocation. These are complex, technical matters and therefore participation at the hearing sessions is necessary

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP15.	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

BRE Ltd support the principle of Policy SP15 but object to the current wording and consider it renders the plan unsound on the basis that it is not clearly written, contrary to paragraph 16 of the NPPF. For example, it is not clear how to interpret what is meant by 'meaningful' public consultation. In addition, sections (b) and (c) could easily be combined into one criteria.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' and supporting Appendices for further detailed explanation

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to 'Representations on behalf of Bradford Rural Estates Ltd' for suggested revised policy wording for Policy SP15

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Alison Wright

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Bradford Rural Estates Ltd (BRE Ltd)
------------------------	--------------------------------------

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	SP16.	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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Parts of Land at J3 fall within a MSA for sand and gravel. Mineral extraction opportunities associated with the site will be investigated and where appropriate extraction works undertaken.
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(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

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Office Use Only	Part A Reference:
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