

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0118
Matter	2
Relevant questions nos	2, 3, 29

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

Shropshire Local Plan 2016- 2038 Hearing Statement

Matter 2 – Duty to Cooperate

Land at Boraston Drive and A456, Burford

Prepared by Fisher German LLP on behalf of Barratt Homes
(West Midlands)

Project Title

Land adjoining Boraston Drive and north of A456, Burford

Agent

Fisher German LLP

Contact details

The Estates Office

Norman Court

Ashby de la Zouch

LE65 2UZ

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1. Introduction

- 1.1 This Hearing Statement has been prepared by Fisher German on behalf of Barratt Homes (West Midlands) regarding land in their control, adjoining Boraston Drive and north of A456, Burford as illustrated at Figure 1 below.
- 1.2 At Regulation 19 stage, the site was previously promoted by Lone Star Land (a land promotion company). However, we wish to make the Inspector’s aware that Barratt Homes West Midlands are now promoting the site and will be the developer of the proposed dwellings.
- 1.3 The land is a proposed housing allocation within the emerging Local Plan under Reference BUR004, within Schedule S10.2(i) – Residential Site Allocations: Community Hubs in the Ludlow Place Plan Area.



Figure 1: Land adjacent to Boraston Drive and the A456, Burford

- 1.4 The proposed allocation is supported and Barratt Homes West Midlands are fully committed to the delivery of housing at BUR004.
- 1.5 We note from correspondence with the Programme Officer that we are not eligible to appear at the Stage 1 Hearings. Nevertheless, we wish to highlight that we would welcome an opportunity to appear at any subsequent Further Hearings, should the Inspectors deem it appropriate.

2. Question 2

Who has the Council engaged with in terms of overall housing provision and what form has this taken?

- 2.1 As outlined within the Shropshire Council Housing Topic Paper (February 2022), the Council have been through a staged consultation process to enable the public and relevant stakeholders to engage with the overall proposed level of housing provision.
- 2.2 A Shropshire Council has proactively engaged with both neighbouring and closely related Authorities and Councils throughout the Local Plan Review process. The engagement with neighbouring authorities has been undertaken in the form of discussions, formal and informal correspondence and consultation during the various Local Plan consultation stages. Details of this engagement has been provided within the Council's Duty to Cooperate Statement of Compliance (September 2021). Statements of Common Ground (SoCG) have also been signed between the various Councils/Authorities and Shropshire Council to summarise the positive engagement and conclusions reached.
- 2.3 The key outcome of the process of engaging with neighbouring and related authorities is the proposed contribution that Shropshire will make towards the unmet housing (and employment) needs arising from the Black Country Authorities. As outlined within the SoCG agreed between Shropshire Council and the Association of Black Country Authorities (EV041), Shropshire will deliver 1,500 dwellings (alongside 30 ha of employment land) towards meeting the unmet housing need forecast to arise within the Black Country. These dwellings will be met in accordance with the proposed strategy for the distribution of development across Shropshire and not on a specific site.
- 2.4 As detailed in our response to Matter 4, Question 1, this approach is positively prepared, in line with paragraph 35 (a) of the NPPF as the Council are accommodating the Black Country's unmet need in a practical way which is consistent with achieving sustainable development within Shropshire.

3. Question 3

What are the relevant inter-relationships with other neighbouring authorities in terms of migration, commuting and housing markets?

- 3.1 As referred to in Question 2 above, the Shropshire Local Plan 2016 – 2018 is proposed to provide 1,500 homes towards the unmet housing need arising from the Black Country. This relationship with the Black Country is considered to be one of the relevant inter-relationships for the Plan. The SoCG agreed with the Black Country Authorities outlines that whilst the Shropshire Council Area is considered to represent a self-contained Housing Market Area (HMA), the duty to cooperate is not solely restricted to Local Authorities within the same HMA. Whilst Shropshire and the Black Country are not within the HMA, there are strong links, particularly for commuting between the eastern part of Shropshire and the Black Country.
- 3.2 As outlined within the Black Country's response to the Regulation 19 Draft Local Plan Consultation in February 2021, they consider that the *"proposals for significant levels of development in Bridgnorth and Shifnal could credibly meet Black Country needs, given existing migration patterns, geographical proximity and physical links"*. Notwithstanding this, the SoCG does outline that both parties agree that no specific allocation will accommodate the Black Country unmet need and that this will be met through the delivery of the overall Shropshire Local Plan housing requirement. As outlined in our response to Matter 4, Question 1, we support this approach as this is the best way to achieve sustainable development in Shropshire.
- 3.3 In relation to Burford, which lies to the south of Shropshire, the SoCG agreed between Shropshire Council and the South Worcestershire Councils (EV037) outlines that Malvern Hills District (which adjoins Burford) is considered a broadly self-contained HMA in terms of migration but that is also part of the South Worcestershire HMA in terms of both migration and travel to work journeys.
- 3.4 Nevertheless, the South Worcestershire SoCG recognises that *"there is a functional and physical relationship between Burford in Shropshire and Tenbury Wells in Malvern Hills District. They jointly provide services and facilities for their residents and those living in the wider rural hinterland. Dwellings are distributed across both settlements, whilst much of the employment land is located within Burford and the majority of the retail development is located on Tenbury High Street"*. As will be expanded on in our response to Matter 4, Question 1, this inter-relationship between Burford and Tenbury Wells justifies the proposed approach to housing growth at Burford as outlined within the Plan.

4. Question 29

Are there any cross-boundary issues such as transport, education, health or other infrastructure requirements that arise from the proposed housing and employment site allocations? If so, how have they been addressed through co-operation?

- 4.1 This Hearing Statement relates to the proposed 100 dwelling housing allocation site BUR004 on land adjoining Boraston Drive and north of A456, Burford. Therefore, the response to the questions below is focused specifically on BUR004 and does not comment on the potential cross-boundary issues which may arise from any of the other proposed housing sites within the Plan.
- 4.2 As outlined by the Development Guidelines contained within Schedule S10.2(i) of the Local Plan, the proposed development of BUR004 will be supported by appropriate on-site infrastructure. As listed within Appendix 5 of the Council's Strategic Infrastructure Implementation Plan, the proposed development will deliver a range of infrastructure including (but not limited to); access to and footways along the A456, land for self-build plots, extensive green infrastructure including public open space and a de-culverted watercourse along the eastern boundary of the site.
- 4.3 Burford lies adjacent to Tenbury Wells (Tenbury), which lies within Malvern Hills District, the two settlements are interlinked and the services and facilities within both are shared. For example, Tenbury Community Hospital lies within Burford and residents of Burford can easily access a range of shops and services on Teme Street/Market Street within Tenbury. This relationship is outlined within the Statement of Common Ground (SoCG) agreed between Shropshire Council and the South Worcestershire Councils (signed by the Director of Planning and Infrastructure for Malvern Hills and Wychavon District Councils).
- 4.4 Burford adjoins Malvern Hills District and therefore the two Councils are engaging on the potential for any cross-boundary issues as a result of the proposed development sites at Burford (including BUR004).
- 4.5 Shropshire Council Officers made us aware (in May 2022) of a recent request from Malvern Hills District Council that the development of BUR004 should provide a contribution towards the existing GP healthcare provision within Tenbury. Shropshire Council have asked Malvern Hills District Council to provide evidence for the need for this contribution, although at the time of writing this is not available.

- 4.6 Whilst no formal evidence of the need for healthcare contributions has been provided, it is noted that paragraph 5.4 of the South Worcestershire Councils SoCG states that *“Following liaison with Tenbury Town Council, the South Worcestershire Councils have indicated that an additional 190 dwellings at Burford may place additional demands on existing services, such as doctors, at Tenbury which are reportedly stretched”*.
- 4.7 Barratt Homes West Midlands are therefore aware of the potential need for the development of BUR004 to contribute towards infrastructure in Malvern Hills District. However, we wish to highlight that this will only be acceptable where such planning obligations accord with the tests as set out within paragraph 57 of the NPPF (taken from Regulation 122(2) of the Community Infrastructure Levy Regulations 2010), which require that any obligations are:
- “a) necessary to make the development acceptable in planning terms;*
 - b) directly related to the development; and*
 - c) fairly and reasonably related in scale and kind to the development”*.
- 4.8 Depending on the provision of the information from Malvern Hills District Council, a further update on this matter will be provided to the Inspectors at a later date.