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ID 10 SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref	A0621
Matter	2: The Duty to Cooperate
Relevant questions nos	2-5 (inclusive), 6 and 10-14 (inclusive)

SHROPSHIRE LOCAL PLAN
INDEPENDENT EXAMINATION
WRITTEN HEARING STATEMENT



MATTER 2
DUTY TO CO-OPERATE

HARROW ESTATES
RESPONDENT REFERENCE: A0621
JUNE 2022

Issue / revision	Final	Prepared by	T Ryan
Reference	161835	Signature	TR
This document is issued for		Date	31.05.2022
<input type="checkbox"/> Information	<input type="checkbox"/> Approval	Checked by	W Charlton
<input type="checkbox"/> Comment	<input type="checkbox"/> Submission	Signature	WC
Comments		Date	31.05.2022
		Authorised by	J Mulliner
		Signature	JM
		Date	31.05.2022
		Please return by	

LONDON
23 Heddon Street
London
W1B 4BQ

BIRMINGHAM
3 Edmund Gardens
117 Edmund Street
Birmingham
B3 2HJ

BOURNEMOUTH
Everdene House
Deansleigh Road
Bournemouth
BH7 7DU

TELEPHONE
020 3664 6755

www.torltd.co.uk

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Terence O'Rourke Ltd Reg.
No.1935454 Registered office
Everdene House Deansleigh
Road Bournemouth Dorset
BH7 7DU Registered in England
and Wales VAT No.905095727

1.0 Introduction

- 1.1 This examination hearing statement is submitted on behalf of Harrow Estates in respect of Matter 2 (Duty to Cooperate) of the Shropshire Local Plan examination in public.
- 1.2 The comments respond directly to the questions set out in the Planning Inspectors' Stage Matters, Issues and Questions document (ID7).
- 1.3 This statement should be read in conjunction with Harrow Estates' Regulation 19 representations (response reference: A0621).

2.0 Response to the Inspectors' questions

Issue	Whether the Council has complied with the relevant procedural and legal requirements
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- 2.1 The responses are made in accordance with the Inspectors guidance and in relation to Harrow Estates interests at Shifnal, specifically the employment allocations referenced SHF018b and SHF018d and their interests at the former draft housing allocation at SHF032.
- 2.2 The responses provided below further our position as set out in our Regulation 19 representations, made on behalf of Harrow Estates.
- Q2 Who has the Council engaged with in terms of overall housing provision and what form has this taken?**
- 2.3 Shropshire Council has considered multiple factors in determining its overall housing need, in accordance with the National Planning Policy Framework and the Planning Practice Guidance.
- 2.4 The Housing Topic Paper, submitted to the Inspectors in February 2022 (reference GC4i) demonstrates and clarifies further the processes undertaken to identify the housing need figure. This includes how the Council has addressed cross-boundary issues and their influence on the overall housing need figure for the new Local Plan.
- 2.5 Engagement with the Black Country Authorities has been made to decipher the extent of cross-boundary considerations that could influence the new Plan's housing strategy. This is crystallised within the published Statement of Common Ground between Shropshire and the Association of Black Country Authorities ('ABCA').
- 2.6 Harrow Estates support the approach that has been taken by Shropshire Council in assessing and considering external influences on the new Local Plan's housing requirement figure. Which is reflected in the commensurate and appropriate dialogue that has been undertaken with the Black Country Authorities.
- Q3. What are the relevant inter-relationships with other neighbouring authorities in terms of migration, commuting and housing markets?**
- 2.7 Shropshire has a notable inter-relationship with the West Midlands conurbation, in particular with the Black Country and its constituent authorities. This is referenced in EV041, the Statement of Common Ground between Shropshire Council and the ABCA, which identifies the M54/A5 corridor as a major strategic link between the two.
- 2.8 These ties are demonstrated in the emerging Local Plan through the accommodation of unmet housing and employment need from the ABCA and have been secured in accordance with the Duty to Cooperate.

- 2.9 The updated Housing Topic Paper provides additional explanation as to how Shropshire Council arrived at the figure to accommodate the unmet need from the ABCA, in response to the Inspectors initial questions.
- 2.10 The Topic Paper provides an overview assessment of the commuter flows, migration patterns and functional relationships between the Shropshire HMA and the Greater Birmingham and Black Country HMA ('GBBC HMA'). It indicates that there are considerable flows between the County and the ABCA (most notably with Wolverhampton and Dudley). The data also shows a rising trend of out-migration from the Black Country into Shropshire, particularly into eastern areas of Shropshire, such as Bridgnorth and Shifnal.
- 2.11 It is considered that these inter-relationships have been appropriately taken into account when considering the position of the Shropshire Plan and its ability to accommodate unmet needs.

Q4. How have these inter-relationships been considered in preparing the Local Plan in terms of identifying the Local Housing Need (LHN) and setting the Local Plan's Housing Requirement?

- 2.12 The inter-relationships between the Black Country and Shropshire Council are the only cross-boundary ties which have directly impacted on the Local Plan's housing need figures. This is due to the functional economic and demographic ties between the Black Country and Shropshire and the acute housing shortfall arising from the Black Country.
- 2.13 Engagement with the ABCA and assessment of the functional economic and demographic nuances between the areas has identified a baseline housing figure of 943 dwellings, with a qualitative uplift to a total of 1,500 dwellings, all to be accommodated within Shropshire.
- 2.14 This unmet housing need has been absorbed into the overall strategic housing requirement for the new Plan period, which as a total is to provide 30,800 dwellings, equivalent to a requisite annual delivery of 1,400 dwellings.
- 2.15 As such it is acknowledged that these inter-relationships have been clearly incorporated and considered in reaching a total housing requirement for Shropshire Council.

Q5. What is the justification for the allocation of 1500 homes to meet some of the unmet housing need from the Black Country?

- 2.16 Paragraph 3.7 of the emerging Local Plan establishes that 1,500 homes are required to accommodate the cross-boundary unmet need arising from the Black Country. This figure was queried by the Inspector through their initial questions (ID1; 4 November 2021), specifically at Question 12 which asked for greater detail demonstrating how the cross-boundary housing figure had been identified.
- 2.17 The Housing Topic Paper (February 2022) sought to establish how this figure was arrived at through engagement with the ABCA, as well as assessment of the functional flows and ties between the Black Country and Shropshire.

- 2.18 The Topic Paper focussed on the migration flows, particularly inward migration from the Black Country, and how these resulted in the creation of new households within Shropshire. These figures were checked with a review of the overlapping between the HMAs through their relationships via commuting, Travel to Work Areas and other functional economic associations.
- 2.19 It is accepted that the Housing Topic Paper emphasises that the figure of 1,500 dwellings demonstrates a significant uplift from the baseline figure of 943 dwellings and this uplift was considered appropriate because of qualitative discussions with the ABCA.
- Q9. In overall terms, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of the co-operation and how has this addressed the issue of housing provision?**
- 2.20 The Regulation 18 Black Country Plan acknowledges that there is an acute shortfall in the ability of the Black Country to accommodate all its own housing need. The Black Country Plan establishes a shortfall of some 28,239 dwellings. Given the size of the shortfall and the small number of dwellings proposed in Shropshire to meet this need it is considered that the strategic significance of this shortfall has not been fully addressed by Shropshire Council. This is pertinent given the inability of the other Authorities that are within the GBBC HMA to effectively address the shortfall more significantly; this is outlined at paragraph 3.32 of the Housing Topic Paper.
- 2.21 Consequently, whilst Shropshire Council have been able to demonstrate accordance the Duty to Cooperate, it is contended whether it has been effective enough to ensure that sufficient unmet need has been truly considered and accommodated within Shropshire.
- 2.22 The Housing Topic Paper (February 2022) identifies strong and enduring links between the Black Country and Shropshire, particularly the eastern part of the county which benefits from the strategic link of the A5/M54 corridors. Indeed, the Shropshire Local Plan recognises the potential of this corridor, as a major growth area, with settlements along the corridor being primary locations for out-migration from the Black Country.
- 2.23 Given the functional relationships with the Black Country, settlements within the M54 corridor, such as Shifnal, can play a major and significant role in accommodating unmet housing need from the Black Country. Furthermore, Shifnal's recognition as a Key Centre demonstrates its sustainability as a location for growth, compounding the support of its position as a potential location for development that can practically address the acute housing shortfall arising in the GBBC Housing Market Area.
- 2.24 Notwithstanding that Shropshire Council has demonstrated accordance with the requirements of the Duty to Cooperate, it is contended that the effectiveness of the approach made by the Council has not been fully realised.

- 2.25 In accordance with paragraph 26 of the NPPF and to improve the effectiveness of the cross-boundary cooperation and the ability of Shropshire Council to demonstrate on-going joint working with the ABCA and its HMA inclusion of a Local Plan review trigger should be considered. This is an area of disagreement between Shropshire Council and the ABCA (see Paragraph 9.1 of the Statement of Common Ground between Shropshire and ABCA).
- 2.26 The inclusion of a Local Plan review trigger mechanism will build-in flexibility into the Local Plan that will ensure appropriate engagement with strategic cross-boundary considerations, specifically regarding ongoing unmet need in the Black Country. This will demonstrate effectiveness in the preparation of the Shropshire Local Plan and implement a deliverable and sound strategy that can meet both the needs of Shropshire but also those of the neighbouring Authorities which are functionally tied with the County.

Q.10 Who has the Council engaged with in terms of jobs growth and employment land provision and what form has this taken?

- 2.27 Shropshire Council has engaged with the Black Country Authorities, comprising of Dudley, Wolverhampton, Sandwell and Walsall Councils. Together they form the Association of Black Country Authorities. Whilst not directly adjoining, they have strategic inter-relationships which have impacted employment and housing delivery requirements in Shropshire.
- 2.28 The Inspectors in their initial questions (ID1 dated 3 November 2021) at Question 7 queried how Shropshire Council arrived at the unmet employment need figure to be accommodated in Shropshire. This has been clarified through the Council's Employment Topic Paper (GC4n dated 15 February 2022).
- 2.29 The Topic Paper establishes that Shropshire Council engaged with the ABCA and assessed the functional economic considerations that tie Shropshire with the Black Country on an economic and employment basis. A Statement of Common Ground (SoCG) was signed between Shropshire Council and the ABCA in July 2021.

Q11 What are the relevant inter-relationships with other authorities in terms of economic activity, travel to work and the market for employment land and premises?

- 2.30 The geographic proximity between the east of Shropshire and the Black Country/South Staffordshire is recognised within the Local Plan, with this connection underpinned by the strategic corridor of the M54/A5. This establishes an overlapping between parts of the Shropshire Functional Economic Market Area (the 'FEMA') and that of the Black Country (which also includes South Staffordshire, the Authority which is directly adjacent to the east of Shropshire).
- 2.31 There is clear and demonstrable evidence of commuting and travel to work patterns that indicate the fundamental ties in the employment market between the FEMAs. This has informed the identification of the employment space figure which the County will contribute towards to help meet the unmet needs arising from the Black Country. The Employment Topic Paper regards this as commensurate and appropriate in its scope which reflects the inter-relationship between the areas.

2.32 However, the geographical influence of the Black Country’s economic inter-relationships are limited to the eastern parts of Shropshire around the M54 and A458/A454 corridors. This is set out in the Employment Strategy Topic Paper, Table 26.

2.33 However, it is the M54/A5 corridor which is identified as having the strongest strategic significance in the SoCG between Shropshire and the ABCA:

“Both Shropshire Council and ABCA recognise the strategic significance of the M54/A5 corridor. This corridor:

- *Provides strategic links between the Shropshire Council area and Wolverhampton and to the wider West Midlands region.*
- *Offers strategic employment and investment opportunities, having considered constraints such as the Green Belt.*

“Both Shropshire Council and ABCA support the development of the strategic corridor and acknowledge the need for proportional infrastructure contributions from development sites, recognising the cumulative impact of such development.” (Paras 7.1-7.2)

2.34 The significance of the M54/A5 link, which is complemented by the mainline railway between Shrewsbury/Telford via Shifnal and Wolverhampton/Birmingham, is recognised in the Shropshire Plan and is a key element that demonstrates the economic inter-relationships between Shropshire and the Black Country. These economic linkages are set out in the Council’s M54 Growth Corridor Strategic Options Study (EV072) which identifies *“The M54 corridor is a key strategic gateway for both Shropshire and its neighbouring local authorities”*.

2.35 Please refer to [Appendix 1 – LSH Report] which sets out the Council’s evidence referred to above in more detail.

Q12 How have these inter-relationships been considered in preparing the Local Plan in terms of jobs growth and employment land provision?

2.36 The inclusion of 30ha of employment space within the County will contribute towards the Black Country’s unmet need, which has been incorporated into the wider employment delivery strategy of the Shropshire Local Plan.

2.37 It takes into consideration the pressures applied on the Black Country through commuter flows from Shropshire, which has been regarded as contributing towards the exacerbation of the unmet needs of the area. As such, the provision of housing and employment space within Shropshire which will contribute towards the needs of the ABCA will relieve some of the pressures on employment space needs within the Black Country.

2.38 However, these inter-relationships are not reflected in the Council’s strategic approach to accommodate this 30ha through its strategy of “balanced growth” at settlements across the county. The SoCG between Shropshire and the ABCA (at para 8.10) makes clear that the unmet needs are to be met within the sites within Shifnal and Bridgnorth as these are the areas with the strongest functional links with the Black Country.

Q13 What is the justification for the allocation of 30ha of employment land to meet some of the unmet need from the Black Country?

- 2.39 Shropshire Council and the ABCA have rightly coordinated through their duty to cooperate to explore the opportunity to meet the Black Country's unmet needs. Both authorities have identified strong functional linkages between parts of their FEMAs, as set out in the signed SoCG.
- 2.40 Any unmet needs in the Black Country will create a future undersupply of employment land which will create a 'ripple effect' for availability within the Black Country and surrounding areas. This should be mitigated through increased provision within areas with strong functional links to the Black Country FEMA, such as the M54/A5 corridor, as has been agreed by Shropshire Council and the ABCA.
- 2.41 The justification for the quantum of unmet need to be met in Shropshire is established that because of the provision of unmet housing need accommodated in Shropshire there are identified commuter and migration flows, as well as an increase in labour supply travelling from the Black Country.
- 2.42 The Employment Topic Paper establishes the approach that has been taken and the methodology that has underpinned the assessment. This has also been informed by engagement with the Black Country Authorities to ensure that spatial and strategic considerations have also been considered.

Q14 In overall terms, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of the co-operation and how has this addressed the issue of jobs growth and employment land provision?

- 2.43 It is considered that the approach adopted by Shropshire Council in engaging with cross-boundary issues has been effective in achieving an appropriate and deliverable employment strategy.
- 2.44 The delivery of the unmet employment space of 30ha, which has been absorbed into the wider strategic requirement for Shropshire, has not been implemented locationally through the spatial strategy, with no specific identification of individual sites to accommodate this need identified.
- 2.45 Notwithstanding the absence of a locational direction to the spatial strategy, it is emphasised that the M54 corridor can contribute significantly towards meeting both the strategic growth needs of Shropshire as contained in the Plan, but also practically accommodate the unmet needs of the Black Country. This is especially pertinent given the functional and strategic ties that the M54 corridor establishes between Shropshire and the Black Country and the wider West Midlands conurbation.
- 2.46 Consequently, Shifnal and the employment allocations at SHF018b and SHF018d can play an important role in delivering employment space to simultaneously meet the needs of Shropshire and of the Black Country.

2.47 As such the engagement and co-operation between Shropshire and ABCA has highlighted the importance of the M54 corridor as a location for cross-boundary growth that meets the needs of multiple Functional Economic Market Areas.

Appendix 1 – LSH Report

**PLANNING,
DEVELOPMENT
& REGENERATION**
**SHROPSHIRE
LOCAL PLAN
EMPLOYMENT
LAND STRATEGY
REVIEW**

Sites East of Shifnal

Final Report

Harrow Estates
May 2022

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1.0 INTRODUCTION

1.1.1 Scope of the Report

1.1.2 This report has been produced to support representations to the Shropshire Local Plan Review relating to the Sites East of Shifnal on behalf of Harrow Estates.

1.1.3 This report relates to the Inspector's initial questions to the Council regarding the Council's strategic approach to accommodating the 30ha of unmet employment land need from the Black Country (ID1) and the Council's response via the Employment Strategy Topic Paper (Feb 2022).

2.0 DRAFT SHROPSHIRE LOCAL PLAN 2016-2038

2.1.1 The section below provides an overview of the economic and employment land policies in the draft Local Plan Review. Key excerpts from the relevant policies are set out below.

SP2 Strategic Approach

2.1.2 Over the plan period from 2016 to 2038, around 300 hectares of employment land will be delivered. This equates to around 14ha of employment land per annum.

2.1.3 The employment requirement for Shropshire of around 300ha of employment land over the plan period from 2016 to 2038 seeks to implement the aspirations of the Economic Growth Strategy for Shropshire and provide a sufficient scale of employment land to deliver enough jobs to achieve a sustainable balance with the housing requirement. (para 3.17)

2.1.4 Further to discussions with the Black Country Authorities as part of their ongoing plan making process, Shropshire's employment requirement of around 300ha of employment land incorporates up to 30ha of employment land to support the employment needs of the emerging Black Country Plan, where evidence indicates employment delivery opportunities are constrained. (para 3.18)

SP12. Shropshire Economic Growth Strategy

2.1.5 Economic growth and investment will be supported in:

- a) Shrewsbury to develop its role as the County Town and Strategic Centre;
- b) The Principal Centres and Key Centres as the key employment and service centres;
- c) The 'Strategic Corridors', 'Strategic Settlements' and 'Strategic Sites' identified in the Plan

SP13. Delivering Sustainable Economic Growth and Enterprise

2.1.6 The primary focus for new development, particularly for inward investment will be sites within or adjoining Shrewsbury and the Principal or Key Centres located on the identified 'strategic corridors'. (para 3.130)

2.1.7 The 'Strategic Corridors' in Policy SP14, provide flexibility to facilitate a 'step change' in our economic performance. The 'Strategic Corridors' comprise groups of settlements on transport corridors where releasing additional employment land, may help support existing business and attract larger windfall developments into the County. The primary purpose here is for Shropshire to respond positively both to demand from the growth of existing business or to demand from new businesses attracted into the County as inward investment and to support unmet development needs in the Black Country particularly along the M54 / A5 growth corridor. This may require the release of significant sites with the potential to function as 'growth zones' on the 'strategic corridors' for larger employment or mixed-use developments. (para 3.135)

SP14. Strategic Corridors

- 2.1.8 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.
- 2.1.9 The primary purpose of this policy is to enable Shropshire to respond positively to demand from new businesses attracted into Shropshire as inward investment and the significant growth of existing businesses, supported by the delivery of new housing as set out in the Shropshire Economic Growth Strategy. (para 3.140)
- 2.1.10 This approach responds to the Council's objective to prioritise significant new development and infrastructure investment into the Strategic, Principal and Key Centres and identified Strategic Sites to create 'growth zones' along the 'strategic corridors' through Shropshire and making effective use of the rail and road routes through these corridors. The sequential release of additional employment land for development in the 'strategic corridors' may also help to attract major employment development into the County. The 'strategic corridors' are:
- a) Eastern Belt M54/A5, A41/A464 and A4169/A458/A454, supporting Shropshire's motorway, road and rail links to the West Midlands region and the role of the West Midlands Combined Authority, including opportunities in and around:
 - Shrewsbury as the Strategic Centre and County Town of Shropshire;
 - Bridgnorth as a Principal Centre in the Shropshire Green Belt;
 - Shifnal and Albrighton as Key Centres in the Shropshire Green Belt;
 - RAF Cosford as a significant location in the Shropshire Green Belt;
 - Ironbridge through the redevelopment of the former Power Station site. (3.141)

3.0 THE UNMET NEEDS FROM THE BLACK COUNTRY

- 3.1.1 The Local Plan employment land target of 300ha includes provision to meet the future employment land needs of Shropshire along with 30ha of unmet need from the Black Country, which is included within this total.
- 3.1.2 The issue of how the Council have strategically addressed and accommodated the Black Country's unmet employment land needs within the Plan has been raised by the Inspector in her correspondence to the Council (ID1) as well as through her Stage 1 Matters, Issues and Questions. The Council have in turn responded through the Employment Strategy Topic Paper (15 February 2022).
- 3.1.3 This short paper provides an overview of the Council's strategic approach to meeting the unmet employment land needs of the Black Country, and assesses this approach against a range of other evidence and strategies produced by Shropshire Council and the Black Country authorities.
- 3.1.4 This shows that the Council's proposed approach of meeting the Black Country's unmet need via the existing settlement pattern is unsuitable, and that meeting the unmet need within the part of the County which relate better and are more attractive to Black Country businesses is the appropriate strategic approach.

Employment Strategy Topic Paper (February 2022)

- 3.1.5 The draft Local Plan requirements include making provision for 30ha of employment land along with 1,500 houses to meet the Black Country's unmet need. This issue has been picked up by the Inspector as one of concern in her first letter to the Council (ID1):
- 3.1.6 *"The Plan seeks to accommodate some of the unmet employment land need from the Black Country. Has the unmet need been tested through a local plan examination? Also, please can the Council explain how the figure of 30 hectares of employment land over the Plan period was arrived at and where it would be accommodated? A topic paper would be helpful in setting out this information along with the details of the Council's spatial strategy and distribution and how it was arrived at."* (ID1, para 17)
- 3.1.7 Shropshire Council's Response to this was included within their Feb 2022 Topic Paper. The Topic Paper provides consideration of meeting 30ha of the unmet needs of the Black Country. The justification for the principle of Shropshire meeting some of the Black Country's unmet needs includes identifying the following sites within Shropshire which have functional relationships with the Black Country Functional Economic Market Area:

Table 1: Strategic Employment Sites With Functional Relationships Between Shropshire and the Black Country

Table 26: Strategic proposals at boundary of Shropshire FEMA and Black Country/southern Staffordshire FEMA

Functional Economic Market Areas (FEMA)	Strategic Corridors	Location	Employment Area	Planning Status	Employment Land Provision	INCLUDES New / Further Provision	
					hectares		
Shropshire FEMA	M54 Jnc.3 / A41 (north) / A464	Stanton Road/Upton Lane, Shifnal	Shifnal East	Proposed Allocation	39	39	
		Lamedge Lane, Shifnal	Shifnal Industrial Estate	Existing Employment Area	12	-	
	A454 / A458	Estate Road, Bridgnorth	Stanmore Industrial	Existing Employment Area	19	-	
		Estate Road & Stewart Road, Bridgnorth	Stanmore I.E. extension	Proposed Allocation	11	11	
	A458	Bridgnorth	Tasley Garden Village and	Proposed (16ha) / Existing (7ha) Allocations	23	23	
Wolverhampton / Dudley / Walsall / South Staffordshire / Cannock FEMA	M54 Jnc.2 / A449 (south)	Wobaston Road	i54 Regional Investment Site	Existing Employment Area part under construction	91	6	
		Wobaston Road: Western	i54 Extension	Committed Employment	40	40	
		Wobaston Road	Balliol Business Park	Existing Employment Area	7	-	
		Wobaston Road	Owen's Trading Estate	Existing Employment Area	7	-	
	M54 Jnc.2 / A449 (south)	Stafford Road North,	Darlaston (IN0123)	Existing Employment Area	?	-	
		Stafford Road North,	Darlaston (IN0124)	Existing Employment Area	?	-	
		Stafford Road, Wolverhampton	Fordhouses Industrial	Existing Employment Area	?	-	
	M6 Jnc.12 / A449 (north M54) / A5	Stafford Road, Wolverhampton	Former London Works	Existing Employment Area	?	-	
		A449 (north M54 Jnc.2)	Four Ashes, Staffordshire	West Midlands Interchange - Strategic Rail	Committed Employment Area: Development Consent	297	233 net area
			ROF Featherstone, Staffordshire	Strategic Employment	Committed Employment	36	36
			Featherstone, Staffordshire	Four Ashes Industrial	Existing Employment Area	72	11
Hilton Cross, Staffordshire	Hilton Cross Business		Existing Employment Area	18	5		
	Hilton Cross, Staffordshire	Hilton Main Industrial	Committed Employment	7	-		

Source: Employment Strategy Topic Paper, Table 26

- 3.1.8 However, this has not influenced the Local Plan strategy for meeting the Black Country’s unmet needs, which are to be disaggregated among the settlement hierarchy in accordance with the spatial strategy based on balanced growth across the County, rather than based on functional relationship to the Black Country:
- 3.1.9 *“It was proposed that this contribution should not be met on a specific site allocation or within a specific settlement, but rather this unmet employment need would be incorporated into the Shropshire Employment Need.”* (para 6.78)
- 3.1.10 *“This unmet need would be met in accordance with the proposed spatial strategy for the distribution of development in Shropshire. This would recognise that the contribution towards the Black Country unmet needs will be influenced by the functional relationships and connectivity between Shropshire and the Black Country Authorities. This would mean the unmet needs are most likely to be satisfied in principal Shropshire settlements on strategic corridors through the County that link to the BCA.”* (para 6.79)
- 3.1.11 However, the Council’s approach of balanced growth ignores the functional relationships between Shropshire and the Black Country FEMAs which, as shown in Table 26 of the Topic Paper and replicated above, shows the influence of the Black Country FEMA does not extend over the whole county but only the strategic corridors in the east of the County.

Shropshire Employment Land Review (ELR) (Avison Young, 2019)

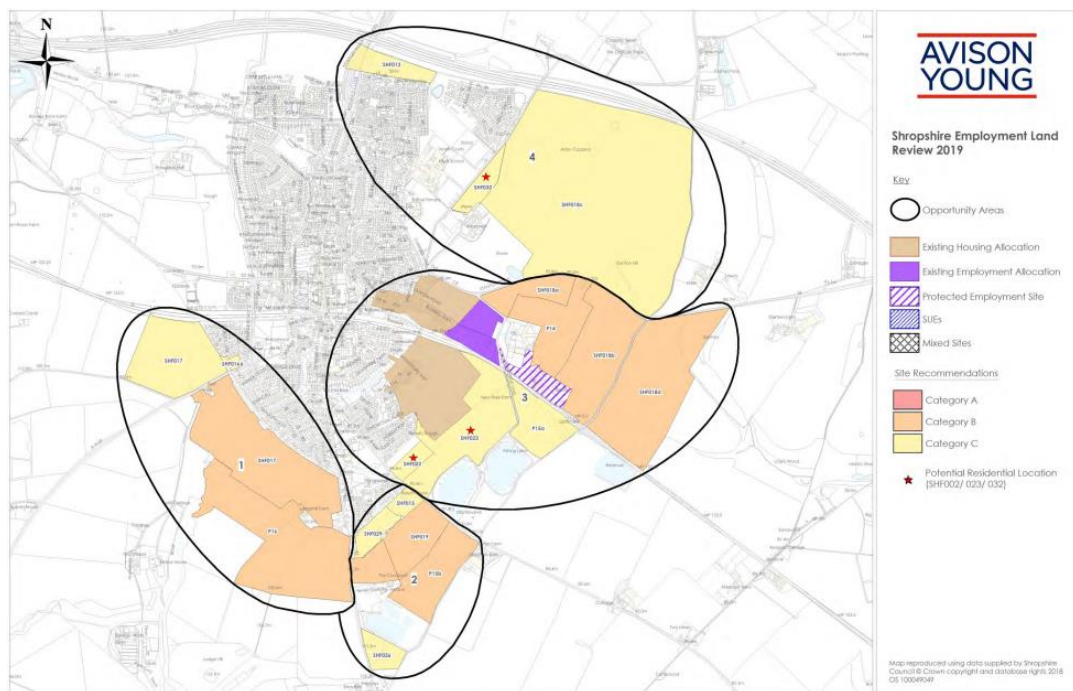
- 3.1.12 This report provides an assessment of employment sites across Shropshire broken down by settlement. The report identifies key locations for strategic, significant, and local growth.
- 3.1.13 *“Key locations for significant local employment opportunities include: Principal and targeted Key Centres on strategic corridors: Particularly Shifnal and Albrighton on the M54/A5 corridor”* (para 20.5).
- 3.1.14 *“Of the strategic corridors present in Shropshire, the M54 corridor is the most prominent forming a gateway into Shropshire offering connectivity to the West Midlands and critical mass resulting from the presence of nationally significant education, training and employment opportunities. Further evidence of this is provided in the M54 Growth Corridor Strategic Options Study”* (para 20.7)
- 3.1.15 For Shifnal specifically the ELR reports:
- 3.1.16 *“It is expected that the market will continue to explore Shifnal as a preferred investment location in the M54 corridor and the demands placed on Shifnal will subject the town to significant growth pressures over time.”* (para 10.3)
- 3.1.17 *“These pressures create some degree of conflict in relation to two significant considerations affecting the future growth strategy for the town. The strategic location, function, size (as the largest key centre in Shropshire) and accessibility will mean that Shifnal will continue to be seen as a suitable growth point. In contrast, the local view of Shifnal, is the town retains the character and ‘feel’ of a village and its community largely wish it to remain so. The structural problems created by such matters as the highway and drainage constraints in the town reinforce the wish to remain as a village. However, the structural problems need to be addressed and these solutions are likely to both invite and help to accommodate, significant new growth.”* (para 10.4)
- 3.1.18 *“To deliver the scale of built (net) development required in Shifnal to satisfy these objectives, there is a need to identify significant additional employment land over and above the 16 hectares proposed in the Local Plan Review. This has increased the land provision to 40 hectares as shown in Table 10.1 and triggered the early release of land to provide a long term investment perspective beyond the current planning timeframe to 2036.”* (para 10.6)
- 3.1.19 The ELR categorised sites into 3 categories:
- Category A: Sites that are in sustainable locations which the market is expected to regard as attractive investment prospects, being assumed to be viable for development, and largely free of any significant environmental and/or technical constraints.
 - Category B: Sites that are in generally sustainable locations which the market might regard as reasonable investment prospects, subject to the degree of environmental or technical constraints that are to be addressed, and their effect on the viability of the sites for development.

- Category C: Sites that are not considered to be suitable for employment use, because they are in locations considered to be less sustainable for these uses, they are substantially affected by environmental and/or technical constraints, and/or are less likely to meet market requirements for employment development.

3.1.20 In total across Shropshire the ELR identifies a total of 100.5ha of Category A sites and 917.19ha of Category B sites. Shifnal is identified as having zero Category A sites and 133.69ha of Category B sites, including the application site. (Table 20.4)

3.1.21 The sites in Shifnal are assessed within four opportunity areas, shown below.

Figure 2: Shifnal Opportunity Areas



Source: ELR, Figure 10.1

3.1.22 The application site is within Opportunity Area 3, about which the ELR concludes:

- *“These sites could represent an extension to the existing business area at the Lamledge Estate, providing an opportunity for a larger employment offering which would be attractive to local companies. They could also address the current shortfall in the employment land supply in the town and stimulate regeneration/redevelopment of the existing employment site.”*
- *“Stanton Road could provide Shropshire Council an opportunity to service sites within Opportunity Area 3. Local improvements/upgrades would be needed to Stanton Road to aid accessibility. Such improvements/upgrades might include a signalled junction and services/utilities being upgraded.”*

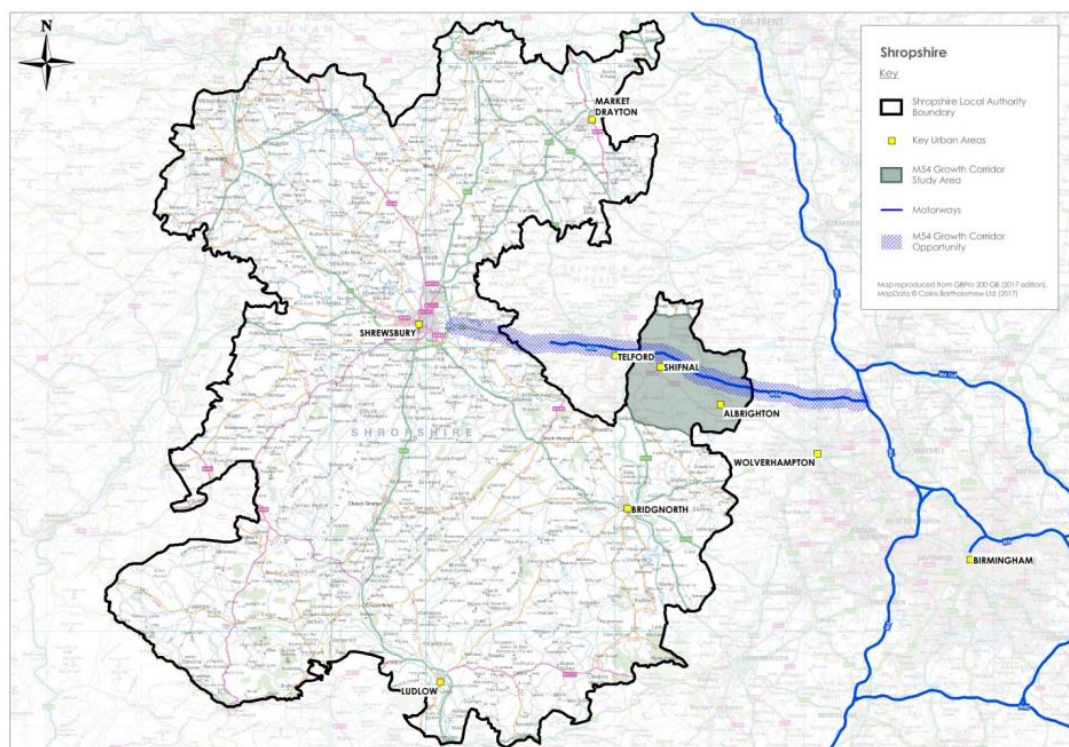
- *“It is recognised that due to the current imbalance between housing and employment that the delivery of employment land is a priority. Housing market demand is strong in Shifnal whereas employment land in this location, to date, is untested. However, given the settlements location in the M54 corridor we understand there to be strong local market interest in this location, although accessibility and visibility from the M54 could limit the potential regional and national market.” (pg 46)*

M54 Growth Corridor Strategic Options Study On behalf of Shropshire Council (Avison Young, June 2019) (EV072)

3.1.23 The M54 Growth Corridor Strategic Options Study was produced for Shropshire Council in 2019. It forms part of the Local Plan Review evidence base documents (EV072) but it is not mentioned within the Council’s Employment Strategy Topic Paper and does not seem to have factored into the Council’s considerations regarding the strategic location of the Black Country’s unmet employment land.

3.1.24 The map below shows the Growth Corridor Opportunity Area which covers a relatively small part of Shropshire:

Table 3: M54 Corridor Growth Opportunity Area



Source: Avison Young 2019, Figure 1.1

3.1.25 The Report sets out clear conclusions regarding the economic importance of the M54 corridor and its growth potential as well as regarding specific sites within the corridor which should be prioritized:

“The M54 corridor is 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. The corridor is extremely well placed to deliver growth within the key sectors identified within Shropshire’s Economic Growth Strategy particularly advanced manufacturing including engineering (with strong links to aviation), innovative healthcare and environmental technologies.

It is recommended that the Council should:

- *Prioritise the strategic employment sites at J3, Cosford and Stanton Road to drive forward the County’s corporate objective of economic growth whilst also delivering balanced employment and residential growth;*
- *Prioritise employment sites that help redress the current imbalance between residential and commercial sites;*
- *Develop a robust employment land, economic and market led evidence base to robustly underpin the Local Plan review and provide delivery certainty;*
- *Maintain momentum by continuing dialogue with all site promoters, land owners and key stakeholders to confirm the deliverability of their proposals to enable development;*
and
- *Engage in cross boundary discussions with Telford to consider the opportunity provided by the Lord Stafford site.*

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.” (Exec Summary)

3.1.26 The study identifies that if Shropshire is to realise its objective to see a step change in economic growth, then suitable sites must be made available in the most attractive business locations, including the M54 corridor:

“A stepped change is needed if an increased focus on opportunity sectors is to be achieved and GVA per job boosted. This will require fit for purpose employment land and premises to meet the requirements of the modern occupier. The most attractive locations, for businesses to locate, are areas situated close to key arterial routes, including the M54. For ease of movement reasons, we would expect this trend to continue and as such, this provides direction for this study.” (para 2.43)

3.1.27 The study identifies many reasons why the M54 corridor is a key area for growth. Key among them being the connectivity between Shropshire and the Black Country and wider Region:

“The location is ripe for investment:

- *Strategic corridor location book ended by Wolverhampton to the east and Shrewsbury to the west closely related to the West Midlands conurbation and the associated opportunities provided as part of the Midlands Engine;*
- *Adjacent to international occupiers dominant in target growth sectors i.e. advanced manufacturing/automotive/engineering;*
- *Accessible to the infrastructure network and set to benefit from pipeline infrastructure investment in road/rail in coming years; and*
- *Close to higher education and training institutions including key assets i.e. RAF Cosford, Harper Adams University, University Centre Shrewsbury.* (para 5.5)

3.1.28 The M54 corridor is therefore identified as the optimal location within Shropshire to attract both local and inward investment opportunities arising from, and linked to the wider Black Country and West Midlands economy.

“A sector/market niche that builds upon Shropshire’s Economic Growth Strategy objectives, meets both local and inward investor needs and integrates into the existing offer/critical mass is a priority i.e. advanced manufacturing/engineering/automotive supply chain.”
(para 5.7)

3.1.29 The findings of the M54 Growth Corridor Study clearly indicates that this is a commercially attractive location which has the economic advantages and strong linkages to existing regional markets, labour force, and infrastructure linking it to the Black Country as well as the wider region and beyond. However, this this report is not mentioned in the Council’s Employment Strategy Topic Paper.

Statement of Common Ground between Shropshire Council and the Association of Black Country Authorities (ABCA) (July 2021)

3.1.30 The Statement of Common Ground (SoCG) was produced to support the Shropshire Council Local Plan Review. It sets out how Shropshire Council has engaged with the Association of Black Country Authorities (ABCA) in order to fulfil its Duty to Cooperate requirements with regards to meeting the Black Country’s unmet housing and employment land needs.

3.1.31 With regards to employment matters, the SoCG sets out that Shropshire Council will meet 30 ha of the Black Country’s unmet employment land needs. Further to this, the SoCG sets out the following regarding the location of where that meet should be met:

3.1.32 With regards to the M54/A5 Strategic Corridor:

“Both Shropshire Council and ABCA recognise the strategic significance of the M54/A5 corridor.

This corridor:

- *Provides strategic links between the Shropshire Council area and Wolverhampton and to the wider West Midlands region.*
- *Offers strategic employment and investment opportunities, having considered constraints such as the Green Belt.*

“Both Shropshire Council and ABCA support the development of the strategic corridor and acknowledge the need for proportional infrastructure contributions from development sites, recognising the cumulative impact of such development.” (Paras 7.1-7.2)

3.1.33 Regarding where the 30ha unmet employment land could be accommodated within Shropshire, the SoCG concludes:

“It is agreed that the draft Shropshire Local Plan seeks to plan positively to distribute this unmet need in sustainable locations in accordance with the draft Local Plan’s strategic approach to development, and in line with distribution of development outlined in the draft policies SP2 and S1-S21 of the Shropshire Local Plan.” (para 8.9)

“Having considered migration patterns, geographic proximity and physical links, it is agreed that this unmet need could credibly be accommodated within the already planned development in Shifnal and Bridgnorth over the plan period to 2038. However, it is agreed that no one specific allocation will accommodate unmet need and rather this will be met through the delivery of the overall Shropshire Local Plan housing requirement.” (para 8.10)

3.1.34 This makes clear while there is no one specific allocation to meet the unmet employment land needs from the Black Country, the unmet needs are to be met within the sites within Shifnal and Bridgnorth, rather than in accordance with the Council’s more general strategy of balanced growth.

3.1.35 In accordance with the SoCG, the unmet need from the Black Country is expected to be met across the sites within Shifnal and Bridgnorth, alongside additional indigenous and local needs arising at these sites.

4.0 SUMMARY AND CONCLUSIONS

- 4.1.1 The Council has agreed to accommodate 30ha of unmet employment land need from the Black Country. This is included within the draft Local Plan Review's target of 300ha.
- 4.1.2 The Plan also sets an ambitious growth agenda with the objective of stimulating a 'step change' in economic growth and improved productivity throughout the Plan period. The strategic approach to achieving this will be focusing development in the main centres and growth corridors, of which the M54 Growth Corridor is identified as key.
- 4.1.3 The Inspector has raised (in ID1) the issue of where the Black Country's 30ha unmet need is to be accommodated. The Council have responded via publication of their Employment Strategy Topic Paper which confirms that it will be accommodated in accordance with the spatial strategy based on balanced growth across the County, rather than based on functional relationship to the Black Country.
- 4.1.4 This approach however ignores the functional economic, commercial market, and labour supply linkages between the Black Country and Shropshire. Many of the Council's own documents – including the Topic Paper itself – refer to the linkages with the Black Country extending only into the eastern edge of Shropshire itself.
- 4.1.5 The Council's M54 Growth Corridor Study highlights the reality that it is the area along the M54 which a commercially attractive location which has the economic advantages and strong linkages to existing regional markets, labour force, and infrastructure linking it to the Black Country as well as the wider region and beyond. It is this area which is best situated to attract and accommodate inward invest opportunities from elsewhere in the Region – including from businesses looking beyond the Black Country.
- 4.1.6 However, this this report is not mentioned in the Council's Employment Strategy Topic Paper. This is particularly noteworthy given the Plan's strategic objectives to focus on growth corridors and improving productivity, both of which were highly relevant to this Paper's findings.
- 4.1.7 The Statement of Common Ground (SoCG) between Shropshire Council and the Association of Black Country Authorities (ABCA) further highlights this view and makes clear while there is no one specific allocation in the Local Plan review to meet the unmet employment land needs from the Black Country, the unmet needs are to be met within the sites within Shifnal and Bridgnorth, rather than in accordance with the Council's more general strategy of balanced growth across the County.
- 4.1.8 In accordance with the SoCG, the unmet need from the Black Country is expected to be met across the sites within Shifnal and Bridgnorth, alongside additional indigenous and local needs arising at these sites.

4.1.9 In conclusion, the employment sites within the M54 Growth Corridor are of paramount importance to achieving the economic objectives of the Plan and for the delivery of the 30ha of unmet need from the Black Country. This is made clear by the Council's evidence base documents (set out herein) and SoCG with the ABCA.