



TERENCE
O'ROURKE

ID 10 SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref	A0621
Matter	4: Housing and Employment Land Needs
Relevant questions nos	1-4 (inclusive) and 6-8 (inclusive)

SHROPSHIRE LOCAL PLAN
INDEPENDENT EXAMINATION
WRITTEN HEARING STATEMENT



TERENCE
O'ROURKE

MATTER 4
HOUSING AND EMPLOYMENT LAND NEEDS

HARROW ESTATES
RESPONDENT REFERENCE: A0621
JUNE 2022

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1.0 Introduction

- 1.1 This examination hearing statement is submitted on behalf of Harrow Estates in respect of Matter 4 (Housing and Employment Land Needs) 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 Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing and employment land.
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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 in the former draft housing allocation referenced SHF032.
- 2.2 The responses provided below further our position as set out in our Regulation 19 representations, made on behalf of Harrow Estates.
- Q1. Is the preferred approach to housing growth and the housing requirement set out in Policy SP2 of 30,800 dwellings (1,400 dwellings per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?**
- 2.3 It is considered that Policy SP2 is positively prepared and consistent with national policy, in so far as the housing delivery provision is based on meeting the local housing need (LHN) as calculated according to the standard methodology with an uplift to provide flexibility to respond to changes to the LHN over time.
- 2.4 However, the plan fails to confirm a minimum housing requirement and, in setting, instead, a housing delivery figure of 'around 30,800' it fails to confirm that the minimum need will be met. This is inconsistent with the NPPF para 11 and fails to meet the soundness test of being positively prepared – see NPPF para 35a.
- 2.5 Consequently, concerns remain that the housing delivery pipeline, which is meant to achieve this requirement, is not effective and therefore, not sound. A clear and measurable minimum housing requirement is necessary so that delivery against that minimum can be monitored, including in accordance with NPPF para 74.
- 2.6 Further, setting the strategic requirement as a minimum figure, and making allocations to meet that figure, will provide clarity and effectiveness, including in reducing the risks around the planned reliance on windfall development to contribute to the deliverable housing supply, at the scale/level envisaged - see Paragraph 5.78 of the Shropshire Council Draft Five Year Land Supply Statement February 2022 (Reference GC4j).
- 2.7 Specifically, Table 4 of the Plan shows a trend of reducing housing completions over consecutive years since 2016/17. Whilst housing completions over this five-year period have totalled 8,769 dwellings, the Five-Year Supply Statement (GC4) states that, "*Specifically, over the last five years (2016/17 – 2020/21), some 5,622 dwellings have been completed on windfall sites in Shropshire*" (para 5.97). Windfalls have represented 64% of the supply and it can be assumed that the rate of windfall completions has followed the overall trend of reducing completions/delivery.

- 2.8 Further, it is considered that the delivery of windfall sites does not necessarily provide for housing in the areas of most need, nor does it generally provide for affordable needs. In this context, we note the statement (at paragraph 5.104 of the Five-Year Land Supply Statement February 2022) which confirms that a large proportion of windfalls comprise of developments in rural locations, with notable numbers of barn conversions. This fails to address both the need and strategy focussed on the urban areas, of, for example, Shrewsbury and Shifnal.
- 2.9 Finally, having established that Exceptional Circumstances exist for the release of Green Belt land to provide for housing, including to address unmet need from the Black Country authorities (see the Statement of Common Ground between the Council and the Association of Black Country Authorities (the 'ABCA')), the plan must demonstrate consistency with NPPF para 142 and 143. In this respect, we contend that the strategic approach made by Policy SP2 does not go far enough. It fails to ensure adequate flexibility to deliver sufficient housing given the compound of issues, inter alia, as discussed above.
- 2.10 It is evident, in accordance with NPPF para 142, that settlements such as Shifnal, which have a demonstrable housing need, can accommodate housing to help meet the needs of Shropshire and contribute significantly to unmet need, particularly given Shifnal's location within the M54 Corridor and its functional/geographic relationship with the Black Country.

Q2. Is the housing requirement in the Local Plan appropriately aligned with forecasts for jobs growth?

- 2.11 Policy SP2, in so far as it seeks to provide for the delivery of 30,800 additional homes, is considered to align with job growth. However, unless this delivery target is expressed as 'a minimum housing requirement' there is a significant risk that delivery will fall short and will become unaligned with, and unsupportive of, jobs growth. In short, the housing requirement that has been established within SP2 needs to be expressed as a minimum if the economic growth and employment ambitions of the new Local Plan are to be realised
- 2.12 In particular, the allocations of SHF018b and SHF018d at Shifnal East are suitable and appropriate locations to achieve employment growth, being advantageously located in an area that can provide employment opportunities for local residents (encouraging greater self-containment of the town) and contribute towards meeting strategic employment needs within the M54 Corridor.
- 2.13 In the context of Shifnal, whilst the employment growth is aimed towards encouraging an internalisation of the jobs market, given the town currently suffers from under-employment opportunities and a "leakage" of working-age residents, through out-commuting, to other employment locations, there is an opportunity to further strengthen and align jobs and homes with reference to the wider / strategic needs and provision.
- 2.14 Hence, and notwithstanding the housing allocations that have been made at Shifnal, the removal of SHF032, as a housing allocation, from the spatial strategy, has undermined the locational alignment between housing allocations and employment growth. The reinstatement of SHF032 would be sound.

Q3. What provision is made within the Local Plan to fulfil the identified unmet housing needs of the Black Country, and will the Local Plan’s approach be effective in addressing the sustainability within the plan period, in accordance with national policy?

2.15 The Housing Topic Paper February 2022 (Reference GC4i) outlines the Council’s methodology which has established the quantum of unmet housing need that Shropshire will accommodate. It highlights the close and significant functional relationships between Shropshire and the Black Country, such as migration flows, commuter patterns and overlapping economic areas.

2.16 It is considered that the general approach taken in accommodating the unmet need has a sound basis, however the policy, which incorporates the 1,500 homes into the wider / strategic housing requirement rather than seeking to secure any direct or closer relationship with the Black Country, is not fully justified.

2.17 The Council should fully recognise and positively plan for the geographical and functional relationship of east Shropshire with the Black Country and the wider West Midlands metropolitan area. This is demonstrated by the significance of the M54 Corridor, which is identified in the emerging Local Plan as a major corridor which links the county with the West Midlands conurbation, and thereby the Black Country.

2.18 Consequently, locations within the corridor, such as the town of Shifnal can play a strategic and significant role in accommodating cross-boundary housing and employment need in accordance with the Duty to Cooperate. Furthermore, due recognition of the corridor and settlements within, such as Shifnal, would demonstrate a sustainable and effective approach in contributing towards accommodating the unmet needs of the Black Country authorities on a spatially deliverable way.

Q4. The soundness of proposals for the land allocations in the Local Plan will be considered at Stage 2 of the Examination. However, given that many ‘saved’ sites which are not before us are included in the housing supply, is it realistic that this examination can determine if the Council have a 5-year supply of deliverable housing land?

2.19 The inclusion of the ‘saved’ sites within the Local Plan as a source of housing land, separate but complementary to the new allocations in the Local Plan, is not considered a wholly sound approach to plan-making.

2.20 Notwithstanding that these sites, saved and brought forward from the SAMDev, were tested at the time of the SAMDev’s Examination in Public, it cannot be assumed that they align with the current spatial strategy or that they are deliverable.

2.21 The NPPF, paragraph 16d, requires policies to be unambiguous which paragraph 31 requires plans to be prepared and underpinned using the latest evidence. However, there is no clarity as to why the ‘saved’ sites have been brought forward into this plan, and as a source of deliverable housing.

2.22 Given that these ‘saved’ sites are a legacy from the current SAMDev, it is not clear that the approach utilises the latest and most up to date evidence. Progressing

the legacy sites from the SAMDev over and above other appropriate and deliverable allocations, such as that at SHF032 which was subsequently removed from the spatial strategy, does not demonstrate a fully sound or justified approach.

2.23 Further, given that these sites have not been delivered with the support of the development plan framework there must be clear evidence that they are deliverable now. At the present time there is a lack of clear evidence indicating that the sites are readily available and deliverable. This is contrary to the NPPF at Paragraph 35c which requires Plans to be effective and contain deliverable policies.

2.24 The Council must provide a justifiable policy basis to explain the inclusion of the 'saved' sites within the housing trajectory as a source of deliverable housing numbers in accordance with emerging Policy SP2.

Q6. Should the Local Plan include a housing trajectory showing the expected rate of delivery of housing land?

2.25 To ensure compliance with the Paragraph 16d of the NPPF, and to avoid ambiguity, the Local Plan should include a housing trajectory demonstrating how the Council anticipates delivery of housing numbers from its various identified sources as established in SP2.

2.26 This will assist in clarifying the policy approach of the new Plan and ensure a sound strategy.

Q7. Is the preferred "balanced growth" approach and the resulting employment land requirement set out in Policy SP2 of around 300 hectares (14ha per annum) over the Plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

2.27 Harrow Estates supports the economic and employment strategy sought by the new Shropshire Plan through recognition of the County's existing strengths and potential to build upon these.

2.28 The requirement of 300ha of employment land represents a positively prepared approach to plan-making. It includes proportionate, yet appropriate, additional flexibility to facilitate the far-ranging and significant economic growth objectives of the Council to achieve a competitive and agile local economy.

2.29 Acknowledgement of the significance of Strategic Corridors is particularly supported and establishes a highly sustainable and deliverable approach to employment and economic development. Such recognition of these corridors, such as the M54 Corridor, will unlock the economic potential of the County in accordance with the Council's Economic Growth Strategy.

2.30 The "balanced growth" approach is an appropriate strategy for disaggregating Shropshire's own employment land needs. However, it is not appropriate to apply this approach to the 30ha of unmet need from the Black Country.

2.31 As referenced in many of the Council's own evidence base reports and the Statement of Common Ground with the Association of Black Country Authorities

(ABCA), this unmet need should be accommodated within the parts of Shropshire with strong functional economic links to the Black Country – most notably, the M54 Corridor. Please refer to [Appendix 1 – LSH Report] which sets out the Council’s evidence on this matter in full.

Q8. What provision is made within the Local Plan to fulfil the Identified unmet employment needs of the Black Country, and will the local Plan’s approach be effected in addressing this sustainability within the plan period, in accordance with national policy?

- 2.32 The Local Plan makes appropriate provision to address unmet employment needs that have been identified as arising from the Black Country area, totalling 30ha of employment land. The Black Country Functional Economic Market Area (the ‘FEMA’), which incorporates South Staffordshire, is recognised to have a notable overlap with parts of Shropshire’s FEMA. As such, there is material evidence to support Shropshire’s contribution to accommodate this unmet need.
- 2.33 The M54 Corridor demonstrates the geographical and physical connectivity between the Black Country and Shropshire FEMAs. Shifnal’s location within this corridor is recognised in the Local Plan by the strategic allocations that have been established at sites SHF018b and SHF018d. These sites will deliver approximately 13% of the strategic employment need of the County but will also be able to make a material and significant contribution towards enhancing the potential of the M54 Corridor.
- 2.34 Furthermore, the interrelationships that the corridor facilitates between east Shropshire and the West Midlands conurbation will allow Shifnal to provide opportunities in accommodating some of the unmet employment need arising from the Black Country. This is directly referenced in the Employment Strategy Topic Paper February 2022 (Reference GD4n) at Paragraph 6.55 which emphasises the suitability of employment and economic growth along the M54 Corridor as being able to functionally and strategically contributing towards meeting unmet employment needs from the Black Country. This is also one of the key conclusions of the Council’s M54 Growth Corridor Strategic Options Study (EV072), although this document appears to not have been mentioned in the Council’s Employment Strategy Topic Paper.
- 2.35 Finally, 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. 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 locations.
- 2.36 Please refer to [Appendix 1 – LSH Report] which sets out the Council’s evidence on this matter in full.
- 2.37 Notwithstanding this however, the Plan’s approach in incorporating the 30ha of unmet need within the wider strategic employment requirement of the Plan fails to ensure that there is a spatial aspect to deliver this unmet need.

2.38 Although it is not advanced that the Plan should allocate specific sites to accommodate this unmet need, it is considered that the Plan should reference the appropriateness of the broad location of the delivery of any employment land to accommodate this unmet need. This would reflect the evidence which suggests that employment development in the M54 Corridor is most suited to aid in strategically accommodating this agreed unmet requirement. This would include the employment allocations made at Shifnal East, referenced SHF018b and SHF018d in the Local Plan.

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	?	-
		Stafford Road, Wolverhampton	Former London Works	Existing Employment Area	?	-
	M6 Jnc.12 / A449 (north M54) / A5	Four Ashes, Staffordshire	West Midlands Interchange - Strategic Rail	Committed Employment Area: Development Consent	297	233 net area
	A449 (north M54 Jnc.2)	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)

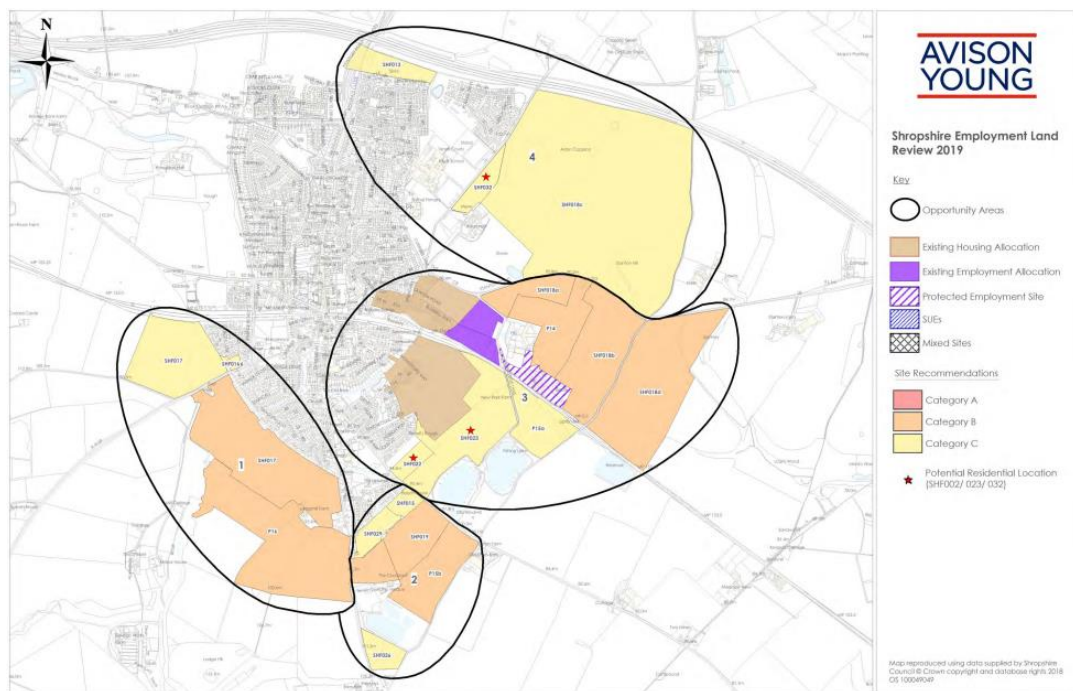
- 3.1.12 This report provides an assessment of employment sites across Shropshire broken down by settlement. The report identifies key locations for strategic, significant, and local growth.
- 3.1.13 *“Key locations for significant local employment opportunities include: Principal and targeted Key Centres 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.”*

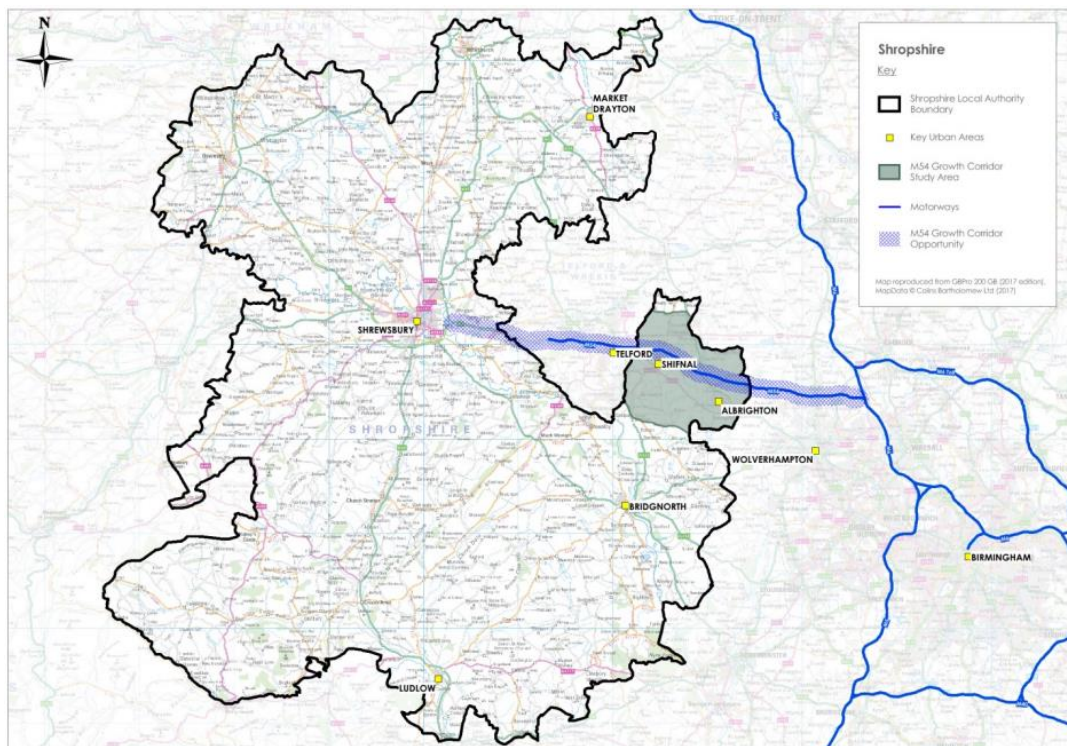
- *“It is recognised that due to the current imbalance between housing and employment that the delivery of employment land is a priority. Housing market demand is strong in Shifnal whereas employment land in this location, to date, is untested. However, given the settlements location in the M54 corridor 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.