9th September 2019

Adrian Cooper
Planning Policy and Strategy Manager
Shropshire Council
Shirehall,
Abbey Foregate,
Shrewsbury
SY2 6ND

Our Ref:406.02395.00004

Dear Adrian,

RE: PROMOTIONAL DOCUMENTS FOR LAND AT COSFORD AND SHIFNAL PROMOTIONAL DOCUMENT TO INFORM SHROPSHIRE COUNCIL'S LOCAL PLAN PARTIAL REVIEW 2016 – 2036

Further to our meeting of 25 July 2019, please find enclosed two Promotional Documents to accompany this letter and the 'Preferred Strategic Sites' Consultation questionnaire, that have been prepared on behalf of Nurton Developments Ltd in support of land interests at Shifnal and Cosford. These documents consider the availability, suitability and achievability of the two sites and demonstrate that they are appropriate to support delivery of sustainable local, strategic and ABCA housing need. We are submitting the documents for consideration in the ongoing consultation that is being undertaken to inform Shropshire Council's Local Plan Partial Review 2016-2036.

To underpin our consideration of the appropriateness of the two sites for development, we have, reviewed the previous Green Belt assessment work undertaken by the Council in preparing their evidence base to inform the emerging Development Plan. The Promotional Documents also review the Sites in terms of their deliverability, having regard to a range of technical considerations including:

- Landscape and Visual Impact
- Ecology
- Historic Environment
- Transport and Access
- Hydrology and Flooding

Based on the outcomes of our technical review, the two Promotional Documents demonstrate that both Sites are appropriate for early release for housing and/or 'safeguarding'.

Critically, both Sites perform better than other proposed Preferred and Strategic Sites and are sequentially preferable now that they are available.

Upton Lane, Shifnal

This Site is located adjacent to recent housing development and proposed housing on the East of Shifnal. The Council's assessment of this location recognises the locational advantage of this side of Shifnal because it enables car bourn movements onto the M54 via Junction 3 avoiding cross town movements. This consideration underpins the proposed allocation of employment land to the north of our Client's site and is similarly relevant to their land.

Preferred safeguarding land to the west of Shifnal has been the subject of a substantial level of objection from local residents during consultation of the local plan, with significant concerns over traffic impact on the town centre. This land is remote from the proposed employment allocations and would locate future housing in a location with limited ability to provide integrated footpaths into the town centre due to the existing configuration of the intervening and established housing areas. As such, it is unlikely to deliver an alternative route around the town by virtue of the railway which forms a barrier to delivering a complete road link. This land is also highly dependent on additional road infrastructure in the form of a by-pass (delivery of which is not secured).

Our Client's land to the east of Shifnal is adjacent to recent and housing development and can be effectively linked to the town centre, schools and other services to encourage pedestrian and cycle . The site is well located for employment opportunities adjacent to the major employment allocation to the north.

In Green Belt terms, the site's release would have no greater impact of the purposes of the Green Belt than the Preferred Site's to the west of Shifnal when considered in the current context. Analysis of Shifnal, together with consideration of the Green Belt purposes and boundaries, concludes that our Client's Site represents a more appropriate location for development in terms of a reduced negative impact upon Green Belt performance. Moreover, with the development of the Employment Allocation and other committed land on this side of the town, any impacts upon the Green Belt will be reduced further, due to our Client's land would be read against the employment site to the North.

The site also delivers a range of other benefits not secured by the release of other Preferred Sites', including;

- The improvement of a junction which has been an accident black spot;
- The provision of accessible open space around the Windmill which is a local landmark and would be protected as part of the proposal;
- Enhanced footpath links into and out of the town;
- Potential to provide local services and facilities, such as increased GP surgery provision, within the masterplan
- Delivery within the M54 corridor to potentially assist in meeting identified cross-boundary housing need and providing an alternative to locations which will generate increased cross-town traffic.

Newport Road, Shifnal

This Site lies to the north of Cosford RAF Base which is a Preferred Strategic Site and aligns with the positive recommendations within the June 2019 M54 Growth Corridor – Strategic Options Study which states that:

"*The core benefits to RAF Cosford and its contribution to the regional economic profile should not go unnoticed. The opportunity presented incorporates Shropshire's aspirations to retain local talent, up skill, create and foster environments of thriving economic activity and raises the profile of Shropshire as an innovative and self-sustaining economic country. "*

RAF Cosford is currently a major part of the Defence College of Technical Training (DCTT) and home to the RAF Museum. The RAF Cosford Site will become a centre of excellence for both UK and International Defence Training and for 4 School of Technical Training to be relocated from MOD St Athan to Cosford. This is to be led by the Aviation Skills Partnership in collaboration with Telford College, which is launching a new series of aviation engineering courses in September.

The benefits accrued from retaining local talent in the M54 Growth Corridor, particularly through supporting RAF Cosford, is a central objective to delivering the economic success of the County. To underpin this there is a need to provide non-military, market housing that will allow civilian staff, military staff, retired and people working in supporting services to purchase property close to where they work. This housing provision is not delivered through the current Preferred Strategic Site Proposal (which confines itself to military uses). Our Client's land therefore offers the opportunity to deliver this element to provide people working at the site with the opportunity to put down real roots by investing in local housing.

Other proposed sites for housing will, by virtue of their location near to Albrighton or north of the M54, be remote from the RAF Base. For example, the promotion of the Bradford Estate Land would deliver housing over 2km to the northern boundary of the RAF Base and separated by Junction 3 of the M54, encouraging more car travel. Furthermore, this would locate housing in open Green Belt land. In contrast, our Client's site which represents land that is already limited in its Green Belt functions by virtue of its location between existing development to the south and the M54 to the north. Releasing our Client's site from Green Belt would also reduce pressure on a constrained Albrighton for further housing to support the growth of Cosford Air Base, thus helping to protect the gap between these two areas.

Concluding Observations

Given the credentials of each Site and the range of related benefits which can delivered through the development of these Sites, in terms of;

- sustainably located housing in the right location,
- delivering housing adjacent to employment opportunities, and
- encouraging travel by alternatives to the car

Each Site can be demonstrated to perform better than other development options in the Shifnal and Cosford areas and should be prioritised for release in the current plan period to support the Council's policy objectives in terms of housing delivery, economic development and employment.

These two Sites were not available in 2017 when Shropshire Council undertook a 'Call for Sites' consultation and as a result, they were not included in consideration of Shropshire Council's 'Preferred Sites'. Although formal consultation on 'Preferred Sites' has now closed, consultation is ongoing for 'Strategic Sites' which affords Shropshire Council the opportunity to consider the significant benefits afforded by these two Sites. It is thus incumbent on the Council to consider these Sites based on the merits outlined in the Promotional Documents and not to prejudice their inclusion in the Development Plan by virtue of them being promoted in a later stage of the plan review period.

Once you have had the opportunity to consider the enclosed Promotional Documents, we would welcome the opportunity to meet and discuss the Sites further.

Yours sincerely
SLR Consulting Limited

Elle Cass
Technical Director

Enc:

- land at Newport Road, Cosford - Promotional Document to Inform Shropshire Council's Local Plan Partial Review 2016 – 2036
- Land at Upton lane, Shifnal - Promotional Document to Inform Shropshire Council's Local Plan Partial Review 2016 – 2036