

26 February 2021

Liam Cowden
Planning Policy and Strategy Manager
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury, SY2 6ND

Our Ref: 406.02395.00004

Dear Liam,

RE: REGULATION 19 SUBMISSION ON BEHALF OF NURTON DEVELOPMENT IN RESPECT OF THEIR LAND INTERESTS AT UPTON LANE, SHIFNAL AND NEWPORT ROAD, COSFORD - TO INFORM SHROPSHIRE COUNCIL'S LOCAL PLAN PARTIAL REVIEW 2016 – 2038

Thank you for the opportunity to submit further comments on the evolving Shropshire Development Plan at this Regulation 19 Stage. As we have outlined to the Council on a number of occasions, we remain very concerned regarding the transparency of the Local Plan process thus far.

Our concerns particularly relate to the Soundness of the Plan having regard to the Council's withholding of the evidence base upon which allocations and safeguarded sites have been identified. The Council has recently confirmed that this has been due to concerns about protecting the 'safe space' for developer discussions and the potential 'cooling effect' if duly made representations were made public.

In this regard, since becoming involved in the process we have repeatedly requested the technical evidence base provided by the promoters of SHF0034, in order that we can fully assess the selection process followed and compare this with other promoted sites around Shifnal. We consider that this evidence should have been made public and indeed in other Authority areas this is the approach which is adopted to ensure parity and a 'level playing field', and to avoid accusations of 'behind closed doors' decisions.

Most recently, we understand that our Client's Communications Consultant submitted to you a Freedom of Information Request. This sought all of the evidence which supported this safeguarded site in Shifnal (and other relevant site promotional work for the town) that had been submitted to the Council during the consultation process for this local plan. The responses to this request are attached; notably the Council declined to release any information, apart from promoters reports provided to the Council at the Draft Pre-Submission Local Plan (August 2020) some 3 years after site SHF0034 was identified for safeguarding. We have therefore seen no detailed technical evidence to demonstrate that the site is in fact deliverable, nor preferable to other sites being promoted within Shifnal.

The failure to disclose the evidence base on which the Council made the decision to identify this site in 2017 undermines the credibility of the decision-making process and thus the Soundness of the Plan's evidence base.

Furthermore, if this circumstance has occurred in Shifnal, it is not inconceivable to assume that the evidence base for other allocations and safeguarded land might similarly be lacking a robust basis to demonstrate that sites are deliverable, particularly in terms of the tests of suitability and achievability, as well as availability.

For instance, Clive Barracks, Tern Hill, which is mainly a greenfield site, meaning that only a relatively small area of the site comprises previously developed land, notwithstanding that land beyond this footprint is proposed for development. The consequence is that the site will deliver a limited development in a location which is poorly served by any existing facilities, being locationally remote.

Moreover, the consultation process has not provided sight of the promotional documents and technical evidence which has been provided to the Council by the MOD in support of the site's release and indeed the extent of that release. This appears to be another failure in terms of the transparency of the process.

More latterly the timeframe for the site's release has been pushed back from 2022 to 2025, which is perhaps two defence reviews away. Given recent changes to the list of property which the MOD will dispose of comprising of the retention of 5 sites, including, Norton Manor Camp; Royal Marines Condor Airfield; Royal Marines Chivenor; MOD Woodbridge (Rock Barracks) and RAF Molesworth, we consider that more flexibility should be built into the Plan through the inclusion of Reserve Sites which would enable the Council to respond to any shortfall in housing delivery.

To elaborate on our concerns in terms of the evidence base, its availability to public scrutiny and wider Local Plan preparation process, we consider that there are a number of key and interrelated themes which the Council has failed to properly consider, including;

Affordability and Housing Supply

- The Council have failed to assess the impact of Right to Buy on the supply and pool of affordable housing within Shropshire and particularly the less affordable settlements including Shifnal. *Could the Council confirm what level of housing has been lost through Right to Buy in Shropshire and in Shifnal?*
- The Plan continues to fail to make allowance for Reserved Sites, which would meet any shortfall during this Plan period should there be an undersupply in delivery or an increase in housing affordability issues in location such as Shifnal. The recent Pandemic has already had an impact on house prices in commutable rural locations and this trend is unlikely to be reversed. This will mean more pressure on such locations and worsening levels of affordability for local people. This is borne out by the evidence provided within the Housing Market Assessment (2020) which identifies Shifnal as having the 2nd worst Lower Quartile Affordability Ratio (and 4th worst Median Based Affordability Ratio) within the County.
- The current Strategy will result in successive Green Belt reviews, because it does not make adequate provisions for sites not being delivered, locational demand (and how this varies across Shropshire) and the critical situation in respect of affordability in settlements such as Shifnal. This runs contrary to NPPF advice and provides another argument for the identification of Reserve Sites to make the Plan, Sound, responsive and robust.

SHF0034

From our discussions with the Council (particularly at our meeting in November 2019), the SHF0034 site was identified because it could deliver a bypass around Shifnal. This was the fundamental reason which your Authority provided at our meetings for this site's identification (in addition to a lack of other available land at that time). However, the deliverability of this bypass, and indeed its impact on congestion in Shifnal Town Centre (including the Five Ways Roundabout junction), were not assessed at the time of the site's identification. This appears to be at odds with the requirement that proposed allocations/identified sites should be demonstrated to be achievable, suitable and available.

Moreover, the full extent of the envisaged bypass has now been discounted (in the most recent Regulation 18 Consultation), because it is not in fact deliverable. To clarify, the latest SHF034 area excludes land required to pass under the railway and make a connection to Priorslee Road; thereby failing to provide the necessary link to the M54 beyond without having to travel through the town centre or Five Ways roundabout. Therefore, the whole premise for this site's allocation has now been removed. We contend that the location of new housing in Shifnal should be revisited, given that the strategic highway improvement on which it was predicated is not achievable. This represents a material change in circumstances which has not been taken into account in the Plan's preparation.

Key concerns include, that;

- The Council have not supplied the evidence base on which they based their identification of SHF0034 as a preferred safeguarded site; particularly not from the time when the site was identified.
 - Where is the evidence in respect of the wider Highway Strategy for Shifnal? (does this site 'achieve' the suggested Highway Strategy benefits outline to us by the Council and HA when we met on November 2019).
 - Why is the Council not now pursuing the bypass, on which the release of this site was predicated? (is this site really 'suitable' to meet the original objective for which it was identified – i.e. the bypass).
 - Where is the evidence that the bypass is not needed? By intensifying traffic at 5-ways, the existing issues are likely to be exacerbated. Where is the capacity evidence for the use of the 5-ways island and any theoretical one-way system through Shifnal which has been advanced by the Council?
 - The latest Regulation 18 promoter documents appear to still include reference to the bypass but now exclude the land needed to deliver a link to Priorslee Road and the M54 beyond? (is this land 'available' in reality?)
 - How have the flooding implications of the Wesley Brook been taken into account, particularly the bridging of Wesley Brook to access the site; and
 - How have the implications for ecological impacts surrounding this new bridge been assessed and what are the costs?

SHF0035

- Greenfield sites such as SHF0035, provide the potential to deliver more affordable housing than more technically constrained Greenfield sites and Brownfield land with high infrastructure and/or remediation costs. We have provided robust evidence (at the request of the Council) to demonstrate that there are no technical constraints to the delivery of this site and that there are a range of benefits, which are not delivered by the release of SHF0034.
 - Proximity to Services;
 - Accessibility by a range of modes;
 - Delivery of direct footpath and cycle links to the town centre;
 - Development of an ecologically unconstrained intensively farmed site;
 - Avoiding locating new development in the fragile gap (as acknowledged in the Council's own evidence base) between Shifnal and Telford;
 - Avoiding locating housing in an area which is known to flood;
 - Locating housing adjacent to Shifnal's main employment allocation rounding off development in this area and enhancing the sustainability credentials of each use;
 - Delivering highway improvements to enhance access to the employment site; and
 - Mitigating any potential increase in cross town traffic and town centre congestion, which could otherwise be caused by this employment allocation as a standalone proposition.
 - The physically unconstrained and intensively farmed character of the SHF0035 site, means that the Council can make better and more efficient use of this available land. This reduces the 'relative' amount of land to be used for the housing development itself, while minimising the other impacts detailed above. The unconstrained nature of this site, (both technically and in terms of the infrastructure costs to deliver it) mean that it will have a greater capacity to deliver housing which improves affordability within Shifnal and contributes to affordable housing, because abnormal costs/considerations are minimal.

Critically, the release of the SHF0035 site, significantly enhances the performance of the proposed Allocated Employment Site (to its north) and delivers locational advantages including; enhanced accessibility which is key to the success of the Employment Site and its delivery. In this context, accessibility to the site from Wolverhampton and the southside of Shifnal will be opened up through the access enhancements proposed as part of the release and development of SHF0035. This will further enhance the 'suitability' of the proposed Employment Site, given that accessibility is critical to the success of employment developments. It will thus add support to the case for the Employment Site's 'achievability' and its ultimate 'deliverability'.

Suggested Amendments to the Plan

To address the concerns above we would request that the plan be amended in one of the following ways, which will also help to balance housing growth adjacent to the proposed employment site;

1. Identify SHF0035 as a Reserve Housing site;

2. Replace SHF0034 with SHF0035 as the preferred safeguarded land for future housing need in Shifnal; or
3. Include SHF0035 as an additional safeguarded site for Shifnal's future housing need to provide a more robust approach to delivering the housing needs of Shifnal and addressing the significant affordability issues which the town faces.

Why do we consider the Plan to be Unsound

Given the absence of a credible evidence base for the identification of SHF0034 in 2017, we remain mystified by the entrenched position which the Council have adopted, when a better site has been brought to the Council's attention through the Local Plan Review Process. Having been asked for additional technical information by the Council, which demonstrates the advantages of our Client's site, and given the absence of a commensurate evidence base for the preferred site, we consider that SHF0034 cannot have been fully considered in terms of the tests of deliverability. This is likely to lead to; poorly located and remote housing; an under delivery of housing and particularly affordable housing; and will necessitate an early Green Belt Review contrary to the provisions of the NPPF.

The approach currently adopted in Shifnal is likely to exacerbate existing affordability issues and lead to increased housing pressure and consequential house price increases, without the means to deliver more affordable housing. Given that affordable, appropriate and sufficient housing delivery goes to the heart of our planning systems objectives, the approach to this matter in Shifnal demonstrates not only a failure to provide an adequate evidence base at the time of identifying preferred locations, but an unwillingness to reconsider the options as new alternative sites come forward. Given the change made in Bridgnorth, it is clear that the Council recognises that changes can be made to the Plan even at a late stage, if these make it more robust. The failure to fully review the approach to housing delivery in Shifnal, following the availability of our Client's site, represents an opportunity missed to address affordability, accessibility and sustainability.

Based on our evidence to date, which is resubmitted with this representation for completeness, we would urge the Council to look again at the evidence and identify our Client's site for housing purposes before the Plan is taken to Examination.

Summary of Evidence in Support of the Identification of SHF0035

In summary, the release of this site will enable the delivery of a range of other benefits which would not be secured in other locations. These benefits include;

- Improved/new road linkage from Wolverhampton Road (A454) to the proposed Employment Allocation and J3 of the M54, hence reducing the impact of that development on the town centre;
- Re-routing of traffic movements away from the town centre, will provide a further high-quality route for existing residential traffic to and from the northern side of Shifnal to Wolverhampton enhancing the suitability, deliverability and accessibility of the Employment Site;
- Significant improvements to and relocation of the poor junction at A464 / Upton Lane;
- Opportunities to significantly enhance public transport accessibility to the east of the town including for established areas currently not well served by buses. This will significantly enhance accessibility for over 1,000 existing residents, plus new housing allocations and the employment land.;
- Protection and enhancement of the Old Windmill, which is a recognised local landmark;

- Provision of 22 hectares of open space and associated green corridors enhancing ecological linkage and providing enhanced access to open space for existing and new residents;
- Repurposing of the 'bio-sterile' fishing lakes to deliver an additional biodiversity net gain, alongside the delivery of more diverse habitats across the new open spaces and retained hedgerows;
- Opportunity to create a strategic walking and cycling network through and from this site to the town centre and the train station through other already allocated or reserved sites, promoting alternative sustainable trips;
- Potential to provide local services and facilities, such as increased GP surgery provision, within the masterplan; and
- Delivery of housing land 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.

Given the technical credentials of this Site and the range of related additional benefits which can be delivered through the development of this Site, in terms of;

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

The Site performs better than other options in Shifnal and should be prioritised for immediate release in the emerging plan to support the Council's policy objectives in terms of housing delivery, economic development and employment. The Site also offers the opportunity to locate new housing, so as to minimise additional cross-town traffic and provide enhanced linkage to J3 of the M54 for existing residents, alongside enhanced access to the A464 and Wolverhampton from the proposed Employment Allocation, addressing local concerns regarding the location of new homes in Shifnal.

This Site was unfortunately not available in 2017 when Shropshire Council undertook a 'Call for Sites' consultation and as a result, it was not included in consideration of Shropshire Council's 'Preferred Sites'. Late sites are however regularly brought forward in the plan making process, and Councils have the discretion to do this. Given the 'evidenced' benefits outlined in the attached technical information, we consider that allocating this Site now will provide the Council with a robust housing position at the Examination in Public and one which secures a range of additional benefits over and above meeting housing need, which are not met elsewhere.

Closing Comments

Finally, it is unfortunate that we were not given the opportunity to meet with you, to discuss the additional evidence which we provided during the last Regulation 18 Consultation. We do appreciate that there was a very small window for discussions between the Consultation closing on the 30 September 2020 and your Cabinet papers being published at the end of November (for the meeting on 7 December 2020). During this time, you were fully considering all 2,500 consultee submissions, duly made, as clearly outlined in the Regulation 19 Consultation Document, which emphasises that, *'every comment made as part of the Regulation 18 stages undertaken have been considered in arriving at the Council's Regulation 19: Pre-Submission Draft of the Shropshire Local Plan'* (para 2.24). However, given the level of investment made by our Client in providing this information, which was requested and scoped by the Council, I am sure you can appreciate that my Client is disappointed by the lack of engagement.

We would welcome a meeting in March to further discuss our Client's site and proposals. We also trust that the full evidence base will be made available for the Examination, in the interests of transparency. At that stage there should be no 'chilling effect' or requirement for a 'safe space', as the Plan will then be in the hands of the Inspector(s).

We look forward to hearing from you in respect of the above and the potential for a meeting in March.

Yours sincerely
SLR Consulting Limited

Elle Cass
 Technical Director

Read also 1 No Part A Representation Form & 14 No Part B Representation Forms and 3 No FOI responses from Council

Enclosures Attached (comprising the Nurton Evidence Base submitted to Shropshire Council in Support of the release of Land at Upton Lane, Shifnal for housing)

- Enclosure A. **Sept 2020 Consultation** 200930 Nurton Regulation 18 Stage 2&3 Assessment Reps FINAL(WA)R
- Enclosure A1. **Sept 2020 Consultation** 200930 Nurton Regulation 18 Stage 2&3 Assessment Reps FINAL
- Enclosure B. **Sept 2020 Consultation** NUR0444 EXHIBITION BOARD PLANS A3_OPT
- Enclosure C. **Sept 2020 Consultation** 21320-03a_Transport Appraisal Review
- Enclosure D. **Sept 2020 Consultation** 200930_Green Belt Appraisal Review Final
- Enclosure E. **Sept 2020 Consultation** 200930_LV Appraisal Review Final
- Enclosure F. **Sept 2020 Consultation** 200930_Heritage Appraisal Review Final
- Enclosure G. **Sept 2020 Consultation** 200930_Ecology Review Final
- Enclosure H. **Sept 2020 Consultation** 20200127jt(C1388)Flood Risk Review

- Enclosure J. **Sept 2019 Consultation** Covering Letter 9_09_2019
- Enclosure K. **Sept 2019 Consultation** Shifnal Site Promotion Rev G Final Draft to Issue

- Enclosure M. **May 2020 Additional Information Requested by LPA** Covering Letter 27_05_2020 Final
- Enclosure N. **May 2020 Additional Information Requested by LPA** NUR0444 VISION R7
- Enclosure O. **May 2020 Additional Info_200526** Supplementary Green Belt & Landscape Appraisal Shifnal
- Enclosure P. **May 2020 A21320-02_Site Appraisal Update final** Access and Highways April 2020
- Enclosure Q. **May 2020 Additional Info200504_406.02395.00004_Shifnal_HIA_V3 final**
- Enclosure R. **May 2020 200506_406.02395.00004_Shifnal_Ecological_Survey_Mitigation_Strategy**
- Enclosure S. **May 2020 Additional Info C1388-20190066** Shifnal Flood Risk 8.6.20 with append

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The failure to disclose the evidence base on which the Council made the decision to identify this site in 2017 undermines the credibility of the decision-making process and thus the Soundness of the Plan's evidence base.

Furthermore, if this circumstance has occurred in Shifnal, it is not inconceivable to assume that the evidence base for other allocations and safeguarded land might similarly be lacking a robust basis to demonstrate that sites are deliverable, particularly in terms of the tests of suitability and achievability, as well as availability.

For instance, Clive Barracks, Tern Hill, which is mainly a greenfield site, meaning that only a relatively small area of the site comprises previously developed land, notwithstanding that land beyond this footprint is proposed for development. The consequence is that the site will deliver a limited development in a location which is poorly served by any existing facilities, being locationally remote.

Moreover, the consultation process has not provided sight of the promotional documents and technical evidence which has been provided to the Council by the MOD in support of the site's release and indeed the extent of that release. This appears to be another failure in terms of the transparency of the process.

More latterly the timeframe for the site's release has been pushed back from 2022 to 2025, which is perhaps two defence reviews away. Given recent changes to the list of property which the MOD will dispose of comprising of the retention of 5 sites, including, Norton Manor Camp; Royal Marines Condor Airfield; Royal Marines Chivenor; MOD Woodbridge (Rock Barracks) and RAF Molesworth, we consider that more flexibility should be built into the Plan through the inclusion of Reserve Sites which would enable the Council to respond to any shortfall in housing delivery.

To elaborate on our concerns in terms of the evidence base, its availability to public scrutiny and wider Local Plan preparation process, we consider that there are a number of key and interrelated themes which the Council has failed to properly consider, including;

Affordability and Housing Supply

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- The Plan continues to fail to make allowance for Reserved Sites, which would meet any shortfall during this Plan period should there be an undersupply in delivery or an increase in housing affordability issues in location such as Shifnal. The recent Pandemic has already had an impact on house prices in commutable rural locations and this trend is unlikely to be reversed. This will mean more pressure on such locations and worsening levels of affordability for local people. This is borne out by the evidence provided within the Housing Market Assessment (2020) which identifies Shifnal as having the 2nd worst Lower Quartile Affordability Ratio (and 4th worst Median Based Affordability Ratio) within the County.
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SHF0034

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Moreover, the full extent of the envisaged bypass has now been discounted (in the most recent Regulation 18 Consultation), because it is not in fact deliverable. To clarify, the latest SHF034 area excludes land required to pass under the railway and make a connection to Priorslee Road; thereby failing to provide the necessary link to the M54 beyond without having to travel through the town centre or Five Ways roundabout. Therefore, the whole premise for this site's allocation has now been removed. We contend that the location of new housing in Shifnal should be revisited, given that the strategic highway improvement on which it was predicated is not achievable. This represents a material change in circumstances which has not been taken into account in the Plan's preparation.

Key concerns include, that;

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 - Why is the Council not now pursuing the bypass, on which the release of this site was predicated? (is this site really 'suitable' to meet the original objective for which it was identified – i.e. the bypass).
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 - How have the flooding implications of the Wesley Brook been taken into account, particularly the bridging of Wesley Brook to access the site; and
 - How have the implications for ecological impacts surrounding this new bridge been assessed and what are the costs?

SHF0035

- Greenfield sites such as SHF0035, provide the potential to deliver more affordable housing than more technically constrained Greenfield sites and Brownfield land with high infrastructure and/or remediation costs. We have provided robust evidence (at the request of the Council) to demonstrate that there are no technical constraints to the delivery of this site and that there are a range of benefits, which are not delivered by the release of SHF0034.
 - Proximity to Services;
 - Accessibility by a range of modes;
 - Delivery of direct footpath and cycle links to the town centre;
 - Development of an ecologically unconstrained intensively farmed site;
 - Avoiding locating new development in the fragile gap (as acknowledged in the Council's own evidence base) between Shifnal and Telford;
 - Avoiding locating housing in an area which is known to flood;
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 - Delivering highway improvements to enhance access to the employment site; and
 - Mitigating any potential increase in cross town traffic and town centre congestion, which could otherwise be caused by this employment allocation as a standalone proposition.
 - The physically unconstrained and intensively farmed character of the SHF0035 site, means that the Council can make better and more efficient use of this available land. This reduces the 'relative' amount of land to be used for the housing development itself, while minimising the other impacts detailed above. The unconstrained nature of this site, (both technically and in terms of the infrastructure costs to deliver it) mean that it will have a greater capacity to deliver housing which improves affordability within Shifnal and contributes to affordable housing, because abnormal costs/considerations are minimal.

Critically, the release of the SHF0035 site, significantly enhances the performance of the proposed Allocated Employment Site (to its north) and delivers locational advantages including; enhanced accessibility which is key to the success of the Employment Site and its delivery. In this context, accessibility to the site from Wolverhampton and the southside of Shifnal will be opened up through the access enhancements proposed as part of the release and development of SHF0035. This will further enhance the 'suitability' of the proposed Employment Site, given that accessibility is critical to the success of employment developments. It will thus add support to the case for the Employment Site's 'achievability' and its ultimate 'deliverability'.

Suggested Amendments to the Plan

To address the concerns above we would request that the plan be amended in one of the following ways, which will also help to balance housing growth adjacent to the proposed employment site;

1. Identify SHF0035 as a Reserve Housing site;

2. Replace SHF0034 with SHF0035 as the preferred safeguarded land for future housing need in Shifnal; or
3. Include SHF0035 as an additional safeguarded site for Shifnal's future housing need to provide a more robust approach to delivering the housing needs of Shifnal and addressing the significant affordability issues which the town faces.

Why do we consider the Plan to be Unsound

Given the absence of a credible evidence base for the identification of SHF0034 in 2017, we remain mystified by the entrenched position which the Council have adopted, when a better site has been brought to the Council's attention through the Local Plan Review Process. Having been asked for additional technical information by the Council, which demonstrates the advantages of our Client's site, and given the absence of a commensurate evidence base for the preferred site, we consider that SHF0034 cannot have been fully considered in terms of the tests of deliverability. This is likely to lead to; poorly located and remote housing; an under delivery of housing and particularly affordable housing; and will necessitate an early Green Belt Review contrary to the provisions of the NPPF.

The approach currently adopted in Shifnal is likely to exacerbate existing affordability issues and lead to increased housing pressure and consequential house price increases, without the means to deliver more affordable housing. Given that affordable, appropriate and sufficient housing delivery goes to the heart of our planning systems objectives, the approach to this matter in Shifnal demonstrates not only a failure to provide an adequate evidence base at the time of identifying preferred locations, but an unwillingness to reconsider the options as new alternative sites come forward. Given the change made in Bridgnorth, it is clear that the Council recognises that changes can be made to the Plan even at a late stage, if these make it more robust. The failure to fully review the approach to housing delivery in Shifnal, following the availability of our Client's site, represents an opportunity missed to address affordability, accessibility and sustainability.

Based on our evidence to date, which is resubmitted with this representation for completeness, we would urge the Council to look again at the evidence and identify our Client's site for housing purposes before the Plan is taken to Examination.

Summary of Evidence in Support of the Identification of SHF0035

In summary, the release of this site will enable the delivery of a range of other benefits which would not be secured in other locations. These benefits include;

- Improved/new road linkage from Wolverhampton Road (A454) to the proposed Employment Allocation and J3 of the M54, hence reducing the impact of that development on the town centre;
- Re-routing of traffic movements away from the town centre, will provide a further high-quality route for existing residential traffic to and from the northern side of Shifnal to Wolverhampton enhancing the suitability, deliverability and accessibility of the Employment Site;
- Significant improvements to and relocation of the poor junction at A464 / Upton Lane;
- Opportunities to significantly enhance public transport accessibility to the east of the town including for established areas currently not well served by buses. This will significantly enhance accessibility for over 1,000 existing residents, plus new housing allocations and the employment land.;
- Protection and enhancement of the Old Windmill, which is a recognised local landmark;

- Provision of 22 hectares of open space and associated green corridors enhancing ecological linkage and providing enhanced access to open space for existing and new residents;
- Repurposing of the 'bio-sterile' fishing lakes to deliver an additional biodiversity net gain, alongside the delivery of more diverse habitats across the new open spaces and retained hedgerows;
- Opportunity to create a strategic walking and cycling network through and from this site to the town centre and the train station through other already allocated or reserved sites, promoting alternative sustainable trips;
- Potential to provide local services and facilities, such as increased GP surgery provision, within the masterplan; and
- Delivery of housing land 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.

Given the technical credentials of this Site and the range of related additional benefits which can be delivered through the development of this Site, in terms of;

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

The Site performs better than other options in Shifnal and should be prioritised for immediate release in the emerging plan to support the Council's policy objectives in terms of housing delivery, economic development and employment. The Site also offers the opportunity to locate new housing, so as to minimise additional cross-town traffic and provide enhanced linkage to J3 of the M54 for existing residents, alongside enhanced access to the A464 and Wolverhampton from the proposed Employment Allocation, addressing local concerns regarding the location of new homes in Shifnal.

This Site was unfortunately not available in 2017 when Shropshire Council undertook a 'Call for Sites' consultation and as a result, it was not included in consideration of Shropshire Council's 'Preferred Sites'. Late sites are however regularly brought forward in the plan making process, and Councils have the discretion to do this. Given the 'evidenced' benefits outlined in the attached technical information, we consider that allocating this Site now will provide the Council with a robust housing position at the Examination in Public and one which secures a range of additional benefits over and above meeting housing need, which are not met elsewhere.

Closing Comments

Finally, it is unfortunate that we were not given the opportunity to meet with you, to discuss the additional evidence which we provided during the last Regulation 18 Consultation. We do appreciate that there was a very small window for discussions between the Consultation closing on the 30 September 2020 and your Cabinet papers being published at the end of November (for the meeting on 7 December 2020). During this time, you were fully considering all 2,500 consultee submissions, duly made, as clearly outlined in the Regulation 19 Consultation Document, which emphasises that, *'every comment made as part of the Regulation 18 stages undertaken have been considered in arriving at the Council's Regulation 19: Pre-Submission Draft of the Shropshire Local Plan'* (para 2.24). However, given the level of investment made by our Client in providing this information, which was requested and scoped by the Council, I am sure you can appreciate that my Client is disappointed by the lack of engagement.

We would welcome a meeting in March to further discuss our Client's site and proposals. We also trust that the full evidence base will be made available for the Examination, in the interests of transparency. At that stage there should be no 'chilling effect' or requirement for a 'safe space', as the Plan will then be in the hands of the Inspector(s).

We look forward to hearing from you in respect of the above and the potential for a meeting in March.

Yours sincerely
SLR Consulting Limited

Elle Cass
 Technical Director

Read also 1 No Part A Representation Form & 14 No Part B Representation Forms and 3 No FOI responses from Council

Enclosures Attached (comprising the Nurton Evidence Base submitted to Shropshire Council in Support of the release of Land at Upton Lane, Shifnal for housing)

- Enclosure A. **Sept 2020 Consultation** 200930 Nurton Regulation 18 Stage 2&3 Assessment Reps FINAL(WA)R
- Enclosure A1. **Sept 2020 Consultation** 200930 Nurton Regulation 18 Stage 2&3 Assessment Reps FINAL
- Enclosure B. **Sept 2020 Consultation** NUR0444 EXHIBITION BOARD PLANS A3_OPT
- Enclosure C. **Sept 2020 Consultation** 21320-03a_Transport Appraisal Review
- Enclosure D. **Sept 2020 Consultation** 200930_Green Belt Appraisal Review Final
- Enclosure E. **Sept 2020 Consultation** 200930_LV Appraisal Review Final
- Enclosure F. **Sept 2020 Consultation** 200930_Heritage Appraisal Review Final
- Enclosure G. **Sept 2020 Consultation** 200930_Ecology Review Final
- Enclosure H. **Sept 2020 Consultation** 20200127jt(C1388)Flood Risk Review

- Enclosure J. **Sept 2019 Consultation** Covering Letter 9_09_2019
- Enclosure K. **Sept 2019 Consultation** Shifnal Site Promotion Rev G Final Draft to Issue

- Enclosure M. **May 2020 Additional Information Requested by LPA** Covering Letter 27_05_2020 Final
- Enclosure N. **May 2020 Additional Information Requested by LPA** NUR0444 VISION R7
- Enclosure O. **May 2020 Additional Info_200526** Supplementary Green Belt & Landscape Appraisal Shifnal
- Enclosure P. **May 2020 A21320-02_Site Appraisal Update final** Access and Highways April 2020
- Enclosure Q. **May 2020 Additional Info200504_406.02395.00004_Shifnal_HIA_V3 final**
- Enclosure R. **May 2020 200506_406.02395.00004_Shifnal_Ecological_Survey_Mitigation_Strategy**
- Enclosure S. **May 2020 Additional Info C1388-20190066** Shifnal Flood Risk 8.6.20 with append

26 February 2021

Liam Cowden
Planning Policy and Strategy Manager
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury, SY2 6ND

Our Ref: 406.02395.00004

Dear Liam,

RE: REGULATION 19 SUBMISSION ON BEHALF OF NURTON DEVELOPMENT IN RESPECT OF THEIR LAND INTERESTS AT NEWPORT ROAD, COSFORD - TO INFORM SHROPSHIRE COUNCIL'S LOCAL PLAN PARTIAL REVIEW 2016 – 2038

We fully support the underlying principles Policy S21 and its development growth objectives, which will support and help to transform RAF Cosford into a Centre for Excellence, delivering a flexible, affordable, modern and effective technical training centre which meets the needs of the UK's Armed Forces now and into the future. It is evident that this Site has huge potential to grow as recognised by the RAFs figures. However we consider that the proposal is currently 'unsound' because of the failure to identify well located land for new housing to support this expansion, and to provide alternatives to RAF Base housing for Service Personnel, Retiring Service Personnel and Civilian Staff who will all be drawn to the area with the expansion of the site

By identifying RAF Cosford as a 'Strategic Site' and releasing it from the Green Belt, Shropshire Council will help to support the long-term sustainability of the site in terms of the Plans to turn the site into a Centre for Excellence, ensuring its continued use as a MOD facility and providing opportunity for future associated employment uses. This will support the Council's Economic Growth Strategy in terms of attracting more high skilled people to the County, however the failure to allocate land to provide housing choice within walking distance of the Base will undermine the objective of retaining people in Shropshire in the longer term.

We believe that our Client's Site provides a clear and necessary opportunity to deliver housing choice which will attract and retain higher skilled people in the area and should be prioritised for early housing delivery or protected for long-term housing need via safeguarding. Any development could be tailored to deliver a mix of private sector market housing and affordable provision aimed at services personnel, retired service personnel and civilian support staff. The release of the site will enhance choice and enable people to access property close to where they work, (helping to address the Climate Emergency) and also support the County's objective to retain and grow a skilled workforce.

Why we consider the plan to be Unsound

The Plan is considered to be unsound because the Strategic release of the Cosford RAF Base is not supported by adequate provision for new housing choice to support the growth planned, to enable people live in locations where they can walk or cycle to work. This makes Policy S21 (Strategic Site RAF Cosford) unsustainable and fails to address the Climate Emergency declared last year by the Council.

The proposals are also considered unsound as they do not address the Council's own Sustainability Objectives set out in the Sustainability Appraisal (SO5 'encouraging the use of sustainable means of transport' and SO6 'Reduce the need of people to travel by car').

Furthermore, without sufficient suitably located housing land, the growth of the Base will put pressure on the important gap between Cosford and Albrighton and will exacerbate local affordability issues, which cannot be addressed in Albrighton due to the tightly drawn development boundary.

Suggested Amendments to the Plan

With regard to Policies DP25 (Green Belt and Safeguarded Land) and S21 (Strategic Site RAF Cosford) or S1 (Albrighton Place Plan Area), we are seeking an amendment to the policies to allow the allocation (or safeguarding) of land at Newport Lane, Cosford which should be removed from the Greenbelt and allocated for housing development to support the strategic growth objectives of RAF Cosford.

Closing Comments

Finally, it is unfortunate that we were not given the opportunity to meet with you, to discuss the additional evidence which we provided during the last Regulation 18 Consultation. We do appreciate that there was a very small window for discussions between the Consultation closing on the 30 September 2020 and your Cabinet papers being published at the end of November (for the meeting on 7 December 2020). During this time, you were fully considering all 2,500 consultee submissions, duly made, as clearly outlined in the Regulation 19 Consultation Document, which emphasises that, *'every comment made as part of the Regulation 18 stages undertaken have been considered in arriving at the Council's Regulation 19: Pre-Submission Draft of the Shropshire Local Plan'* (para 2.24).

We would welcome a meeting in March to further discuss our Client's site and proposals. We also trust that the full evidence base will be made available for the Examination, in the interests of transparency. At that stage there should be no 'chilling effect' or requirement for a 'safe space', as the Plan will then be in the hands of the Inspector(s).

We look forward to hearing from you in respect of the above and the potential for a meeting in March.

Yours sincerely

SLR Consulting Limited



Elle Cass

Technical Director

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- **Enclosure J. Sept 2019 Consultation** Covering Letter 9_09_2019
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Representation Form

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Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
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- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

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

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="DP3"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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

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

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

See comments on Housing, Affordability and Shifnal/Cosford as set out in accompanying letter 26 February 2021.
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(Please continue on a separate sheet if necessary)

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

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Signature:

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Date: 26/02/2021

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Office Use Only	Part A Reference:
	Part B Reference:



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Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
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- (Please tick one box)

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

Paragraph: Policy: Site: Policies Map:

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

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Part A Reference:

Part B Reference:

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Part B Reference:

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Paragraph:	<input type="text"/>	Policy:	<input type="text" value="New Policy"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Signatur

Date: 26/02/2021

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See comments on Housing, Affordability and Shifnal/Cosford as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

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

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

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

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

(Please continue on a separate sheet if necessary)

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

Signature: |

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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

Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
------------------------	--

Q1. To which document does this representation relate?

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

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

Paragraph:

Evidence Omissions

 Policy:

--

 Site:

--

 Policies Map:

--

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

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

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

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

See comments on Housing, Affordability and Shifnal/Cosford as set out in accompanying letter 26 February 2021.
--

(Please continue on a separate sheet if necessary)

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

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

See comments on Housing, Affordability and Shifnal/Cosford as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

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

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

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

We are concerned that the technical evidence base on which the allocations have been made has not been made public through the process

(Please continue on a separate sheet if necessary)

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

Signature:

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
------------------------	--

Q1. To which document does this representation relate?

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

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

Paragraph: Policy: Site: Policies Map:

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

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

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

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

See comments on Housing, Affordability and Cosford as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

See comments on Housing, Affordability and Cosford as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

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

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

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

(Please continue on a separate sheet if necessary)

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

Signature:

--	--

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

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

Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
------------------------	--

Q1. To which document does this representation relate?

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

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

Paragraph: Policy: Site: Policies Map:

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

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

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

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

See comments on Housing, Affordability and Cosford as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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See comments on Housing, Affordability and Cosford as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

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

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

(Please continue on a separate sheet if necessary)

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

Signature: [

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
------------------------	--

Q1. To which document does this representation relate?

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

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

Paragraph: Policy: Site: Policies Map:

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

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

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

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

See comments on Housing, Affordability and Cosford as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

See comments on Housing, Affordability and Shifnal/Cosford as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

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

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

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

(Please continue on a separate sheet if necessary)

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

Signature: [

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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

Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
------------------------	--

Q1. To which document does this representation relate?

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

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

Paragraph:	<input type="text"/>	Policy:	<input type="text"/>	Site:	SHF0034	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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

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

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

See comments on Housing, Affordability and Shifnal as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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See comments on Housing, Affordability and Shifnal as set out in accompanying letter 26 February 2021.

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

(Please continue on a separate sheet if necessary)

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

Signature:

--

Date: 26/02/2021

--

Office Use Only	Part A Reference:
	Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
------------------------	--

Q1. To which document does this representation relate?

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

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

Paragraph: Policy: Site: Policies Map:

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

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

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

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

See comments on Housing, Affordability and Shifnal as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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See comments on Housing, Affordability and Shifnal as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

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

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

(Please continue on a separate sheet if necessary)

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

Signature: [

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
------------------------	--

Q1. To which document does this representation relate?

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

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

Paragraph:	<input type="text"/>	Policy:	<input type="text"/>	Site:	<input type="text" value="SHF018b"/> <input type="text" value="SHF018d"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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

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

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

See comments on Housing, Affordability, Access and Shifnal as set out in accompanying letter 26 February 2021.
--

(Please continue on a separate sheet if necessary)

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

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

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing (and employment) which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

(Please continue on a separate sheet if necessary)

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

Signature:

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Elle Cass, SLR Consulting on Behalf of Nurton Developments Ltd
------------------------	--

Q1. To which document does this representation relate?

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

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

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

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

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

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

See comments on Housing, Affordability and Shifnal as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

See comments on Housing, Affordability and Shifnal as set out in accompanying letter 26 February 2021.

(Please continue on a separate sheet if necessary)

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

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

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

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

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

(Please tick one box)

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

To fully detail our concerns regarding the evidence base, the plan preparation process and to ensure the delivery of sufficient housing which addresses the affordability issues faced by the County and avoids the need for future successive Green Belt reviews.

(Please continue on a separate sheet if necessary)

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

Signature

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference: