

LAND TO EAST OF SHIFNAL, SHROPSHIRE

SHROPSHIRE REG 19 PRE-SUBMISSION DRAFT LOCAL PLAN

18 DECEMBER 2020 – 5 FEBRUARY 2021

HARROW ESTATES

FEBRUARY 2021



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1 Introduction

1.1 This document comprises representations submitted to the Shropshire Local Plan Review – Regulation 19 pre-submission draft Local Plan. They are made on behalf of Harrow Estates, and their interest in promoting land parcels to the east of Shifnal, which are within the ownership of Ruckley Estate:

- SHF18b & 18d: (Employment parcels 39ha c.15.6a employment floorspace)
- SHF018c (Residential parcels for safeguarded strategic land 29.7ha)
- SHF032: (Residential parcel 2.8ha for c.80 homes)

1.2 The representations respond to the draft policies contained in the pre-submission draft Local Plan and strengthen the case presented in previous representations submitted to the draft Local Plan (February 2019 and September 2020).

1.3 The representations demonstrate that given the particular characteristics of the aforementioned sites and their surroundings, development of these parcels will provide the most appropriate solution to accommodating Shifnal's growth as part of Shropshire's short, medium and long-term development needs. Accordingly, these sites are promoted for inclusion as development allocations in the draft Local Plan.

1.4 The representations demonstrate support from Ruckley Estate and Harrow Estates for the proposed employment allocations SHF018b and SHF018d. The sites are viable, readily available and deliverable sites, and represent the most appropriate option for the locality for employment use. They have been made in accordance with the employment led growth strategy for the area.

1.5 Site SHF032 was previously allocated for residential development as a Preferred Site Allocation in February 2019, however, was withdrawn from the draft Local Plan at Regulation 18 stage in September 2020 following comments made by Historic England. As with our response to the Regulation 18 consultation, these representations continue to seek to reinstate allocation SHF032 which had been previously considered appropriate for Green Belt release and considered acceptable in principle for residential development by Shropshire Council. We consider such development would not only be sustainable but would also play an important role in helping to meet local housing needs, whilst ensuring that heritage interests are protected.

1.6 We note that the draft plan continues to identify safeguarded land, to meet future development need beyond the plan period. We concur with this position but highlight that alternative safeguarded land, as referenced above (SHF018c), has been previously submitted for consideration as part of representations to Local Plan consultations on behalf of Ruckley Estate and Harrow Estates. We continue to promote this land as a reasonable and preferable alternative to the currently proposed safeguarded land to the south west of Shifnal, when

considering the locational benefits and SA objectives, including when measured against the Green Belt release tests. It offers a more sound and robust approach to safeguarded land, to meet needs beyond the plan period. Given the requirements of the NPPF paragraph 139, the fact that a preferable site is available, which ensures consistency with the plan strategy and SA objectives, indicates that the plan should be modified to safeguard site SHF18c if it is to be found sound.

1.7 The representations propose policy wording amendments as appropriate in the context of the above sites (appendix 2), seeking to ensure the plan, policies and site allocations are sound, robust and sufficiently flexible for the lifetime of the adoption.

1.8 To confirm, the representations specifically comment on the following policies:

- SP1 – The Shropshire Test
- SP2 – Strategic Approach
- SP4 – Sustainable Development
- SP7 – Managing Housing Development
- SP11 – Green Belt and Safeguarded Land
- SP12-Shropshire Economic Growth Strategy
- SP13 – Delivering Sustainable Economic Growth and Enterprise
- SP14 – Strategic Corridors
- DP23 – Conserving and Enhancing the Historic Environment
- DP25 – Infrastructure Provision
- DP28 – Communications and Transport
- S15 – Shifnal Place Plan Area
- Appendix 7 – Forecast of Delivery Timescales for Local Plan Allocations

1.9 It is confirmed within these representations that Ruckley Estate and Harrow Estates support the draft plan overall in terms of its general approach, including the need for Green Belt review and for development at Shifnal, but consider Main Modifications are required, as set out below, in order for the plan to be found sound. These Main Modifications can be pursued without amending the general approach to the level or distribution of development across the district and without undermining the plan as a whole. Hence, they can be progressed through the examination process, moving forward towards adoption. They do not represent a fundamental change in the planned strategy but are necessary to demonstrate and justify the plan in the context of both exceptional circumstances and the requirement for deliverable / effective policy.

- 1.10 In summary, we support for the growth strategy, identification of Shifnal as key location, and the principle of Green Belt release. In supporting the SHF018b & 18d allocations for employment land, SHF032 and SHF018c would further complement the sustainable growth of Shifnal, and its role within the County. The sites are readily available and deliverable now and offer the most suitable option, and a sound option, for development in Shifnal.

2 Land East of Shifnal

- 2.1 This section outlines the suitability of Land East of Shifnal, with regard to the proposed allocation of land for employment and residential development (references: SHF032, SHF018b, SHF018c, SHF018c). As previously noted, all sites are within single land ownership and are readily deliverable.

Shifnal as a centre for growth

- 2.2 Shifnal is a compact and walkable town, offering a range of services, supporting the local community. The town benefits from key transport infrastructure by road (notably the M54 connecting to Telford and Birmingham), rail via Shifnal Station (connecting to Shrewsbury and Wolverhampton), and bicycle (National Cycle Route 81 connecting Aberystwyth and Wolverhampton). As outlined in the Council's evidence base and referenced in these representations, Shifnal as a key centre within the M54 corridor has a strategically important role in supporting Shropshire's future housing and employment growth needs. The M54 corridor in particular is highlighted as being a main strategic gateway for both Shropshire and its neighbouring local authorities. It is identified locally and regionally as a key growth corridor resulting from the strong transport links present and the economic potential associated with the presence of nationally significant education, training and employment opportunities. The proposed employment and residential allocations promoted by these representations therefore have significant scope to support this growth potential to the east of Shifnal.

Proposed employment allocations SHF018b & SHF018d

- 2.3 Shifnal has the opportunity to greatly diversify the employment offer in the town, rebalancing with recent residential growth, and within its wider strategic context. Dedicated employment land within Shifnal is currently limited to Lamledge Lane Industrial Area (Shifnal Industrial Estate) to the east of the town. The economic case for additional employment land in the town is clear when reviewing the following:

- Shifnal has historically experienced limited expansion in employment land over the last 10 years which has significantly constrained economic growth, in part due to lack of appropriate sites being identified.
- Due to housing need pressure and a 5 year land supply shortfall, Shropshire Council has also approved residential development on land previously identified for employment purposes.
- In recent years, the local impact area has seen a decline and stagnation in employment, which fell by 8% from 2015 to 2016 and remained at the same level until 2018, whilst Shropshire and Great Britain have seen growth of 4% and 5% respectively from 2015 to 2018.
- Shifnal lacks the presence of major employers. Development of additional employment land therefore would have the potential to attract more significant businesses to Shifnal and present opportunities for growth of existing businesses which would bring balance to the structure of Shifnal's business base.
- Shifnal is the seventh largest employment centre in Shropshire and home to 2,750 jobs. However, the area has a low job density of 500

jobs per 1,000 working aged population, compared to an average of 760 jobs per 1,000 working aged population nationally. The relatively low job density seen in Shifnal reflects a sustained period of lower investment into new employment sites.

- Office vacancy rates in Shifnal have been very low in recent years. According to CoStar data, in 3 out of the 5 last years, there was no vacant space in Shifnal. Furthermore, Shifnal's office inventory has remained the same over recent years as there been no construction new office space and currently there is no significant office development in progress locally. Equally, there has been very little vacant industrial/light industrial space and storage in and around Shifnal (less than 1%). Within the wider M54 corridor this is even more acute with a vacancy rate of 0.4%.
- As outlined in further detail in the appended Employment Land Study, the development of the employment sites in Shifnal would allow the town to contribute to the economic potential of high growth and strategic sectors within Shropshire. According to Local Authority and Oxford Economics forecasts, there will be the largest growth in the Real Estate and Professional Sector (£413m), Wholesale and retail trade (£363m), Scientific and technical sectors (£355m).

- 2.4 With limited land currently dedicated to employment within Shifnal therefore, there is considered to be significant potential to the east of the town, given its location within the M54 corridor, to diversify the employment provision in terms of scale, quality and use. Employment allocations SHF018b and SHF018d are strategically well placed to maximise this potential and fulfil Shifnal's chronic need for new employment land and address the imbalance of uses within the locality.
- 2.5 Ruckley Estate and Harrow Estates strongly support the employment allocation of Land East of Shifnal Industrial Estate (Lamledge Industrial Area), Upton Lane, which is within the ownership of Ruckley Estate. It is readily available and deliverable to assist with meeting local employment need. With approximately 15.6ha of employment floorspace provided across the two sites (39ha site area combined), the allocation will improve the offer of commercial premises in Shifnal. As proposed, it would be located adjacent to the existing employment site on the eastern side of Shifnal, and create a stronger edge-of-settlement industrial/commercial location, characterised by employment uses. Traffic generated from the proposed allocations and large service vehicles will be able to access from the M54/A41 junction link, and not travel through the town centre road network.
- 2.6 The accompanying indicative employment masterplan (Appendix 6) outlines a potential layout, with central access point between the two parcels with a complementary verdant landscaping scheme. The approach taken to the masterplanning of the employment sites is strongly influenced by its landscaping response. The layout has been guided by the specific characteristics and form of the site. The green infrastructure has been designed to be naturalistic and create an appropriate landscape setting for pavilion buildings to sit within. Strong green corridors have been incorporated to sensitively align with the site's topography, resulting in a layered response, and mitigating the visual impact of the sloping site. The inclusion of new woodland, connecting to the existing, will also provide a tree-lined backdrop to the development. In addition to the

transport, landscape, built heritage and employment land study appended to this submission, the masterplan has been informed by technical assessments including a topographical survey, ecological assessment, flood risk and drainage strategy, utilities survey, and archaeology desk-based assessment.

- 2.7 The employment allocations are located in a highly sustainable location, on the eastern edge of Shifnal with excellent opportunities for future residents and employees to travel to the Town Centre on-foot or by bicycle. In terms of walking and cycling routes, the site will be developed with a focus on prioritising pedestrian activity and cycle movements within the site to encourage non-car modes.
- 2.8 The proposed design approach has been developed to be consistent with the development guidelines for the site. It will include the provision of high quality and flexible employment floorspace to respond to the needs of a range of occupiers and current market requirements. The indicative employment masterplan delivers on the aspiration of a landscape-led 'campus' where development sits within a strong landscape framework. Overall, the sites are deliverable and considered to have a critical role in supporting the economic growth potential of Shifnal in this strategic location within the M54 corridor.

Proposed residential allocation SHF032

- 2.9 Site SHF032 forms a small parcel of land located on Coppice Green Lane, north of the access road to Aston Court Mews and opposite Idsall School. The northern section of its eastern boundary is formed by a thick belt of woodland.
- 2.10 This site was previously allocated for residential development and its removal from the Green Belt was deemed to be acceptable and justified by the Council. The benefits of this as a residential allocation have therefore already been established and are considered to similarly apply at this Regulation 19 consultation stage.
- 2.11 A Built Heritage Assessment for SHF032 is appended to this submission (Appendix 9a). It was prepared as part of a part of pre-application discussions with Historic England. Appendix 9b is the rebuttal letter issued to Shropshire Council, following the pre-application meeting with Historic England, outlining concerns with the assessment approach undertaken. The rebuttal letter clarifies this concern, and reiterates that the introduction of built form to the SHF032 would cause a minor degree of harm to Aston Hall's significance (within the spectrum of less than substantial harm). However, this level of harm is not considered to be at such an extent to warrant an in principle objection to allocate the site for residential development. Other sites have been developed to the west and south of Aston Hall in recent years including a three-storey care home (application ref. 19/00494/REM), with no concerns raised in regard to heritage impact.
- 2.12 As noted in the Council's 5-year Housing Land Supply Statement (March 2020), small scale windfall sites have 'always represented a significant component of the housing land supply in Shropshire, and it is anticipated that this will remain the case.' Furthermore, this has principally derived from 'recycling of previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings.' The delivery of these types of windfall sites is highly uncertain, particularly in the context of the current economic climate. In addition, these sites are not necessarily coming forward in

locations of greatest housing need, such as Shifnal. Consequently, the reinstatement of allocation SHF032 has the potential to reduce the reliance on windfall sites whose delivery is unreliable. It also ensures that housing is being delivered where it is needed most. Windfall sites, most notably those derived from rural buildings and barns, are unlikely to serve Shifnal's housing need to the same extent that it would in other, more rural, parts of Shropshire.

- 2.13 The proposed reinstated residential allocation at SHF032 will provide up to 80 dwellings, is readily available and can be delivered early within the plan period. The Shifnal Settlement and Growth Study (Appendix 4), which accompanies these representations, outlines how development can come forward, complementing the land opposite currently under construction. The design approach is centred on a development pattern in keeping with Shifnal's character, as well as respecting existing key landscape and historic features. This could be delivered in isolation, or would be able to connect with the alternative safeguarded land at SHF018c described below.

Proposed safeguarded residential land SHF018c

- 2.14 The opportunity also exists to create a new edge to the settlement through the inclusion of proposed safeguarded land at SHF018c which would round off the settlement boundary to the north of the employment allocations, without resulting in any coalescence and merging with Telford to the west. This is the position as currently proposed through this draft emerging Local Plan with the proposed safeguarding of site references SHF017 north, SHF017 south, P15b and SHF019.
- 2.15 The settlement growth study (Appendix 4) demonstrates the benefits and logic of growth to the east of Shifnal for residential land, to be delivered in addition to the proposed employment land allocation at SHF018 b & 18d.
- 2.16 The alternative safeguarded land is sustainably located within walking distance of existing Shifnal town centre services, and close to primary and secondary schools. It is well located on the eastern edge of the town, adjacent to existing employment uses and with convenient access via Stanton Road, to the A41 and Junction 3 of the M54 beyond, thus avoiding the town centre. A network of pedestrian and vehicular routes could also link between Coppice Green Lane and Stanton Road, connecting to National Cycle Route 81. The proposed design approach has included careful consideration of the setting of the Grade II listed heritage asset (Aston Hall and Grounds) to the south west of SHF018c. This includes a significant setback in the development line and inclusion of an enhanced landscaping buffer and tree belt as appropriate mitigation.
- 2.17 The strength and importance of the sustainable location, offering links to existing local services, proposed employment allocations at SHF018b/18d, and a network of green spaces within and around the site is further emphasised by potential implications of Covid-19 on living and working environments. The value of outside space and walking permeability of local areas has been magnified over recent months. The site is controlled by a single landowner who also controls land beyond the identified site boundary which could facilitate further opportunities for pedestrian access and walking routes, where appropriate.
- 2.18 In summary, it is highlighted that:

- The proposed design approach will ensure that there is limited impact on the Green Belt for the following reasons:
- This area makes a weaker contribution to the five main purposes of the Green Belt;
- The landscape is visually contained and so any development would not be viewed as unplanned urban sprawl;
- The housing would be well-located in relation to existing schools and within walking distance of the Town Centre and the proposed employment allocation;
- Stanton Road provides a convenient link to the A41 and the M54, and opportunity for school bus service, without the need to travel through the Town Centre;
- Development of this section of land from Green Belt would not be harmful overall to the five purposes given the level of physical and visual containment with development (Appendix 8);
- Notwithstanding the Green Belt designation, the site is not subject to physical or environmental constraints or technical obstacles to delivery;
- The site assessed on its own merits is worthy of a residential allocation in the context of the level of housing need, the overarching spatial strategy and settlement hierarchy, relationship with the urban area and its containment.
- Development of this site avoids further coalescence between Shifnal and Telford.

- 2.19 The site offers sufficient capacity to accommodate an appropriate scale of additional residential development, where required. Alongside this, the land is also able to accommodate the provision of additional community facilities. This includes the potential for a medical centre and/or day nursery, local play areas, and green space which would be accessible for existing residents of Shifnal, as well as future residents, as part of a new neighbourhood.
- 2.20 In terms of Green Belt release, SHF018c offers a justified and effective alternative to the safeguarded land identified in the Reg 19 Local Plan. Importantly, it would allow a flexible approach of a smaller, rolling-scale release of Green Belt in order to respond to shorter-term need. This is considered to be a more robust approach to take in the safeguarding of land at Shifnal. By doing so, the safeguarded land would be of a more proportionate scale to meet potential future development requirements. In short, the current planned approach is reliant on the release / safeguarding at a significant scale, far beyond that which is likely to be necessary beyond this plan period based on current evidence of development need. This would not be the case with SHF018c. At c.50% smaller than parcels identified to the south-west, the release of valued Green Belt land would not need to be as extensive as currently proposed.
- 2.21 With a Local Plan review scheduled for every 5 years, SHF018c offers an appropriate smaller option for safeguarding purposes at this stage, than the current identified land to the South-West of Shifnal. This is in addition to the parcel-specific merits assessed in the Settlement Study, development pattern, the principles of Green Belt protection purposes and Sustainability Appraisal

objectives, which are discussed within these representations and supporting documents.

- 2.22 The transport assessment (Appendix 7b) demonstrates the potential to reduce level of traffic generated on the local highway network through effective behaviour change/mode shift initiatives. As a comparison to the current safeguarded land to the south-west, the area to be safeguarded no longer includes land at parcel 17a. This will therefore not allow for delivery of a full bypass between the A462 south and west and across the railway line, as originally anticipated. The proposed bypass based upon the extent of safeguarded land will now only be partial and is unlikely to present any benefit for through traffic using the A464. When this is considered alongside the benefits of delivering residential development adjacent to planned employment development and proximity to local school provision, SHF018c represents a more suitable alternative.
- 2.23 It is further noted that land associated with SHF018c was discussed at Shifnal Town Council committee (22.09.20), as part of P11 in the Green Belt Review. Whilst we understand that this recommendation was not taken forward, in favour of an objection in principle, it indicates recognition that SHF018c should be considered as an alternative option to the south western safeguarded land.
- 2.24 The meeting note includes:

- *“A suggestion was made at the Committee meeting, that an additional paragraph be added in the Shifnal Safeguarded Land section recommending that part of Parcel P11 shown on the Green Belt Assessment Review (land east of Coppice Green Lane) be recommended for inclusion as Safeguarded Land as an alternative to the Parcel P16/part P17a (land south and west of Shifnal) proposed in the draft Plan. These parcels are shown on the Plan attached to the agenda. The Committee agreed to put this suggestion to Council for decision”.*

(Paragraph 1.2 of Shifnal Town Council Report of Planning Committee to Council) ¹

A comprehensive approach to development

- 2.25 There may be the opportunity to explore a wider comprehensive development strategy which includes all promoted parcels around the east, south and west of Shifnal. It is however stated that delivery of SHF032, SHF018b, SHF018c and SHF018d could be delivered independently and would not be reliant on the other parcels. The option is suggested however for further consideration in the context of strategic scale requirements as a sustainable growth strategy for Shifnal.

¹[https://www.shifnaltowncouncil.gov.uk/STC/uploaded_photos/REPORT%20OF%20PLANNING%20COMMITTEE%20TO%20COUNCIL%2022%20\(002\).pdf](https://www.shifnaltowncouncil.gov.uk/STC/uploaded_photos/REPORT%20OF%20PLANNING%20COMMITTEE%20TO%20COUNCIL%2022%20(002).pdf)

3 Response on particular draft paragraphs and policies

- 3.1 The following section presents representations on specific draft policies within the Shropshire Local Plan Review.

Policy SP1 (The Shropshire Test)

- 3.2 Draft Policy SP1 sets out those issues considered of most importance in supporting Shropshire's growth and ensuring this takes place in a sustainable manner. Ruckley Estate and Harrow Estates support the approach that development at Shifnal will contribute to meeting local needs in the right place and should provide the right mix of new housing and employment. The principle of making efficient use of land whilst also balancing design, community and natural environment factors is also considered a sound policy basis.
- 3.3 The allocation of circa 15ha of employment floorspace at SHF018b and SHF018d reflects this ambition, focusing development in a highly sustainable location to the east of the settlement of Shifnal, the strategy can assist in achieving a greater level of self-containment for the town and reducing the need to travel, which has substantial benefits across all three objectives of sustainability (economic, social and environmental, noting with respect to the latter that Shropshire Council has declared a climate change emergency). The proximity with the Lamledge Industrial Area (Shifnal Industrial Estate) and proposed residential allocations further ensures that it makes a key contribution to supporting the creation of a cohesive community to the east of Shifnal, thus according with part b) of the draft Policy.
- 3.4 The proposed design approach to SHF018b and SHF018d is also considered to align with the expectation of part e) of the draft Policy for development to raise design standards, as well as making efficient use of land in line with part f) of the draft Policy. This is outlined in more detail in the accompanying Shifnal Settlement and Growth Study and Section 4 of these representations.
- 3.5 Equally, sites SHF032 and SHF018c are considered to adhere to the strategic objectives and requirements of The Shropshire Test. These alternative safeguarded land options are sustainably located within walking distance of existing Shifnal town centre services and, being located on the east side of the town, clearly look towards Shifnal for these services and to the employment allocations for work opportunities, rather than Telford. This again will encourage local movement, reducing the requirement or desire to make longer journeys and therefore contributing to settlement containment. To this extent they should be preferred, and clearly, the alternative would also ensure the provision of additional community facilities and green space for the benefit of existing and future residents, supporting the creation of cohesive communities, thus according with parts b) and g) of the Shropshire Test.

Policy SP2 (Strategic Approach)

- 3.6 The policy objective of draft Policy SP2 to direct development in sustainable and appropriate patterns, with a particular focus on principal and key centres, is supported. Furthermore, adoption of a strategic approach which is designed to both accommodate and maximise investment opportunities is welcomed and considered essential in supporting the County's growth both during and beyond the plan period.

- 3.7 Paragraph 3.17 outlines that to achieve the aspirations in the Economic Growth Strategy for Shropshire, it is important to encourage appropriately located and high-quality new employment development which contributes to making Shropshire more productive, prosperous and sustainable. In addition, an employment requirement for Shropshire of around 300ha of employment land is identified over the plan period. This includes the provision of 30ha unmet employment needs from within the Black Country. The policy approach contained in draft Policy SP2 is, accordingly, considered to adhere to the economic objective outlined in the NPPF (paragraph 80) for significant weight to be placed ‘on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.’
- 3.8 As noted in the Shropshire Employment Land Review prepared by Avison Young (December 2019), Shifnal has a ‘significant role as a key centre’ and contributes ‘towards the strategic growth objectives in the east of the County.’ The strategic economic role of Shifnal and the employment allocations SHF018b and SHF018d reflect this significant role and aligns with the County’s strategic economic growth requirements and potential outlined in draft Policy SP2.
- 3.9 Having confirmed Shifnal as an appropriate location to accommodate employment growth, the key sustainability issue is to ensure that future new housing growth clearly looks to those new employment opportunities, to optimise the potential for local living; encouraging local patterns of live-work. This represents good growth.

Housing need

- 3.10 In relation to housing delivery, draft Policy SP2 states that around 30,800 new dwellings will be delivered across the plan period which equates to around 1,400 dwellings per annum. As outlined in paragraph 3.5, Shropshire Council has undertaken an assessment of the local housing need based on the Government’s Standard Methodology, which indicates a housing need of 25,894 dwellings over the plan period (2016 to 2038) as of April 2020. This equates to an annualised housing need figure of 1,177 dwellings per annum (dpa). In appraising the housing need figure and consequently the required housing delivery, this should be viewed in the context of the NPPG which outlines that the standard method for local housing need is a ‘formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure.’ We support the identification of a requirement above the minimum, aligned with Shropshire’s growth aspirations, which provides flexibility and contingency, it is a justified and effective means to ensure delivery of an appropriate scale of development to meet needs.

Employment need

- 3.11 The local plan aims to deliver around 300 hectares of employment development from 2016 to 2038 and to support development on allocated sites. This policy approach is considered sound and supported by Ruckley Estate and Harrow Estates. The employment land at Shifnal will assist in meeting this need, at c.13% of the total provision. It is acknowledged that Economic Development Needs Assessment (EDNA) (December 2020) identifies up to 264 ha required for the plan period. The Council has however adopted an approach to exceed this target of forecasted growth as a response to facilitate a ‘step change’ in

economic growth in the County over the plan period, as part of the Economic Growth Strategy.

- 3.12 The delivery of this level of employment development is critical to deliver on and facilitate the County's ambition for sustainable economic growth contained in the Economic Growth Strategy for Shropshire. This strategy aims to achieve £300 million of private sector investment over the next 5 years and at least 3,700 new jobs.
- 3.13 Even at the lower end of the range, there is an identified need for employment land. SHF018 and SHF018d are suitable, sustainable locations for such development due to the links to the M54 corridor links and ability to serve local need within Shifnal.

Black Country unmet need

- 3.14 Correspondence from the Association of Black Country Authorities (ABCA) has highlighted that, with the exception of Shropshire, 'other local authorities are either not currently progressing Local Plan reviews, have very limited physical capacity themselves or consider themselves to be too remote from the Black Country to be able to reasonably meet our needs.' Shropshire therefore represents one of the preferred locations to meet this unmet need. As outlined in the Green Belt Exceptional Circumstances statement (published August 2020), Shropshire proposes to accept a degree of this unmet need equal to 1,500 dwellings and 30ha of employment. In accepting this degree of unmet need however, Shropshire has not stated where this additional housing or employment need is expected to be accommodated within the County. The Local Plan does not make any specific land allocations to meet this need. The statement does, however, outline that 'the settlements located along the M54/A5 strategic corridor and those located in the east of Shropshire are therefore likely to play key roles in the delivery of housing to satisfy this unmet need in Shropshire.'
- 3.15 It is noted that the ABCA support the general principles identified above, and with employment land now included it is anticipated this will be formally recognised between respective authorities, subject to potential early stage review(s) as noted by ABCA. Shropshire has sought to respond to legal obligations under the Duty to Cooperate and note the intentions to agree a Statement of Common Ground. This is encouraged and supported to demonstrate requirements of cross boundary working.
- 3.16 Whilst there is uncertainty regarding the future operation of the Duty to Cooperate (as signposted in the Government White Paper) it is clear that there is housing and employment need in Shropshire and therefore the need for strategically scaled development at sustainable locations, such as east Shifnal, will not diminish.
- 3.17 Furthermore, in light of the updated standard housing need methodology approach published by MHCLG in December 2020, there is increased pressure on the Black Country unmet housing need. Sandwell, Walsall and the City of Wolverhampton have all seen notable increases in their housing need figures (to 1,488, 882 and 1,013 respectively). The latest housing delivery test for 2020 also highlights that Sandwell has delivered only 49% of housing against its identified need and Walsall only 88%. Consequently, the presumption in favour of sustainable development is engaged for Sandwell and Walsall is subject to an action plan to address this under delivery. This position is further reflected in the

Greater Birmingham and Black Country Housing Market Area Housing need and Housing Land Supply Position Statement (GBBCHMA) (July 2020) which outlines that *'future completions might slow in the short term because of the COVID19 crisis'* and that it is *'now apparent that there will be a HMA shortfall post 2031, with the Black Country alone estimating a shortfall of 29,260.'*

- 3.18 If the Government is to meet its housing target and boost housing supply, both within Shifnal and the Black Country, exceptional circumstances can be expected to continue to be applied through the plan making process. The release of land from the Green Belt, either now given the revised need, or safeguarded to meet future need, should, and must, continue to feature in the Shropshire plan under exceptional circumstances.

Reliance on Windfall sites

- 3.19 As noted in the Council's 5-Year Housing Land Supply Statement (March 2020), small scale windfall sites have *'always represented a significant component of the housing land supply in Shropshire, and it is anticipated that this will remain the case.'* Furthermore, it is highlighted that this supply was principally derived from *'recycling of previously developed land; significant numbers of infill development; high numbers of conversions of barns and other rural buildings.'* The delivery of these types of windfall sites is highly uncertain particularly in the context of the current economic climate and brownfield opportunities are limited in the existing built-up area. In addition, these sites are not necessarily coming forward in locations of greatest housing need, such as Shifnal. Consequently, the reinstatement of allocation SHF032 and alternative safeguarded land SHF018c have the potential to reduce the reliance on windfall sites whose delivery is highly uncertain. It also ensures that housing is being delivered where it is needed most. Windfall sites, most notably those derived from rural buildings and barns, are unlikely to serve Shifnal's housing need to the same extent that it would in other, more rural, parts of Shropshire.

Covid-19 impact

- 3.20 An additional area of concern regarding housing assumptions contained in the draft plan relates to the short, medium and potential long-term implications on housing delivery during the plan period resulting from the Covid-19 pandemic. The complete cessation for several weeks of construction activity on most major housing sites combined with an economic downturn that the Office for Budget Responsibility (OBR) estimates could feature a 35% reduction in GDP, will undoubtedly impact on the future housing market supply.
- 3.21 Consequently, even where local planning authorities are able to demonstrate a 5-year housing land supply (5YHLS), the likely impact on the anticipated pipeline of delivery suggests the need for greater flexibility. This was reflected in appeal decision APP/X0360/W/19/3238048 where the Inspector noted that *'the Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy.'*
- 3.22 It is likely to be the case that there are a number of substantive risks linked to the future housing supply resulting from the Covid-19 pandemic. This includes ongoing challenges for the capacity of the construction industry on sites that had been assumed to be deliverable. As well as potential supply chain issues for housebuilders, a key risk comprises housebuilders or developers running out of funds to maintain the delivery previously anticipated. These issues are also likely to have a direct impact on the viability of some existing permissions and

allocations, causing stalling of delivery and also requiring existing s106 commitments to be reviewed.

- 3.23 The NPPF requires sites in a 5YHLS to be ‘deliverable’ and for those in category b) (where a site has been allocated in a development plan), the realistic prospect of housing completions within five years should be demonstrated with ‘clear evidence’. Covid-19 is a planning force majeure which means previous deliverability assumptions in recent Annual Monitoring Reports may need to be reviewed.
- 3.24 In this context, it is essential that potential for housing development in strategic and sustainable locations is maximised and policies ensure there is sufficient flexibility, should assumed delivery rates be constrained.
- 3.25 SHF032 is readily available for housing and deliverable, once released from the Green Belt. The alternative safeguarded land option SHF018c also has the potential to be brought forward earlier (within the plan period) should there be a more immediate requirement for housing land.
- 3.26 In summary, draft Policy SP2 is considered to be positively prepared in relation to the overall strategic approach to development in the County. However, the 1,400 dwellings per annum that are anticipated to be delivered during the plan period is considered to be a minimum, and now unlikely to be sufficient to meet Government objectives set within the updated NPPF in due course. The Plan should allow for housing delivery above and beyond this level, including through safeguarded land, to take into account the higher housing need figure identified by the draft standard housing methodology, a proportion of the unmet need from the Black Country, flexibility to ensure housing delivery, and the economic implications associated with the Covid-19 pandemic and the associated impact this may have on assumed delivery.

Policy SP4 (Sustainable Development)

- 3.27 Ruckley Estate and Harrow Estates support the positive approach to reviewing development proposals and reflecting the presumption in favour of sustainable development contained in the NPPF. Accordingly, the policy is considered to be sound and positively prepared on this basis.
- 3.28 A key tenet of sustainable development identified by NPPF paragraph 8 is ‘to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity.’ Ensuring that there is sufficient land of the right type available in order to support sustainable economic growth is consistent with the strategic approach contained in paragraph 3.87 of draft Policy SP4. This outlines that ‘the principal focus for employment investment is the Strategic, Principal and Key Centres of the County.’ Furthermore, it is highlighted that ‘creating a sustainable pattern of development will mean that employment development should be directed to Shrewsbury, our Principal Centres and our Key Centres.’ Shifnal as a key centre is therefore rightly recognised as a sustainable location for employment development which is reflected in allocations SHF018b and SHF018d.
- 3.29 Particular attention should be made to how the presumption in favour of sustainable development is applied in relation to plan making. The NPPF (paragraph 11) states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that ‘plans

should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.’

- 3.30 In taking forward a robust local plan which provides the necessary flexibility where assumed delivery may not reach expected levels, ensuring that opportunities for sustainable development in areas of strategic growth are maximised is considered critical. In this context, site SHF032, alongside site SHF018c, have the combined ability to perform positively, both as standalone options, and contributing to a comprehensive strategy for development, in accordance with the aims and objectives of sustainable development. Specifically, they respond to NPPF paragraph 72 relating to ‘planning for large scale development’ and offer the potential to both complement and benefit from the infrastructure improvements delivered as part of the adjacent proposed employment allocations. In appraising sustainable development in key centres such as Shifnal, and how this is applied, it is considered that SHF018c and SHF032 fulfil the economic, social and environmental objectives contained in the NPPF and should be incorporated into the plan as safeguarded land.
- 3.31 Specifically, in combination, these land allocations create a strong basis for local living, to create a strong cohesive community and reduce the need to travel, with substantial benefits including a reduction in carbon footprint.

Policy SP7 (Managing Housing Development)

- 3.32 The recognition contained in paragraph 3.47 that the delivery of Shropshire’s housing requirement is ‘essential for the long-term prosperity of Shropshire’ is welcomed. Furthermore, the reference within paragraph 3.48 that the NPPF and NPPG require plans ‘remain flexible and adaptable to changing circumstances’ is supported by Ruckley Estate and Harrow Estates.
- 3.33 It is considered however that the wording of draft Policy SP7 does not provide sufficient flexibility in line with the NPPF and NPPG requirements for plan making. In light of the impact on assumed housing delivery caused by the economic climate, combined with the proposed increase in the housing requirement contained in the revised standard methodology, the Black Country unmet need and recent delivery rates, the housing need is likely to be higher than that identified.
- 3.34 Sustainable development opportunities adjacent to the settlement boundaries of identified growth locations, such as Shifnal, should therefore be maximised. Sites SHF018c and SHF032 are both sustainably located, within walking distance of existing Shifnal town centre services, and close to primary and secondary schools on the eastern side of Shifnal. All sites are well-located on the eastern edge of the Town, adjacent to existing and proposed employment uses and with convenient access via Stanton Road to the A41 and Junction 3 of the M54.
- 3.35 Site 018c has been submitted previously for consideration as part of representations to Local Plan consultations on behalf of Harrow Estates. Whilst the sites do not currently form part of identified growth strategy, these representations seek to present their merits as a positive, suitable and justifiable option for residential-led development.

SP11 (Green Belt and Safeguarded Land)

- 3.36 Ruckley Estate and Harrow Estates support the Council’s aspiration to safeguard land for residential and employment development beyond the plan

period (2036) or as part of a Local Plan Review in the future. As set out in the Green Belt Exceptional Circumstances Statement (August 2020), the case for exceptional circumstances is clear and fully supported by Ruckley Estate and Harrow Estates. Shifnal, as a key centre in the settlement hierarchy, and the largest settlement in the north of the Shropshire Green Belt, represents a highly sustainable opportunity for safeguarded land to meet both the County's and Black Country's future housing needs. As noted in the Green Belt Exceptional Circumstances Statement, 'Shifnal can build on its strategic location and accessibility.'

Shifnal Housing Need

3.37 Whilst there has been recent growth in Shifnal, there are several key factors which support the need for additional allocations or safeguarded residential land around Shifnal as referenced in the Green Belt Exceptional Circumstances Statement:

- Shifnal has experienced decades of restraint on its housing growth, which has resulted in significant demand for housing in the town. Shifnal needs to redress many years of under provision as a result;
- Housing completions in Shifnal have traditionally been very low over the past two decades;
- It is expected that the current rate of completions could result in the adopted housing land supply in both the current Local Plan and the Local Plan review being exhausted before 2024-25.
- The slower rate of housing development in Shifnal has affected the affordability ratio in the town making Shifnal one of the most expensive markets in the County.

3.38 Combined with historic under-delivery and constrained housing growth in Shifnal, Shropshire proposes to accept a degree of the Black Country's unmet housing need. Paragraph 8.98 of the Green Belt Exceptional Circumstances Statement highlights that 'Shifnal as the primary settlement in Shropshire, located on the strategic corridor is therefore likely to play a key role in satisfying this need, and its proximity to the Black Country is likely to promote the town within the migrants key areas of search.' The Council's assertion in Local Plan paragraph 3.96 that 'much of the safeguarded land provided at Shifnal and Albrighton to make provision for longer-term development needs has been used or is now allocated for development within this Plan' is noted. However, these representations propose the reinstatement of site SHF032 as a housing allocation for up to 80 units and an alternative, sound, option for safeguarded land which would sensibly link with the proposed employment allocations, to the east of Shifnal (comprising sites SHF018b and SHF018d). This meets the objectives of sustainable development, including the objectives of the SA and overall plan approach. Furthermore, land to the east of Shifnal represents the strongest opportunity to accommodate the Black Country's unmet housing need, being located closest to the M54 corridor and the Black Country itself.

Green Belt Assessment

3.39 A review has been undertaken of the Shropshire Green Belt Assessment prepared by LUC (September 2017) and forms part of the Council's evidence base. In reviewing the individual sites as sub areas of the assessment, it has been concluded that the proposed housing site SHF032 would make no

contribution for purpose 1 of NPPF paragraph 134 (to check the unrestricted sprawl of large built-up areas). In addition, it would perform weakly for purposes 2 (to prevent neighbouring towns merging into one another), 3 (to assist in safeguarding the countryside from encroachment) and 4 (to preserve the setting and special character of historic towns) and is considered that it would create low to moderate harm if released from the Green Belt. Furthermore, it is highlighted that the Council previously identified the site for release from the Green Belt, and therefore accepted that there were sufficient exceptional circumstances to justify its release with limited harm.

- 3.40 Site SHF018c does not contribute to purpose 1 and performs weakly for purpose 2 and 4, but moderately against purpose 3. If released from the Green Belt it is considered they also would create moderate harm.
- 3.41 Similarly, Sites SHF018b and SHF018d have been assessed as making no contribution to purpose 1, a weak contribution to purpose 4 and performing moderately for purposes 2 and 3.
- 3.42 It is therefore concluded that with careful consideration given to siting, massing and landscape through master planning, all of these sites could be released from the Green Belt and developed with limited harm to the Shropshire Green Belt and its overall integrity. It would have limited effect on both landscape character and visual amenity, and development on all these sites would form a logical extension to the north east of Shifnal, representing a more sustainable pattern of development in accordance with the NPPF.
- 3.43 In terms of hierarchy of land release from the Green Belt and development priority, it is considered that SHF032 and SHF018c provide a more suitable and therefore preferred option for development than land to the south west of Shifnal as currently identified for safeguarding beyond the plan period.
- 3.44 As referred to in section 2 above, in terms of Green Belt release, SHF018c (and SHF032) is a justifiable, effective and sound approach to safeguarded land. In this context, given the availability of these alternative sites, the current plan is not sound and requires modification prior to submission of Main Modification through the examination process.
- 3.45 These sites would allow a flexible approach of a smaller, rolling-scale release of Green Belt (as deemed necessary) in order to respond to shorter-term need, and is not reliant on a release of significant scale in Shifnal. With a Local Plan review scheduled for every 5 years, the SHF018c parcel offers an appropriate and more proportionate smaller-scale option for safeguarding purposes at this stage, than the current identified land to the South-West of Shifnal.

South west safeguarded land

- 3.46 The currently proposed safeguarded land on the western boundary of Shifnal is recognised as having a moderate-high harmful impact on the Green Belt, in particular the perception of openness between Shifnal and Telford to the west and further coalescence between settlements. Given the alternative available (as proposed by these representations), the development of that collection of sites would be inconsistent with national planning policy taking into consideration the five purposes of the Green Belt (NPPF paragraph 134) given the available alternative and need for exceptional circumstances to be demonstrated overall but also on a site by site basis.

- 3.47 The Greater Birmingham HMA Strategic Growth Study (February 2018) ² makes reference to the strategic function of the Green Belt to the west of Birmingham and its role of containing urban sprawl. Paragraph 8.39 specifically cites the potential sprawl of Shifnal being checked, noting the strategic separation between Shifnal and Telford.
- 3.48 Furthermore, and now a fundamental weakness in the detailed site selection approach, it is noted that land parcel 17a is no longer included in the identified safeguarded land which will not allow for the delivery of a full bypass between the A462 south and west. The proposed bypass based upon the extents of safeguarded land will only be partial, linking the A464 south with the A4169. This is unlikely to function as a bypass and therefore unlikely to provide any benefit to the operation of the Five Ways roundabout. Critically, a partial bypass is unlikely to present a significant benefit for through traffic using the A464 and thereby will still have an associated impact on the town centre, notably traffic associated with Idsall School and existing and future employment land (in comparison to developing the north-east, which would avoid this).
- 3.49 Further and as described above, in locational terms, the alternative should be preferred because of its relationship with the employment land, Idsall School and clear relationship with Shifnal, rather than Telford.
- 3.50 These are all fundamental issues to be addressed in confirming exceptional circumstances for Green Belt release and weigh heavily in favour of allocating the alternative sites in preference to those sites currently identified/allocated, in accordance with the presumption in favour of sustainable development and approach to Green Belt release.
- 3.51 In addition to the points covered above, as a comparison, SHF018c (and SHF032) would require c.50% less land to be released from the Green Belt, as identified for safeguarding. This would allow Shropshire to take a more considered, measured approach to releasing currently valued open land, in the event it is demonstrated as required.
- 3.52 SHF018c offers a genuine and more suitable alternative for safeguarded land to be identified in the Local Plan. It would allow a flexible approach of a smaller, rolling-scale release of Green Belt in order to respond to short-term need, and is not reliant on a release of significant scale at this current draft plan stage. With a Local Plan review scheduled for every 5 years, SHF018c offers an appropriate smaller option for safeguarding purposes at this stage, than the current identified land to the South-West of Shifnal. This is in addition to the parcel-specific merits assessed above.

Sustainability

- 3.53 As outlined further in Appendix 1, a review of the Council's Sustainability Appraisal and Site Assessment Environmental Report and Appendix P (Shifnal Place Plan Areas Site Assessment) has been undertaken. This has reviewed the proposed residential safeguarded land SHF018c and the proposed reinstatement of residential allocation SHF032, in comparison to the safeguarded land to the south west of Shifnal. Site SHF018c is scored as Good against the sustainability objectives in Stage 2a of the assessment, with a better overall numeric sustainability score than all of the south western safeguarded

² <https://www.bromsgrove.gov.uk/media/3523536/Greater-Birmingham-HMA-Strategic-Growth-Study-Standard.pdf>

sites. The main justification for SHF018c not being safeguarded appears to be closely related to the fact that it is considered that the safeguarded south western sites offer better opportunities, such as the strategic link road, and make less important contributions to the Green Belt. However, land parcel 17a is no longer included in the identified safeguarded land which will not allow for the delivery of a full bypass between the A462 south and west. The deliverable bypass based upon the extents of safeguarded land will only be partial, linking the A464 south with the A4169. This key strategic benefit associated with the south western safeguarded land will therefore not be delivered as originally anticipated.

- 3.54 In addition, the rationale for retention of site allocation SHF032 within the Green Belt, despite previously being allocated for residential safeguarding is unclear. In the Stage 3 assessment for example, whilst it states the site should remain in the Green Belt, only limited weight appears to have been placed on the proximity of the Grade II* listed Aston Hall in this assessment. In its assessment, it concludes that 'this land is not suited to employment development because the sensitivities to landscape and visual impact (both medium-high) are greater than for housing use.' Therefore, whilst the assessment specifically states that the site is not considered suited to employment use, it is not apparent if the site has been reviewed as a housing allocation, or specified why a residential use would be deemed inappropriate.

Heritage

- 3.55 Specifically in relation to proposed allocation SHF032, it is noted that Historic England previously objected to the allocation on the basis that it is within open landscape and too close to Aston Hall. As outlined further in the response prepared by CGMS, these are not considered valid arguments for dismissing this allocation on built heritage grounds. It has been clearly demonstrated that the site does not deliver a significant contribution to the asset's significance, and neither do views from or through SHF032 provide notable legibility of that significance. The openness of the site is relative, and more crucially, there is significant screening by mature planting around the Hall and from the former ancillary and farm buildings. By contrast, the designed landscape to the southeast was always intended to be seen from the Hall and in wider views with the Hall, irrespective of distance.
- 3.56 Being in open land and close to a heritage asset does not deliver sufficient justification to object to a site's allocation. Historic England's own guidance on development in the setting of heritage assets (GPA3: The Setting of Heritage Assets 2nd edition, 2017), sets out that 'consideration of the contribution of setting to the significance of heritage assets, and how it can be appreciated, will almost always include the consideration of views.' It is the case that the appropriate analysis in line with the Historic England guidance has been carried out (as contained in the appended Historic Environment Desk-Based Assessment). It has found that the site has a marginal and residual relationship to the asset; has a secondary level of contribution to the asset's significance; and that the legibility of the asset's significance in views from and through the site is minimal. It should therefore be duly considered for residential safeguarded land under draft Policy DP25.
- 3.57 In summary, the Council's own evidence base supports the reinstatement of SHF032 as a residential allocation and proposed strategic safeguarded site SHF018c for inclusion within the Local Plan. This represents a more sustainable

and strategically favourable opportunity in comparison with the land presently safeguarded to the south west of Shifnal. Furthermore, Shifnal's historically constrained housing growth and delivery indicates that a positively prepared Local Plan should maximise opportunities for growth adjacent to Shifnal. The land east of Shifnal represents a sustainable, deliverable and strategically important opportunity to safeguard residential growth, reflecting its location close to the M54 and with the ability to support the Black Country's unmet need in the future.

SP12 (Shropshire Economic Growth Strategy)

- 3.58 The strategy of the draft Local Plan outlined in paragraph 3.87 is supported by Ruckley Estate and Harrow Estates. This outlines that the 'the primary focus for employment investment is the Strategic, Principal and Key Centres of the County with their employment land offer, housing, services and accessibility.' As acknowledged in subsection 5, part a) of draft Policy SP12, the delivery of employment needs to be supported by investment in 'housing of the right type, quality, tenure and affordability, in the right locations with jobs, services, facilities and leisure to make Shropshire a good place to live, work and play.'
- 3.59 The employment allocations of SHF018b and SHF018d will greatly improve the availability of employment land in Shifnal as well as linking with the existing employment areas on the eastern side of the town. These allocations therefore fully accord with the aspiration of draft Policy SP12 for key centres in the County to be the focus for growth. There is a need to rebalance previously existing employment uses lost to residential uses. As outlined in further detail in the accompanying Employment Land Study prepared by Hatch (please refer to Appendix 3), Shifnal has historically experienced limited expansion in employment land over the last 10 years which has significantly constrained economic growth. Consequently, this has resulted in a relatively low jobs density in Shifnal and a notable deficit in jobs and employment levels in the town. This historic trend reaffirms the strong need for additional employment land at SHF018b and SHF018d, which are readily available and deliverable.
- 3.60 As noted in the draft policy wording, the delivery of employment needs to be supported by investment in housing in the right locations. In this context, and alongside employment allocations SHF018b and SHF018d, the inclusion of alternative safeguarded land should be considered. Site SHF032 was previously allocated for housing and the Council had recognised the site's potential as a favourable residential opportunity to justify its release from the Green Belt. The change in the Council's position is therefore questioned in light of the need for housing investment to support Shifnal's economic growth.
- 3.61 Sites SHF018c (as well as SHF032 which was previously identified by the Council as suitable for Green Belt release) is sustainably located, within walking distance of existing Shifnal town centre services. Both sites are well-located on the eastern edge of the town, adjacent to existing employment uses and with convenient access via Stanton Road to the A41 and Junction 3 of the M54. The M54 Growth Corridor Strategic Options Study (June 2019) highlights that '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.' In addition, the Green Belt Exceptional Circumstances Statement (August 2020) highlights that Shifnal has historically had decades of restrained housing growth and housing completions have traditionally been very low over the past two decades. Consequently, this

slower rate of housing development has negatively affected the housing affordability ratio in the town.

- 3.62 In summary, Shifnal represents a highly sustainable strategic location for economic growth to support Shropshire's wider economic objectives. In delivering on this potential for growth however, alongside allocations SHF018b and SHF018d, there needs to be appropriate provision for investment in residential development in the right locations. SHF032 and SHF018c are highly sustainable opportunities for residential allocation and alternative safeguarded land on the eastern side of Shifnal, well placed for connections to the M54. In conjunction with the existing and allocated employment land to the east of Shifnal therefore, this future residential land will be essential in supporting the town's long term economic growth needs.

Policy SP13 (Delivering Sustainable Economic Growth and Enterprise)

- 3.63 Draft Policy SP13 aims to deliver around 300 hectares of employment development from 2016 to 2038 and to support development on allocated sites. This policy approach is considered sound and supported by Ruckley Estate and Harrow Estates. The delivery of this employment development is critical to deliver on and facilitate the County's ambition for sustainable economic growth contained in the Economic Growth Strategy for Shropshire. This strategy aims to achieve £300 million of private sector investment over the next 5 years and at least 3,700 new jobs. These targets have been informed by a range of studies including assessment work undertaken by Oxford Economics.
- 3.64 Sites SHF018b and SHF018d, as allocated employment sites, are considered to represent strategically important opportunities to support Shropshire's sustainable economic growth ambitions. As outlined in the Shropshire Employment Land Review undertaken by Avison Young (December 2019), 'Shifnal will perform a significant role as a Key Centre and contribute towards the strategic growth objectives in the east of the County. 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.' In this context, the review notes that 'outside of current allocations/commitments there are no sites currently suitable and readily available for employment uses, which is reflective of the constraints on employment land in this location.' As well as reaffirming the importance of SHF018b and SHF018d being delivered, the review highlights the potential for Opportunity Area 3 (which includes SHF018b and SHF018d) to both address the current shortfall in Shifnal and rebalance the employment land.
- 3.65 In addition, the accompanying Employment Land Study prepared by Hatch highlights the importance of the allocation of appropriate employment land in stimulating vital growth in the town. In particular, it is noted that '*Shifnal's imbalance between residential and employment land uses has led to the town's distinctive dormitory character, which is evident in its relatively large daily net outflow of commuters.*' Consequently, '*Shifnal has struggled to achieve growth in its employment base*' and '*new investment would help reverse the stagnation in employment growth.*'

SP14 (Strategic Corridors)

- 3.66 The aspiration of Policy SP14 to focus major development 'along the principal rail and strategic routes through the County' is supported. As noted in paragraph 4.91 this includes the strategic corridor 'Eastern Belt M54/A5' and

the opportunities in and around Shifnal as a Key Centre. Shifnal is the first major town on the corridor route travelling west and therefore represents a logical location for growth.

- 3.67 As identified in the M54 Growth Corridor Strategic Options study, the M54/A5 corridor is a key east-west road and rail transport corridor between Shropshire and the West Midlands. The M54 corridor is a main strategic gateway for both Shropshire and its neighbouring local authorities and is identified locally and regionally as a key growth corridor for both employment and residential development, resulting from the strong transport links present and critical mass resulting from the presence of nationally significant education, training and employment opportunities.
- 3.68 Development of site allocations SHF018b and SHF018d reflects the strategic importance of Shifnal as a key centre and the east of Shifnal as being located within the economically significant M54 Growth Corridor. This part of the County represents a highly sustainable location to support economic growth and deliver on the jobs and investment targets contained in Shropshire's Economic Growth Strategy.
- 3.69 Sites SHF018c and SH032 have been identified as potential development opportunities in the M54 Growth Corridor Strategic Options Study which forms part of the Council's Local Plan evidence base. The study undertakes a review of the extent of the opportunity associated with the M54 corridor, key opportunity sites within the corridor and draws out the economic rationale for bringing forward strategic sites. With sites located in the Green Belt, the study findings will ultimately assist with forming a case to enable release of land, on the basis of exceptional circumstances.
- 3.70 Shifnal is ideally located to assist with the County's growth ambitions, and there is also an identified need for employment land locally. The study identifies five potential development sites which could help Shropshire achieve the objectives of the Economic Growth Strategy. As one of the five sites assessed, Development Opportunity Site 1 (referred to as Stanton Road), covers an area including the land parcels of SHF032, SHF018b, SHF018c and SHF018d.
- 3.71 The sites' location to the east of Shifnal, close to the M54, is recognised as a potential area suitable for employment use, with an element of residential use, therefore offering an opportunity to co-locate both land uses. Furthermore, located adjacent to the existing employment land occupied by the Lamledge Lane Industrial Estate, the site represents an opportunity to provide a natural extension to this established area of commercial activity.
- 3.72 The report outlines the economic case for development, and whilst noting potential constraints to development, concludes that the site should be prioritised (alongside two other sites, of the five) to drive forward the Council's vision. The role of the sites in balancing employment needs and residential growth is also highlighted, given their proposed offer, geographical location and proximity to each other and key assets in the West Midlands conurbation. Development of the sites would reduce commuting pattern through Shifnal Town Centre.
- 3.73 The study states that 'the development of this site could contribute in part to meeting Shropshire's vision of balanced growth and could provide much needed employment land to address the current imbalance between residential and employment uses in the area'. In addition, it recommends 'that an informed

view be taken to enable mitigation of constraints to enable development to bring forward this strategic opportunity site and bring forward much needed employment accommodation.'

- 3.74 The conclusions reached within the study are welcomed and provide further support for allocations SHF018b and SHF018d and the proposed release of site SHF018c from the Green Belt as safeguarded land, on the basis of exceptional circumstances. Furthermore, it highlights the need for the Council to review their decision to withdraw SHF032 when this was previously deemed acceptable for Green Belt release. All the land parcels being promoted will make a vital contribution to the aim of the economic growth objective to increase productivity, deliver new jobs as well as balancing those jobs with new housing opportunities in the M54 corridor. Consequently, this strategic approach will assist in reducing the need to commute between settlements, and be of a sufficient scale to achieve appropriate compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land

DP23 (Conserving and Enhancing the Historic Environment)

- 3.75 The aim of draft Policy DP24 in seeking to protect and conserve heritage assets is supported by Ruckley Estate and Harrow Estates. Furthermore, recognition that a balanced judgement is required in appraising proposals that may have an impact on heritage assets is welcomed. In particular, the recognition that clearly demonstrated benefits of the proposal can outweigh loss or harm.
- 3.76 In reviewing the conformity of draft Policy DP24 with the NPPF however, the wording of part 4) represents a notable departure. NPPF paragraph 197 states that 'in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.' By contrast, part 4) states that 'proposals which are likely to result in loss of, or harm to, the significance of a non-designated heritage asset and/or its setting, either directly or indirectly, will only be permitted if it can be clearly demonstrated that the benefits of the proposal outweigh that loss or harm.' The wording of part 4) more closely aligns with NPPF paragraph 196 which relates to designated heritage assets, rather than paragraph 197 which covers non-designated heritage assets. To ensure conformity with the NPPF, the distinction between designated and non-designated assets should be made clear. Furthermore, the wording of part 4) should be amended to reflect the balanced judgement for non-designated heritage assets contained in NPPF paragraph 197.
- 3.77 Site allocation SHF032 has been removed from the current draft Local Plan following heritage concerns raised by Historic England. In the context of the balanced judgement outlined in draft Policy DP24 it is considered this position should be reviewed as part of the draft Local Plan consultation.
- 3.78 The proposed safeguarded land is bounded to the south-west by Grade II* listed Aston Hall and its grounds. A Built Heritage Assessment has been undertaken (and is appended to these representations), including a review of the significance of the setting and potential development impact of the proposed residential allocation on the heritage asset. At present, the site is considered to make a moderate positive contribution to the significance of the asset as part of its wider rural setting. However, it is noted that Aston Hall principally derives its significance from its high-quality architectural form and historic fabric, and from

its immediate setting, none of which will be impacted. In addition, a number of suitable mitigation measures have been outlined, including the following:

- Drawing back development from the northern/north-western boundary of the Aston Hall Park and Garden (PAG), and including a substantial landscape buffer along this part of the site. This will screen/break up the appearance of the proposed development in views of, and from, the asset.
- Providing additional landscaping, including generous tree provision throughout the northern part of the site, which will help to further soften the appearance of the development in views of/from the asset.
- The residential development proposed within the northern part of the site should be of an appropriate scale and massing, not exceeding two storeys in height in order to minimise its visual prominence.
- The individual designs of the dwellings in the northern part of the site can and should reflect the more traditional architectural forms evident in Shifnal. Prominent plots such as those turning corners or at the heads of roads/drives can incorporate local details taken from a survey of the wider area. The use of repetitive units and appearances can be avoided. In this way, the proposed development can and should have its design roots firmly established in the historical Shifnal town buildings, which have architectural merit.

3.79 In addition to the robust and effective mitigation measures outlined, there are clear and demonstrable public benefits resulting from the inclusion of SHF032. These include the following:

- Making an important contribution to housing supply in light of Shifnal's historic under delivery, the Black Country's unmet housing need and the increased housing requirement identified by the draft standard housing methodology for Shropshire;
- The site, as well as its relationship with SHF018c, SHF018b and SHF018d, will contribute to meeting the aims of the economic growth objective to increase productivity, deliver new jobs, balanced with new housing and reducing commuting levels between settlements;
- Making effective use of a site in a highly sustainable location which is situated directly adjacent to both existing and new development.

3.80 It is highlighted that the Council had previously considered the site suitable for Green Belt release due to its limited harm. When balanced against the significant public benefits associated with this allocation and the robust mitigation measures put in place with regard to the heritage asset, there is a clear and demonstrable case for this allocation to be reinstated.

DP25 (Infrastructure Provision)

3.81 The policy aim for new development to 'only take place where there is sufficient existing infrastructure capacity available' is supported by Ruckley Estate and Harrow Estates. Paragraph 18.8 of the Shifnal Place Area Plan identifies that significant traffic movements and larger vehicle access is better located to the east of the town, directing traffic flow towards the A41/M54 Junction 3 link. This supports the proposed residential and employment allocations to the east of Shifnal. Traffic generated from allocations SHF018b, SHF018d, SHF032 and

SHF018c, as well as large service vehicles, will be able to access from the M54/A41 junction link, and consequently not need to travel through the town centre network.

- 3.82 Whilst the current draft Local Plan approach identifies the south west safeguarded land will facilitate a bypass connection, this would be reliant on a comprehensive approach to delivery across multiple land parcels and ownerships. SHF018c (and SHF032 & SHF018b & 18d) land is within single ownership and thereby presents an opportunity to provide infrastructure and mitigate impacts (highways improvements, drainage, community, health) in a simplified, effective method, in accordance with the NPPF paragraph 35. Furthermore, it is noted that with the exclusion of land parcel 17a, it is no longer possible to deliver a full bypass between the A462 south and west. Consequently, a partial bypass is unlikely to present a significant benefit for through traffic using the A464 particularly in relation to school related traffic, thus undermining the cited benefits of the south west safeguarded land.
- 3.83 The location of housing on sites east of Shifnal is considered more favourable given that trips towards the M54 will route away from the town centre, and the proximity of the proposed development on SHF018b and SHF018d provides realistic opportunities for future residents and employees to travel by sustainable modes. Further, the proximity to schools, in particular Idsall School, and direct walking route to the station demonstrate additional sustainable benefits for the sites and the potential to minimise traffic movements through the town centre. As a result, inclusion of SHF032 and SHF018c, as an alternative to the south west safeguarded land, will provide greater potential to reduce level of traffic generated on the local highway network through effective behaviour change/mode shift initiatives). In addition, it is further noted that proposed safeguarded land at 17a has now been removed to the south west of Shifnal. This will therefore not allow for delivery of a full bypass between the A462 south and west and across the railway line, as originally anticipated. The deliverable bypass based upon the extent of safeguarded land will now only be partial and is unlikely to present a significant benefit for through traffic using the A464.
- 3.84 In addition, the inclusion of SHF018c would represent a highly sustainable extension to Shifnal with good access to existing services and facilities within the town centre, including walking distance to the train station and local schools. The option for this land to include a potential health/medical facility and/or day nursery (delivered at an earlier stage, if required) to serve existing and future residents (of adopted and proposed housing allocations) further demonstrates the benefits of this alternative option.

DP28 (Communications and Transport)

- 3.85 The emphasis draft Policy DP29 places on improving the communications and transport networks and promoting access to sustainable transport modes is welcomed. The objectives of draft Policy DP29 to help manage the environmental impacts of travel on climate change, air quality and public health are similarly supported.
- 3.86 The land east of Shifnal, encompassing employment allocations SHF018b and SHF018d, proposed reinstated allocation SHF032 and proposed residential safeguarded land at SHF018c, have been appraised in the context of these objectives. Being located on the eastern edge of Shifnal, they are able to benefit from excellent opportunities for both future residents and employees to travel to the Town Centre on-foot or bicycle. In terms of walking and cycling routes, the

sites will be developed with a focus on prioritising pedestrian activity and cycle movements. Links to wider routes will be provided by linking proposed internal pedestrian and cycle routes with existing and proposed off-site routes on Coppice Green Lane and along Stanton Road, including connection to National Cycle Route 81.

- 3.87 The travel planning strategy for the respective sites will also seek to ensure that the long-term management of the promotion and delivery of sustainable transport initiatives will be secured and managed, both for the employment and residential uses. This transport approach to the land east of Shifnal has been developed to align with the requirements of draft Policy DP28 and is considered to similarly accord with NPPF paragraph 103. This states that ‘significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.’

S15 (Shifnal Place Plan)

- 3.88 The draft policy’s commitment to Shifnal as a key centre and having a primary role in ‘providing homes, jobs, services and facilities to the Place Plan area, other Green Belt communities and the M54/A5 Strategic Corridor’ is supported by Ruckley Estate and Harrow Estates.
- 3.89 It is noted that the policy outlines the need for Shifnal to ‘be a significant focus for the provision of infrastructure and services to meet the needs of the town and its wider catchment area.’ Furthermore, as outlined in paragraph 5.201, Shifnal is likely to experience ‘significant growth pressures due to its situation between Junctions 3 and 4 on the M54 and between the urban centres of Wolverhampton and Telford.’
- 3.90 In this context, the approach to safeguarded land is questioned to ensure that the land identified for Green Belt release is the most suitable available and the extent allocated is justified, to ensure the approach is sound. The allocation of the employment sites (SHF018b and SHF018d) is strongly supported and justified based on the clear need for additional employment land in Shifnal, as set out in the Council’s own evidence base.
- 3.91 Similarly, based on Shifnal’s historic under delivery of housing and to support the town’s economic growth, it is considered that there is a strong case to reinstate previous allocation SHF032. Notably, the Council had previously concluded that the release of this site from the Green Belt was justified and acceptable.
- 3.92 In addition, the inclusion of the alternative safeguarded land strategy (SHF018c) is promoted through this representation. As well as supporting growth in a highly strategically sustainable location, this would ensure a more rounded settlement boundary alongside the allocated employment sites.
- 3.93 Paragraph 5.212 outlines the requirement for commercial buildings to be ‘developed as single storey properties that here, are expected to largely provide Class B1c, B2, and B8 uses serving the sub-regional supply chains on the A5, M54 and M6 corridors.’ This requirement is considered to be overly restrictive and will constrain the ability for the strategically important employment allocations SHF018b and SHF018d to respond to market demand and requirements. In addition, allowing for floorspace to be provided across more than one storey (limited to a certain height) would help to deliver the Council’s

aspiration for a landscape-led campus, as opposed to large, single storey units, with a more substantial footprint.

3.94 The inclusion of SHF018c would represent a highly sustainable extension to Shifnal with good access to existing services and facilities within the town centre, including walking distance to the train station and local schools. The option for this land to include a potential health/medical facility and/or day nursery (delivered at an earlier stage, if required) to serve existing and future residents (of adopted and proposed housing allocations) further demonstrates the benefits of this alternative option. As noted in Section 3, on review of the assessment undertaken of SHF018c, the site scored as Good against the sustainability objectives in Stage 2a of the assessment, with a better overall numeric sustainability score than all of the south western safeguarded sites.

3.95 In addition, Ruckley Estate and Harrow Estates strongly support the housing allocation of site reference SHF032. This site offers an opportunity to develop opposite the residential development to the west, creating a stronger sense of place along Coppice Green Lane. As a gateway site, it also creates an opportunity to establish the access and connection from Coppice Green Lane to the south, at Stanton Road.

Schedule S15.1(ii): Land east of Shifnal Industrial Estate (SHF018b and SHF018d)

3.96 Ruckley Estate and Harrow Estates fully support the employment allocations SHF018b and SHF018d and welcome the recognition that ‘the development of these two inter-related sites will significantly improve the employment land offer, commercial premises, business representation and employment in Shifnal.’

3.97 The allocation of SHF018b and SHF018d for employment use provides opportunities within this plan period to promote and replenish the supply of employment land available for investment. It will also rebalance the employment opportunity, alongside the significant growth of new housing in and around Shifnal.

3.98 It is further highlighted that the allocation of the respective sites will greatly improve the offer of commercial premises in Shifnal. As proposed, it would adjoin with the existing and protected employment sites on the eastern side of Shifnal, thus resulting in a stronger edge-of-settlement industrial and commercial location, characterised by employment uses. Traffic generated from the proposed allocations and large service vehicles will be able to access from the M54/A41 junction link, controlled through a traffic management plan.

3.99 Modifications to the policy wording for the allocation from Regulation 18 stage are welcomed, as amended in the current draft. This includes the update to proposed Use Classes and the omission of the need to adopt a Supplementary Planning Document (SPD) for a masterplan and design code. Further additional minor updates are proposed however to ensure flexibility and avoid unnecessary restrictions on future deliverability (see Appendix 2). Notwithstanding this however, it remains to be considered that the policy wording is overly prescriptive, and the detail referred to would evolve, be fully justified and ultimately secured through a planning application.

3.100 As outlined in NPPF paragraph 87, ‘applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.’ Furthermore, paragraph 81 outlines that planning policies should ‘be

flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.’ An overly prescriptive policy may unnecessarily restrict future flexibility and adaptability.

- 3.101 The amended uses reflect the latest planning use class categorisations (September 2020), in that the former Class B1(a) has been omitted. The policy wording now includes ‘appropriate secondary’ employment uses and ‘ancillary service’ uses, alongside the primary aim for Class B2 & B8. These amendments are supported and considered to offer sufficient flexibility for future development.
- 3.102 It is accepted that a masterplan and design code will be developed in consultation with the public and Shropshire Council. This would evolve and progress through a pre-planning application procedure, and post-planning where necessary (i.e. in advance of any Reserved Matters application) and ensure sufficient consultation and feedback stages are incorporated in the sites’ development.
- 3.103 A carefully conceived design approach has been outlined in the indicative employment masterplan. Key guiding principles that have informed the design approach include the following:
- Provision of high quality and flexible employment floorspace to respond to a range of occupiers and current market requirements.
 - The indicative employment masterplan delivers the aspiration of a landscape-led ‘campus’ where development sits within a strong landscape framework;
 - Focus on the functional relationship with the neighbouring Lamledge Lane Industrial Area (Shifnal Industrial Estate);
 - An approach built on the existing pedestrian and cycle infrastructure, delivering an integrated and walkable development through a landscaped campus. The employment allocations are located in a highly sustainable location, on the eastern edge of Shifnal, with excellent opportunities for future residents and employees to travel to the Town Centre on-foot or by bicycle. In terms of walking and cycling routes, the site has been designed with a focus on prioritising pedestrian activity and cycle movements to encourage non-car transport modes;
 - Inclusion of landscaping, woodland screening and a responsive masterplan which ensures that the impact of development to the east of Shifnal is mitigated, and a new gateway to the town from the east is created.
- 3.104 The policy continues to propose the consideration of a link with the Lamledge Lane Industrial Area (Shifnal Industrial Estate). The current draft has substantiated this requirement to alleviate the constraints of the adjoining site as a result of the existing intensity of uses. As outlined in the Transport Assessment prepared by Mode however, whilst this potential can be explored as part of a future planning application, this requirement should not be a precursor for development given the opportunities for pedestrian and cycle access via Stanton Road and Upton Lane. In addition, connectivity would be reliant on a third-party and as delivery remains outside of the control of the landowner and Council, it is suggested this reference is omitted from the policy.

- 3.105 The policy also stipulates that the transport evidence required will be informed by consultation with Highways England. To confirm, Ruckley Estate and Harrow Estates are supportive of engagement and has already approached Highways England and the Local Highway Authority with a view to setting a framework for future development.
- 3.106 With regard to transport considerations, it is highlighted that the site is in a highly sustainable location on the eastern edge of Shifnal, with excellent opportunities for future residents and employees to travel to the Town Centre on-foot or by bicycle. In line with the proposed allocation, the site will be developed with a focus on prioritising pedestrian activity and cycle movements within the site to encourage non-car modes. However the current wording is overly prescriptive and should allow for greater in-built flexibility in line with NPPF paragraph 87. In particular, the allocation notes that ‘the potential to operate a Park and Ride service should be investigated.’ As outlined further in the accompanying Transport Assessment prepared by Mode, ‘a Park and Ride is not considered to be a necessity to make the proposals sustainable as this could adequately addressed through a more traditional bus offer.’ In addition, the feasibility of a Park and Ride on the approach to a settlement is typically informed by a review of passing traffic volumes on the arterial routes entering a settlement to give an indication of the potential for capture of vehicles at the periphery. Forecast 2026 inbound passing traffic volumes on Stanton Road equate to circa 200-300 vehicles per hour in the peaks providing a limited potential passenger pool for a Park and Ride service. The reference to a Park and Ride service should be removed from the policy wording to reflect this.
- 3.107 In addition, the allocation wording states that ‘the priority given to Stanton Road as the primary access will require improvements to Stanton Road along its length.’ Any requirement to improve Stanton Road should arise from an evidenced safety or capacity assessment as part of a planning application, and be necessary and appropriate, rather than be pre-conceived. This requirement should therefore be removed from the policy wording and instead be determined by appropriate capacity assessment undertaken as part of a future planning application. This applies to the aforementioned concern that the policy wording in general is overly prescriptive. The detail of transport mitigation should be determined as part of the planning application process, once fully informed by appropriate assessments. For example, references specific offsite highways improvements may be refined and adapted once detailed evidence is prepared alongside a planning application.
- 3.108 In addition to the transport, landscape, built heritage and employment land study appended to this submission, the masterplan has also been informed by technical assessments including a topographical survey, ecological assessment, flood risk and drainage strategy, utilities survey, and archaeology desk-based assessment.
- 3.109 It is recognised that the sites have a critical role in supporting the economic growth potential of Shifnal in this strategic location within the M54 corridor. The Local Plan notes that there are currently limited employment opportunities within this plan period to promote and replenish the supply of employment land. The strategic importance of these allocations combined with the housing growth in and around Shifnal requires a flexible and responsive approach to design and delivery

Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations

- 3.110 Schedule A7 of the Draft Local Plan sets out indicative timescales for the development of allocations for short-, medium- or long-term delivery timescales. SHF018b & 018d is indicated as medium-, to long term, including beyond the plan period.
- 3.111 It has been stated above that SHF018b & 018d are readily available for delivery and development can therefore be brought forward in the plan period to the short & medium term stages. The accompanying ELS (Appendix) outlines the status of the historic context and current offer, economic case for employment land and ability for the sites to diversify the employment provision in terms of scale, quality and use. There is no reason to seek to delay delivery of the employment sites, which would meet an identified current need and can assist the growth of Shifnal and Shropshire.

4 Conclusion

- 4.1 The representations and appendices demonstrate strong support for Shropshire's approach for growth and in particular, Shifnal as a key centre, as part of the Regulation 18 pre-submission draft of the Shropshire Local Plan. The principle of Green Belt release, and the identification of SHF018b and SHF018d is supported to meet Shifnal's short, medium and long term growth needs. These sites provide sustainable development opportunities to be delivered within the plan period, to strongly support Shifnal and its role as a key location within the Shropshire County, and specifically the M54 corridor. The sites are readily available and deliverable now and offer the most suitable option for employment development in Shifnal.
- 4.2 In light of the removal of residential allocation SHF032, these representations outline why this allocation should be reinstated. The site is a readily available land parcel to provide housing development in a sustainable location and will enhance the sense of place along Coppice Green Lane. The comments made by Historic England have been duly reviewed and responded to as part of these representations.
- 4.3 Beyond the plan period, and in addition to SHF032, a further approach is proposed for the release of alternative safeguarded land from the Green Belt in order to meet future residential needs. This is considered to offer the opportunity to deliver a more sustainable and proportional scale of development, if required in the future. Here, the proposed safeguarded land at SHF018c is submitted to be removed from the Green Belt for future residential-led mixed use development to support the re-balanced economic growth of Shifnal. SHF018c is also considered to be a more appropriate than the currently proposed safeguarded land to the south west of Shifnal for a number of reasons. SHF018c will protect the strategic gap between Shifnal and Telford and will ensure there is limited impact on the Green Belt. It would allow Shropshire a more considered and measured approach to releasing currently valued designated open land, in the event it is demonstrated as required. It is also more sustainably located within close proximity of Idsall (Secondary) School, as well as the existing and proposed employment land in Shifnal. Trips to these facilities from this east Shifnal location could be undertaken without impacting on the town centre road network.
- 4.4 Shifnal represents a highly sustainable strategic location for economic growth to support Shropshire's wider economic objectives. In delivering on this potential for growth however, alongside allocations SHF018b and SHF018d, there needs to be appropriate provision for investment in residential development in the right locations. SHF032 and SHF018c are highly sustainable residential opportunities for allocation or safeguarded land on the eastern side of Shifnal, well placed for connections to the M54.
- 4.5 The Council's evidence base supports ensuring that sustainable opportunities for allocation and safeguarded land are maximised. This includes the east of Shifnal being a focus for employment growth with allocations SHF018b and SHF018d, as well as Shifnal's historically constrained housing growth and under-delivery combined with accommodating the Black Country's unmet housing need.

Appendix 1: Review of Sustainability Appraisal

A review has been undertaken of the Regulation 19 Pre-submission Draft Local Plan 2016 to 2038: Sustainability Appraisal and Site Assessment Environmental Report (December 2020) and SA Appendix P: Shifnal Place Plan Areas Site Assessment (December 2020).

With minimal change to the Regulation 18 documents (August 2020), the points raised during the previous consultation remain valid. This review therefore reiterates these as noted below.

Overview

The sustainability appraisal of sites forms part of the wider site assessment process which informs the selection of land for allocation in the Local Plan. The site assessment process considers factors beyond the site SA process, but the outcomes of the SA process are a key component of the wider site assessment. During the preparation of this Local Plan, the processes were carried out in parallel, with the SA results feeding into the site selection process. The Council's sustainability appraisal document also incorporates the site selection process, with the methodology outlined below.

The SA and site assessment process undertaken to support the allocations within the draft Local Plan has three key stages. Stage 1 was the SLAA (Strategic Land Availability Assessment), which provided a high level of assessment to determine potential site suitability, availability and viability.

Stage 2a looked at the performance of the sites against a series of sustainability objectives using a positive and negative scoring system, with comparisons and final ratings made on a settlement-by-settlement basis.

Stage 2b was the screening of sites, which considered in more detail availability, size and constraints. This stage of the assessment built upon the strategic assessment work of the SLAA.

Stage 3 of the assessment process involved a detailed review of sites and selection of proposed site allocations (for all sites not screened out in stage 2b) using a combination of technical studies, consultation comments, consideration of infrastructure requirements, other strategic considerations and professional judgement. Once the initial conclusions were reached within Stage 3, these were evaluated through Stage 2a of the site assessment process before the proposals were finished, although this re-evaluation appears to be recorded in a more general discussion form as opposed to a specific re-scoring exercise.

Site SHF018c

On review of the assessment undertaken of SHF018c, the site scored as Good against the sustainability objectives in Stage 2a of the assessment, with a better overall numeric

sustainability score than all of the south western safeguarded sites (which would result in coalescence and further narrowing of the sensitive gap between Telford and Shifnal).

The main justification for SHF018c not being safeguarded appears to be closely related to the fact that it is considered that safeguarded south western sites offer better opportunities (e.g. a strategic link road) and make less important contributions to the Green Belt. However, as set out in the main representations text, the validity of the Green belt Assessment of SHF018c (which forms part of land parcel P11 in the Council's Green Belt work), in line with the reasoning given in the Green Belt section of the representation, the effect of releasing site P11 (including SHF018c) from the Green Belt would be moderate as opposed to high as per the Council's conclusion.

In revising the Green Belt assessment of this land parcel, the justification presented in relation to SHF018c is also likely to require reconsideration. On the basis of the sustainability rating, the points currently being raised in the Stage 3 site assessment conclusions, and a revised position on the value of the Green Belt, it would appear that the release of site SHF018c from the Green Belt as safeguarding land can be supported.

SHF018b and SHF018d

With regard to employment allocation SHF018b and SHF018d, a review has been undertaken against the other Shifnal sites considered for employment use but not included in the draft local plan. This is outlined as follows:

Table 2: Stage 2a and Stage 3 summary for sites SHF18b, SHF 18d and other sites considered for employment use		
Shifnal Employment Sites SA Summary		Summary of Stage 3: site assessments
SHF0197VAR	Fair	Remove from the Green Belt and safeguard for future development. This site in combination with others may provide a strategic opportunity to meet the longer term need of Shifnal, in particular this site has the potential to provide an access to the A464.
SHF021	Fair	Not identified as potential windfall or allocation, but it is land within existing Shifnal development boundary. It is identified as having the potential to complete the pattern of development in this location.
SHF022	Fair	Currently safeguarded for future development (housing). This site is considered to be better suited to housing than employment and has been proposed as an allocated housing site.
SHF023	Fair	Currently safeguarded for future development. This site is considered to be better suited to housing than employment and has been proposed that the southern part be an allocated as a housing site, with the northern part remaining outside the development boundary but be safeguarded for future development.
SHF024	Fair	Removed from the site assessment process in Stage 2b due to it being more closely associated with the settlement of Telford.
SHF025	Good	Removed from the site assessment process in Stage 2b due to the majority of the site is located within flood zone 2 and / or 3. Site in isolation is also landlocked (without a road frontage).
SHF026	Fair	Removed from the site assessment process in Stage 2b due to the site being remote from the built form of the settlement, separated by land that has not been promoted for consideration
SHF027	Good	This is a small site within the retail core of the town and is in current business use (vehicle sales and repairs). Whilst it is not

		allocated, it has been identified as a potential windfall site, although it is recognised that residential use would reduce the floorspace in the retail centre.
SHF028	Good	A small site accommodating a former industrial works (non-designated heritage asset) within the town. Implications in relation to heritage, amenity and ground conditions identified in respect to potential for residential development. Not allocated, but identified as a potential windfall site. Existing historical industrial buildings could accommodate residential or employment uses.
SHF029	Fair	This previously safeguarded site is within the development boundary and is allocated for housing development. This site is identified as not being suited to employment development because of the smaller size of the areas, proximity of existing housing and the sensitivities to landscape and visual impacts, which are generally greater for employment uses.
SHF032	Fair	Smaller site (3ha) within the Green Belt, with potential high harm caused by its release. The land is not considered to be suitable for employment development because of the sensitivities to landscape and visual impacts (which would be greater than for housing) and that it is recommended that the site remains in Green Belt.
SHF033	Fair	Site is within the setting of a grade II* listed building. Likely high level of harm on the Green Belt (which at this location serves to separate adjoining towns). The site assessment concludes that the land should not be released from the Green Belt.
SHF034	Fair	This site is a combination of a number of smaller sites, which taken together in combination may provide a strategic opportunity to meet the longer-term development needs of Shifnal (including strategic highway provision joining the A4169 and the A464. At this time no allocation is made but it is recommended that the area of the site to the south of the railway line be removed from the Green Belt. The reasoning does identify that these land parcels may accommodate employment within a broad range of categories of onsite uses, but that given that the town's employment needs will be met through SHF018b and SHF018d, this land use is not currently recommended for SHF034.
SHF035	Fair	This site was identified as making an important contribution to the Green Belt. Other sites have a better relationship with the existing built settlement form and access. Any development on this site will be extend the settlement well beyond its current form with a partial separation from the existing built form of the town. This site is not part of the safeguarded land to meet the future needs of the town.
SHF037	Fair	The southern part of this site is to be removed from the Green Belt and allocated for employment development (SHF018b and SHF018d – see below). The land to the north of Stanton Road is recommended to remain in the Green Belt.
SHF018b & SHF018d	Fair	Recommended removal from Green Belt and allocation for employment uses. Taken together, these sites offer potential for large scale employment (to redress the employment needs of the town) and offer highway and infrastructure improvements. These sites have good road access and will potentially route commercial traffic away from the town centre.

Based on the information summarised above, there does not appear to be a strategic site not currently allocated or safeguarded for employment use which performs more strongly, both against the SA objectives, or in the detailed assessment, than SHF018b and SHF018d.

Appendix 2 : Proposed modifications to draft policies

SP2: Strategic Approach

Amend:

2. Over the plan period from 2016 to 2038, a minimum of 30,800 new dwellings and around 300 hectares of employment land will be delivered. This equates to around 1,400 dwellings and around 14ha of employment land per annum. This Local Plan ensures that sufficient land in the right locations is available to achieve these growth aspirations, however the availability of land will be kept under review to ensure a continuous supply of suitable sites is available.

SP11: Green Belt and Safeguarded Land

Amend:

Table SP11.1 Green Belt release by Location and Type.
Shifnal safeguarded land ha. figures amended with SHF018c and removal of Land SW of Shifnal.

S15. Shifnal Place Plan Area

Amend:

7. Land beyond the development boundary that is not part of the Green Belt is safeguarded for Shifnal's future development needs, beyond the Plan period after 2038. This extensive land release from the Green Belt is located to the east ~~and to the south and west~~ of the town as shown in Schedule S15.1(iii) and on the Policies Map. Development of this land during the Plan period will only be permitted in 'very special circumstances' to meet Shifnal's development needs in accordance with national and local Green Belt policies.

Schedule S15.1(i). Residential Allocations: Shifnal Key Centre

Add:

Land east of Coppice Green Lane (SHF032)

Schedule S15.1(ii). Employment Allocations: Shifnal Key Centre

Land east of Shifnal Industrial Estate, Upton Lane, Shifnal (SHF018b & SHF018d)

Omit:

- The development of land west of Upton Lane should consider the functional relationship with Shifnal Industrial Estate and the opportunity to link the two employment areas to: create a secondary access into the new employment area; and to alleviate the constraints imposed on Shifnal Industrial Estate through the existing intensity of the uses within this employment area.*

Omit:

- *The priority given to Stanton Road as the primary access will require improvements to Stanton Road along its length.*

Omit:

- *The potential to operate a dedicated Park and Ride service should be investigated in partnership with appropriate local community groups and bus operators.*

Safeguarded Land Site Area

Amend:

~~Land between Park Lane and A4169 at Lodge Hill~~

~~46.1 hectares~~

~~Land between A4169 and the western rail line~~

~~12.8 hectares~~

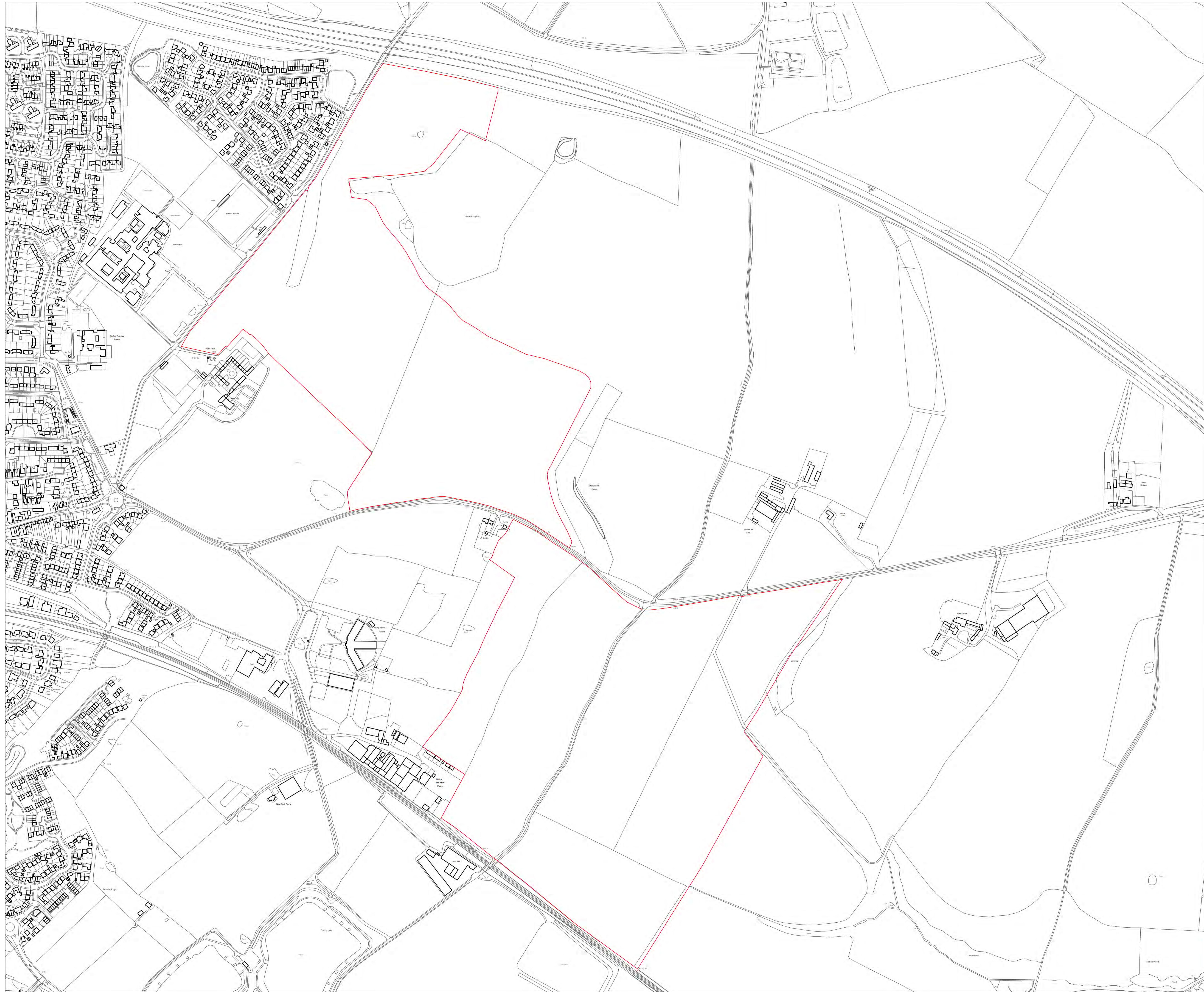
SHF018c (29.7ha) Land between Coppice Green Lane and Stanton Road

Omit:

5.215 – 5.217 which refer to south-west safeguarded land.

Appendix 7 changes to be inserted (delivery timetable amendments)

SHF18b & 18d to be delivered in the short & medium term within the plan period



Shifnal Local Plan Allocations
Harrow Estates

Plan 1

Status:	Drawn by:	Checked by:
DRAFT	SL	GB
Project Number:	Scale:	Date drawn:
161835	(@A)1:2500 (@A3)1:5000	FEB 2019
Drawing Number:	Revision:	
TOR-FL0001		

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LAND NORTH EAST OF SHIFNAL

SETTLEMENT STUDY AND POTENTIAL FOR GROWTH
SEPTEMBER 2020

Contents

1. Analysis of Shifnal and Site Context
2. Opportunities for employment
3. Logical growth to the east
4. Summary and key benefits



Introduction

PURPOSE OF THE DOCUMENT

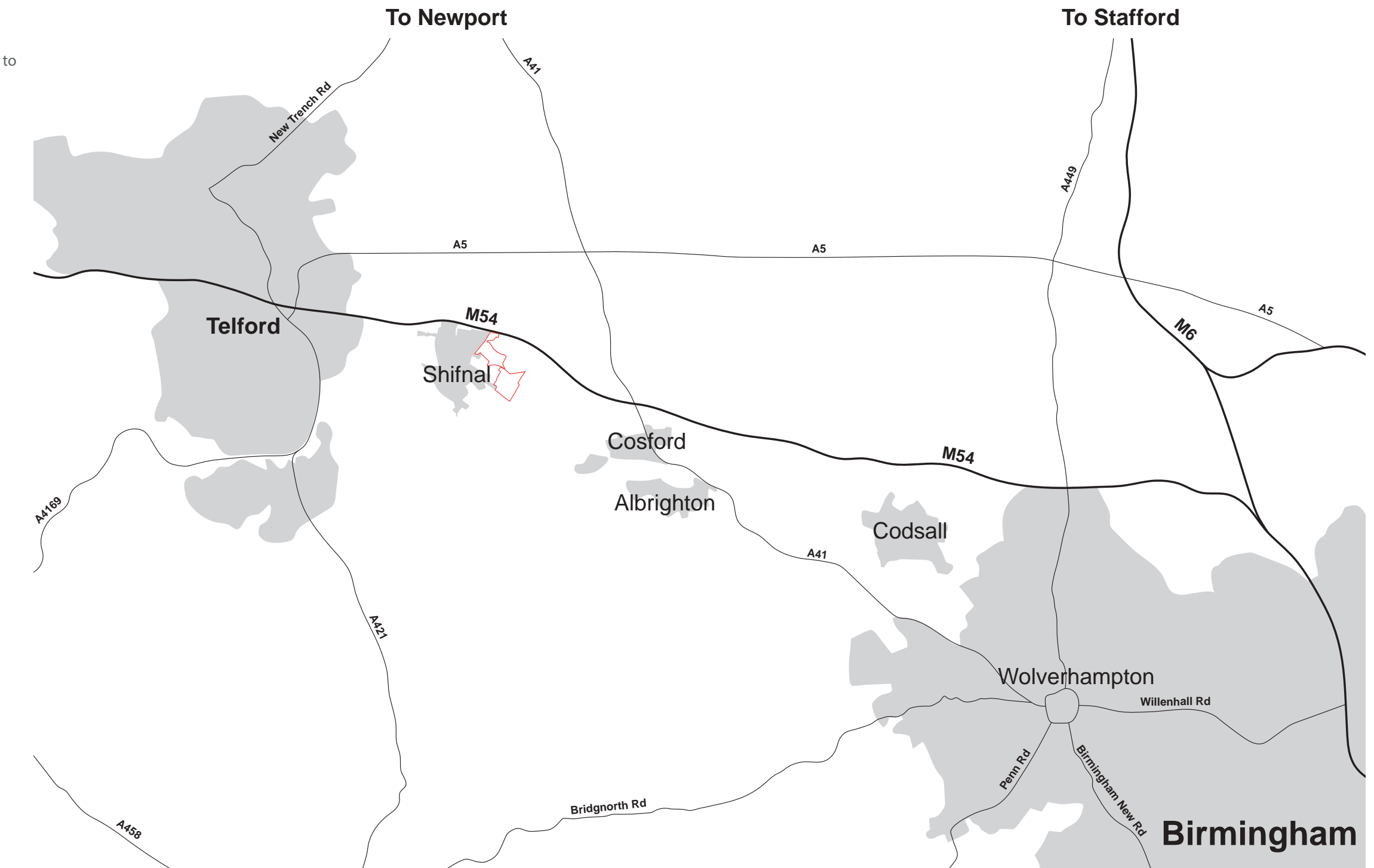
This document has been prepared on behalf of Harrow Estates to support the growth of Shifnal to the east in relation to sites for residential and employment development.

The Settlement Study and Potential for Growth document will firstly analyse the existing built fabric before presenting a concept and framework for growth to the east of the town.

LOCATION

Shifnal, a Shropshire market town, is strategically located on the M54 corridor between Telford (to the west) and Birmingham (to the east). Shifnal also benefits from a train station, providing direct connections to Shrewsbury and Wolverhampton.

The town has been identified by the Local Authority as an area for growth for both residential and employment development and supporting services.



Shifnal in its regional context

Analysis of Shifnal and Site Context

INTRODUCTION AND POTENTIAL FUTURE GROWTH SITES

Shifnal is a compact and walkable town, offering a range of services, supporting the local community. Shifnal benefits from key transport infrastructure by road (notably the M54 connecting to Telford and Birmingham), rail via Shifnal Station (connecting to Shrewsbury and Wolverhpton), and bicycle (National Cycle Route 81 - the route between Aberystwyth and Wolverhpton).

Shifnal offers great potential for future growth, given its strategic location and wealth of benefits to build upon.

This document supports written representations submitted to the Shropshire Local Plan Review – Regulation 18 pre-submission draft Local Plan for the following land parcels:

- SHF18b & 18d: (Employment parcels 39ha c.15.6a employment floorspace)
- SHF018c (Residential parcels for safeguarded strategic land 29.7ha)
- SHF032: (Residential parcel 2.8ha for c.80 homes)

This document responds to the draft policies contained in the pre-submission draft Shropshire Local Plan. It is demonstrated that given the particular characteristics of the aforementioned sites and their surroundings, development of these parcels will provide the most appropriate solution to accommodating Shifnal's growth as part of Shropshire's short, medium and long-term development needs.

Accordingly, these sites are promoted for inclusion as development allocations in the draft Local Plan (see alternative proposals map; p.g. 5 image)



View in to the site from Coppice Green Lane



Ipsall School



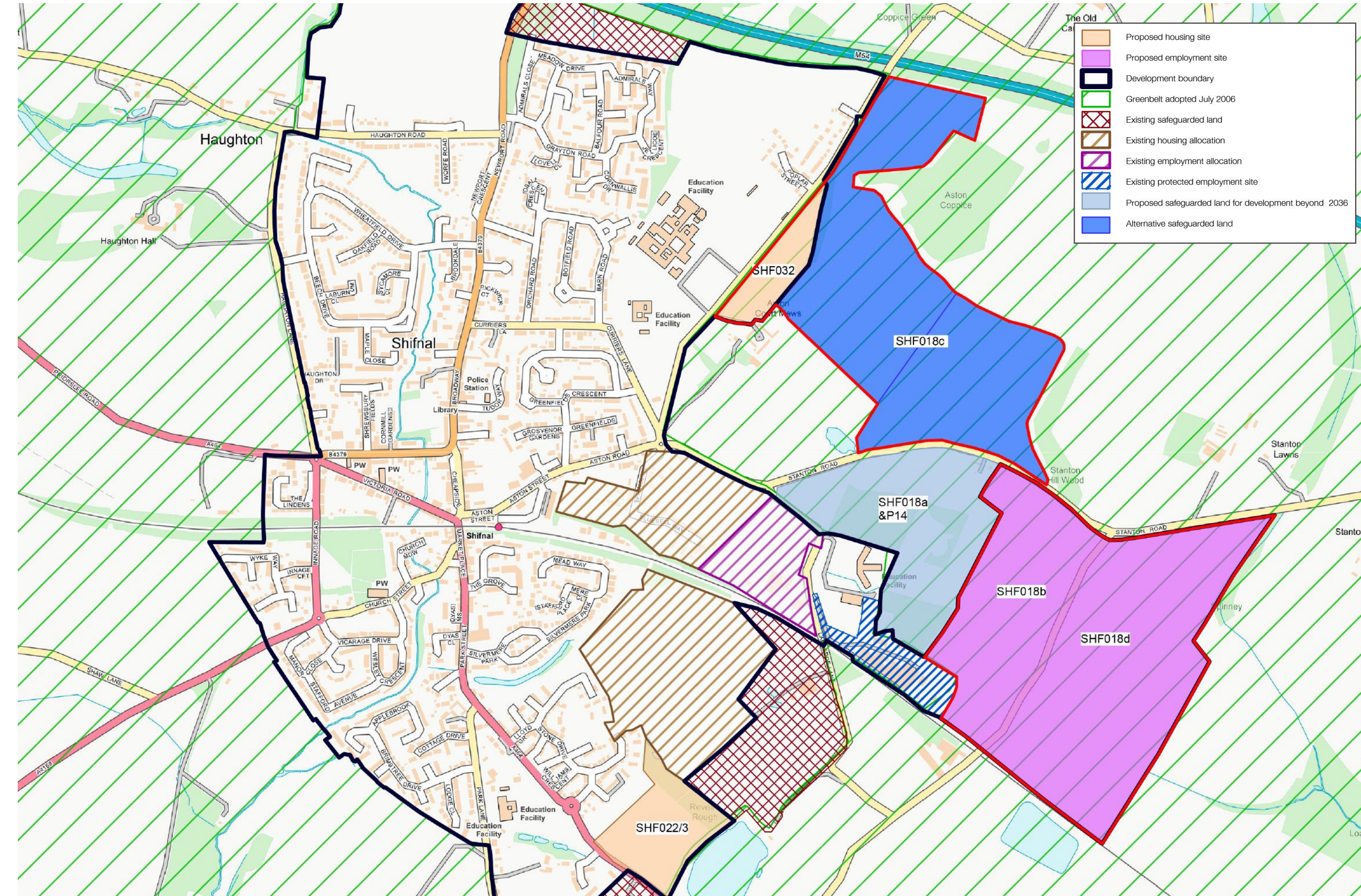
View from the PRoW in the southern parcel



Shifnal town centre



View from southern parcel



Alternative proposals map for safeguarded land

HISTORIC GROWTH OF SHIFNAL

Shifnal has seen relatively substantial growth in its recent history, predominantly due to its location between Telford and Birmingham and the construction of the M54 to the north.

Shifnal emerged as a Market Town due to the crossing of key trade routes, and along with the railway line, this confluence of routes is as evident at the settlement centre in the 1880 plan as it is today.

The surrounding land beyond the settlement boundary is designated Green Belt. Development of land east of Telford and west of Shifnal has narrowed the separation distance between the two settlements. Further development within this gap would reduce the separation distance, resulting in coalescence of the neighbourhood settlements. Through locating development opportunities to the east of Shifnal any merging would be avoided.



1960 Settlement growth in 1960

Telford was starting to redesign itself after the coal and ironstone mining which took place around its original settlement. Telford and Shifnal were still connected through the old railway line and Priorslee Road.



1980 Settlement growth in 1980

By the 1980s, Telford had significantly redeveloped and expanded in all directions; and would continue to do so till 1990s. The newly constructed M54 provided a new connection from Shifnal as well as Birmingham to the east. Other major roads were constructed such as the A442.



The historic core of the town has developed around the intersection of key routes and the later construction of the railway station. Predominant growth from the centre has been north-south with some additional development to the west towards Telford.

1880



Various pockets of infill development around the centre of the town has occurred, creating a compact settlement, broadly stretching north-south along a central spine. The M54 corridor is now in place.

1970



Shifnal has now expanded north and is bound by the M54. Additional growth of both residential and commercial development has occurred to the east, along the railway line.

2000



1950

Significant residential development occurred to the north-east of the town during the post-war period with additional pockets of development around the town centre.

1980

Residential growth continues to spread north-east towards the motorway and to the south beyond the railway line.

Settlement expansion

Previous settlement growth



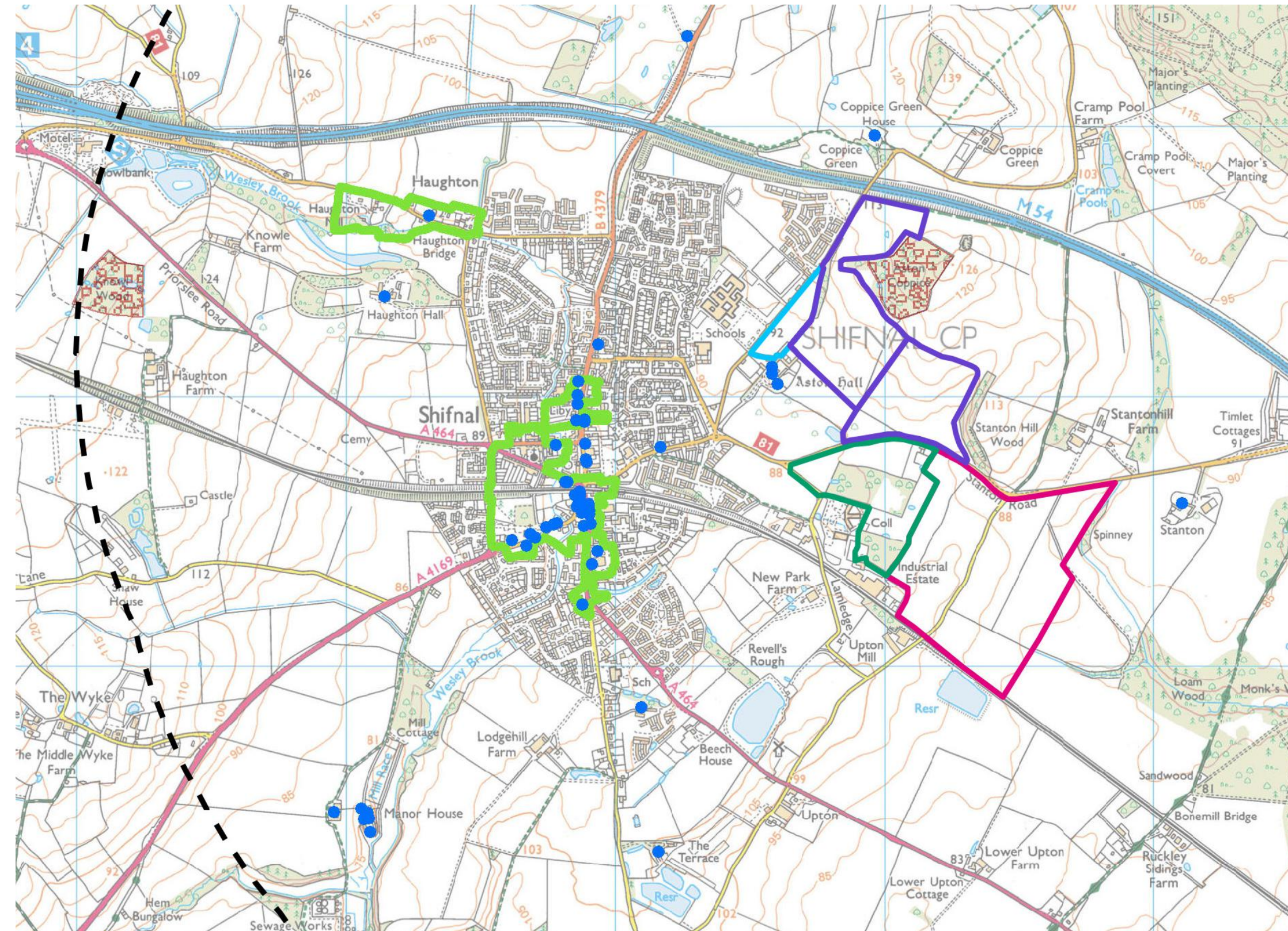
LISTED BUILDINGS AND KEY DESIGNATIONS

There are many listed buildings within the centre of Shifnal encompassed within a conservation area. With the site located to the east, Aston Hall and grounds are the primary listed buildings that are closest to SHF032 and needs to be considered for the framework masterplan.

Aston Coppice is a notable ancient woodland located north of the site that helps influence the framework masterplan.

The notable woodland clusters located around the site helps provide containment to the development areas.

-  Alternative safeguarded land
-  Proposed housing site - SHF032
-  Proposed safeguarded land for development beyond 2036 - SHF018a/P14
-  Proposed employment site - SHF018b/SHF018d
-  2.5km study area
-  Listed buildings
-  Ancient woodland
-  Conservation areas




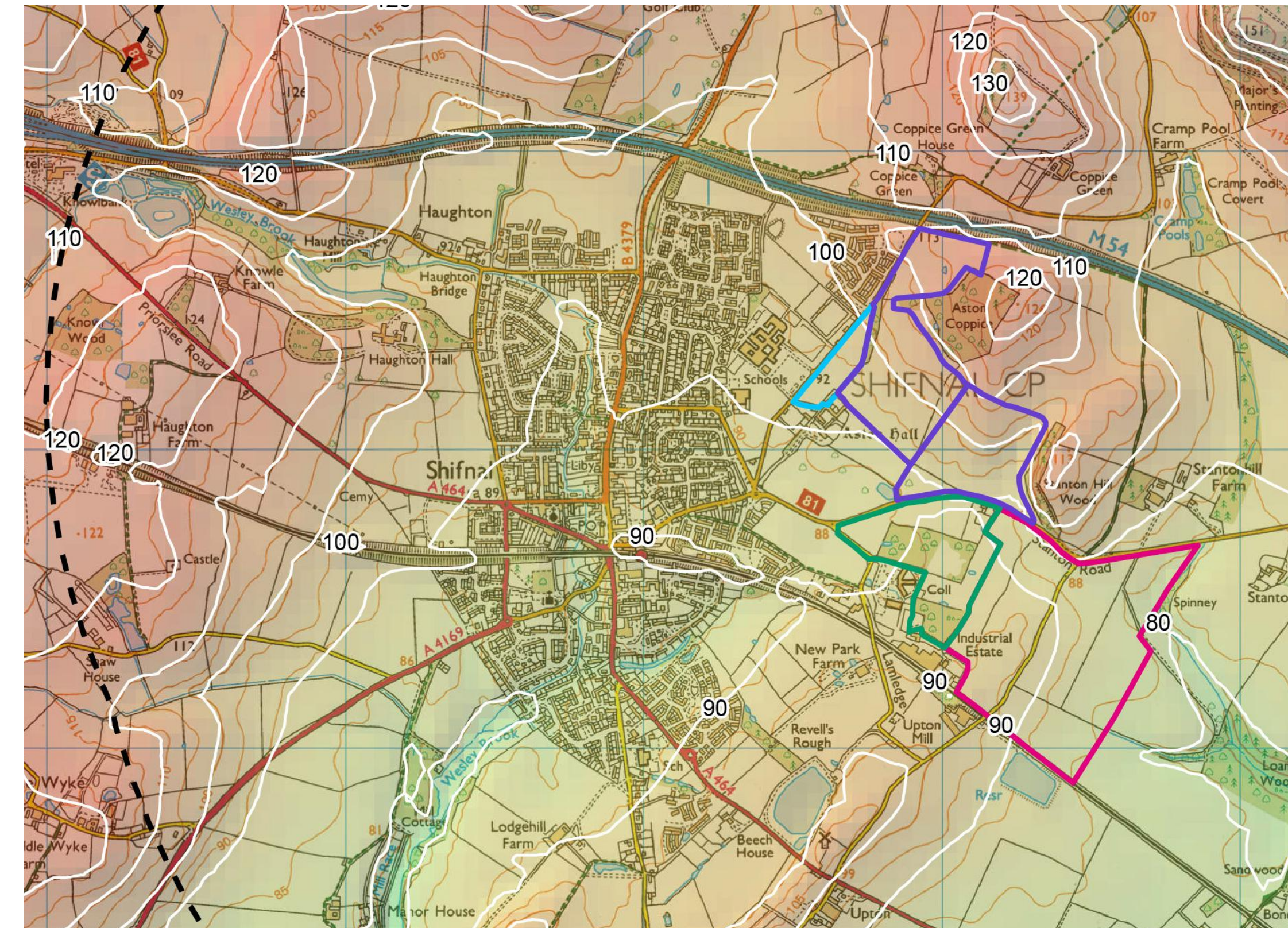
LANDSCAPE AND TOPOGRAPHY

Shifnal is surrounded by higher ground with areas reaching 130m and 120m and slowly dropping to 90m when arriving within the settlement.

The topography within the site contains a slope that starts at a high point of 110m at the northern parcels, which drops down to 90m in a southward direction to the railway line.

The southern parcel is relatively flat and suitable for employment purposes. The northern parcel has more of a gradient, contributing to the character of the proposed residential development up to the woodland which provides a natural boundary.

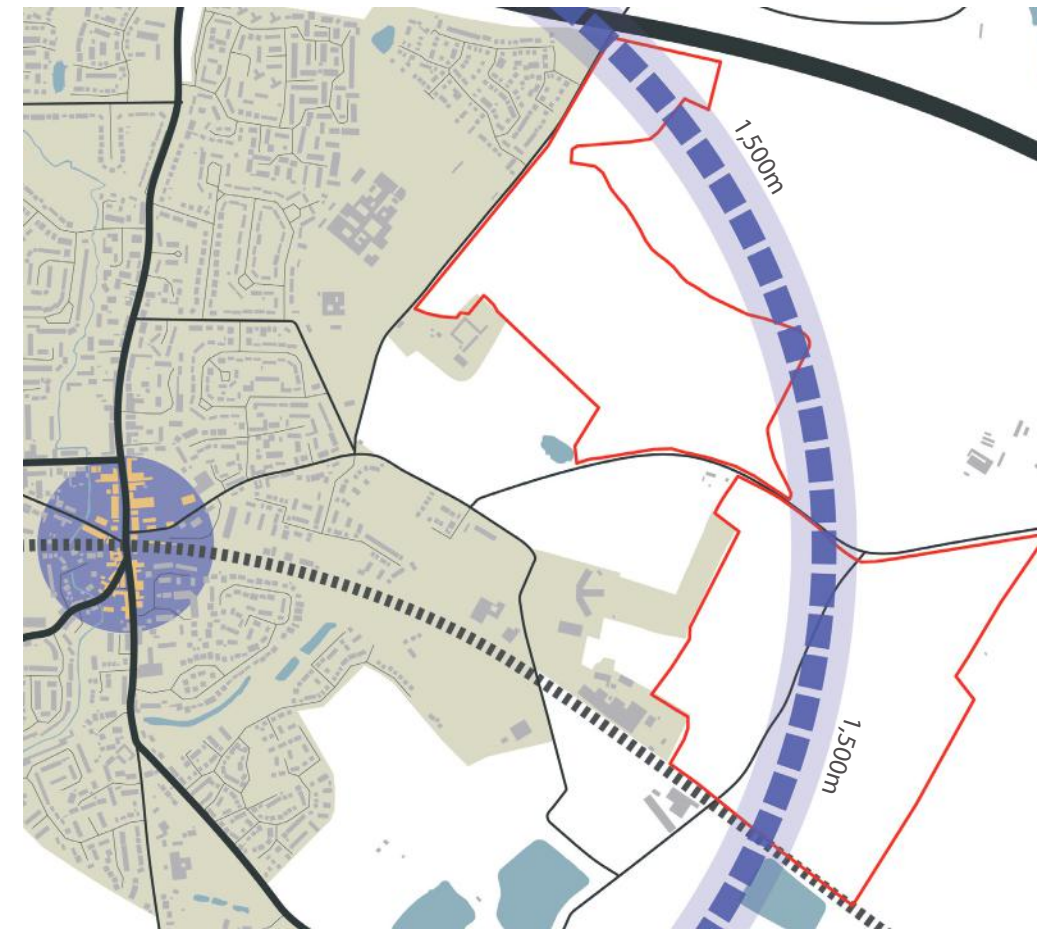
-  Alternative safeguarded land
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-  2.5km study area



FACILITIES, AMENITIES & CENTRES

Shifnal provides a range of different facilities and are primarily grouped around the town centre. Both sites are of walkable distance from the main facilities on Bradford Street and Market Place.

The catchment areas for three of Shifnal's schools (Idsall School, Shifnal Primary School, and Hillcrest Shifnal School) fall within the sites and allow for easy and fast access to its future community.



Shifnal town centre catchment



Shifnal school catchment



Main facilities within Shifnal

KEY ROUTES AND CONNECTIONS

Located on the eastern edge of Shifnal, the sites are able to benefit from excellent opportunities for both future residents and employees to travel to the Town Centre on-foot or bicycle.

In terms of walking and cycling routes, the sites will be developed with a focus on prioritising pedestrian activity and cycle movements. Links to wider routes will be provided by linking proposed internal pedestrian and cycle routes with existing and proposed off-site routes on Coppice Green Lane and along Stanton Road, including connection to National Cycle Route 81.

The sites have direct access to Shifnal's other key transport infrastructure by road (notably the M54 connecting to Telford and Birmingham) and rail via Shifnal Station (connecting to Shrewsbury and Wolverhampton).

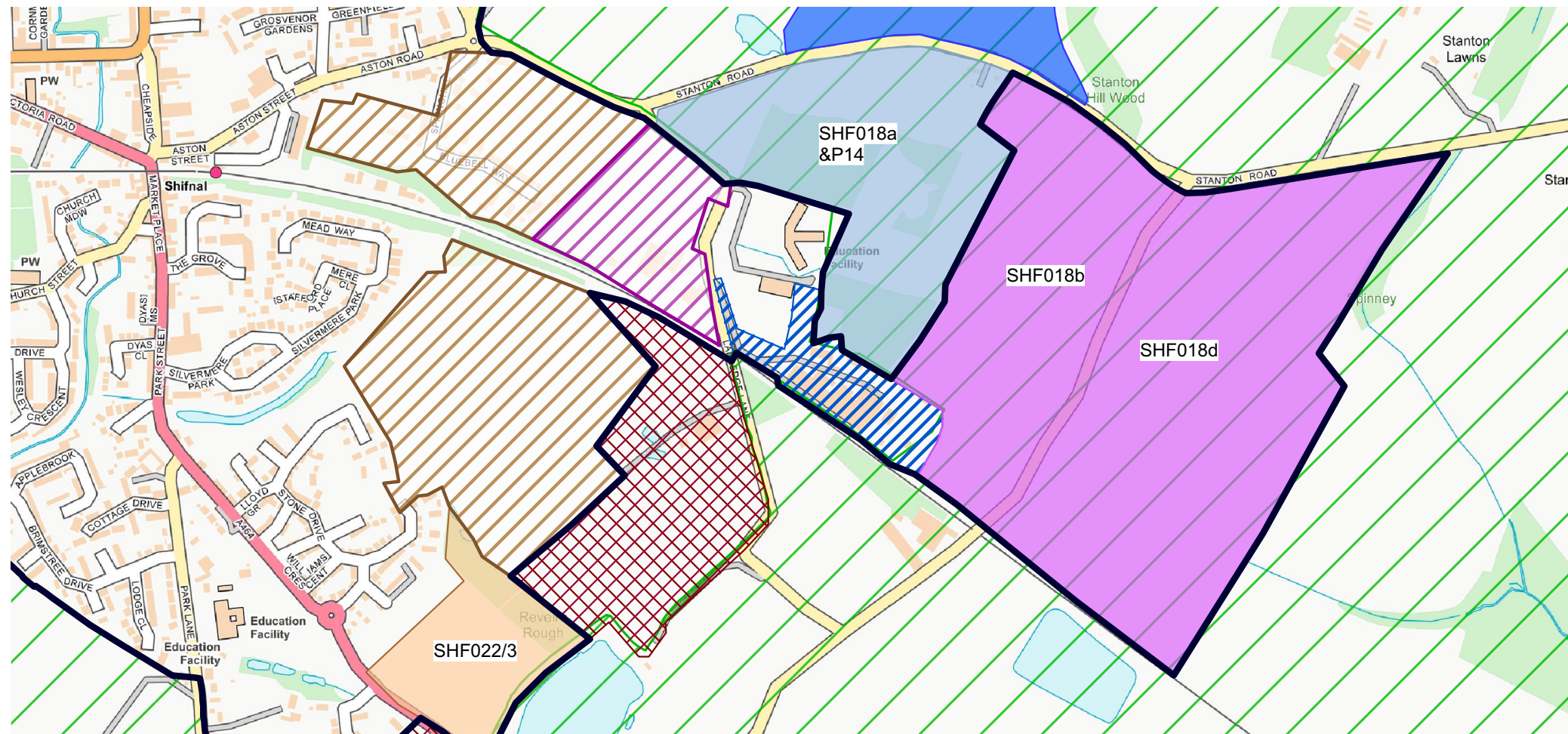


Existing street hierarchy and PRoW through site

Opportunities for employment

Shifnal has the opportunity to greatly diversify the employment offer in the town, and in the wider context. Dedicated employment within Shifnal is currently limited to Lamledge Lane Industrial Area (Shifnal Industrial Estate) to the east of the town.

With little land currently dedicated to employment within Shifnal there is significant potential for the town, given its strategic location within the M54 corridor, to diversify the employment provision in terms of scale, quality and use. SHF018b & 018d are viable, readily available and deliverable sites, and represent the most appropriate option in the locality for employment use.



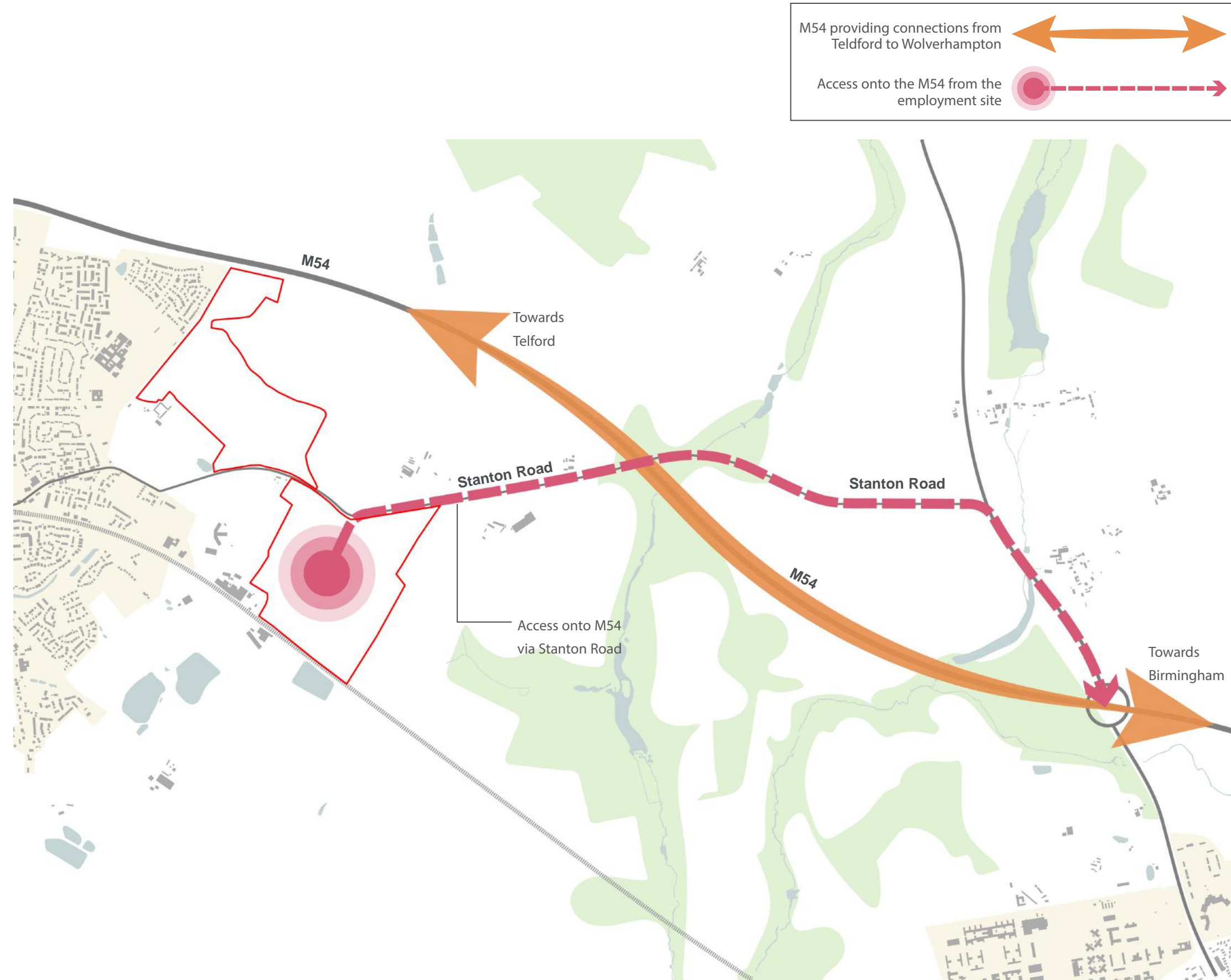
STRATEGICALLY LOCATED EMPLOYMENT CAMPUS

Sites SHF018b & SHF018d are located to the east of Shifnal, bounded by Stanton Road to the north and the railway line to the south.

The sites are well served by highways infrastructure, accessed from the east by the M54 junction 3 via Stanton Road. In addition to this strategic location, the access arrangement benefits the existing town by ensuring no direct through traffic.

The sites lie adjacent to the existing Lamledge Lane Industrial Area (Shifnal Industrial Estate). There is potential for connections between the existing employment uses as well as building on existing uses, diversifying the employment offer in terms of scale, quality and type. This offers the opportunity to compliment the existing employment areas within the Shifnal context.

The sites are also well connected by sustainable travel modes, lying on National Cycle Route 81 and within a short walk and cycle of Shifnal Railway Station and the facilities and amenities within the town centre.

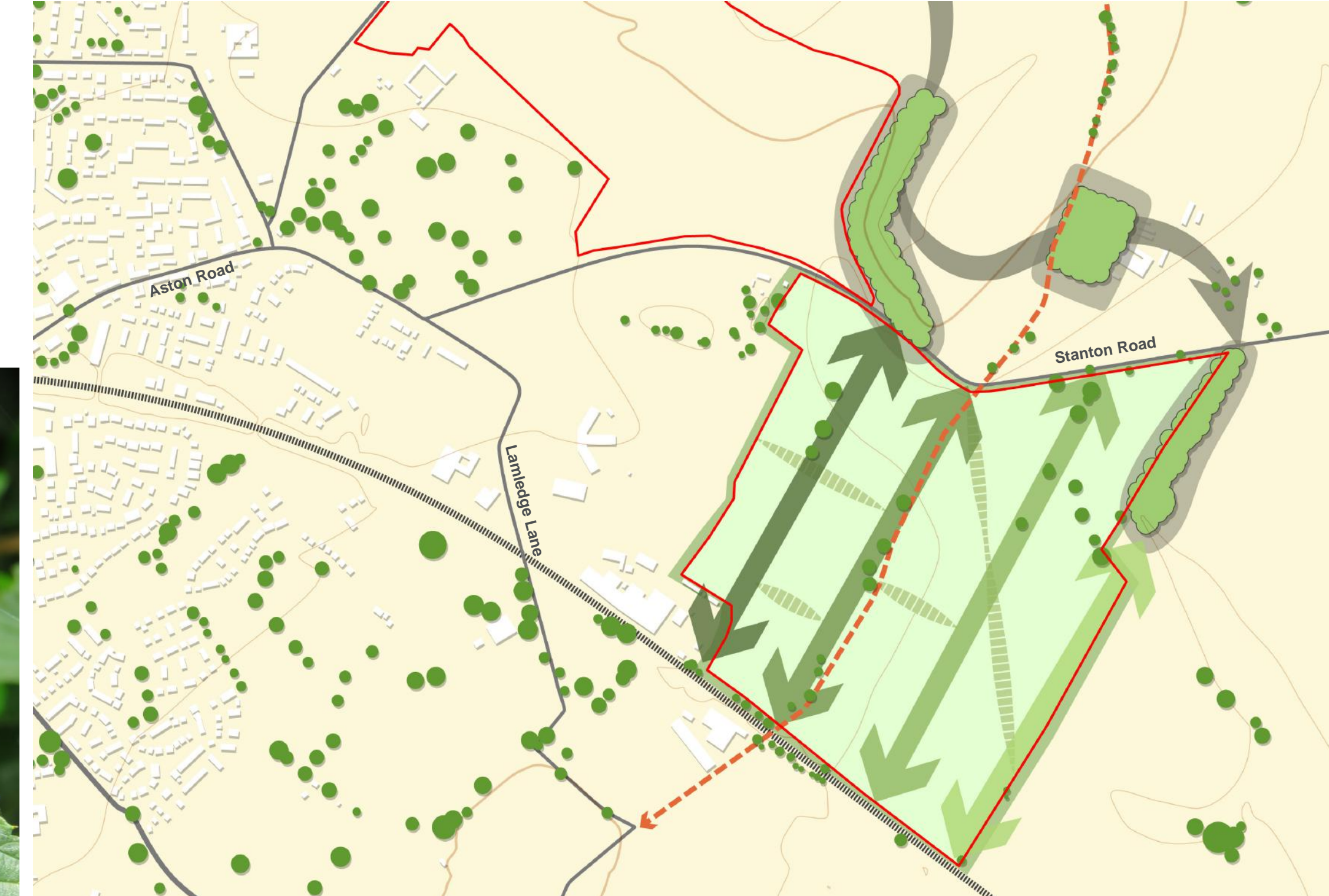


A BIODIVERSITY AND LANDSCAPE-LED APPROACH

The approach taken to the masterplanning of the employment sites is strongly influenced by a landscape response. The layout is responsive to the specific characteristics and form of the Site. The green infrastructure is naturalistic and creates a landscape setting for pavilion buildings to sit within.

Strong green corridors follow site topography to create a layered response, mitigating visual impact of the sloping site. New woodland, connected to existing, provides a tree-lined back drop to development.

The proposals build on the existing pedestrian and cycle infrastructure, delivering an integrated and walkable development through a landscaped campus.

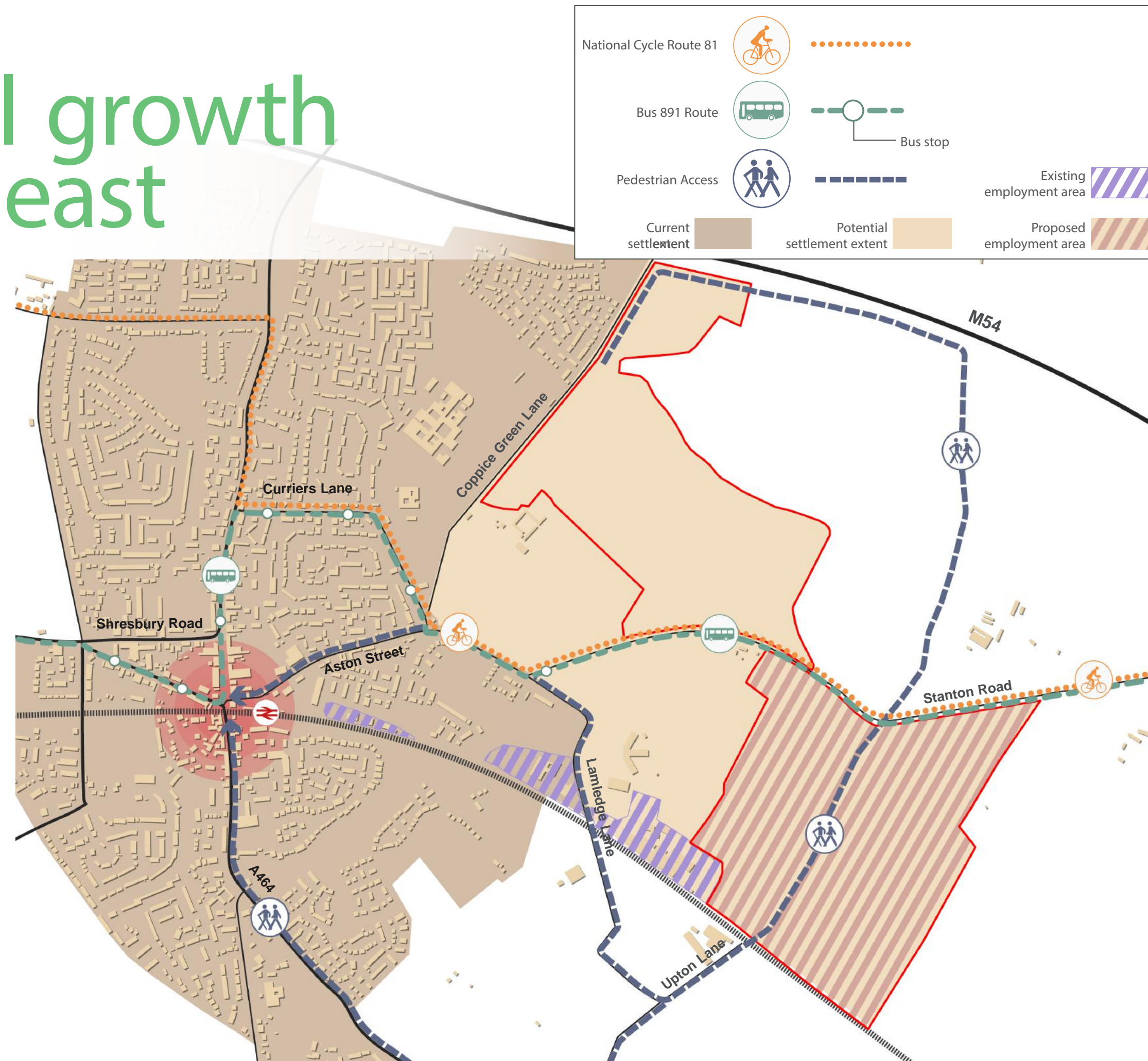


Logical growth to the east

A BENEFICIAL RELATIONSHIP WITH SHIFNAL

The potential growth of employment to the east of Shifnal has a number of benefits. SHF018b & SHF018d are located adjacent to the existing Lamledge Lane Industrial Area (Shifnal Industrial Estate), development to the east of the town offers the potential to expand the existing provision, creating a sustainable quantum of employment uses. The site is also visually contained by the neighbouring woodland clusters located north east.

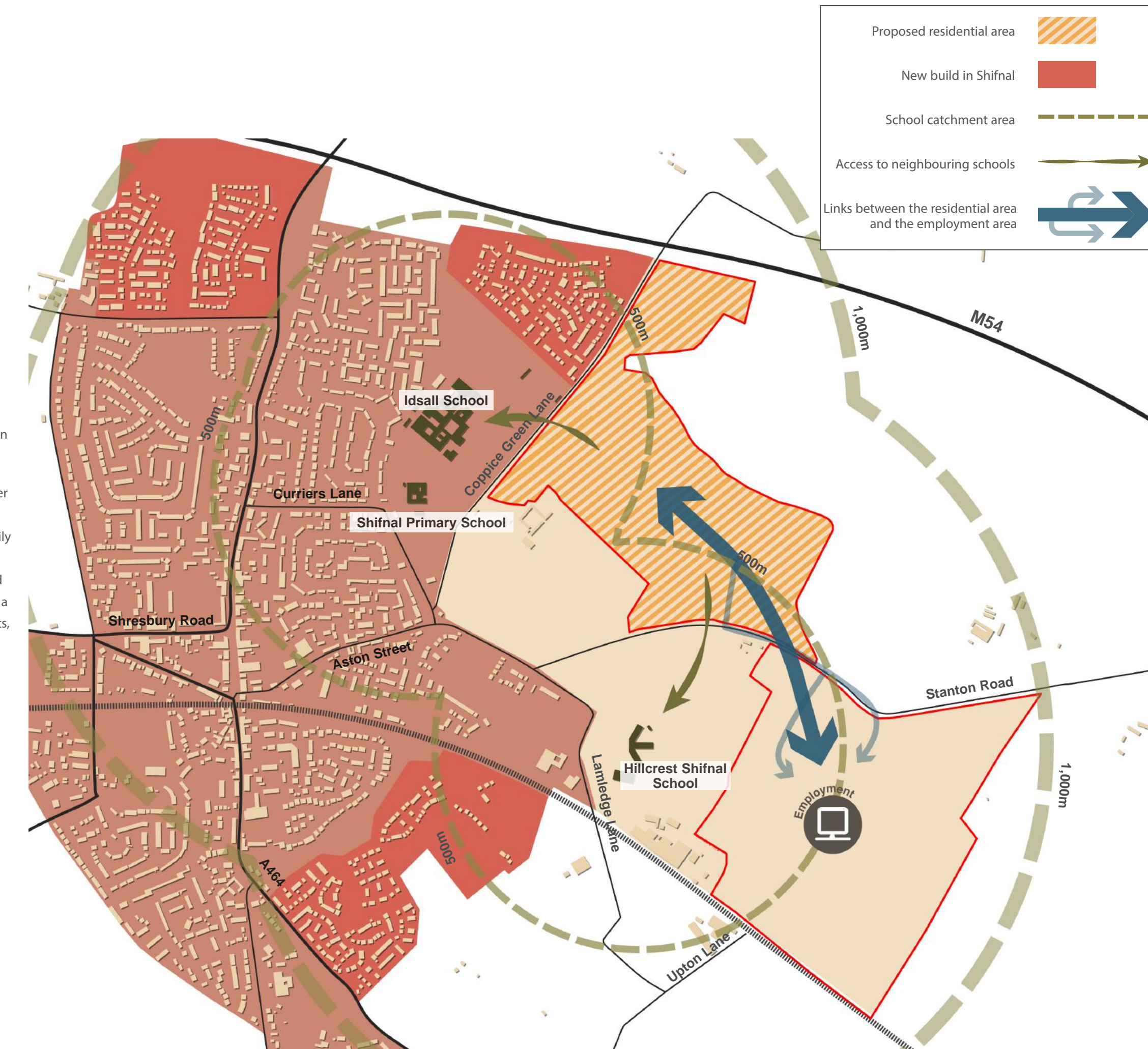
The site lies on a highly sustainable connection into the town, providing bus and cycle (via a national cycle route) connections to the town centre and its varied facilities and amenities, including Shifnal Station. In addition, a public right of way crosses the site, north to south adding pedestrian permeability to the proposed development.



UNLOCKING RESIDENTIAL DEVELOPMENT

Should Shifnal grow to the east as proposed, to deliver the employment campus, SHF032, & SHF018c provide the opportunity for coupled residential development to the north. Benefiting from a strong relationship with the proposed employment campus, the residential sites will integrate harmoniously with the existing urban fabric and the proposed development to the east of Shifnal. The residential parcels are ideally located within the local school catchment and are within a short walk or cycle to the town centre amenities.

Bringing the residential and employment sites forward together provides the unique opportunity to deliver truly sustainable growth to Shifnal. SHF018c, SHF032 & SHF018b & 18d are readily available and deliverable. They are within single ownership and offer an opportunity for comprehensive development, and capability to provide infrastructure and mitigate any impact in a simplified, effective method (including highways improvements, drainage, additional community and/or health facilities).



FRAMEWORK MASTERPLAN

The framework masterplan provides the opportunity for a highly sustainable new residential neighbourhood and new employment hub to the east of Shifnal. A landscape-led approach has driven the masterplan and helps to deliver harmonious growth of Shifnal to the east of the town.

A new employment campus lies to the south, accessed directly from Stanton Road, providing excellent access from the M54. Green corridors, aligned with existing landscape features and topography permeate the campus, breaking up the massing of buildings and creating a treed backdrop. The campus will support a range of employment and ancillary uses, meeting local need and re-balances the lack of employment related development in recent years.

Growth of employment to the east, coupled with existing development and excellent access to schools and the town centre, unlocks the potential for sustainable residential development here. The residential masterplan integrated with its new and existing context, responds sensitively to its landscape and heritage setting, and benefits local ecology with a strong green infrastructure framework and series of linked woodland spaces.



Summary and key benefits



A strategically located, readily available and deliverable 40ha employment campus which benefits from direct access to the M54 at junction 3, whilst not impacting the existing town of Shifnal



A truly landscape-led approach to the masterplan delivers c.50% of the site as publicly accessible open space, delivering a development at one with its context



A sustainable extension to Shifnal brings forward integrated employment and residential opportunities which lie on key pedestrian, cycle and public transport routes



A commitment to biodiversity net gain and a masterplan which is sensitive to its local and wider context, eastern growth of Shifnal offers a unique opportunity for sustainable growth