

SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 18 CONSULTATION

Upton Lane, Shifnal (Ref. SHF035)

Nurton Developments Limited

SLR Ref: 406.02395.00004
Version No: FINAL
September 2020

SLR 

BASIS OF REPORT

This document has been prepared by SLR Consulting Limited with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with Nurton Developments Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

CONTENTS

EXECUTIVE SUMMARY	1
1.0 INTRODUCTION	3
1.1 Background	3
1.2 Identification of Proposed Site Allocations and Safeguarded Land	3
1.3 Purpose of Report	4
2.0 POLICY & BACKGROUND	5
2.2 Local Plan Reviews & Housing	5
2.3 Green Belt & Safeguarding of Land	7
3.0 ASSESSMENT & SCORING CRITERIA	10
3.2 Stage 2 Assessments	10
3.3 Stage 3 Assessments	13
3.4 Evidence Base	18
4.0 OTHER MATTERS OF CONSIDERATION	20
4.1 Climate Change Emergency	20
4.2 Planning for the Future White Paper (August 2020)	21
4.3 Affordability	23
5.0 SUMMARY & CONCLUSION	26
5.1 Summary	26
5.2 Conclusion	27

DOCUMENT REFERENCES

TABLES

Table 1: Housing Need calculated using the proposed Revised Standard Methodology	23
Table 2: Composite Scoring Table of site SHF034 from the site assessments for P15b, P16, P17a, SHF017 and SHF019 under the Preferred Sites Consultation SA (2018).....	32

FIGURES

Figure 1: Relationship between the site assessment and site SA process	3
Figure 2: UN Sustainability Goals Diagram.....	21
Figure 3: Median Household Income (2019) by Shropshire Place Plan Area.....	24
Figure 4: Lower Quartile Household Income (2019) by Shropshire Place Plan Area	24

APPENDICES

Appendix 1: SHF035 Contextual Drawings	
Appendix 2: Combined Summary Tables for Stage 2a Assessments	
Appendix 3: Transport Appraisal Report	
Appendix 4: Flood Risk Appraisal Report	
Appendix 5: Green Belt Appraisal Report	
Appendix 6: Landscape & Visual Appraisal Report	
Appendix 7: Heritage Appraisal Report	
Appendix 8: Ecology Appraisal Report	

Executive Summary

This report has been prepared by SLR Consulting Limited on behalf of Nurton Developments Limited and is submitted as part of their representations to the latest Regulation 18 Consultation of the Local Plan Review process.

Nurton Developments Limited are actively promoting their landholdings at Upton Lane, Shifnal for residential development and associated supporting uses. The site has been considered within the Stage 2 and 3 Assessments undertaken by Shropshire Council's Local Plans Team (site ref. SHF035). These assessments form part of the Council's site identification process and are published within the Sustainability Appraisal prepared in support of the Local Plan Review. This report primarily concentrates on the methodology and findings of these site assessments.

The key findings of this review are as follows:

- The Authority has erred in the site assessment process and, as such, the identification of site SHF034 for safeguarding is considered inappropriate and unsound;
- There are a number of inconsistencies, alterations and omissions contained within the Stage 2 and 3 site assessment process and, as such, the evidence base which has informed the site identification process for the Local Plan Review is not robust and should be reviewed prior to any Regulation 19 Consultation or formal submission of the plan for Examination in Public;
- The evidence base upon which the Stage 2 and 3 site assessments were undertaken is inconsistently utilised, does not follow best practice in principle and unfairly favours the sites identified and promoted for allocation or safeguarding early in the local plan review process. Our client's site is therefore considered to have been disadvantaged by an inconsistent approach to the site assessments;
- Nurton Developments Limited are concerned that the evidence base requested by the Authority, and duly provided by the promoter, for site SHF035 does not appear to have been taken into account in the site assessments which support the current Regulation 18 consultation;
- Despite information requests made by Nurton Developments Limited, there is a lack of technical evidence to support the selection of site SHF034 for safeguarding. Should such evidence base exist, the Authority should have published this for public consultation and made clear reference to the assumptions upon which judgements were based. Without this evidence base, it is not possible to confirm that the site has been properly and appropriately assessed, nor does it allow objectors and interested parties to consider the relative merits of promoted land alternatives;
- The Authority has erred in its judgement in identifying a single additional site for safeguarding beyond the plan period which will fail to offer the opportunity to identify appropriate development options in future; thereby committing to a significant future allocation which may not be the most suitable or sustainable option for the future growth of Shifnal;
- The Authority has erred in the site assessment process and, as such, the identification of site SHF034 for safeguarding is considered inappropriate and unsound. The site is not sequentially preferable from a flood risk perspective, whilst the apparent driver for its safeguarding (the delivery of a new link road) is neither suitably tested nor deliverable; and

- Site SHF035, as evidenced through the submission of a range of site assessments and technical reports, is considered to perform better than SHF034 and should, therefore, be safeguarded for future allocation beyond the current plan period. More land could be safeguarded to provide the Authority with greater choice and flexibility in the future, particularly given the 'need' and 'affordability' challenges surrounding Shifnal; and having regard to likely Green Belt review restrictions as a consequence of the current White Paper (albeit that the substance of this might be altered).

On the basis of the above, it is considered that the current Draft Local Plan Review, as contained within the Regulation 18 Consultation, is unsound, the evidence base should be updated and made publicly available for consideration, and that policies DP25 (Green Belt and Safeguarded Land) and S15 (Shifnal Place Plan Area) need to amended.

1.0 Introduction

1.1 Background

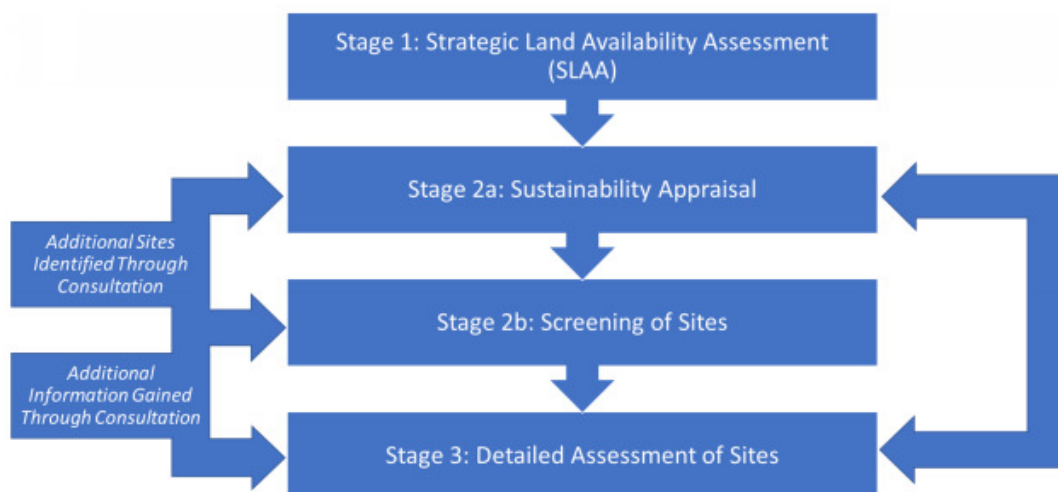
1.1.1 This report has been prepared by SLR Consulting Limited on behalf of Nurton Developments Limited and is submitted as part of their representations to the latest Regulation 18 Consultation of the Local Plan Review process.

1.1.2 Nurton Developments Limited are actively promoting their landholdings at Upton Lane, Shifnal for residential development and associated supporting uses. The site has been considered within the Stage 2 and 3 Assessments undertaken by Shropshire Council's Local Plans Team (site ref. SHF035). These assessments form part of the Council's site identification process and are published within the Sustainability Appraisal prepared in support of the Local Plan Review. This report primarily concentrates on the methodology and findings of these site assessments.

1.2 Identification of Proposed Site Allocations and Safeguarded Land

1.2.1 As identified within Chapter 4 of the Regulation 18 Pre-Submission Draft Local Plan: Sustainability Appraisal and Site Assessment Environmental Report, the Sustainability Appraisal of sites is meant to form part of a wider site assessment process which informs the selection of land for allocation in the Local Plan. The Local Plan site assessment process considers a much larger number of factors than the site SA process, but the outcomes of the site SA are a key component of it. The diagram shown within Figure 1 below sought to explain how the two processes fit together:

Figure 1: Relationship between the site assessment and site SA process



1.2.2 In terms of the stages, the SA outlines that:

- Stage 1 (SLAA) consisted of a strategic screening and review of sites;
- Stage 2a consisted of the assessment of the performance of sites against the objectives identified within the Sustainability Appraisal;
- Stage 2b consisted of a screening exercise informed by consideration of a site's availability; size and whether there were obvious physical, heritage or environmental constraints present, based

on the strategic assessment undertaken within the SLAA; and

- Stage 3 consisted of a proportional and comprehensive assessment of sites informed by the Sustainability Appraisal and assessments undertaken by Highways; Heritage; Ecology; Trees; and Public Protection Officers; various technical studies, including a Landscape and Visual Sensitivity Study, Strategic Flood Risk Assessment and Green Belt Assessment/Review where appropriate; consideration of infrastructure requirements and opportunities; consideration of other strategic considerations; and professional judgement. This stage of assessment was an iterative process.

1.2.3 With regard to the Stage 3 Assessments, whilst the methodology provided within Chapter 4 of the Sustainability Appraisal implies that a range of assessments and technical studies have been undertaken and utilised to inform the site identification process, these do not appear to be published as part of the Regulation 18 Consultation (for example, we are not aware of an updated Strategic Transport Appraisal which supports the Local Plan Review).

1.2.4 Furthermore, from discussions with the Authority, it is understood that the only assessment data/information published is that contained within the Sustainability Appraisal itself (i.e. the Stage 2 and Stage 3 tables). Neither the Authority's background evidence, nor any site promotion information has been made publicly available for comment.

1.3 Purpose of Report

1.3.1 Nurton Developments Limited are disappointed that the evidence base requested by the Authority, and duly provided by the promoter, for site SHF035 does not appear to have been taken into account in the site assessments which support the current Regulation 18 consultation. This is notwithstanding that the Authority have indicated that the reports have been fully reviewed, considered and taken into account in the most recent site assessments. Further contextual drawings regarding the potential delivery of SHF035 are provided within Appendix 1.

1.3.2 Furthermore, despite information requests made by Nurton Developments Limited, there appears to be a lack of technical evidence to support the selection of site SHF034 for safeguarding. Should such evidence base exist, the Authority should have published this for public consultation and made clear reference to the assumptions upon which judgements were based. Without this evidence base, it is not possible to confirm that the site has been properly and appropriately assessed, nor does it allow objectors and interested parties to consider the relative merits of promoted land alternatives.

1.3.3 On the basis of the above, this report seeks to outline Nurton Developments' principle concerns with the regard to the site assessment process from both a technical and compliance perspective. The report contains the following Chapters:

- Chapter 2 – Policy and Background
- Chapter 3 – Assessment & Scoring Criteria
- Chapter 4 – Other Matters of Consideration; and
- Chapter 5 – Summary and Conclusion.

2.0 Policy & Background

2.1.1 This section provides a brief factual summary of the relevant extant National Planning Policy Framework and associated Planning Practice Guidance related to the preparation of Local Plans (and Reviews), identification of housing sites and the release of Green Belt land.

2.2 Local Plan Reviews & Housing

National Planning Policy Framework

2.2.1 As identified by the National Planning Policy Framework (NPPF), it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that with permission is developed without unnecessary delay (paragraph 59).

2.2.2 To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for (paragraph 60).

2.2.3 In identifying land for homes, paragraph 67 of the NPPF identifies that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

2.2.4 In this regard, and in respect of the overall housing need identified within the current Regulation 18 Consultation, insufficient evidence has been provided to satisfy paragraphs 60 and 67 of the NPPF in terms of responding to the Strategic Housing Market Assessment, current and future demographic trends and market signals. Nor has sufficient evidence been provided that a sufficient supply and mix of sites has been identified for both the current plan period and beyond (i.e. safeguarded sites).

2.2.5 Paragraph 72 continues by stating that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
- c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;
- d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and
- e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

2.2.6 As outlined within the sections below, we do not believe that the current sites identified within the Regulation 18 Consultation accord with the overall thrust of paragraph 72 of the NPPF with regard to having the support of their communities or meeting identified needs in a sustainable way. This includes how consideration has been given to planned investment in infrastructure, the area's economic potential and the scope for net environmental gains.

2.2.7 Furthermore, it is contended that the authority has not ensured that the site's identified for safeguarding within Shifnal will support a sustainable community in the longer term, with sufficient access to services and employment opportunities.

Planning Practice Guidance – Plan Making

2.2.8 At paragraph 065 of the Planning Practice Guidance (PPG) on 'Plan Making' it is identified that in undertaking a plan review an authority can consider information such as (but not exclusively):

- conformity with national planning policy;
- changes to local circumstances; such as a change in Local Housing Need;
- their Housing Delivery Test performance;
- whether the authority can demonstrate a 5-year supply of deliverable sites for housing;
- whether issues have arisen that may impact on the deliverability of key site allocations;
- their appeals performance;
- success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;
- the impact of changes to higher tier plans;
- plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;
- significant economic changes that may impact on viability.; and

- whether any new social, environmental or economic priorities may have arisen.

2.2.9 Paragraph 034 continues by stating that authorities preparing local plans should assess future needs and opportunities for their area, explore and identify options for addressing these, and then set out a preferred approach (except where this has already been dealt with through a spatial development strategy). This involves gathering evidence, carrying out a Sustainability Appraisal to inform the preparation of local plans and effective engagement and consultation with local communities, businesses and other interested parties.

2.2.10 This is echoed by paragraph 037 which identifies that every local plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the local plan reflects sustainability objectives and has considered reasonable alternatives. The Sustainability Appraisal should incorporate a Strategic Environmental Assessment to meet the statutory requirement for certain plans and programmes to be subject to a process of 'environmental assessment'.

2.2.11 Again, it is duly contended that the Local Plan Review is not robust given that there are significant errors and omissions from the prepared evidence base and associated Sustainability Appraisal. Furthermore, as outlined above, it is contended that the authority does not accord with key policy requirements of the NPPF with regard to identifying and assessing sites for allocation and future safeguarding.

2.3 Green Belt & Safeguarding of Land

National Planning Policy Framework

2.3.1 Whilst the safeguarding of land does not go toward meeting an identified housing need, it is an important factor in the preparation of a Local Plan Review. This is especially pertinent for locations such as Shifnal which is immediately bound by Green Belt and with the knowledge that this will form a significant constraint to the future release of land for housing. As such, in undertaking a Green Belt Review, it is important that the review is and has regard to the five purposes identified within the NPPF and to safeguard sufficient land to meet housing needs well beyond the plan period.

2.3.2 As identified by the NPPF (paragraph 133), the Government attaches great importance to the Green Belt and their fundamental aim is to prevent urban sprawl. An essential characteristic of the Green Belt is its openness and their permanence. Paragraph 134 continues by identifying the five purposes of Green Belt, namely:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.3.3 Indeed, paragraph 136 of the NPPF identifies that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation

or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

- 2.3.4 Paragraph 138 continues by identifying that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
- 2.3.5 When defining Green Belt boundaries, paragraph 139 identifies that plans should:
- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
 - b) not include land which it is unnecessary to keep permanently open;
 - c) where necessary, **identify areas of safeguarded land** between the urban area and the Green Belt, in order to meet longer-term development needs stretching **well beyond** the plan period;
 - d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
 - e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
 - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.3.6 Finally, paragraph 141 identifies that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. As such, in identifying sites for release from the Green Belt, an authority should be able to assist in achieving these key Green Belt aspirations.
- 2.3.7 On the basis of the above, it is duly contended that the site assessment and identification process has erred in judgement by failing to identify sufficient area for safeguarding well beyond the plan period. This fails to respond to the longer term needs of Shifnal, allowing flexibility and opportunity for a choice of potential allocation sites in future, ensuring the longer term sustainability of the Local Plan or achieving key aspirations to improve the Green Belt. Failure to do so would likely result in Shropshire having to undertake a further Green Belt Review at the end of the current plan period in contradiction of paragraph 139 of the NPPF.

Planning Practice Guidance – Green Belt

2.3.8 Paragraph 002 of the PPG identifies that where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

2.3.9 Again, it is duly contended that the authority has failed to provide sufficient evidence that consideration has been given to any compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land that can be delivered when undertaking the site assessment and identification process.

3.0 Assessment & Scoring Criteria

3.1.1 In reviewing the Stage 2 and 3 Site Assessments contained within both the Strategic Site Assessments and Shifnal Place Plan Assessments, it is noted that there are a number of inconsistencies, alterations and/or omissions. In undertaking this review, we have also compared the Stage 2 and 3 Assessments published as part of the evidence base for the following consultations which have taken place as part of the Local Plan Review:

- Preferred Sites Consultation (November 2018);
- Strategic Sites Consultation (July 2019); and
- Local Plan Review Regulation 18 Consultation (August 2020).

3.1.2 As outlined within the sections below, it appears that there have been various amendments undertaken between the successive Stage 2 and 3 Assessments which have not been clarified and/or appear to be incorrect when compared against previous iterations. On this basis, we must raise significant concerns that the evidence base upon which the Local Plan Review is based is not robust and should be reviewed prior to any Regulation 19 Consultation or formal submission of the Plan for Examination in Public.

3.1.3 In undertaking this review, we have also sought to sense check and compare the scoring results for Nurton Development's site (SHF035) with the site which has been identified for safeguarding (SHF034) within the current Local Plan Review Regulation 18 Consultation for Shifnal. In undertaking this comparison, we are of the view that SHF035 performs equally to or better than this competing site when errors, omissions or the correct evidence base information is taken into consideration.

3.2 Stage 2 Assessments

Inconsistencies, Alterations and Omissions

3.2.1 It is noted that whilst reference is made to Sustainability Objectives SO5 (*'encouraging the use of sustainable means of transport'*) and SO6 (*'Reduce the need of people to travel by car'*) that no relevant scoring criteria for this was included within either the Stage 2a assessments for the Preferred Sites Consultation (2018) or the Strategic Sites Consultation (2019). It is not until this latest Local Plan Review Regulation 18 Consultation Sustainability Appraisal that a new Criteria 6 has been introduced into the scoring matrices for *'Site boundary within 480m of a public transport node with regular service offered during peak times'*.

3.2.2 Furthermore, it is noted that the Local Plan Review Regulation 18 Consultation Sustainability Appraisal does not provide any explanation as to why the criteria was excluded from previous Stage 2a Assessments nor any confirmation that it has been introduced into this latest Stage 2a Assessment matrices and why. Indeed, we would also question whether this criteria meets the requirements of the Sustainability Objectives SO5 and SO6 as set out within the Sustainability Appraisal.

3.2.3 As evidenced by the Combined Summary Tables provided within Appendix 2, it is also apparent that the Local Plan Review Regulation 18 Consultation Sustainability Appraisal Stage 2a Residential Assessments for the Strategic Sites (Appendix T) and those prepared for the Shifnal Place Plan Area (Appendix P) are inconsistent in their approach.

3.2.4 Given that sites SHF034 and SHF035 are considered within both assessment tables, it is unclear why

their scores would alter given that neither the site boundaries nor the basis for the scoring criteria have altered between these two Stage 2a Assessment documents. No adequate explanation has been provided for this altered scoring within the Sustainability Appraisal. The two sites scored as follows:

- SHF034:
 - Strategic Sites (Appendix T) - Score -2 (Good);
 - Shifnal Place Plan Area (Appendix P) – Score -9 (Poor);
- SHF035:
 - Strategic Sites (Appendix T) - Score -7 (Fair);
 - Shifnal Place Plan Area (Appendix P) – Score -9 (Poor);

3.2.5 In this regard, we draw your attention to the following scoring inconsistencies within both the Local Plan Review Regulation 18 Consultation Sustainability Appraisal Stage 2a Residential Assessments for the Strategic Sites (Appendix T) and those prepared for the Shifnal Place Plan Area (Appendix P):

- Under Criteria 3 – *‘Tree Preservation Order (single or group) within or on-site boundary’* – Site SHF034 is scored incorrectly for this criterion within the Shifnal Place Plan Area (Appendix P);
- Under Criteria 5 – *‘Site boundary within 480m of one or more of the following (record all that apply)’* – Site SHF034 is scored incorrectly for proximity to a primary school, children’s playground, outdoor sports facility and amenity green space within the Shifnal Place Plan Area (Appendix P);
- Under Criteria 5 – *‘Site boundary within 480m of one or more of the following (record all that apply)’* – Site SHF034 is scored incorrectly for proximity to a GP surgery within the Strategic Sites (Appendix T). This is due to the exclusion of land north of the railway line (formally site P17a) which therefore increases the distance to this community facility;
- Under Criteria 9 – *‘All or part of site within Flood Zones 2 or 3’* – Site SHF034 is scored incorrectly for this criterion within the Shifnal Place Plan Area (Appendix P);
- Under Criteria 11 – *‘Site is wholly/partly classified as brownfield or is wholly/partly within an area with a previous industrial or potentially contaminative use’* – Site SHF034 is scored incorrectly for this criterion within the Strategic Sites (Appendix T). In this regard, SLR notes that the mapping for SHF034 has been amended under the Local Plan Review Regulation 18 Consultation with land to the north of the railway line (formally site P17a) being excluded, whilst buildings at Lodge Hill Farm are included. The inclusion of the Lodge Hill Farm buildings within the site, and thereby ensuring a positive score under criteria 11, is disingenuous given that the publicly available promotional material submitted for site SHF034 clearly excludes this land and shows that these buildings are retained as part of the proposed Masterplan layout. On the basis of the site area being promoted for development (i.e. excluding the Lodge Hill Farm buildings), site SHF034 contains no land which would accord with Criteria 11 and it should be scored accordingly.
- Under Criteria 5 – *‘Site boundary within 480m of one or more of the following (record all that apply)’* – Site SHF035 is scored incorrectly for proximity to a primary school and children’s playground within the Shifnal Place Plan Area (Appendix P); and

- Under Criteria 5 – ‘Site boundary within 480m of one or more of the following (record all that apply)’ – Site SHF035 is scored incorrectly for proximity to an outdoor sport’s facility and amenity green space within both the Shifnal Place Plan Area (Appendix P) and Strategic Sites (Appendix T). The Council should be aware that outdoor sports facilities are provided at St. Andrews Primary School and amenity green space is provided within the recent development at Wolverhampton Road; both of which are within 480m of the site boundary for SHF035.

SLR Scoring of Shropshire Stage 2a Criteria

- 3.2.6 On this basis, SLR has undertaken an independent GIS mapping exercise to prepare a further set of Stage 2a scores for both SHF034 and SHF035. As can be noted from the table provided within Appendix 2, when the inconsistencies and errors are rectified, SHF035 (-4 Good) is contended to score better, and is therefore more sustainable than, SHF034 (-5 Good).
- 3.2.7 This is also borne out when further consideration is given to the suitability of the Scoring Criteria themselves and the benefits that can be delivered through the potential future development of SHF035 when compared to SHF034 (for example the protection and conservation of the Windmill which delivers a heritage opportunity or the ability to provide direct dedicated cycle and footpath access to the town centre). More detailed information is also provided within the various technical reviews contained within Appendices 3 – 8.

Alternate and Additional Criteria

- 3.2.8 It is noted that a number of the assessment criteria do not comply with best practice guidance, whilst other well-established criteria used by other authorities are not included within the Stage 2 and Stage 3 Assessments undertaken by the Authority. Whilst not a comprehensive list, we would provide the following comments:
- The current 480m walking distance criteria is based on an outdated Open Space Study adopted in 2010 (an updated consultation draft was published 2012 but not adopted). This Study identifies that 480m is the average walking distance to ensure accessibility to Natural and Semi-Natural Open Space, rather than public services and recreational facilities. Walking distances should, therefore, be based on an accessibility criteria of 800m and 2km in accordance with CABE and DfT guidance documents;
 - Additional criteria associated with the quality of walking routes and taking into account potential mitigation should also be provided to fully consider accessibility by foot;
 - An additional criteria should be utilised to consider the accessibility of the sites by cyclists and wider accessibility in accordance with recent Government Guidance on cycle network (LTN 1/20);
 - A site level analysis of the Green Belt, whilst still drawing on past conclusions, would create a more robust assessment;
 - A more refined approach to the landscape and visual analysis of sites (i.e. differentiate between medium-low, medium and medium-high) should be applied to allow greater granularity. The inclusion of some narrative would also add to the overall analysis and robustness of the conclusions that are reached;
 - An evaluation of the spatial relationship between promoted sites, proposed allocations and safeguarded sites should be undertaken to understand the potential for combined impacts

and/or benefits to be identified due to the inter-relationships between adjoining sites; and

- An additional criteria should be included for the consideration of non-designated heritage assets;
- An additional criteria should be included which recognises the potential heritage benefit which could be accrued by a sites release, for example the retention and conservation of heritage assets, in accordance with proposed Local Plan Policy DP24.

3.2.9 Further discussion of these alternate and additional criteria is provided within the Technical Appraisals contained within Appendices 3-8.

3.3 Stage 3 Assessments

3.3.1 Chapter 4 of the Sustainability Assessment states that the Stage 3 Assessments, which were an iterative process, *'consisted of a proportional and comprehensive assessment of sites informed by the Sustainability Appraisal and assessments undertaken by Highways; Heritage; Ecology; Trees; and Public Protection Officers; various technical studies, including a Landscape and Visual Sensitivity Study, Strategic Flood Risk Assessment and Green Belt Assessment/Review where appropriate; consideration of infrastructure requirements and opportunities; consideration of other strategic considerations; and professional judgement'*.

3.3.2 With regard to the Stage 3 Assessments, whilst the methodology provided within Chapter 4 of the Sustainability Appraisal implies that a range of assessments and technical studies have been undertaken and utilised to inform the site identification process, these do not appear to be published as part of the Regulation 18 Consultation (for example, we are not aware of an updated Strategic Transport Appraisal which supports the Local Plan Review).

3.3.3 Furthermore, from discussions with the Authority, it is understood that the only assessment data/information undertaken is that published and contained within the Sustainability Appraisal itself (i.e. the Stage 2 and Stage 3 tables). Neither the Authority's background evidence, nor any site promotion information has been made publicly available for comment. This is not considered robust given that it does not allow a full consideration of the Assessment process and assumptions which have been utilised to inform the site identification process.

3.3.4 A review of the Stage 2 and 3 Assessments and criteria has been undertaken by Nurton Developments Limited's consultant team. A suite of Technical Appraisal Reviews are provided within Appendices 3 – 8, whilst a brief summary of the key points raised are outlined within the sections below.

Highways

3.3.5 A Transport Appraisal Review, prepared by David Tucker Associates, is provided within Appendix 3. This report reviews the transport planning policy approach that should have been adopted in defining and determining development allocations. The process requires first, an assessment of the need for any scheme (in this case housing allocations), then to identify potential options to meet that need, and finally to confirm whether the chosen solution would meet the scheme objectives.

3.3.6 The following key points are raised by the Transport Appraisal Review:

- The traffic model is now significantly out of date (based on 2012 survey data) and no update has been provided. This is a fundamental omission of process;

- It would have been appropriate for the Council to prepare an updated Strategic Transport Appraisal of the promoted sites to allow proper and proportionate assessment of the alternatives;
- The Stage 2 Assessment relies on an entirely arbitrary walking distance to test accessibility to bus services and some local facilities and the process that should have been followed is as set out in the Planning Practice Guidance to the NPPF (*'Transport evidence bases in plan making and decision taking'*);
- The assessments have failed to duly consider the current constraints and significant opportunities for both walking and cycle route improvements;
- Site SHF0034 can provide no strategic improvement to Shifnal and there is indeed no evidence that it could mitigate its own impact in terms of traffic on the town centre. This issue is exacerbated by the fact that the area of SHF0034 has been reduced so that it does not now provide a full link from the Priorslee Road to the A464. As a result the key capacity constraint in the town (Five Ways Roundabout) will have to accommodate all Telford bound traffic from the site.
- Site SHF0035 can offer significant benefits to the local and wider highway network by providing:
 - Significant improvements to and relocation of the poor junction at A464 / Upton Lane; and
 - The potential for provision of a new link from the allocated employment sites to the A464 hence reducing the impact of that development on the town centre.
- The location of SHF035 on the eastern side of the town means that all development generated traffic routing to the east (Birmingham and Wolverhampton) can avoid the town centre altogether.

Flooding

3.3.7 A Flood Risk Review, prepared by Shepherd Gilmour Infrastructure Ltd, is provided within Appendix 4. This report reviews the current status and process of assessing Flood Risk as part of the evidence base. The following key points are raised by the Flood Risk Review:

- Shifnal Place Plan Area Site Assessment, published in August 2020 marks Site SHF034 as a "0" when considering flood risk. This is despite the site being dissected by an area zoned as Flood Zone 2 and 3. We have undertaken an assessment of the area zoned as Flood Zone 2 and 3 and believe that the area currently indicated in the SFRA and the Environment Agency Flood Maps is 2.3%;
- It is important to note that the Wesley Brook, which crosses site SHF034, is directly downstream of a catchment which has a high proportion of 'impermeable' historically developed land. This will inevitably make the Wesley Brook prone to 'flash flooding' with large changes in water levels and flow speed;
- The flood risk evidence base for all sites is limited and is provided by the Strategic Flood Risk Assessment and the Environment Agency Database. Site specific Hydrological Modelling of critical watercourses and the effect of climate change is vital to clearly identify the flood impact on the sites in question;

- In flood risk terms, and considering the Environment Agency Policy, it is clear that site SHF035 is sequentially preferable to site SHF034; and
- SHF034 will require the introduction of an 'engineered structures' in the form of a bridge or culvert to cross the watercourse and its associated Flood Zone 2 and 3. The Environment Agency policy is that no watercourse should be culverted unless there is an overriding need to do so. In flood risk terms culverting a watercourse increases Flood Risk and requires increased maintenance.

Green Belt

3.3.8 A Green Belt Appraisal Review, prepared by SLR Consulting Limited, is provided within Appendix 5. This report supplements Green Belt appraisal work that has been an integral part of previous representations made by Nurton Developments in relation to this site. This document does not repeat the previous appraisals, but focuses on the overall site assessments published by Shropshire Council.

3.3.9 The following key points are raised by the Green Belt Appraisal Review:

- The Green Belt Assessment and Review has been applied coarsely, with no site-specific analysis undertaken, this means that the evaluation is relatively simplistic and in the context of site SHF035 the land within broad area BA2, any evaluation is very limited;
- It appears that there is inconsistency in the approach taken and the overall consideration of the vulnerability of the gap between Shifnal and Telford, which is clearly expressed in the Green Belt Assessment and Review documents. This is perhaps best expressed in the differences between the consideration of sites SHF024 ('Land located to the south of Junction 4 of the M54') and SHF034 ('Land South of Shifnal'), with the former being discounted due to the strategic importance of this gap. Whilst land within Green Belt Parcels P16 and P17 (including site SHF017 ['Lodge Hill, South West of Shifnal'] and P17a ['Land south of Priorslee Road and North of the Railway Line, Shifnal']; part of which SHF034 is located), which also lies in the gap between Shifnal and Telford, is proposed to be released from the Green Belt;
- The emphasis placed on the ridgeline for site SHF035 in the Strategic Considerations row in the site analysis table is inconsistent when compared with other sites, including SHF18b ('Land to the East of Shifnal Industrial Estate') and P15b ('Land between Hinnington Road and A464') which is part of site SHF019VAR ('Land South of the A464'). The consideration of the ridgeline within site SHF035 should be comparable to that applied for sites SHF18b and SHF019VAR, where this does not form a constraint. There also appears to be limited consideration of the strategic benefits associated with the combined release of adjacent sites;
- The analysis against Green Belt purposes and harm relies on drawing together conclusions from the Green Belt Assessment and Review. This was undertaken at a different scale to the sites that are now being evaluated. To review this approach and consider the sites more specifically, whilst still drawing on past conclusions, would create a more robust assessment moving forward. This approach would also allow a more thorough evaluation of site SHF035 where it extends into Broad Area BA2; and
- There is no evaluation, even at a strategic level, as to how the sites being promoted relate to each other e.g. the spatial relationship between SHF035 and SHF18d. This could comprise an analysis of the potential for combined benefits to be identified due to the inter-relationships

between adjoining sites.

Landscape and Visual

3.3.10 A Landscape and Visual Appraisal Review, prepared by SLR Consulting Limited, is provided within Appendix 6. This report supplements Landscape and Visual appraisal work that has been an integral part of previous representations made by Nurton Developments in relation to this site. This document does not repeat the previous appraisals but focuses on the overall site assessments published by Shropshire Council.

3.3.11 The following key points are raised by the Landscape and Visual Appraisal Review:

- The Landscape and Visual Sensitivity Assessment has been applied very coarsely, meaning that all the land around Shifnal is given a neutral score. This means there is no differentiation between sites. Landscape and visual effects have the potential to be key considerations at a planning application stage, therefore it is disappointing that no weight can be applied to this (in the context of Shifnal) in the plan preparation process;
- Only scoring the site in the comparative site analysis, with no associated description is a simplistic approach. Again, this does not allow even a broad understanding of the sites and their context;
- The emphasis placed on the ridgeline for site SHF035 in the Strategic Considerations row in the site analysis table is potentially disingenuous. The same ridgeline is not referred to in the table in relation to site SHF18b, or in the Green Belt Release Exceptional Circumstances Statement (Shropshire Council, August 2020) in relation to site P15b (part of site SHF019VAR). This would appear to suggest an inconsistent approach to the assessment or reporting of findings for different sites;
- The Strategic Considerations row in the site analysis tables makes reference to the importance of the ridgeline in relation to site SHF035. However, no comparable mention of the ridgeline is made in relation to site SHF18d, yet this lies almost adjacent to the north (only separated by the railway line).
- In addition, the Green Belt Release Exceptional Circumstances Statement (Shropshire Council, August 2020) identifies that site P15b (part of site SHF019VAR) should be released from the Green Belt. However, according to Shropshire Council's interactive site map, site P15b extends up to Upton Lane on the southern side of the A464, which is on the highest part of the ridgeline at 105m AOD. At the very least this appears to suggest the inconsistent analysis of sites; and
- A more refined approach to the landscape and visual analysis of sites (i.e. differentiate between medium-low, medium and medium-high) should be applied to allow greater granularity. The inclusion of some narrative would also add to the overall analysis and conclusions that are reached.

Heritage

3.3.12 A Heritage Appraisal Review, prepared by SLR Consulting Limited, is provided within Appendix 7. This report focuses on the overall site assessments published by Shropshire Council and the associated analysis of sites SHF034 and SHF035. The following key points are raised by the Heritage Appraisal Review:

- Sustainability Objective SO15 is incorrectly written in the sustainability questions table and has not included setting (but has added some other text instead). Such errors suggest the Council has not applied heritage planning policy correctly, and undermines the soundness of the decision-making process;
- Site SHF034 has four (4) Listed Buildings and five (5) non-designated heritage assets identified within its buffer zone, whilst SHF035 has no designated heritage assets but does include a ruined windmill (Non-Designated Heritage Asset) and the Historic Upton Lane route. Both sites have the potential for buried archaeological remains, although given SHF035 intensively farmed history the potential is considered to be reduced;
- It is not apparent that any desk-based assessment has been undertaken with regard to site SHF034, whilst a Heritage Impact Assessment was prepared and submitted in support of SHF035. Sufficient evidence has been provided to demonstrate enhancements to the heritage assets contained within SHF035, whilst the likely impact within SHF034 remains unknown; and
- We consider that the Assessment of the relative merits of the sites should have included a criteria which recognised any heritage benefit which could be accrued by a sites release, for example the retention and conservation of the windmill which is a recognised local landmark, indeed there is a box in the Stage 3 Assessment for such consideration but this has not been completed.

Ecology

3.3.13 An Ecology Appraisal Review, prepared by SLR Consulting Limited, is provided within Appendix 8. This report focuses on the overall site assessments published by Shropshire Council and the associated analysis of sites SHF034 and SHF035. The following key points are raised by the Ecology Appraisal Review:

- The scoring criteria applied do not recognise potential effects of development against emerging Policy or the potential positive effects of development through the ability to deliver a net gain for biodiversity (i.e. emerging Local Plan Policy DP13 which will require a 10% net gain for biodiversity);
- The Ecology Comments provided as part of the Stage 3 Assessment of SHR035 do not relate to SHF035, as SHF035 is not proposed as employment land, there is no woodland habitat within SHF035 and the eastern or southern boundaries do not form part of the Environmental Network. The comments made here in relation to SHF035 were found to be duplicates of those made in respect of SHF024, a parcel of land located approximately 3km to the west on the distal side of Shifnal which does include priority woodland (Taggs Rough) and was proposed for employment use. The assessment is therefore unsound, and should be amended to reflect the correct site;
- Site SHF034 comprises a swathe of land along the south-western fringes of Shifnal. The majority of the land encompassed by this parcel appears to be a mixture of arable farmland and agricultural pasture with hedgerows marking boundaries. SHF034 also includes part of Wesley Brook and the associated grassland/woodland habitats which are within the Environmental Network. These are potentially of greater ecological value and therefore more susceptible to the effects likely to occur as a result of development in accordance with the illustrative masterplan, which includes the severance of the Wesley Book corridor with a primary route road previously promoted to provide a new by-pass for Shifnal to alleviate town centre congestion.

3.4 Evidence Base

3.4.1 Whilst the methodology provided within Chapter 4 of the Sustainability Appraisal implies that a range of assessments and technical studies have been undertaken and utilised to inform the site identification process, these do not appear to be published as part of the Regulation 18 Consultation.

3.4.2 Furthermore, from discussions with the Authority (24 September 2020), it is understood that the only assessment data/information published is that contained within the Sustainability Appraisal itself (i.e. the Stage 2 and Stage 3 tables). Neither the Authority's background evidence, nor any site promotion information has been made publicly available for comment. This is not considered robust given that it does not allow the full and necessary assessment and assumptions which have been utilised to inform the site identification process.

3.4.3 As the Authority will be aware, Nurton Developments Limited held discussions with the planning team regarding the promotion of site SHF035 in early 2019 and prepared a vision document for the site in February 2019. SLR then also provided a Promotional Document in August 2019 to the Preferred Strategic Sites Consultation (as agreed with the Authority), which included a more detailed review of the following technical considerations:

- Performance against Green Belt Objectives;
- Landscape and Visual Impact;
- Ecology;
- Historic Environment;
- Traffic and Transport;
- Drainage and Flood Risk; and
- Indicative Masterplan.

3.4.4 Dialogue and discussions regarding site SHF035 were subsequently undertaken with the Authority and a range of additional supporting information to inform their consideration of the SHF035 site was requested. This additional information was submitted in May 2020 and included:

- Vision Document (including masterplan);
- Transport Appraisal;
- Flood Risk and Utilities Appraisal;
- Supplementary Green Belt and Landscape Appraisal;
- Heritage Impact Assessment; and
- Ecological Mitigation Strategy.

3.4.5 The Authority has confirmed to us that they have fully considered this information, however neither the Stage 2 nor Stage 3 Assessments appear to have taken account of this evidence. For example, the

Stage 3 Assessment makes no reference to the HIA submitted as part of the site representations and the identified Heritage Opportunities that the site could deliver.

4.0 Other Matters of Consideration

4.1 Climate Change Emergency

4.1.1 Shropshire Council resolved to declare a 'Climate Emergency' at a Committee Meeting on the 16th May 2019, outlining that they would write to the Secretary of State for the Environment, Food & Rural Affairs to encourage Government to be ambitious in its plans for carbon reduction targets and aiming for Carbon Neutrality.

4.1.2 In doing so, the Council committed to the preparation of Carbon Emissions Appraisals for all policy reports, the creation of a Climate Action Partnership of stakeholders and the wider community, and to review its progress on addressing the climate emergency on an annual basis.

4.1.3 It is considered that the current Local Plan Review and the associated Sustainability Appraisal have not given due consideration to the aims and objectives of the Climate Emergency position adopted by Shropshire Council. The evidence base documents are insufficient in this regard and the site assessments undertaken do not adhere to the key sustainability objectives identified as part of this process.

4.1.4 Furthermore, it is considered that site SHF035, as evidenced within the submitted reports and masterplan vision, would be an exemplar in sustainable development practises, aligning itself to achieve all 17 of the United Nations sustainable development goals and helping to overcome the global challenges we face. Each of the 17 sustainable development goals are interconnect and will build on each other to create a best practice scheme that is truly socially, economically and environmentally sustainable. Just some of the ways we will achieve these goals are through:

- Mixed-tenure homes and housing types that are genuinely affordable
- A wide range of local jobs within easy commuting distance of homes
- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities
- Educating the community about the natural environment and gaining an affiliation with nature, with opportunities to grow food within the neighbourhood
- Development that enhances the ecological systems, providing a comprehensive green infrastructure network and net biodiversity gains
- Zero-carbon development and energy-positive technology to ensure resilience against the climate emergency
- Strong cultural, recreational and shopping facilities within a walkable, vibrant and sociable neighbourhood
- Integrated and accessible transport systems with walking, cycling and public transport designed to be the most attractive modes of movement

4.1.5 The site has been carefully selected for its proximity to valuable existing services and amenities, to be able to work with Shifnal's existing assets and create a new sustainable community for all.

Figure 2: UN Sustainability Goals Diagram



4.2 Planning for the Future White Paper (August 2020)

- 4.2.1 The recent 'Planning for the Future' White Paper consultation published by the Government (August 2020) outlines a package of proposal for reform of the planning system in England to streamline and modernise the planning process, improve outcomes on design and sustainability, reform developer contributions and ensure more land is available for development where it is needed.
- 4.2.2 The White Paper identifies that it takes too long to adopt a Local Plan: although it is a statutory obligation to have an up-to-date Local Plan in place, only 50 per cent of local authorities (as of June 2020) do, and Local Plan preparation takes an average of seven years (meaning many policies are effectively out of date as soon as they are adopted).
- 4.2.3 Assessments of housing need, viability and environmental impacts are too complex and opaque: land supply decisions are based on projections of household and business 'need' typically over 15- or 20-year periods. These figures are highly contested and do not provide a clear basis for the scale of development to be planned for. Assessments of environmental impacts and viability add complexity and bureaucracy but do not necessarily lead to environmental improvements nor ensure sites are brought forward and delivered.
- 4.2.4 The White Paper details that an increase in the supply of land available for new homes where it is needed to address affordability pressures, support economic growth and the renewal of our towns and cities, and foster a more competitive housing market is needed. Shifnal exhibits all of the challenges which the White Paper speaks to, but is constrained by Green Belt which exacerbates these challenges.

4.2.5 In terms of site identification, the White Paper proposes that areas of land would be put into one of these three categories:

- Growth areas 'suitable for substantial development';
- Renewal areas 'suitable for development'; and
- Areas that are Protected

4.2.6 With regard to the areas that are protected, this would include sites and areas which, as a result of their particular environmental and/or cultural characteristics, would justify more stringent development controls to ensure sustainability. This would include areas such as Green Belt, Areas of Outstanding Natural Beauty (AONBs), Conservation Areas, Local Wildlife Sites, areas of significant flood risk and important areas of green space. At a smaller scale it can continue to include gardens in line with existing policy in the National Planning Policy Framework. It would also include areas of open countryside outside of land in Growth or Renewal areas. Some areas would be defined nationally, others locally on the basis of national policy, but all would be annotated in Local Plan maps and clearly signpost the relevant development restrictions defined in the National Planning Policy Framework.

4.2.7 On this basis, it is likely that all authority areas will need to prepare for a more reactionary and fluid local plan process, whereby land needs to be identified for development over shorter timescales and not over progressive plan iterations. Given the emphasis placed upon the protection of the Green Belt within the White Paper, land availability pressures will be placed upon authorities that have failed to identify sufficient safeguarded land for future release. We would urge the Authority to consider the future constraints which this will ultimately place on the areas of most housing need and least affordability.

Changes to the Planning System Consultation

4.2.8 The White Paper is supported by a consultation paper called 'Changes to the Planning System' within which an amendment to the calculation of housing need is proposed.

4.2.9 The paper details that housing need would potentially be established either through use of a figure calculated as 5% of an authority's existing housing stock or through use of a modified 'standard methodology' which considers a local affordability ratio across a 10-year period. The proposed amendment to the standard methodology is as follows:

$$\begin{aligned}
 & \text{Adjustment Factor} \\
 & = \left[\left(\left(\frac{\text{Local affordability ratio}_{t=0} - 4}{4} \right) \times 0.25 \right) \right. \\
 & \quad \left. + \left(\text{Local affordability ratio}_{t=0} - \text{Local affordability ratio}_{t=-10} \right) \times 0.25 \right] \\
 & \quad + 1
 \end{aligned}$$

Where $t = 0$ is current year and $t = -10$ is 10 years back.

4.2.10 Were these amendments to calculating housing need adopted, the authority would be required to deliver additional housing beyond that currently identified within the latest Regulation 18 Consultation. The table below outlines the potential uplift in housing need this would identify for Shropshire, not including any allowance for meeting the needs of any adjoining authority (i.e. the Black Country Core Strategy Area) nor any sustainability and economic growth aspirations (as allowed for within the current Regulation 18 Consultation).

Table 1: Housing Need calculated using the proposed Revised Standard Methodology

10-year period (2018 data)		10-year Growth	Annual Growth	Affordability Ratio Adjustment (Median House Price to Median Earnings)			
Start	End			2016 (7.81)	2017 (8.52)	2018 (8.11)	2019 (7.97)
				2006 (8.50)	2007 (8.41)	2008 (8.73)	2009 (8.07)
				1.066	1.393	1.102	1.148
2016 – 135,452	2026 – 153,863	+18,411	+1,841 per annum	+1,963 per annum	+2,565 per annum	+2,029 per annum	+2,113 per annum
2017 – 137,305	2027 – 155,557	+18,252	+1,825 per annum	+1,945 per annum	+2,542 per annum	+2,011 per annum	+2,095 per annum
2018 – 138,998	2028 – 157,211	+18,213	+1,821 per annum	+1,941 per annum	+2,537 per annum	+2,007 per annum	+2,091 per annum
2019 – 141,085	2029 – 158,813	+17,728	+1,773 per annum	+1,890 per annum	+2,470 per annum	+1,954 per annum	+2,035 per annum
2020 – 142,954	2030 – 160,361	+17,407	+1,741 per annum	+1,856 per annum	+2,425 per annum	+1,919 per annum	+1,999 per annum

- 4.2.11 As can be noted from the above table, utilising the most recent 10-year period for population growth and affordability data, the revisions to the standard methodology would result in Shropshire having a housing need of 1,999 dwellings per annum; this would equate to a total housing need of approximately 43,978 dwellings across the plan period (2016 – 2038) and approximately 13,178 units above that current identified within the Regulation 18 Consultation.
- 4.2.12 Whilst these proposed amendments are yet to be adopted, consideration should be given to the potential future pressures this will place on the Authority. Indeed, SLR considers that the current housing target proposed to be achieved under Policy SP2 (Strategic Approach) of the Regulation 18 Consultation is likely to worsen the affordability ratio for Shropshire, especially with regard to Shifnal at sub-area level. This will place any future Local Plan Review under further pressure to deliver additional housing, and placing Shifnal at risk of needing to accommodate further housing site release.
- 4.2.13 On this basis, we would encourage the Authority to identify further land for release from the Green Belt and for safeguarding beyond the current plan period. Failure to do so will significantly constrain the Authority in the future and potentially result in a further Green Belt Review having to be undertaken in any subsequent Local Plan Review. This is especially pertinent should the recommendations of the Government White Paper be adopted, and more protection be afforded to the Green Belt (i.e. no opportunity to undertake any subsequent Green Belt Reviews).

4.3 Affordability

- 4.3.1 As outlined above, SLR raises concerns that the affordability ratio for Shropshire could worsen in future were insufficient sites allocated or safeguarded for future development. This affordability issue is also highlighted at a submarket level when reviewing the Strategic Housing Market Assessment (2020).
- 4.3.2 As highlighted by the tables below (taken from the Strategic Housing Market Assessment 2020), the Shifnal area has the 4th worst affordability ratio within the County based on median household income; house prices being 7.9 times the median gross household income. This is well in excess of the affordability ratio for the County as a whole which is identified as being 6.8 times the median gross household income.

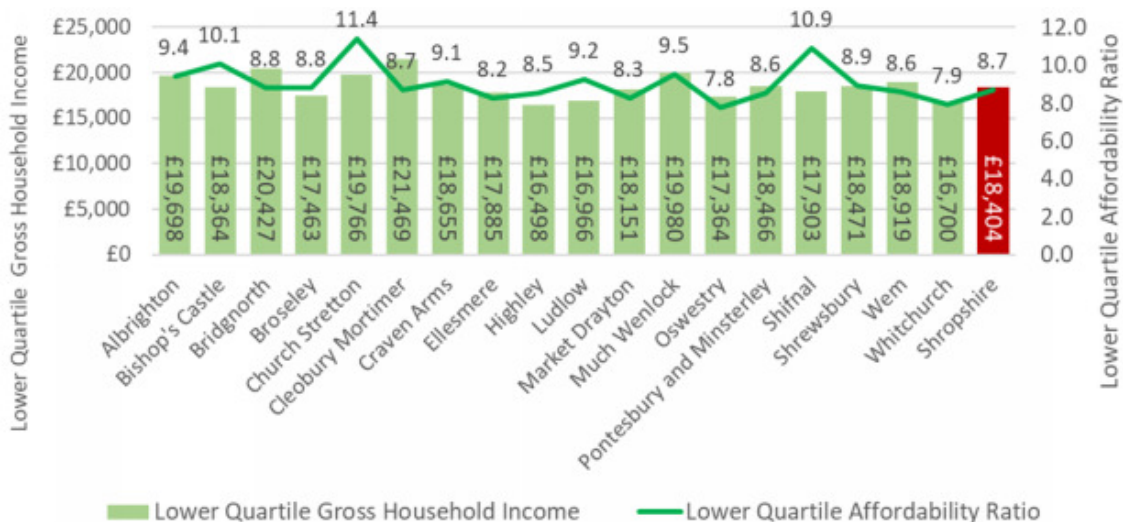
4.3.3 Only Bishop’s Castle area (8.4 times the median gross household income), Church Stretton area (8.6 times the median gross household income) and Craven Arms area (8.3 times the median gross household income) have worse affordability ratios than Shifnal.

Figure 3: Median Household Income (2019) by Shropshire Place Plan Area¹



4.3.4 This position is worsened when the affordability ratio is based against lower quartile household incomes, with the Shifnal area becoming the 2nd worst for affordability; house prices being 10.9 times the lower quartile household income. Again, this is well in excess of the affordability ratio for the County as a whole which is 8.7 times the lower quartile household income. Indeed, this trend is also true for Church Stretton area which becomes the least affordable area based on lower quartile household income which is 11.4 times lower quartile household income).

Figure 4: Lower Quartile Household Income (2019) by Shropshire Place Plan Area²



4.3.5 Identification of insufficient land for housing allocation and or safeguarding for beyond the plan period

¹ <https://www.shropshire.gov.uk/media/14608/shma-part-1-2020-strategic-housing-market-assessment-part-1.pdf>

² <https://www.shropshire.gov.uk/media/14608/shma-part-1-2020-strategic-housing-market-assessment-part-1.pdf>

will worsen the affordability ratio within Shifnal. This pressure will be felt hardest by lower earning households who will be unfairly disadvantaged and likely be forced to move away from the Shifnal area. This does not meet either the sustainability or climate emergency agenda that has been adopted by Shropshire Council.

- 4.3.6 On this basis, Shropshire Council should recognise the ongoing Housing Market pressures placed upon Shifnal and that restricting sufficient housing land provision within the town will place further pressure upon the affordability of the housing stock in this area of the County in the longer term.
- 4.3.7 On this basis, SLR would recommend that further sites be identified for housing land supply and safeguarded for release from the Green Belt to ensure that such demand and housing market pressures are recognised both for the plan period (2016-2038) and beyond. Failure to safeguard sufficient sites for Green Belt release will only worsen the affordability position within Shifnal and fail to allow for the release of the necessary level of housing land at the appropriate time (i.e. allowing the Council differing options for allocation beyond the plan period).

5.0 Summary & Conclusion

5.1 Summary

5.1.1 Nurton Developments Limited are disappointed that the evidence base requested by the Authority, and duly provided by the promoter, for site SHF035 does not appear to have been taken into account in the site assessments which support the current Regulation 18 consultation, notwithstanding assurances by the Authority.

5.1.2 Furthermore, despite information requests made by Nurton Developments Limited, there appears to be a lack of technical evidence base to support the selection of site SHF034 for safeguarding. Should such evidence base exist, the Authority should have published this for public viewing and reference made to where these assumptions have been used to inform either the Stage 2 or 3 assessments. Without this evidence base, it is not possible to confirm that the site has been properly and appropriately assessed, nor does it allow objectors and interested parties to consider the relative merits of promoted land alternatives.

5.1.3 On the basis of the above, this report seeks to outline Nurton Developments' principle concerns with the regard to the site assessment process from both a technical and compliance perspective. The key points raised within this report are as follows:

- SHF035 has not been properly considered and the evidence submitted to date has not been fully considered by the Authority in undertaking the site assessment process;
- There are clear inconsistencies in how the evidence base has been applied in undertaking the site identification process, leading to errors, omissions and inaccuracies in the Authority's consideration of the sites assessed for allocation and safeguarding, rendering the plan unsound;
- There are a number of inconsistencies, alterations and omissions contained within the Stage 2 and 3 site assessment process and, as such, the evidence base which has informed the site identification process for the Local Plan Review is not robust and should be reviewed prior to any Regulation 19 Consultation or formal submission of the plan for Examination in Public;
- The evidence base upon which the Stage 2 and 3 site assessments were undertaken is inconsistently utilised, does not follow best practice in principle and unfairly favours the sites identified for allocation or safeguarding;
- The Authority has erred in judgement in identifying a single additional site for safeguarding beyond the plan period which will fail to offer the opportunity to identify appropriate development options in future; thereby committing to a significant future allocation which may not be the most suitable or sustainable option for the future growth of Shifnal;
- The Authority has erred in the site assessment process and, as such, the identification of site SHF034 for safeguarding is considered inappropriate and unsound. The site is not sequentially preferable from a flood risk perspective, whilst the apparent driver for its safeguarding (the delivery of a new link road) is neither suitably tested nor deliverable; and
- Site SHF035, as evidenced through the submission of a range of site assessments and technical reports, is considered to perform better than SHF034 and should, therefore, be safeguarded for future allocation beyond the current plan period.

5.2 Conclusion

Why do we consider the plan as drafted is unsound?

- 5.2.1 The Plan is considered to be unsound as the evidence base for the identification for SHF034, has not demonstrated that the site is deliverable and its release will lead to unsustainable development and will fail to address the Climate Emergency Agenda. Moreover, its allocation was predicated on the delivery of a link road which is now not part of the proposals.
- 5.2.2 Furthermore , there are other more sustainable and appropriate sites which have not been considered on a level playing field and have been discounted without fully taking account of the evidence provided, namely SHF035.
- 5.2.3 SHF035 has been demonstrated to be preferable to SHF034 through our submitted evidence base, when considered in its own right.
- 5.2.4 Finally, the cumulative benefits of allocating/safeguarding SHF035 have not been considered, particularly in terms of its relationship with employment allocations SHF18b and SHF18d and to development currently underway to the west which enables the provision of direct and dedicated green cycle and footpath accesses straight into the town centre.

What changes do we propose?

- 5.2.5 With regard to Policies DP25 (Green Belt and Safeguarded Land) and S15 (Shifnal Place Plan Area), we are seeking an amendment to the policies to allow the allocation (or safeguarding) of site ref. SHF035 for housing to be developed in association with the employment allocation sites SHF18b and SHF18d during this plan period. This might include some of the site being safeguarded for later in the plan period to ensure delivery aligns with housing need and to secure the early upgrade to Upton Lane and removal of an accident blackspot.
- 5.2.6 This could either be in association with the safeguarding of SHF034 for later housing need, or in preference to this allocation, given the benefits and sustainability credentials of site SHF035 which are supported by a full evidence base.

APPENDIX 1

SHF035 Contextual Drawings

APPENDIX 2

Combined Summary Tables for Stage 2a Assessments

Comparative Stage 2a Assessment Overview, including Preferred Sites Consultation (2018), Preferred Strategic Sites Consultation (2019) and Local Plan Review Regulation 18 data (2020) and SLR assessment (Sept 2020)

Please note that the Second Regulation 18 Consultation data includes two different assessments of the site because they are over 25 hectares and also trigger the Strategic Site Assessment, under the LPAs adopted approach

NB:

*A composite score has been prepared for SHF034 from the site assessments for P15b, P16, P17a, SHF017 and SHF019 under the Preferred Sites Consultation SA (2018) – Please see Table 2. SHF035 or any component areas were not assessed under the Preferred Sites Consultation SA (2018).

**Appendix T Strategic Sites Assessments Published: August 2020 Stage 2a

***Appendix P Shifnal Place Plan Area Site Assessments Published: August 2020 Stage 2a

Table 1: Comparative Stage 2a Assessments Overview

#			Preferred Sites Consultation SA (2018)		Preferred Strategic Sites Consultation SA (2019)		Local Plan Review Reg 18 Consultation SA (2020)		Preferred Sites Consultation SA (2018)		Preferred Strategic Sites Consultation SA (2019)		Local Plan Review Reg 18 Consultation SA (2020)		Stage 2a Employment (As set out in Reg 18 Consultation Aug/Sept 2020)				SLR Stage 2a Assessment			
			Site Ref: SHF034 (Composite*)	Site Ref: SHF034	Appendix T	Appendix P	Site Ref: SHF035	Site Ref: SHF035	Appendix T	Appendix P	Appendix T	Appendix P	Appendix T	Appendix P	Appendix T	Appendix P	Appendix T	Appendix P	Appendix T	Appendix P	Site Ref: SHF034	Site Ref: SHF035
					Site Ref: SHF034	Site Ref: SHF034			Site Ref: SHF035	Site Ref: SHF035	Site Ref: SHF035	Site Ref: SHF035	Site Ref: SHF18b	Site Ref: SHF18b	Site Ref: SHF18d	Site Ref: SHF18d						
1	Site wholly or partly within one or more of the following (record all that apply):																					
	Special Area of Conservation		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	Ramsar Site		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	National Nature Reserve	Yes = double minus score (--)	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	Site of Special Scientific Interest	No = zero score (0)	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	Ancient Woodland		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	Wildlife Site		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	Local Nature Reserve		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
2	Site boundary within buffer zone of one or more (record all that apply):																					
	1km of a Special Area of Conservation		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	1km of a Ramsar Site		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	500m of a National Nature Reserve	Yes = minus score (-)	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	500m of a Site of Special Scientific Interest	No = zero score (0)	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	500m of an Ancient Woodland		-	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	250m of a Wildlife Site		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
	100m of a Local Nature Reserve		0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0
3	Tree Preservation Order (single or group) within or on-site boundary	Yes = minus score (-)	-	-	-	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	-	0
		No = zero score (0)																				
4	Site contains one or more (or part) of the following (record all that apply):																					
	Children's playground	Yes = minus	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	N/A	0	0	0	0	0

Outdoor sports facility	score (-)	-	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
Amenity green space	No = zero score (0)	0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
Accessible natural green space (natural/semi-natural green space)		0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
5 Site boundary within 480m of one or more of the following (record all that apply):															
Primary School		+	+	+	-	N/A	+	+	-	N/A	-	-	-	+	+
GP Surgery		+	+	+	-	N/A	-	-	-	N/A	-	-	-	-	-
Library (permanent or mobile library stop)		-	-	-	-	N/A	-	-	-	N/A	-	-	-	-	-
Leisure centre	Yes = plus score (+)	-	-	-	-	N/A	-	-	-	N/A	-	-	-	-	-
Children's playground	No = minus score (-)	+	+	+	-	N/A	-	+	-	N/A	-	-	-	+	+
Outdoor sports facility		+	+	+	-	N/A	+	-	-	N/A	-	-	-	+	+
Amenity green space		-	+	+	-	N/A	-	-	-	N/A	-	-	-	+	+
Accessible natural green space (natural/semi-natural green space)		-	-	-	-	N/A	-	-	-	N/A	-	-	-	-	-
6 Site boundary within 480m of a public transport node with a regular service offered during peak travel times															
	Yes = plus score (+)	N/A	N/A	+	+	N/A	N/A	-	-	N/A	-	-	-	+	-
	No = minus score (-)														
7 Site wholly or partly on grade 1 or 2 or 3 agricultural land (best & most versatile)															
	Yes = minus score (-)	-	-	-	-	N/A	-	-	-	N/A	-	-	-	-	-
	No = zero score (0)														
8 All or part of the site within a Source Protection Zone (groundwater)															
	Yes = minus score (-)	-	-	-	-	N/A	-	-	-	N/A	-	-	-	-	-
	No = zero score (0)														
9 All or part of the site within Flood Zones 2 or 3															
	Yes = minus score (-)	-	-	-	0	N/A	0	0	0	N/A	0	0	0	-	0
	No = zero score (0)														
10 Site wholly/partly within an Air Quality Management Area															
	Yes = minus score (-)	0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
	No = zero score (0)														
11 Site is wholly/partly classified as brownfield or is wholly/partly within an area with a previous industrial or potentially contaminative use															
	Yes = plus score (+)	+	+	+	0	N/A	0	0	0	N/A	0	0	0	0	0
	No = zero score (0)														
12 Site would displace an existing waste management operation															
	Yes = minus score (-)	0	0	0	0	N/A	0	0	0	N/A	-	0	0	0	0
	No = zero score (0)														
13 Site wholly/partly within/contains any of the following (record all that apply):															
a World Heritage Site or its buffer zone	Yes = double minus score (--)	0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
a Scheduled Monument		0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
a Registered Battlefield	No = zero score	0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0

a Registered Park or Garden	(0)	0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
a Conservation Area		0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
a Listed Building		-	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
14 Site boundary within buffer zone of one or more of the following (record all that apply):															
300m of a World Heritage Site or its buffer zone		0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
300m of a Scheduled Monument	Yes = minus score (-)	0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
300m of a Registered Battlefield	No = zero score (0)	0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
300m of a Registered Park or Garden		0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
300m of a Conservation Area		-	-	-	0	N/A	0	0	0	N/A	0	0	0	-	0
300m of a Listed Building		-	-	-	0	N/A	0	0	0	N/A	0	0	0	-	-
15															
Site is wholly/partly classified as very high landscape sensitivity for residential	Double minus score (--)					N/A				N/A					
Site is wholly/partly classified as high landscape sensitivity for residential	Minus score (-)					N/A				N/A					
Site is wholly/partly classified as medium low, medium or medium high landscape sensitivity for residential	Zero score (0)	0	0	0	0	N/A	0	0	0	N/A	0	0	0	0	0
Site is wholly/partly classified as low landscape sensitivity for residential or site is inside the development boundary	Plus score (+)					N/A				N/A					
TOTAL STAGE 2a SCORE		-8	-3	-2	-9	-6	-6	-7	-9		-10	-9	-9	-5	-4
Preferred Sites SA (2018): Good is 5 to 0 / Fair is -1 to -6 / Poor is -7 to -12															
Preferred Strategic Sites SA (2019): Good is 2 to -7 / Fair is -8 to -14 / Poor is -15 to -20															
		Fair	Good	Good	Poor	Good	Good	Fair	Poor		Fair	Fair	Fair	Good	Good
LPR (2020) SA Appendix T: Good is 2 to -5 / Fair is -6 to -13 / Poor is -14 to -21															
LPR (2020) SA Appendix P: Good is 0 to -5 / Fair is -6 to -10 / Poor is -11 to -15															

Table 2: Composite Scoring Table of site SHF034 from the site assessments for P15b, P16, P17a, SHF017 and SHF019 under the Preferred Sites Consultation SA (2018)

	Scoring Guide	Areas of SHF034 Assessed under Preferred Sites Consultation SA (2018)					SLR Amalgamated Score
		P15b (West Part)	P16	P17a (East Part)	SHF017	SHF019	
1	Site wholly or partly within one or more of the following (record all that apply):						
	Special Area of Conservation	Yes = double minus score (--)	0	0	0	0	0
	Ramsar Site	No = zero score (0)	0	0	0	0	0
	National Nature Reserve		0	0	0	0	0
	Site of Special Scientific Interest		0	0	0	0	0
	Ancient Woodland		0	0	0	0	0
	Wildlife Site		0	0	0	0	0
	Local Nature Reserve		0	0	0	0	0
2	Site boundary within buffer zone of one or more (record all that apply):						

	1km of a Special Area of Conservation	Yes = minus score (-)	0	0	0	0	0	0
	1km of a Ramsar Site	No = zero score (0)	0	0	0	0	0	0
	500m of a National Nature Reserve		0	0	0	0	0	0
	500m of a Site of Special Scientific Interest		0	0	0	0	0	0
	500m of an Ancient Woodland		0	0	-	0	0	-
	250m of a Wildlife Site		0	0	0	0	0	0
	100m of a Local Nature Reserve		0	0	0	0	0	0
3	Tree Preservation Order (single or group) within or on-site boundary	Yes = minus score (-) No = zero score (0)	-	-	-	-	-	-
4	Site contains one or more (or part) of the following (record all that apply):							
	Children's playground	Yes = minus score (-)	0	0	0	0	0	0
	Outdoor sports facility	No = zero score (0)	0	0	-	0	0	-
	Amenity green space		0	0	0	0	0	0
	Accessible natural green space (natural/semi-natural green space)		0	0	0	0	0	0
5	Site boundary within 480m of one or more of the following (record all that apply):							
	Primary School	Yes = plus score (+)	-	+	-	+	+	+
	GP Surgery	No = minus score (-)	-	-	+	+	+	+
	Library (permanent or mobile library stop)		-	-	-	-	-	-
	Leisure centre		-	-	-	-	-	-
	Children's playground		-	-	+	+	+	+
	Outdoor sports facility		-	+	+	+	+	+
	Amenity green space		-	-	-	-	-	-
	Accessible natural green space (natural/semi-natural green space)		-	-	-	-	-	-
6	Site boundary within 480m of a public transport node with a regular service offered during peak travel times	Yes = plus score (+) No = minus score (-)	N/A	N/A	N/A	N/A	N/A	N/A
7	Site wholly or partly on grade 1 or 2 or 3 agricultural land (best & most versatile)	Yes = minus score (-) No = zero score (0)	0	-	-	-	-	-
8	All or part of the site within a Source Protection Zone (groundwater)	Yes = minus score (-) No = zero score (0)	-	-	-	-	-	-
9	All or part of the site within Flood Zones 2 or 3	Yes = minus score (-) No = zero score (0)	0	-	0	-	0	-
10	Site wholly/partly within an Air Quality Management Area	Yes = minus score (-) No = zero score (0)	0	0	0	0	0	0
11	Site is wholly/partly classified as brownfield or is wholly/partly within an area with a previous industrial or potentially contaminative use	Yes = plus score (+) No = zero score (0)	0	0	+	0	+	+
12	Site would displace an existing waste management operation	Yes = minus score (-) No = zero score (0)	0	0	0	0	0	0
13	Site wholly/partly within/contains any of the following (record all that apply):							

	a World Heritage Site or its buffer zone	Yes = double minus score (--)	0	0	0	0	0	0
	a Scheduled Monument	No = zero score (0)	0	0	0	0	0	0
	a Registered Battlefield		0	0	0	0	0	0
	a Registered Park or Garden		0	0	0	0	0	0
	a Conservation Area		0	0	0	0	0	0
	a Listed Building		-	0	0	0	0	-
14	Site boundary within buffer zone of one or more of the following (record all that apply):							
	300m of a World Heritage Site or its buffer zone	Yes = minus score (-)	0	0	0	0	0	0
	300m of a Scheduled Monument	No = zero score (0)	0	0	0	0	0	0
	300m of a Registered Battlefield		0	0	0	0	0	0
	300m of a Registered Park or Garden		0	0	0	0	0	0
	300m of a Conservation Area		0	0	-	-	-	-
	300m of a Listed Building		-	-	-	-	-	-
15	Site is wholly/partly classified as very high landscape sensitivity for residential	Double minus score (--)						
	Site is wholly/partly classified as high landscape sensitivity for residential	Minus score (-)						
	Site is wholly/partly classified as medium low, medium or medium high landscape sensitivity for residential	Zero score (0)		0	0	0	0	0
	Site is wholly/partly classified as low landscape sensitivity for residential or site is inside the development boundary	Plus score (+)						
TOTAL STAGE 2a SCORE			-13	-9	-8	-5	-4	-8
Preferred Sites SA (2018): Good is 5 to 0 / Fair is -1 to -6 / Poor is -7 to -12			Poor	Fair	Fair	Fair	Good	Fair

APPENDIX 3

Transport Appraisal Report

APPENDIX 4

Flood Risk Appraisal Report

APPENDIX 5

Green Belt Appraisal Report

APPENDIX 6

Landscape and Visual Appraisal Report

APPENDIX 7

Heritage Appraisal Report

APPENDIX 8

Ecology Appraisal Report

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

belfast@slrconsulting.com

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 9064280

CARDIFF

T: +44 (0)2920 491010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 3356830

EXETER

T: +44 (0)1392 490152

GLASGOW

T: +44 (0)141 3535037

GUILDFORD

T: +44 (0)1483 889800

LONDON

T: +44 (0)203 6915810

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER (Denton)

T: +44 (0)161 5498410

MANCHESTER (Media City)

T: +44 (0)161 8727564

NEWCASTLE UPON TYNE

T: +44 (0)191 2611966

NOTTINGHAM

T: +44 (0)115 9647280

SHEFFIELD

T: +44 (0)114 2455153

SHREWSBURY

T: +44 (0)1743 239250

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: +353 (0)1 296 4667

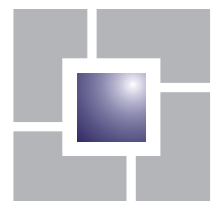
France

GRENOBLE

T: +33 (0)4 76 70 93 41

Shropshire Council Regulation 18 Submission

Transport Appraisal Review



david tucker associates
transport planning consultants

Shropshire Regulation 18
Submission

Prepared by:

Transport Appraisal Review

David Tucker Associates

Forester House, Doctor's Lane
Henley-in-Arden
Warwickshire B95 5AW

Tel: 01564 793598
Fax: 01564 793983
inmail@dtatransportation.co.uk
www.dtatransportation.co.uk

28th September 2020

SJT/RT/21320-03a_Transport Appraisal Review

Prepared for:

Nurton Developments

© **David Tucker Associates**

No part of this publication may be reproduced by any means without the prior permission of David Tucker Associates

Table of Contents

1. Introduction and Summary	1
2. Transport Planning Approach and Policy	3
3. Suitability of Accessibility Appraisal	6
4. Transport Impact Issues	8

Appendices

Appendix A NPPG Extracts

Appendix B Webtag Guidance

Appendix C Walk Routes to SHF0034



1. Introduction and Summary

- 1.1 This report has been prepared on behalf of Nurton Developments Ltd to review the current status and process of the transport appraisal work undertaken as part of the evidence base for Shropshire Local Plan.
- 1.2 This report reviews the transport planning policy approach that should have been adopted in defining and determining development allocations. The process requires firstly an assessment of the need for any scheme (in this case housing allocations), then to identify potential options to meet that need, and then finally to confirm whether the chosen solution would meet the scheme objectives.
- 1.3 The purpose of the output is that the process should be transparent and allow proper consideration of alternatives to be assessed, by overall economic performance, against the benefits and dis-benefits of each option. Based on evidence base available to date this process does not seem to have been followed.
- 1.4 The evidence base is so far as it goes is very limited. There is a traffic model for the town of which was used as part of the evidence for the SAMDev Plan from 2006 to 2026. Using that model, Shropshire Council undertook a Modelling exercise of the highway network in Shifnal using their Paramics Model.
- 1.5 The outputs of this Model were used to establish the likely effects of all the committed and allocated developments on the highway network in the town. However that model is now significantly out of date (based on 2012 survey data) and no update has been provided.
- 1.6 For the reasons set out below it would have been appropriate for the council to prepare an updated Strategic Transport Appraisal of the site to allow proper and proportionate assessment of the alternatives.
- 1.7 To the extent that transport issues were used to test the alternative site options, it relies solely on an arbitrary walk distance (from the site boundary as the crow flies) to test accessibility to bus services and some local facilities.
- 1.8 The process that should have been followed by the council is as set out in the Planning Policy Guidance which is extracted at **Appendix A**.



-
- 1.9 It does not however provide any meaningful direct evidence base to inform the decision making process on where to appropriately locate development as part of the local plan allocation.
- 1.10 The process undertaken by SC to identify and test the appropriate level and location of development for the local plan was, and is, wholly flawed.
- 1.11 On the evidence submitted by the Authority therefore, the chosen option performs demonstrably worse than other available options. The Local Plan cannot therefore be considered sound in that respect.



2. Transport Planning Approach and Policy

2.1 In February 2019, the DCLG published the latest NPPF. The NPPF confirms that the Government will continue to encourage sustainable development and in relation to the transport issues it notes that:

103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

2.2 In respect of Plan making, the Framework sets out that the key priority for new development allocation should be maximise accessibility, create safe and suitable access for all modes and the provision of major infrastructure to accommodate development should be considered only as a last resort.

2.3 At Paragraph 104 it confirms that

Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

2.4 The interpretation and implementation of these Policy requirements are confirmed in the National Planning Policy Guidance Notes. These are set out in full in **Appendix A**. The most pertinent elements of the requirements are summarised below:

"It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan

and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector.”

Para 001

The key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
- consider the cumulative impacts of existing and proposed development on transport networks
- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands
- identify the short, medium and long-term transport proposals across all modes

The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.

2.5 Paragraph: 004 Reference ID: 54-004-20141010 goes onto to confirm that assessment should be undertaken at every stage of Local Plan progression thus:

- as part of the initial evidence base in terms of issues and opportunities
- as part of the options testing
- as part of the preparation of the final submission

2.6 Following this review, Paragraphs 008 -010 set out a comprehensive and thorough assessment process to ensure appropriate evidence to support any allocation, which provides full consideration of all transport related implications including accessibility, highway safety, amenity and traffic impacts.

2.7 Specifically, Paragraph 010 encourages the use of WebTAG to assess the development. For transport schemes, the approach requires as a fundamental starting point the need to identify objectives. In the context of a local plan that objective would be to determine the appropriate location and scale of housing allocation.



- 2.8 WebTAG would then require an assessment of all the possible alternatives to meet these against the key criteria of Environment, Social, Economy, and Public Accounts. The Guidance on WebTAG is clear that

There must be a clear rationale for any proposal and it must be based on a clear presentation of problems and challenges that establish the 'need' for a project.

There must be consideration of genuine, discrete options, and not an assessment of a previously selected option against some clearly inferior alternatives. A range of solutions should be considered across networks and modes.

There should be an auditable and documented process which identifies the best performing options to be taken forward for further appraisal.

There should be an appropriate level of public and stakeholder participation and engagement at suitable points in the process. In most cases this should inform the evidence-base which establishes the 'need' for an intervention, guide the option generation, sifting and assessment steps, as well as informing further appraisal in Stage 2.

Para 1.1.5

- 2.9 The process requires firstly an assessment of the need for any scheme (in this case housing allocations), then to identify potential options to meet that need, and then finally to confirm whether it would meet the scheme objectives. The purpose of the output is that the process should be transparent and allow proper consideration of alternatives to be considered, by overall economic performance, against the benefits and dis-benefits of each option. The process is clearly set out on Figure 1 of **Appendix B** which is an extract from the TAG Guidance Appraisal Process Summary.
- 2.10 As discussed below there is currently no evidence to suggest that the Council have sought to adopt any element of this approach.

3. Suitability of Accessibility Appraisal

3.1 The regulation 18 submission Strategic Site Assessment contains only one criteria (#7) which relates to transport and that is

“Site boundary within 480m₃ of a public transport node with a regular service offered during peak travel times ⁴ :

The document does not provide footnotes 3 or 4 but they appear to relate to

3. 480m is the average distance walked in 10 minutes and is derived from the Accessibility Standards set out in Shropshire Council's PPG17 Study.

4. A public transport service is considered to be regular and offered during peak travel times when it runs an outward service between 0600 and 0900 and a return service between 1500 and 1800 Monday to Friday

3.2 There is no formal or firm advice in relation to transport appraisal that recognises 480m as a suitable limit (or parameter) for acceptable walk distances to bus stops. This is therefore an unreasonable and un-evidenced criteria against which development should be tested.

3.3 The evidence that does relate to walk distances confirms that quality of bus stop infrastructure and real time information for passengers is more important than walk distance and it is therefore inappropriate to fix a specific distance in the SPD. For a proper comparison of alternatives, it is suggested that accessibility within 800m and 2km should be assessed. This is consistent with the limit set by:

- CABE, 2001 [CABE, 2001: 'Better Places To Live By Design: a companion guide to planning policy guidance 3'; London: Thomas Telford.] identifies 800m as being a threshold distance for access to facilities on foot and "... opportunities to reach more distant facilities by public transport."
- DfT, 2007 ['Manual for Streets'] defines walkable neighbourhoods as "... having a range of facilities within ... up to about 800 m ... walking. It also confirms that this is not an upper limit and also states that the 800m walking distance is not an upper limit and references guidance in respect of walking replacing short car trips, particularly those under 2km.



- 3.4 In terms of this criteria, SHF034 is scored as a '+' in that regard and SHF035 as a '-'. This ranking is wrong for two key reasons:
- i) It fails to take account of the quality of the walk route to the bus stops, and;
 - ii) It fails to take into account potential mitigation that could be provided.
- 3.5 As shown on the plan at **Appendix C**, the walk route from SHF0034 is poor to the point it would be unacceptable in the context of the NPPF Para 108 test. Both routes (Church Street and Park Lane) available to the site are roads with only one footway and those are less than 2m wide. The highway boundary on those sections is tight against the back of the verge and there are no clear opportunities to provide improvements.
- 3.6 In terms of other appropriate tests for inclusion in the Site Appraisal consideration should have been given to cyclists and wider accessibility. Further recent Government guidance on cycle network (LTN 1/20) note that "The statutory Cycling and Walking Investment Strategy (CWIS) sets a clear ambition to make cycling and walking the natural choices for short journeys or as part of a longer journey with supporting objectives to increase cycling and walking levels. This guidance supports the delivery of high-quality cycle infrastructure to deliver this ambition and objective; and reflects current good practice, standards and legal requirements." The highway constraints on the approach to DHF0034 are such that these requirements simply cannot be met.
- 3.7 In contrast SHF0035 has significant opportunities to not only meet the test set but also provide for significantly enhanced cycle linkages on Lamledge Lane, and pedestrian linkages through adjacent consented sites to provide safe and secure access (NPPF Para 108) to local schools and facilities. As set out in the transport evidence submitted on behalf of Nurton, the scheme could also provide opportunities to significantly enhance public transport accessibility to the east of the town including areas currently not well served by buses.
- 3.8 Overall these issues clearly support that on proper and robust comparison of the two sites SHF0035 should score significantly higher in terms of transport accessibility.

4. Transport Impact Issues

- 4.1 As set out above there is no robust assessment of the different traffic impacts of the options in the evidence base. Shropshire themselves confirmed the following in response to the Transport Strategy provided by in DTA that:

Future Modelling of Shifnal Highway Network

These previous datasets and Modelling outputs describe the predicted outcomes from a baseline position established several years ago between 2013 and 2015.

Shropshire Council therefore requires any landowner / developer to consider the likely impacts of their proposed development from a highways perspective. This consideration must also consider the cumulative impact of all the currently committed development and the preferred options in the Local Plan Review and including the SAMDev Plan to 2026. The certainty that would be required should be provided by Transport modelling the likely impacts of the proposed developments.

The previous Modelling exercise should therefore be repeated to take account of the new committed sites in Shifnal and the land parcels proposed in the Local Plan Review to be allocated.

Where land is proposed to be safeguarded for development in Shifnal beyond 2036 then the Modelling outputs should also address this further time period.

Whilst the Council's transport consultant will undertake further surveys in due course, these are not currently available. Those landowner / developer proposing land for development in Shifnal are therefore recommended to undertake their own vehicle counts by street but they may be able to access the Shropshire Council Paramics model in order to ensure consistency and comparability with previous Modelling exercises and their forecast outputs.

- 4.2 This appraisal was supported by Nurton and indeed updated traffic counts were undertaken to inform that and submitted as part of the representations made in April 2020. Despite consistent requests for collaborative working with the Council the model was not made available for use.
- 4.3 Clearly traffic implications would have a material impact on the consideration of which site might perform better and this should have weighed heavily on the councils site options appraisal. The absence of such an assessment is a fundamental omission of process.
- 4.4 Site SHF0034 can provide no strategic improvement to Shifnal and there is indeed no evidence that it could mitigate its own impact in terms of traffic on the town centre. This issue is exacerbated by the fact that the area of SHF0034 has been reduced so that it does not now provide a full link from the Priorslee Road to the A464. As a result the key capacity constraint in the town (Five Ways Roundabout) will have to accommodate all Telford bound traffic from the site.

-
- 4.5 In contrast SHF0035 can offer significant benefits to the local and wider highway network by providing:
- a) Significant improvements to and relocation of the poor junction at A464 / Upton Lane.
 - b) The potential for provision of a new link from the allocated employment sites to the A464 hence reducing the impact of that development on the town centre.
- 4.6 The location of the site on the eastern side of the town means that all development generated traffic routing to the east (Birmingham and Wolverhampton) can avoid the town centre altogether.
- 4.7 Overall this clearly supports that on proper and robust comparison of the two sites SHF0035 should score significantly higher in terms of transport impacts. The lack of any meaningful assessment of these in the evidence base is in clear contradiction of Government advice with respect to robust plan making.

Appendix A

Transport evidence bases in plan making and decision taking

Why establish a transport evidence base for Local Plans?

It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their [Local Plan](#) so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector.

The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources.

Local planning authorities should also refer to the Department for Transport's [Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development](#)

Paragraph: 001 Reference ID: 54-001-20141010

Revision date: 10 10 2014

What is the purpose of a transport evidence base to support the Local Plan?

A robust evidence base will enable an assessment of the transport impacts of both existing development as well as that proposed, and can inform sustainable approaches to transport at a plan-making level. This will include consideration of viability and deliverability.

A robust assessment will establish evidence that may be useful in:

- improving the sustainability of transport provision
- enhancing accessibility
- creating choice amongst different modes of transport
- improving health and well-being
- supporting economic vitality
- improving public understanding of the transport implications of development
- enabling other highway and transport authorities/service providers to support and deliver the transport infrastructure that conforms to the Local Plan
- supporting local shops and the high street

Paragraph: 002 Reference ID: 54-002-20141010

Revision date: 10 10 2014

What key issues should be considered in developing the transport evidence base to support the Local Plan?

The key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
- consider the cumulative impacts of existing and proposed development on transport networks
- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands
- identify the short, medium and long-term transport proposals across all modes

The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.

Paragraph: 003 Reference ID: 54-003-20141010

Revision date: 10 10 2014

When should the transport assessment of the Local Plan be undertaken?

An assessment of the transport implications should be undertaken at a number of stages in the preparation of a Local Plan:

- as part of the initial evidence base in terms of issues and opportunities
- as part of the options testing
- as part of the preparation of the final submission

The last of these stages should highlight the scale of and priorities for investment requirements and support infrastructure spending plans. Like a sustainability appraisal, it will be an iterative process and become more refined and detailed as the process draws to a conclusion.

Paragraph: 004 Reference ID: 54-004-20141010

Revision date: 10 10 2014

What baseline information should inform a transport assessment of a Local Plan?

The following list indicates the key aspects that should be addressed in the transport assessment. This list is not exhaustive, and there may be additional issues that are important to consider locally.

- all current transport issues as they affect all modes and freight covering, for example, accessibility, congestion, mobility, safety, pollution, affordability, carbon reduction across the whole Plan area and, within relevant areas of the Plan, including existing settlements and proposed land allocations
- the potential options to address the issues identified and any gaps in the networks in the short, medium and longer term covering, for example, accessibility, congestion, mobility, safety, pollution, carbon reduction
- the locations of proposed land allocations and areas/corridors of development and potential options for the provision of sustainable transport and transport networks to serve them
- solutions to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- the scope and options for maximising travel planning and behavioural change.
- accessibility of transport nodes such as rail/bus stations to facilitate integrated solutions

The transport assessment should be produced at a Local Plan level in partnership with all relevant transport and planning authorities, transport providers and key stakeholders, for example, the Local Economic Partnership. It may be appropriate for the transport assessment to cover an area wider than the Local Plan at least initially given the size of some travel to work areas (this would be similar to the Strategic Housing Market Assessment). This process should help to identify any potential measures that may be required to mitigate negative impacts.

Paragraph: 005 Reference ID: 54-005-20141010

Revision date: 10 10 2014

What detailed information is required for the transport assessment of the Local Plan?

Much information required for the transport assessment will already be available, not least from the development needs and land availability assessments. Local planning authorities will need to consider the demographics of the area and also the desired or perceived changes likely to take place in the life of the Plan as they might affect the transport network.

Other considerations that could be included are:

- baseline existing conditions, which need to be established accurately to understand fully the context of the Local Plan policies and proposals
- the existing integrated transport networks and any gaps in these as well as service and quality
- opportunities to change to other forms of transport
- the current use and demand by all different types of transport including cumulative trips into and out of the area
- the availability of information from travel plans, previous assessments, transport operators etc
- capacity data on rail and tram networks and constraints across the area
- walking and cycling facilities and movements including future predicted trips
- description and functional classification of the road network
- current traffic flows including peak periods on roads, links and key junctions
- parking facilities, including any park and ride and existing under-provision of off-street parking spaces
- journey purpose of trips
- identification and assessment of key links and junctions on the highway network to establish existing conditions
- committed network improvements
- personal injury accident records, including cyclist safety
- any programmed public transport improvements including type, timing and promoter information
- pollution, including baseline carbon emissions broken down by type of travel
- existing transport-related environmental impacts
- established best practice in transport provision and the share of each type

- at a broad level, journey purpose and origin and destination currently and how it is likely to change or desired to change – for all types of transport

The above is not exhaustive, and other issues may need to be included as appropriate to give a complete baseline for the Plan area and how it will change. Early engagement between interested parties is important in agreeing the level and scope of assessment required.

Paragraph: 006 Reference ID: 54-006-20141010

Revision date: 10 10 2014

How can a transport assessment of the Local Plan be undertaken?

A transport assessment is likely to be scenario based and in terms of projections look at a range of potential outcomes given a number of assumptions, for example, a movement in the proportion of people using different forms of transport consistent with best practice.

Transport data should be included that reflects the typical (neutral) flow conditions on the network (for example, non-school holiday periods, typical weather conditions etc) in the area of the Plan, and should be valid for the intended purposes. It should also take account of holiday periods in tourist areas, where peaks could occur in periods that might normally be considered non-neutral. The recommended periods for data collection are spring and autumn, which include the neutral months of April, May, June, September and October. Further advice is available from the Highways Agency, as described for traffic in the [Design Manual for Roads and Bridges \(Volume 13, Part 4\)](#).

In terms of road traffic, but not other types of traffic, where there is a need to project existing or historical traffic data for future year assessments, the preferred option is the use of appropriate local traffic forecasts (such as the Trip End Model Presentation Program used for transport planning purposes), provided they offer a robust assessment. In some cases, National Road Traffic Forecast growth rates would be appropriate. However, it is important to ensure that this does not just perpetuate existing travel patterns but, where reasonable to do so, facilitates the use of sustainable modes of transport.

The use of any area-wide traffic models or background growth rates should be agreed with the relevant transport or highway authority at the evidence gathering stage of the Local Plan. Care needs to be taken when considering using any model that it takes account of the need to address historic travel patterns not necessarily reinforce them.

To assess the availability of the capacity of the road network, the transport assessment should take into account:

- recent counts for peak period turning movements at critical strategic junctions, for example, in certain instances where there is known to be a significant level of heavy goods vehicles traffic, a classified count (identifying all vehicles separately) should be provided
- 12 hour/24 hour automatic traffic counts

Additional counts that may be required on the strategic parts of the road network could include:

- manual turning counts (which should be conducted at 15 minute intervals) to identify all strategically relevant highway network peak periods
- queue length surveys at key strategic signal junctions to establish demand and actual traffic flows
- journey time surveys
- freight counts
- abnormal load counts
- pedestrian and cyclists counts

Capacity assessments for roads, rail and bus should also be obtained.

Paragraph: 007 Reference ID: 54-007-20141010

Revision date: 10 10 2014

How should the impact of land allocations be considered in assessing the transport implications of Local Plans?

The first step in quantifying the impact of proposed land allocations in the Local Plan on the transport system is to provide an estimate of the person trips (for all types of transport) that are likely to be generated by it.

In all cases, an analysis of development-related trips using an appropriate database or an alternative methodology should be agreed with the relevant highway authorities, as this will form the major element of the assessment.

An assessment of the impacts of the proposed additional land allocations can be initiated once initial potential allocations have been determined. There needs to be a description of the type of development at each of the locations proposed in as much detail as possible at the time. Where this is not possible,

a “likely” scenario will need to be employed to set out the potential transport impact. Information that could be required includes:

- location plans of each site
- description of all the proposed land uses
- scale of development – such as the number of residential units or gross floor area of development – subdivided by land use where appropriate/possible
- site area in hectares
- likely proposed access to existing transport infrastructure for all types of travel
- where known, the likely proposed parking strategy
- development phasing, where applicable
- potential for securing travel planning benefits and enhanced sustainable transport provision

The above requirements are not exhaustive and will require adaptation to reflect the knowledge about the potential site allocations and developments as well as the type and scale of the proposed developments.

Paragraph: 008 Reference ID: 54-008-20141010

Revision date: 10 10 2014

How should safety considerations be addressed and accident analysis used effectively in the transport assessment of the Local Plan?

All types of transport should be covered by safety considerations and accident analysis, taking into account the objective of facilitating, where reasonable to do so, the use of sustainable modes of transport. The level of detail required will be dependent on the stage of the Local Plan.

The transport assessment should identify any significant highway safety issues and provide an analysis of the recent accident history of the affected/impacted areas. The extent of the safety issue considerations and accident analysis will depend on the scale and type of developments in the context of the character of the affected Strategic Road Network. The need to minimise conflicts between vehicles and other road user groups should be adequately addressed.

Critical locations on the road network with poor accident records should be identified. This is to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads.

Where the Strategic Road Network is involved, we recommend that appropriate national statistics are also used as a comparison.

Paragraph: 009 Reference ID: 54-009-20141010

Revision date: 10 10 2014

How is the WebTAG approach useful in the transport assessment of the Local Plan?

An assessment should adopt the principles of [WebTAG](#) by assessing the potential impacts of development within the framework of WebTAG objectives. For most Local Plan assessments the full methodology recommended will not be appropriate. The Highways Agency's [Project Appraisal Report System](#) may provide some useful guidance on methods more appropriate in these cases. Assessments involving major new transport infrastructure should, however, employ the methods set out in WebTAG. Although this approach is typically applied when planning for local transport infrastructure, adopting this approach for Local Plan transport assessments will ensure that any proposed land allocation impact is considered in the context of two alternative scenarios – ‘with development’ and ‘without development’ – and will enable a comparative analysis of the transport effects of the proposed allocation.

Paragraph: 010 Reference ID: 54-010-20141010

Revision date: 10 10 2014

Appendix B



Department
for Transport

TRANSPORT ANALYSIS GUIDANCE

The Transport Appraisal Process

January 2014

Department for Transport

Transport Analysis Guidance (TAG)

<https://www.gov.uk/transport-analysis-guidance-webtag>

This TAG Unit is guidance for the **TECHNICAL PROJECT MANAGER**

Technical queries and comments on this TAG Unit should be referred to:

Transport Appraisal and Strategic Modelling (TASM) Division
Department for Transport
Zone 2/25 Great Minster House
33 Horseferry Road
London
SW1P 4DR
tasm@dft.gsi.gov.uk
Tel 020 7944 6176
Fax 020 7944 2198

2 Option Development (Stage 1)

2.1 Introduction

2.1.1 This Section describes Stage 1 of the transport appraisal process - Option Development (Figure 1). It is applicable to all types of intervention, including individual schemes, packages of measures, strategies and plans.

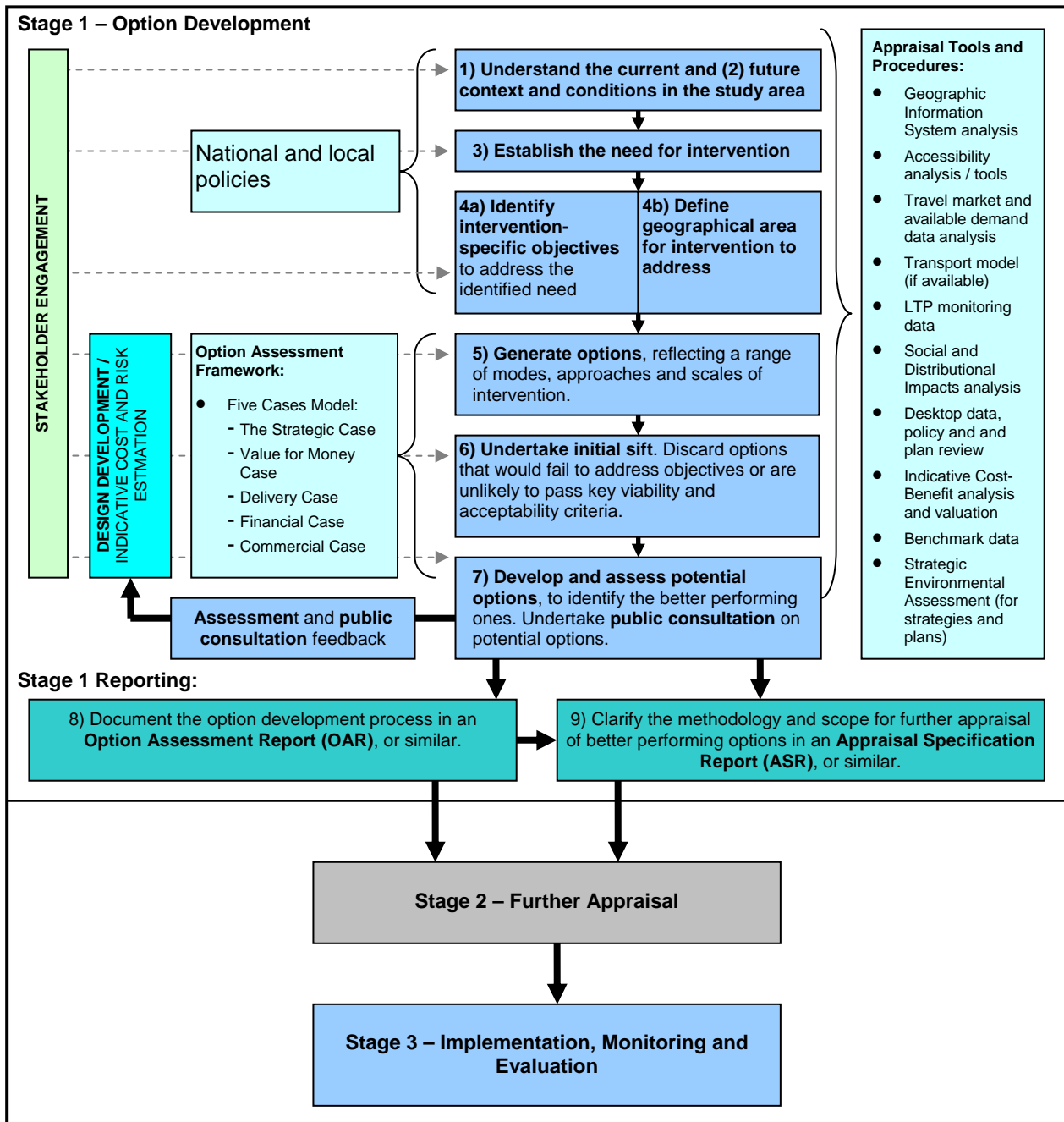


Figure 1 Steps in the Stage 1 process

2.1.2 Stage 1 involves identifying the need for intervention and developing options to address a clear set of locally developed objectives. It involves generating a broad range of options, which reflect a range of modes, approaches and scales of intervention. These are then sifted and assessed against criteria from the [Transport Business Case](#) (DfT, 2011) 'Five Case Model' to identify the better performing options for further appraisal in Stage 2. The focus of assessment is on developing a transparent and appropriate view of the relative merits and disadvantages of different options.

Appendix C

800m Walking Distance to Bus Stops



Walking Routes
from Site
Shif0034 to Key
Destinations via
access off A4169



Walking Routes
from Site
Shif0034 to Key
Destinations via
access off Park
Lane





david tucker associates

Forester House

Doctor's Lane

Henley-in-Arden

Warwickshire B95 5AW

Tel: +44(0)1564 793598

Fax: +44(0)1564 793983

inmail@dtatransportation.co.uk

www.dtatransportation.co.uk

SHROPSHIRE COUNCIL REGULATION 18 SUBMISSION: LAND AT UPTON LANE, SHIFNAL (SITE SHF035)

Green Belt Appraisal Review
Prepared for: Nurton Developments Ltd

SLR Ref: 406.02395.00004
Version No: FINAL
September 2020

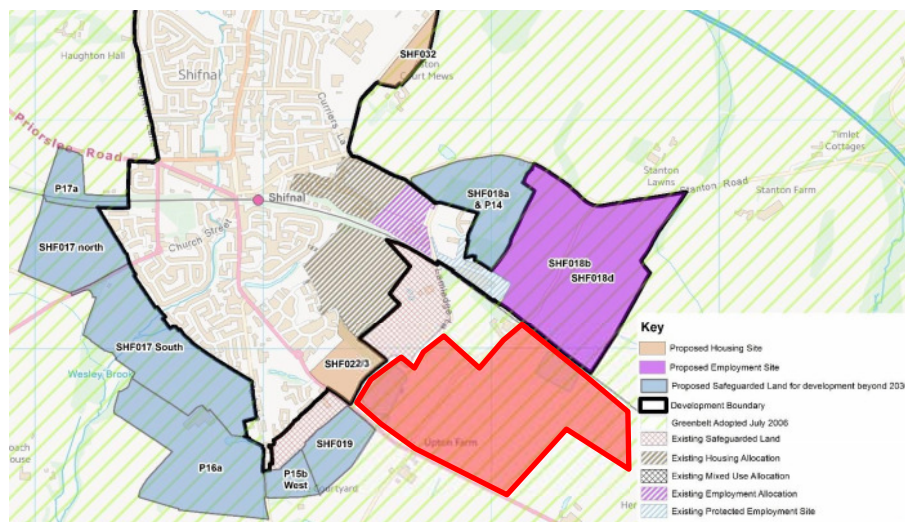


1.0 Introduction and Summary

- 1.1 This document has been prepared on behalf of Nurton Developments Ltd to review the Green Belt appraisal work undertaken as part of the evidence base for the Shropshire Local Plan. The focus of this analysis is Site SHF035, Land at Upton Lane, Shifnal, which is being promoted for residential development by Nurton Developments.
- 1.2 This supplements Green Belt appraisal work that has been an integral part of previous representations made by Nurton Developments in relation to this site. This document does not repeat the previous appraisals but focuses on the overall site assessments published by Shropshire Council.
- 1.3 It considers the analysis that has been undertaken by Shropshire Council, which summarises the findings of the Shropshire Green Belt Assessment (LUC for Shropshire Council, September 2017) and Shropshire Green Belt Review: Stage 2 (LUC for Shropshire Council, November 2018). The site assessment tables do not include any specific scores for the sites in relation Green Belt, but instead focus on the harm to the Green Belt that would result from development. This document also provides a review of this Shropshire Council's analysis, reflecting and building on previous submissions made in relation to site SHF035. It also identifies if or how other criteria would help the Council's work going forward.

Figure 1

Site SHF035 (indicated by the red area) in relation to other sites being considered by Shropshire Council* on the southern side of Shifnal



*The site and boundaries shown are indicative, with further information available on www.shropshire.gov.uk

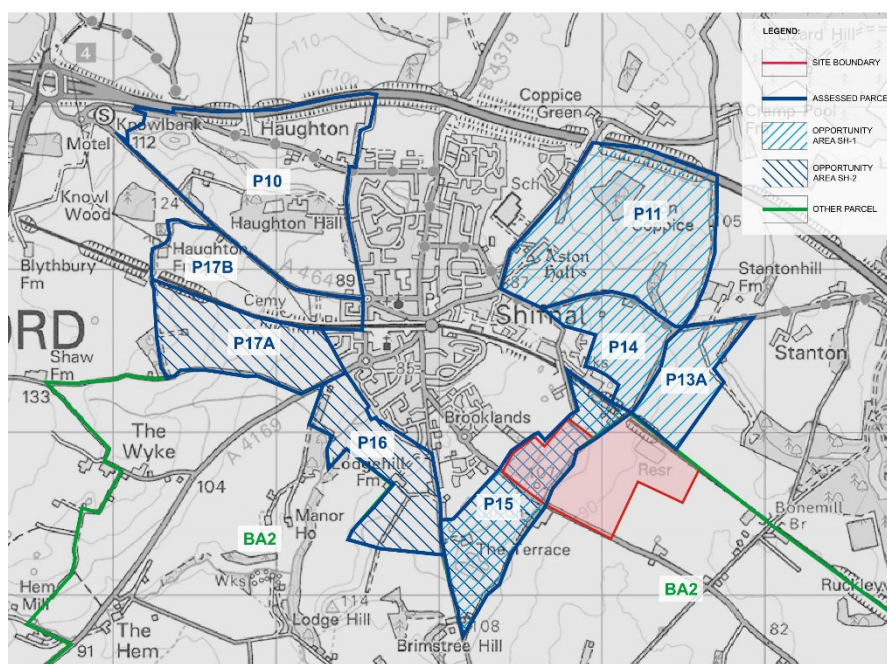
- 1.4 The Green Belt summary has been broadly described in a consistent way in relation to the site around Shifnal and the content comprises a concise summary of the Green Belt studies referred to above, particularly the Shropshire Green Belt Review: Stage 2. However, there are several important issues to highlight:
 - The Green Belt Assessment and Review has been applied coarsely, with no site-specific analysis undertaken, this means that the evaluation is relatively simplistic and in the context of site SHF035 the land within broad area BA2 any evaluation is very limited;

- It appears that there is inconsistency in the approach taken and the overall consideration of the vulnerability of the gap between Shifnal and Telford, which is clearly expressed in the Green Belt Assessment and Review documents. This is perhaps best expressed in the differences between the consideration of sites SHF024 ('Land located to the south of Junction 4 of the M54') and SHF034 ('Land South of Shifnal'), with the former being discounted due to the strategic importance of this gap. Whilst land within Green Belt Parcels P16 and P17 (including site SHF017 ['Lodge Hill, South West of Shifnal'] and P17a ['Land south of Priorslee Road and North of the Railway Line, Shifnal']; part of which SHF034 is located), which also lies in the gap between Shifnal and Telford, is proposed to be released from the Green Belt; and
- The emphasis placed on the ridgeline for site SHF035 in the Strategic Considerations row in the site analysis table is inconsistent when compared with other sites, including SHF18b ('Land to the East of Shifnal Industrial Estate') and P15b ('Land between Hinnington Road and A464') which is part of site SHF019VAR ('Land South of the A464'). The consideration of the ridgeline within site SHF035 should be comparable to that applied for sites SHF18b and SHF019VAR, where this does not form a constraint. There also appears to be limited consideration of the strategic benefits associated with the combined release of adjacent sites.

2.0 Overview of Shropshire Council's Analysis

2.1 Shropshire Council's analysis of the sites around Shifnal is consistently reflective of the Shropshire Green Belt Assessment and Review. Site SHF035 lies within Green Belt parcel P15 and broad area BA2 in the Green Belt Assessment. Parcel P15 is considered to make a moderate contribution to Green Belt purposes 2, 3 and 4, whilst broad area BA2 is considered to make a moderate contribution to purposes 2 and 4 and strong contribution to purpose 3. The location of the site in relation to the Green Belt parcels and broad area BA2 is shown in Figure 2.

Figure 2
Site Location in Relation to Green Belt Parcels and Opportunity Areas



2.2 The Stage 3 Assessment by Shropshire Council sets out that:

“within the Green Belt Review, the element of the site within parcel P15 is also considered within sub-opportunity area (Sh-1 and Sh-2), furthermore a sub-area of the parcel is also considered within opportunity area Sh-1a. The review of opportunity areas Sh-1 and Sh-2 indicates that there would be high harm to the Green Belt resulting from release. The review of sub-opportunity areas Sh-1a indicates that there would be moderate harm to the Green Belt resulting from release.”

3.0 Commentary on Site Scoring

3.1 As set out above, the sites have not been scored in relation to Green Belt purposes or harm, with the Stage 3 Assessment drawing on the conclusions of the Shropshire Green Belt Assessment and Review. Overall, the Green Belt parcels applicable to site SHF035 make broadly comparable contribution to Belt Purposes as those associated with sites SHF034, SHF18b and SHF18d, noting that there are some differences.

3.2 Whilst this does reflect the Shropshire Green Belt Review: Stage 2 the presentation of the summary text is very misleading. The summary for site SHF035 relates the harm rating to the opportunity areas. However, no comparable relationship is made for sites SHF034, SHF18b and SHF18d. These sites lie within the same opportunity areas i.e. with a harm rating of high. The selective presentation of the harm ratings makes SHF035 appear less favourable.

3.3 Shropshire Council identify that site SHF035 lies partly within broad area BA2. There has been no attempt to assess this land in more detail as part of the Stage 3 Assessment, which suggests that its promotion has not been addressed on a comparable basis.

3.4 One important point that is not picked up in the Stage 3 Assessment is the relative position of site SHF034. The Green Belt Assessment highlights the vulnerability of the Green Belt between Shifnal and Telford. To quote the Green Belt Assessment in relation to purpose 2:

“On a more localised scale the Green Belt designation within Shropshire is considered to be playing a vital role in preventing the perceived merging of Telford with Shifnal. The area of open land between these towns is relatively narrow with a minimum distance of 1.7km separating the two settlements. Therefore, any loss of openness within the area of countryside between these two settlements might be perceived as a gradual merging of Telford with Shifnal and an erosion of their separate identities.”

3.5 In addition, the Green Belt Review sets out that Site SHF034 lies in opportunity area Sh-3 with the Green Belt Review: Stage 2 stating:

“Release of opportunity area Sh-3 would however have a strategic effect on the functioning of the Green Belt by leading to the effective merging of Shifnal and Telford particularly in relation to parcels P10 and P17.”

- 3.6 The above points are of critical importance, both in terms of the Green Belt evaluation and also the Strategic Considerations associated with site SHF034.
- 3.7 Reviewing the above in the context of other sites, Site SHF024 also lies within the gap between Shifnal and Telford. The Stage 3 Assessment for this site recommends that it is retained as Green Belt, with the justification for this being:
- “The site is located within the Green Belt and forms an important component of the gap between the settlements of Telford and Shifnal. As such it is considered that the retention of this site within the Green Belt is important to avoid the actual or perceived coalescence of these two settlements.”*
- 3.8 Comparing this with site SHF034 suggests inconsistency in the way sites have been analysed, with potential selective use of criteria. It would be useful to understand how Shropshire Council have reached conclusions about these sites, particularly in relation to the vulnerability of the gap between Shifnal and Telford.
- 3.9 The Strategic Considerations row in the site analysis tables makes reference to the importance of the ridgeline in relation to site SHF035. However, no comparable mention of the ridgeline is made in relation to site SHF18d, yet this lies almost adjacent to the north (only separated by the railway line). In addition, the Green Belt Release Exceptional Circumstances Statement (Shropshire Council, August 2020) identifies that site P15b (part of site SHF019VAR) should be released from the Green Belt. However, according to Shropshire Council’s interactive site map, site P15b extends up to Upton Lane on the southern side of the A464, which is on the highest part of the ridgeline at 105m AOD. At the very least this appears to suggest the inconsistent analysis of sites. The information that has previously been submitted in support of Nurton Development’s promotion of site SHF035 acknowledges that the ridgeline is a potential challenge, which is why the proposed masterplan avoids development on the higher part of the ridge (with this comprising public open space), together with the creation of extensive landscape planting to create a strong and clearly defined framework for development.

4.0 Potential Additional Criteria

- 4.1 The analysis against Green Belt purposes and harm relies on drawing together conclusions from the Green Belt Assessment and Review. This was undertaken at a different scale to the sites that are now being evaluated. To review this approach and consider the site more specifically, whilst still drawing on past conclusions, would create a more robust assessment moving forward. This approach would also allow a more thorough evaluation of site SHF035 where it extends into Broad Area BA2.
- 4.2 There is no evaluation, even at a strategic level, as to how the sites being promoted relate to each other e.g. the spatial relationship between SHF035 and SHF18d. This could comprise an analysis of the potential for combined benefits to be identified due to the inter-relationships between adjoining sites.

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

T: +44 (0)28 9073 2493

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 906 4280

CARDIFF

T: +44 (0)29 2049 1010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: + 44 (0)1392 490152

GLASGOW

T: +44 (0)141 353 5037

GUILDFORD

T: +44 (0)1483 889800

LONDON

T: +44 (0)203 805 6418

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER

T: +44 (0)161 872 7564

NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

NOTTINGHAM

T: +44 (0)115 964 7280

SHEFFIELD

T: +44 (0)114 245 5153

SHREWSBURY

T: +44 (0)1743 23 9250

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: + 353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)6 23 37 14 14

SHROPSHIRE COUNCIL REGULATION 18 SUBMISSION: LAND AT UPTON LANE, SHIFNAL (SITE SHF035)

Landscape and Visual Review
Prepared for: Nurton Developments Ltd

SLR Ref: 406.02395.00004
Version No: FINAL
September 2020



1.0 Introduction and Summary

- 1.1 This document has been prepared on behalf of Nurton Developments Ltd to review the landscape and visual appraisal work undertaken as part of the evidence base for the Shropshire Local Plan. The focus of this analysis is Site SHF035, Land at Upton Lane, Shifnal, which is being promoted for residential development by Nurton Developments.
- 1.2 This supplements landscape and visual appraisal work that has been an integral part of previous representations made by Nurton Developments in relation to this site. This document does not repeat the previous appraisals but focuses on the overall site assessments published by Shropshire Council.
- 1.3 It considers the analysis that has been undertaken by Shropshire Council and how the site has been scored. It also provides a review of this scoring, reflecting and building on previous submissions made in relation to site SHF035. It also identifies if or how other criteria would help the Council's work going forward.
- 1.4 The landscape and visual criteria have been applied consistently across the sites around Shifnal and the scoring given is consistent with the Landscape and Visual Sensitivity Assessment. However, there are several important issues to highlight:
 - The Landscape and Visual Sensitivity Assessment has been applied very coarsely, meaning that all the land around Shifnal is given a neutral score. This means there is no differentiation between sites. Landscape and visual effects have the potential to be key considerations at a planning application stage, therefore it is unusual and surprising that no weight has been applied to this (in the context of Shifnal) in the plan preparation process.
 - Only scoring the site in the comparative site analysis, with no associated description is too crude and simplistic an approach. Again, this does not allow even a broad understanding of the sites and their context.
 - The emphasis placed on the ridgeline for site SHF035 in the Strategic Considerations row in the site analysis table is potentially disingenuous. The same ridgeline is not referred to in the table in relation to site SHF18b, or in the Green Belt Release Exceptional Circumstances Statement (Shropshire Council, August 2020) in relation to site P15b (part of site SHF019VAR). This would suggest an inconsistent approach to the assessment or reporting of findings for different sites which undermines the site selection process.

2.0 Overview of Shropshire Council's Analysis

- 2.1 Shropshire Council's analysis of the sites around Shifnal is consistently reflective of the Shropshire Landscape and Visual Sensitivity Assessment (prepared for Shropshire Council by Gillespies, dated 28.11.2018, Revision 01). Site SHF035 lies within area Shifnal C (16SHF-C) in the Landscape and Visual Sensitivity Assessment, which is identified as being of medium-low landscape sensitivity and medium-high visual sensitivity to residential development. Site SHF035 is consistently given a neutral score in the site analysis undertaken in 2018, 2019 and 2020. Figure 1 shows the areas identified in the Shropshire Landscape and Visual Sensitivity Assessment around Shifnal. Figure 2 shows the extent of site SHF035 in relation to other site around Shifnal that are being evaluated by Shropshire Council.

Figure 1
Shropshire Landscape and Visual Sensitivity Assessment Areas: Shifnal

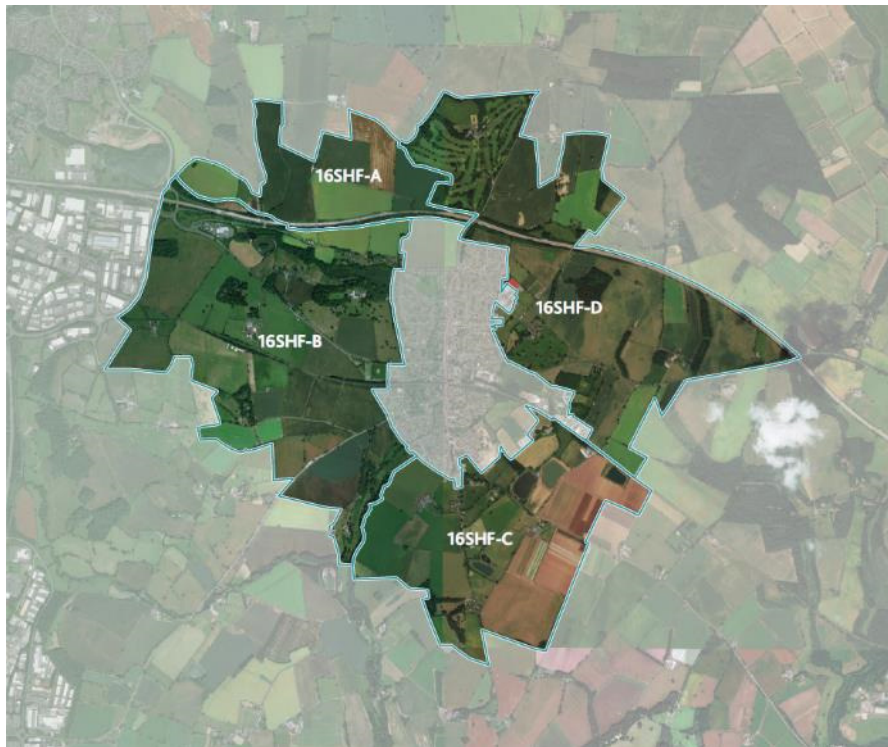
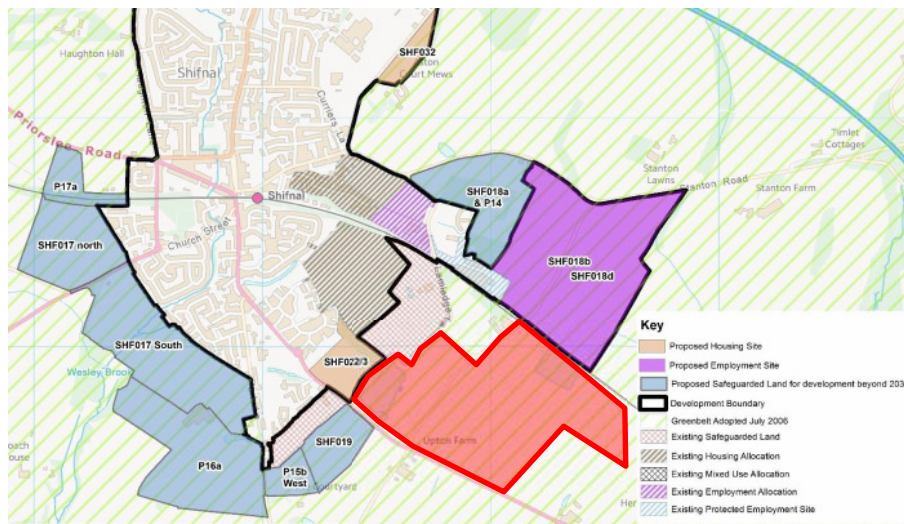


Figure 2
Site SHF035 (indicated by the red area) in relation to other sites being considered by Shropshire Council* on the southern side of Shifnal

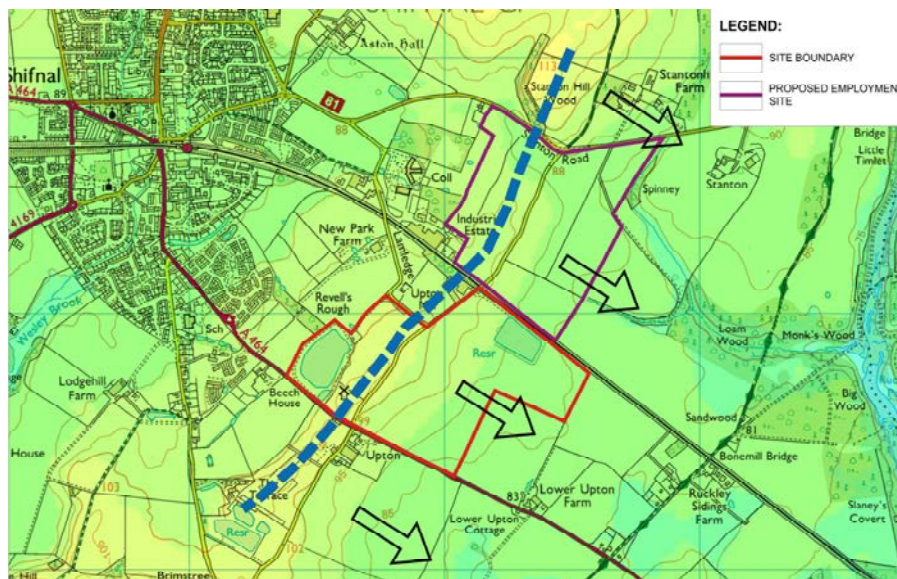


*The site and boundaries shown are indicative, with further information available on www.shropshire.gov.uk

2.2 Shropshire Council’s interpretation of the Landscape and Visual Sensitivity Assessment in the site analysis undertaken applies a neutral score if the sensitivity assessment is medium-low, medium or medium high. All the land surrounding Shifnal falls into these three categories, and therefore it is all given a neutral score. This means there is no differentiation between any sites, yet at an application stage an appraisal of potential landscape and visual effects would likely be a key requirement of any planning consideration.

- 2.3 The Strategic Considerations row in the site analysis tables makes reference to the importance of the ridgeline in relation to site SHF035. However, no comparable mention of the ridgeline is made in relation to site SHF18d, yet this lies almost adjacent to the north (only separated by the railway line). In addition, the Green Belt Release Exceptional Circumstances Statement (Shropshire Council, August 2020) identifies that site P15b (part of site SHF019VAR) should be released from the Green Belt. However, according to Shropshire Council’s interactive site map, site P15b extends up to Upton Lane on the southern side of the A464, which is on the highest part of the ridgeline at 105m AOD. At the very least this appears to suggest the inconsistent analysis of sites. Figure 3 shows the local topographic context of the SHF035, together with the spatial relationship with sites SHF18b and SHF18d.

Figure 3
Local Topographic Context of the Site



3.0 Commentary on Site Scoring

- 3.1 In the Shropshire Landscape and Visual Sensitivity Assessment the landscape value for Shifnal C 16SHF-C states, “the landscape does not make an important contribution to the enjoyment of the area due to limited P_{RoW} access and an absence of recreational provision beyond the fishery” and this seems to be reflected in the overall Medium-Low score for residential development sensitivity. However, the fishery is a private facility and is not part of any publicly accessible space; although the development proposes the retention of one lake and its inclusion within an area of public open space along the highest parts of the skyline north of Upton Lane, which is considered a positive factor in terms of landscape value.
- 3.2 Visual sensitivity of Shifnal C 16SHF-C which includes SHF035 is concluded as Medium-High for residential and High for employment. The reasons provided are “intervisibility with the AONB” and “visible on the skyline in places”. However, such views of the AONB are restricted to the south of the parcel, and to the west of the A 464 and “the parcel itself does not take in the special qualities (of the AONB) and these views do not represent the majority of views from the parcel”. The value of views due to the AONB is highly questionable, particularly within the context of the proposed development area to the east of the parcel. Area Shifnal B 16SHF-B (which includes part of SHF034) notes “the parcel largely screens views towards the AONB with only glimpsed views from the south of the parcel”. This appears to be very similar to area Shifnal C 16SHF-C in terms of visual sensitivity.

- 3.3 The landscape section states, *“the landscape is flat to gently rolling with some areas which are slightly steeper, such as along Upton Road (landscape susceptibility description max adjacent landform 105 m AOD)”* and the landform here is gently rolling. However, Lodge Hill to the west of the parcel is a far more prominent feature, located above the steeper sided valley of Wesley Brook landform (114 m AOD). Area Shifnal B 16SHF-B notes *“and also views towards Lodge Hill”*. Therefore, views towards skylines are important for both areas Shifnal B 16SHF-B and Shifnal C 16SHF-C.
- 3.4 The description of visual value for Shifnal C 16SHF-C states, *“the landscape is relatively intact, with main detracting elements within the landscape being the roads and agricultural sheds”*. Although this is in the context of the landscape susceptibility description for Shifnal C 16SHF-C stating that *“hedgerows are degraded in places, especially to the east due to agricultural practices”*. Comparing this with Shifnal B 16SHF-B, which relates to the northern part of site SHF034, the Landscape and Visual Sensitivity Assessment states, *“the landscape is intact and the main detracting elements are the railway line, overhead line and A4169 to the middle and the south of the parcel”*.
- 3.5 Visual sensitivity for Shifnal C 16SHF-C is rated as Medium-High, whereas for the Shifnal B 16SHF-B is rated as Medium. In the context of the comparison above it could be argued that the key criteria are very similar and that the visual sensitivity for Shifnal C 16SHF-C should also be rated as Medium for residential use, particularly with respect to the portion of Shifnal C 16SHF-C proposed for development by Nurton Developments.

4.0 Potential Additional Criteria

- 4.1 Applying a more refined approach to the landscape and visual analysis of sites (i.e. differentiate between medium-low, medium and medium-high) would allow greater granularity. The inclusion of some narrative would also add to the overall analysis and conclusions that are reached. The previous information provided in relation to site SHF035 has demonstrated how a development could be delivered on this land with recognition of the landscape and visual sensitivities. Key aspects of this include avoidance of the ridge in the vicinity of the derelict windmill and the inclusion of considerable landscape planting to create a strong and clearly defined framework for development.

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

T: +44 (0)28 9073 2493

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 906 4280

CARDIFF

T: +44 (0)29 2049 1010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: +44 (0)1392 490152

GLASGOW

T: +44 (0)141 353 5037

GUILDFORD

T: +44 (0)1483 889800

LONDON

T: +44 (0)203 805 6418

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER

T: +44 (0)161 872 7564

NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

NOTTINGHAM

T: +44 (0)115 964 7280

SHEFFIELD

T: +44 (0)114 245 5153

SHREWSBURY

T: +44 (0)1743 23 9250

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: +353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)6 23 37 14 14

SHROPSHIRE COUNCIL REGULATION 18 SUBMISSION: LAND AT UPTON LANE, SHIFNAL (SITE SHF035)

Heritage Appraisal Review
Prepared for: Nurton Developments Ltd

SLR Ref: 406.02395.00004
Version No: FINAL
September 2020



1.0 Introduction

- 1.1 This document has been prepared on behalf of Nurton Developments Ltd to review the Heritage appraisal work undertaken as part of the evidence base for the Shropshire Local Plan. The focus of this analysis is Sites SHF034, 'Land South of Shifnal', and SHF035, 'Land at Upton Lane', which is being promoted for residential development by Nurton Developments.
- 1.2 This document does not repeat previous heritage appraisals, but instead compares the approach and results of the overall site assessments published by Shropshire Council. Section 2 below contains a more detailed analysis of the policy background and assessment methodology (and its shortcomings) that Shropshire Council has applied to the current plan process. From discussion with Shropshire Council we have been advised that the Tabular Assessment Forms for Stages 2 and Stage 3 comprise the full Assessment in terms of Heritage and no additional background evidence base has been prepared to support the conclusions drawn.

2.0 Policy & Assessment Methodology

Historic Environment Planning Approach and Policy

- 2.1 In February 2019, the DCLG published the latest NPPF. The NPPF confirms that the Government will continue to encourage sustainable development and in relation to the Historic Environment it notes that:
- Paragraph 185: *"Plans should set out a positive strategy for conservation and enjoyment of the historic environment, including assets most at risk through neglect, decay or other threats"* (with four criteria for advising this strategy); and
 - Paragraph 188: *"...planning authorities should make information about the historic environment... publicly available"*
- 2.2 The new plan includes Policy DP24: 'Conserving and Enhancing the Historic Environment' which in Item 6 refers to the need for *"Encouraging development which delivers positive benefits to heritage assets. Support will be given in particular, to proposals which appropriately conserve, manage or enhance the significance of a heritage asset including its setting, especially where these improve the condition of those assets which are at risk or in poor condition."* Further details on such enhancement are explained in paragraph 4.210 of the supporting text to Policy DP24.

Suitability of Historic Environment Appraisal

- 2.3 The regulation 18 Pre-Submission Draft Shropshire Local Plan 2016 to 2038 Sustainability Appraisal and Site Assessment Environmental Report objectives include SEA Objective (k) cultural heritage, including architectural and archaeological heritage which is identified by Shropshire Council as SO15: Conserve and enhance features and areas of heritage value and their setting and the following questions are used to test whether the assessment meets the policy requirements set by the council:
- Conserve and/or enhance heritage assets and the historic environment?
 - Contribute to the better management of heritage assets?
 - Improve the quality of the historic environment?
 - Provide for increased access to and enjoyment of the historic environment
 - Increase the social benefit (e.g. education, participation, citizenship,

- health and well-being) derived from the historic environment?
- Increase the economic benefit derived from the historic environment?
- Promote heritage based sustainable tourism?

2.4 The option assessment criteria are set out in table 2.5 with the scoring below:

Table 2.5 Option and policy assessment criteria

Significance of effect		Description of effect
++	Strongly positive	Likely to benefit a large area of Shropshire or a large number of people or receptors, including outside the county. The effect is likely to be direct, permanent, irreversible and of major magnitude.
+	Positive	The extent of the predicted benefits is likely to be limited to small areas of the county or small groups of people or receptors. The effect may be any or all of the following: indirect temporary reversible infrequent and its predicted magnitude is likely to be minor.
0	Neutral	Neutral effects are predicted when the policy being assessed is unlikely to alter the present or future baseline situation, where current trends are likely to continue or where the positive or negative effects are likely to balance each other out.
-	Negative	Likely to have an adverse effect on a small area of Shropshire or on a small number of people or receptors. The effect may be any or all of the following: indirect temporary reversible infrequent and its predicted magnitude is likely to be minor.
--	Strongly negative	Likely to have a significant adverse impact on the whole, or on a large part of, Shropshire, on internationally or nationally protected assets or on areas outside the county. The effect is predicted to be direct, permanent, irreversible and of major magnitude.
?	Unknown	Where there is insufficient information to make a confident assessment.

SO	Sustainability questions	Score if Yes	Score if No
SO15: Conserve and enhance features and areas of heritage value and interest Is development on the site likely to	Is the site within a designated heritage area or does it contain designated heritage assets?	strongly negative	neutral
	Is development on the site likely to affect the setting of designated heritage assets?	negative	neutral

Relevant Sustainability Objective(s)	Criteria no.	Criteria	SA Score
SO15: Conserve and enhance features and areas of heritage value and interest	13	Site wholly or partly within any of the following (record all that apply):	
		a World Heritage Site or its buffer zone	-- or 0
		a Scheduled Monument	-- or 0
		a Registered Battlefield	-- or 0
		a Registered Park or Garden	-- or 0
SO15: Conserve and enhance features and	14	a Conservation Area	-- or 0
		Site boundary within buffer zone ⁶ of one or more (record all that apply):	
		300m of a World Heritage Site or its buffer zone	- or 0
		300m of a Scheduled Monument	- or 0

areas of heritage value and interest (cont)	14	300m of a Registered Battlefield	- or 0
		300m of a Registered Park or Garden	- or 0
		300m of a Conservation Area	- or 0
		100m of a Grade I or Grade II* Listed Building	- or 0

12	Site wholly/partly within/contains any of the following (record all that apply):		Yes = double minus score (--) No = zero score (0)
	a World Heritage Site or its buffer zone		
	a Scheduled Monument		
	a Registered Battlefield		
	a Registered Park or Garden		
	a Conservation Area		
13	Site boundary within buffer zone ⁵ of one or more (record all that apply):		Yes = minus score (-) No = zero score (0)
	300m of a World Heritage Site or its buffer zone		
	300m of a Scheduled Monument		
	300m of a Registered Battlefield		
	300m of a Registered Park or Garden		
	300m of a Conservation Area		
	100m of a Listed Building		

- 2.5 As can be seen by the above tables Shropshire Council’s approach has only considered designated heritage assets, not non-designated heritage assets, and it has regarded them only as constraints, rather than scoring benefits that might derive from certain schemes which would fulfil the NPPF and Core Strategy policies to enhance heritage assets and allow public enjoyment.
- 2.6 SO15 is incorrectly written in the sustainability questions table and has not included setting (but has added some other text instead). Such errors suggest the Council has not applied heritage planning policy correctly, and undermines the soundness of the decision-making process.
- Heritage Impact Issues**
- 2.7 As set out above there is no robust assessment of the different Heritage enhancements of the options in the evidence base.
- 2.8 In the 2018 assessment Site SHF034 twice scored double minus for being 300m from a conservation area, and 100m from a listed building. There was no comparative assessment of site SHF035
- 2.9 In the July 2019 Local Plan Review Sustainability Report the two sites were both scored and SHF034 again had two double minus scores (for the reasons given in 2018) but SHF035 scored better at 0.
- 2.10 It can be seen from the above that SHF035 would score better than SHF034 for the potential impacts on the historic environment due to the absence of designated heritage assets within SHF035, and fewer non-designated heritage assets.
- 2.11 What Shropshire Council has failed to assess are the potential merits that each scheme might bring with them for enhancement and enjoyment of the historic environment. For SHF035 the retention of the ruined windmill, its conservation and future safeguarding, and its enjoyment as a focal point within a public amenity space, should elevate the scoring for this site well above that of SHF034, which has no such enhancements to offer.

- 2.12 SHF035 could also enhance the ancient routeways by reducing traffic options along Lamledge and Upton lanes, and opening these up for safer pedestrian and cycle use. SHF034 by contrast has considerable traffic movements every day along Park Lane.
- 2.13 Archaeological remains have been identified in the past within SHF034, whereas they may not be present at all within SHF035. To apply the same criteria for future requirement is therefore unfair, as there is a lower probability of finding archaeological remains within the large agricultural expanse of SHF035 than closer to the historic centre of Shifnal, and the known resource of manor houses, medieval settlement and parkland which are located within SHF034.

3.0 Heritage Considerations

- 3.1 The comparative assessments of promoted sites in Shifnal indicate that SHF034 (previous numbering P17a, SHF017 north, SHF017 south, P16a, P15b west and SHF019), includes the following designated heritage assets which are identified within the site and buffer zone:
- Haughton Hall Grade II* (site 17a)
 - Manor House Grade II
 - The Terrace Grade II
 - Cluster of other Grade II LBs
- 3.2 In addition, the following non-designated heritage assets identified within the site and buffer zone include:
- 17th century millpond
 - Idsall (deserted medieval village)
 - Other potential buried archaeological remains
 - Brickworks
 - Lodgehill Farm
 - Haughton farm buildings (site 17a)
- 3.3 In comparison SHF035 has no designated heritage assets within the site and buffer zone, but includes the following non-designated heritage asset and historic lane:
- The Ruined windmill (NDHA)
 - Historic Upton Lane route
- 3.4 It appears that no desk-based assessment or heritage impact assessment has been carried out in relation to SHF034. Nurton Development's site promotion documents have considered these matters and suggested undertaking archaeological investigations, as relevant to the specifics of different parts of the site, if allocated and developed.

4.0 Summary

- 4.1 SHF034 has several potential heritage constraints and related probable harm to the historic environment.

- 4.2 In comparison SHF035 has only one heritage constraint, the ruined windmill which would be retained, conserved and enhanced for public appreciation. Furthermore, the submitted masterplan demonstrates how the Historic route of Upton Road will be retained and enhanced as a dedicated green cycle/pedestrian route in association with open space surrounding the enhanced windmill setting. Delivery of this site would therefore secure an enhancement to the historic environment in accordance with Policy DP24 of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan (2016-2038).

5.0 Additional Assessment Criteria

- 5.1 We consider that the Assessment of the relative merits of the sites should have included a criteria which recognised any heritage benefit which could be accrued by a site's release, for example the retention and conservation of the windmill which is a recognised local landmark.

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

T: +44 (0)28 9073 2493

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 906 4280

CARDIFF

T: +44 (0)29 2049 1010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: +44 (0)1392 490152

GLASGOW

T: +44 (0)141 353 5037

GUILDFORD

T: +44 (0)1483 889800

LONDON

T: +44 (0)203 805 6418

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER

T: +44 (0)161 872 7564

NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

NOTTINGHAM

T: +44 (0)115 964 7280

SHEFFIELD

T: +44 (0)114 245 5153

SHREWSBURY

T: +44 (0)1743 23 9250

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: +353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)6 23 37 14 14

SHROPSHIRE COUNCIL REGULATION 18 SUBMISSION: LAND AT UPTON LANE, SHIFNAL (SITE SHF035)

Ecology Appraisal Review
Prepared for: Nurton Developments Ltd

SLR Ref: 406.02395.00004
Version No: FINAL
September 2020



1.0 Introduction

- 1.1 This section of the report has been prepared to review the evidence base and ecological criteria applied to the Shropshire Local Plan Review, more specifically the assessment of sites.

2.0 Background

- 2.1 As part of initial stages of the Local Plan Review process, ecological appraisal of the proposed sites has been undertaken at a high level. Shropshire Council has completed a Habitats Regulations Assessment (HRA, which is required under the Conservation of Habitats and Species Regulations 2017 or the 'Habitats Regulations', in order to assess the potential impacts of a project or plan upon designated sites of European Importance. This has been undertaken to consider all Local Plan Review areas in combination to ensure potential cumulative impacts are also identified.
- 2.2 In addition, Shropshire Council has undertaken scoring of sites in order to identify the presence of natural environment assets, including ecology, such that if a significant environmental constraint is present which would prevent or reduce the deliverability of development at any proposed site then it may be removed from the process. This relates to Statutory and Non-statutory ecologically designated sites, the presence of veteran trees, the presence of Tree Preservation Orders (TPO's) and the presence of Ancient Woodland.
- 2.3 Following this, comments from the Ecologist at Shropshire Council are provided as part of Site Assessment – Stage 3.

3.0 Review of Process

- 3.1 At a high level, the approach to scoring and criteria used will enable the objectives to be met, such that significant environmental (ecological) constraints which could compromise the delivery of any proposed housing are identified. The scoring criteria applied do not, however, recognise potential effects of development against emerging Policy or the potential positive effects of development through the ability to deliver a net gain for biodiversity (i.e. emerging Local Plan Policy DP13 which will require a 10% net gain for biodiversity).
- 3.2 The Ecology Comments provided as part of the Stage 3 Assessment of SHR035 are in error, as they do not relate to SHF035, as SHF035 is not proposed as employment land, there is no woodland habitat within SHF035 and the eastern or southern boundaries do not form part of the Environmental Network. The comments made here in relation to SHF035 were found to be duplicates of those made in respect of SHF024, a parcel of land located approximately 3km to the west on the distal side of Shifnal which does include priority woodland (Taggs Rough) and was proposed for employment use. The assessment is therefore unsound, and should be amended to reflect the correct site.
- 3.3 Whilst it is therefore not possible to comment on the Stage 3 Assessment of SHR035, we make the following observations which draw upon previously supplied ecological information:
- The Site has been subject to an ecological desk study and walkover survey to identify potential constraints and opportunities in relation to potential future development of the Site for residential use.
 - This work has identified the presence of potential ecological constraints although the opportunities for mitigation, compensation and enhancement using standard and well accepted

measures that have also been identified are considered to be sufficient to address the likely impacts associated with the potential future development of the Site.

- An indicative Site masterplan has been prepared to demonstrate these measures which maximise retention and seek enhancement of the environmental network through the inclusion of new green infrastructure links and dedicated habitat creation areas encompassing approximately 50% of the Site area. It is anticipated development of this scale could be undertaken whilst still demonstrating a net gain for biodiversity.
- The completion of ecological surveys will be needed at an appropriate stage of the detailed development design process, to confirm these potential constraints have been addressed and adequately mitigated or compensated through the completion of an Ecological Impact Assessment (EclA). Based on the information obtained to date, and the extent and nature of development shown to be deliverable by the indicative masterplan, it is not considered at this stage that such a level of development would result in any significant long term ecological impacts providing the mitigation hierarchy is followed and it can be demonstrated no residual impacts would occur.

4.0 Comparison with other Sites

- 4.1 Site SHF034 comprises a swathe of land along the south-western fringes of Shifnal. The majority of the land encompassed by this parcel appears to be a mixture of arable farmland and agricultural pasture with hedgerows marking boundaries. SHF034 also includes part of Wesley Brook and the associated grassland/woodland habitats which are within the Environmental Network. These are potentially of greater ecological value and therefore more susceptible to the effects likely to occur as a result of development in accordance with the illustrative masterplan, which includes the severance of the Wesley Book corridor with a primary route road previously promoted to provide a new by-pass for Shifnal to alleviate town centre congestion.
- 4.2 The ecological features potentially present are unlikely to be significantly different to the SHF035 Site, the possible exception being species such as otter and white-clawed crayfish which may occur in the Wesley Book and the extent of mitigation land required for great crested newt (based on review of the ecology officer comments). In the absence of mitigation, development of this swathe of land could potentially result in greater ecological impacts than development of the SHF035 Site, purely by virtue of the greater scale of land involved and resultant increase in land take and risk of indirect effects of fragmentation associated with new road developments, in particular severance of the Wesley Brook corridor.
- 4.3 Overall, the quantum of built development proposed by the illustrative Masterplan for SHF034 appears far greater than that proposed for SHF035, where approximately 50% of the site is allocated to habitat creation and open space, such that the ability to deliver comparable biodiversity gain if developing SHF034 is not clear.

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

T: +44 (0)28 9073 2493

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 906 4280

CARDIFF

T: +44 (0)29 2049 1010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: + 44 (0)1392 490152

GLASGOW

T: +44 (0)141 353 5037

GUILDFORD

T: +44 (0)1483 889800

LONDON

T: +44 (0)203 805 6418

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER

T: +44 (0)161 872 7564

NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

NOTTINGHAM

T: +44 (0)115 964 7280

SHEFFIELD

T: +44 (0)114 245 5153

SHREWSBURY

T: +44 (0)1743 23 9250

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: + 353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)6 23 37 14 14



Shepherd Gilmour
Consulting Engineers

4th Floor, Colchester House, 40 Peter Street, Manchester M2 5GP

T (44)0161 837 1500

www.shepherd-gilmour.co.uk

Shropshire Council Regulation 18 Submission

Flood Risk Review

Shepherd Gilmour Infrastructure Ltd.
Colchester House
40 Peter Street
Manchester
M2 5GP

CI388/EAJ/jt/20200127
September 2020



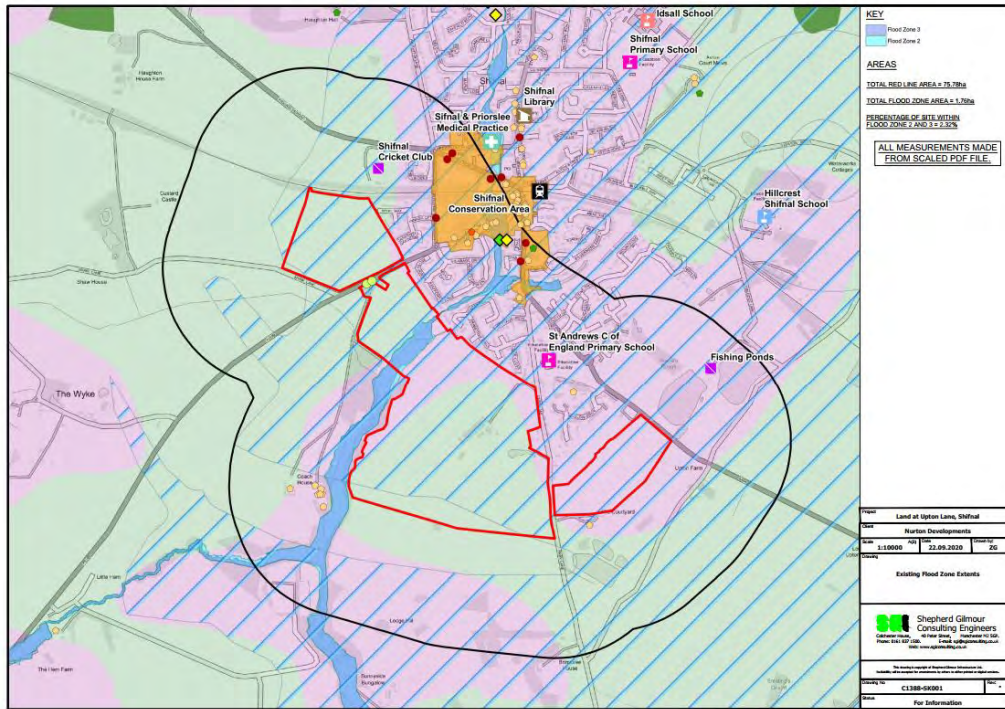
I. INTRODUCTION

- I.1 This report has been prepared on behalf of Nurton Developments Ltd to review the current status and process of the Flood Risk Assessment as part of the evidence base for Shropshire Local Plan.
- I.2 The purpose of the output is that the process should be transparent and allow proper consideration of alternatives to be assessed.
- I.3 The flood risk evidence base for all sites is limited and is provided by the Strategic Flood Risk Assessment and data held by the Environment Agency. Site specific Hydrological Modelling of critical watercourses is vital to clearly identify the flood impact on the sites in question.

2.0 POLICY

- 2.1 The Environment agency's policy in relation to Flood Risk is clear and is reproduced below
- In plan-making, local planning authorities apply a [sequential approach](#) to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, **taking account of climate change** and the vulnerability of future uses to flood risk. In plan-making this involves applying the ['Sequential Test' to Local Plans](#) and, if needed, the ['Exception Test' to Local Plans](#).
 - In decision-taking, where necessary, local planning authorities also apply the ['sequential approach'](#). In decision-taking this involves applying the [Sequential Test for specific development proposals](#) and, if needed, the [Exception Test for specific development proposals](#), to steer development to areas with the lowest probability of flooding.

- 2.2 Shifnal Place Plan area Site Assessment, published in August 2020 marks Site SHF034 as a “0” when considering flood risk. This is despite the site being dissected by an area zoned as Flood Zone 2 and 3. We have undertaken an assessment of the area zoned as Flood Zone 2 and 3 and believe that the area currently indicated in the SFRA and the Environment Agency Flood Maps is actually 2.3%.



- 2.3 It is also important to note that the Wesley Brook is directly downstream of a catchment which has a high proportion of ‘impermeable’ historically developed land. This will inevitably make the Wesley Brook prone to ‘flash flooding’ with large changes in water levels and flow speed.

- 2.4 Current flood maps contained in the SFRA and the Environment Agency Database do not consider climate change, or the extent of the land which will be prone to flooding once climate change effects are considered. As noted in the introduction it is critical that watercourse specific hydrological Assessments are undertaken to clearly review the impact of Climate change on the surrounding available land. Without such assessments the area of land which will flood during storm events allowing for climate change is unknown. The conclusion of such a study could significantly affect the flooded area of the site and in turn reduce the area of site available for development.



- 2.5 In Shifnal Place Plan area Site Assessment, Site SHF035 is marked as 0. This site is wholly within Flood Zone 1 and can be demonstrated to be unaffected by future climate changes on nearby watercourses.
- 2.6 In flood risk terms and considering the Environment Agency Policy provided in Paragraph 2.1 above, it is clear that site SHF035 is a sequentially preferable to site SHF034.
- 2.7 Site SHF024 site is split in approx. 35% to the North of the watercourse and 65% to the South. The development of this site will require the introduction of an 'engineered structures' in the form of a bridge or culvert to cross the watercourse and its associated Flood Zone 2 and 3.
- 2.7 The Environment Agency policy is that no watercourse should be culverted unless there is an overriding need to do so. In flood risk terms culverting a watercourse increases Flood Risk and requires a lifetime commitment to maintenance.
- 2.8 The Environment Act 1995 places both general and specific duties on the Agency relating to environmental, recreational and nature conservation matters. The Agency must be mindful of these duties in discharging all its functions, including those relating to flood defence and land drainage. Consequently, the Agency is in general opposed to the culverting of watercourses because of the detrimental effects that are likely to arise. Such effects may be:
- loss of and adverse effects on environmental features arid wildlife habitat;
 - increased likelihood of flooding due to blockage;
 - increased impact of flooding;
 - loss of floodwater storage;
 - increased difficulties in providing for drainage connections;
 - difficulties in the repair, maintenance and replacement of culverts;
 - increased health and safety hazards;
 - reduced groundwater recharge;



- increased difficulty in detecting the origins of pollution and in monitoring water quality.

2.9 Conclusion

Based on the current available desk-based information, it is clear that site SHF035 is sequentially preferable in Flood Risk terms than site SHF034 as it is wholly within Flood Zone 1.

Site SHF034 falls within Flood Zone 1, 2 and 3 and will require future culverting of a watercourse which has already demonstrated flash flooding problems in the area.

SHROPSHIRE LOCAL PLAN REVIEW - REGULATION 18 CONSULTATION

Land at Newport Road, Cosford

Nurton Developments Ltd

SLR Ref: 406.02395.00004
Version No: V4 (FINAL DRAFT)
September 2020



BASIS OF REPORT

This document has been prepared by SLR Consulting Limited with reasonable skill, care and diligence, and taking account of the manpower, timescales and resources devoted to it by agreement with Nurton Developments Ltd (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

SLR shall not be liable for the use of or reliance on any information, advice, recommendations and opinions in this document for any purpose by any person other than the Client. Reliance may be granted to a third party only in the event that SLR and the third party have executed a reliance agreement or collateral warranty.

Information reported herein may be based on the interpretation of public domain data collected by SLR, and/or information supplied by the Client and/or its other advisors and associates. These data have been accepted in good faith as being accurate and valid.

The copyright and intellectual property in all drawings, reports, specifications, bills of quantities, calculations and other information set out in this report remain vested in SLR unless the terms of appointment state otherwise.

This document may contain information of a specialised and/or highly technical nature and the Client is advised to seek clarification on any elements which may be unclear to it.

Information, advice, recommendations and opinions in this document should only be relied upon in the context of the whole document and any documents referenced explicitly herein and should then only be used within the context of the appointment.

CONTENTS

1.0 INTRODUCTION	1
2.0 LAND PROMOTION DOCUMENT.....	2
3.0 POLICY S21 – STRATEGIC SITE: RAF COSFORD	4
4.0 CONCLUSIONS	8

DOCUMENT REFERENCES

FIGURES

Figure 1 - Outline/Indicative Masterplan	3
Figure 2 – RAF Cosford Strategic Site and location of Midlands Air Ambulance Charity	4

APPENDICES

Appendix 1: Land Promotion Document (August 2019)

1.0 Introduction

- 1.1 This representation is made on behalf of our Client, Nurton Developments, and relates to the promotion of their land interests at 'Newport Road, Cosford' (the Site). Following proposals for the removal of RAF Cosford from the Green Belt contained in the Regulation 18 Consultation Draft Plan, this site is promoted to support the Strategic Site Objectives for RAF Cosford which include making it a centre for excellence as outlined within Shropshire Council's Draft Local Plan (2018-2038).

'RAF Cosford will become a strategic site, complementing and enabling growth aspirations in the east of the County. Employment and training provision on this strategic site will facilitate the sustainable growth of the local economy and contribute to meeting the employment needs of nearby Albrighton.' (Policy S21)

- 1.2 The Newport Road site is located directly adjacent to RAF Cosford in a small gap between the Base and the M54. As such the Site offers the potential to deliver housing for existing service personnel seeking private or affordable housing, retiring service personnel wishing to remain in the area and civilian staff who will be required to support the Strategic Objectives of the Base and the wider long term centre of excellence. It should be recognised by Shropshire Council that the living accommodation to be provided as part of the RAF Cosford site will only be made available to those in active service or on contract to the MOD. As such, there will be unmet housing demand in this locality that will not be provided by the RAF Cosford site alone.
- 1.3 In considering the draft Plan we are disappointed to note that our Client's site has not been assessed in its own right in the Stage 2 and 3 Assessments. This is despite the submission of a Promotional Document during the Strategic Sites consultation, which clearly defined the promoted area, and outlined the technical case for the site release. The failure of the Council to assess this site on its merits in the context of the evidence base is, at best, inconsistent with the consideration of other promoted sites which have been provided with their own site assessment numbers in the Council's Evidence Base which supports this Regulation 18 Consultation. It is therefore impossible to make any meaningful comments on the Council's consideration of the site in terms of the Stage 2 and 3 Assessments because the site is only considered as part of a much larger parcel (Site ref. P30), within the 'Albrighton Place Plan Area.'
- 1.4 This representation therefore confines itself to the merits of the site and a commentary of how it can support the RAFs Objectives and assist in reducing pressure on the Gap between Cosford and Albrighton.

2.0 Land Promotion Document

- 2.1 Following on from our Client's Land Promotion Document (LPD) 'Land at Newport Road, Cosford' (dated August 2019), which was submitted formally as part of the Strategic Sites Consultation (1st July 2019 – 9th September 2019), we would like to take this opportunity to re-present this site for Shropshire Council's consideration. The LPD has also been attached to this representation for ease.
- 2.2 Based on the outcomes of our technical review contained within the LPD, the conclusions remain the same, and support the case for the site's early release for housing or 'safeguarding' as this land is:
- available,
 - in a suitable location for development, and
 - achievable (i.e. with a realistic prospect that housing will be delivered within the plan period) and in particular that development is viable.
- 2.3 Analysis of planning and environmental issues, as set out in the LPD, identifies that there are no major constraints to the development of this Site, and where there are potential constraints, solutions can mitigate these. If this Site is considered by Shropshire Council as a potential development opportunity, further and more detailed work would be undertaken to fully detail the Site's technical deliverability, which our Client would be happy to undertake and work with Shropshire Council on.
- 2.4 To summarise, the LPD demonstrates that the site is appropriate for release for residential development to meet future housing requirements in this area particularly given that the site's contribution to the aims of Green Belt mean that its release would have little impact on the operation of Green Belt in this location, especially given the clearly defined Green Belt boundaries that could be established through its release.
- 2.5 Key consideration in terms of the positive contribution which this site can make to delivering Shropshire's current and future housing needs include the following;
- The delivery of accessibly located land to meet the identified and future housing and other requirements, without the need for significant new infrastructure improvement;
 - The provision of non-military, market housing that will allow civilian staff, services staff, retired and other people working in supporting services to purchase property within walking distance of where they work;
 - The delivery of affordable housing which could be prioritised for serving and ex-services personal;
 - The release of Green Belt land which has a more limited contribution to the NPPF's Green Belt purposes than other areas around RAF Cosford, particularly given the defensible boundary provided by the M54, Newport Road and established woodland planting;
 - The ability to deliver sustainable housing development in co-location with a strategic level employment allocation within the M54 corridor;
 - The opportunity for Shropshire Council to identify this Site as safeguarded land, to ensure that sufficient land is taken out of the Green Belt and avoid the risk of successive reviews in any subsequent Local Plan iteration, which would run contrary to the NPPF;
 - Delivery of a site which is located sustainably and can be readily linked into the wider, existing transport network;

- Unlocking the opportunity to enhance the Site and its wider setting through improved/diversified landscaping of retained open areas;
- The opportunity to improve and enhance the level of accessible publicly available open space, enhancing its quality, general condition and providing opportunities for better, natural surveillance;
- The opportunity to enhance biodiversity and implement an ecological mitigation/improvement scheme to develop ecological connectivity within the Site, and beyond the Site's boundary;
- The opportunity to create a landscape framework to be implemented which incorporates green infrastructure corridors;
- The delivery of development within the M54 corridor to assist in meeting identified cross-boundary housing need; and
- Reducing pressure on a constrained Albrighton for further housing to support the growth of Cosford Air Base, thus helping to protect the gap between these two areas.

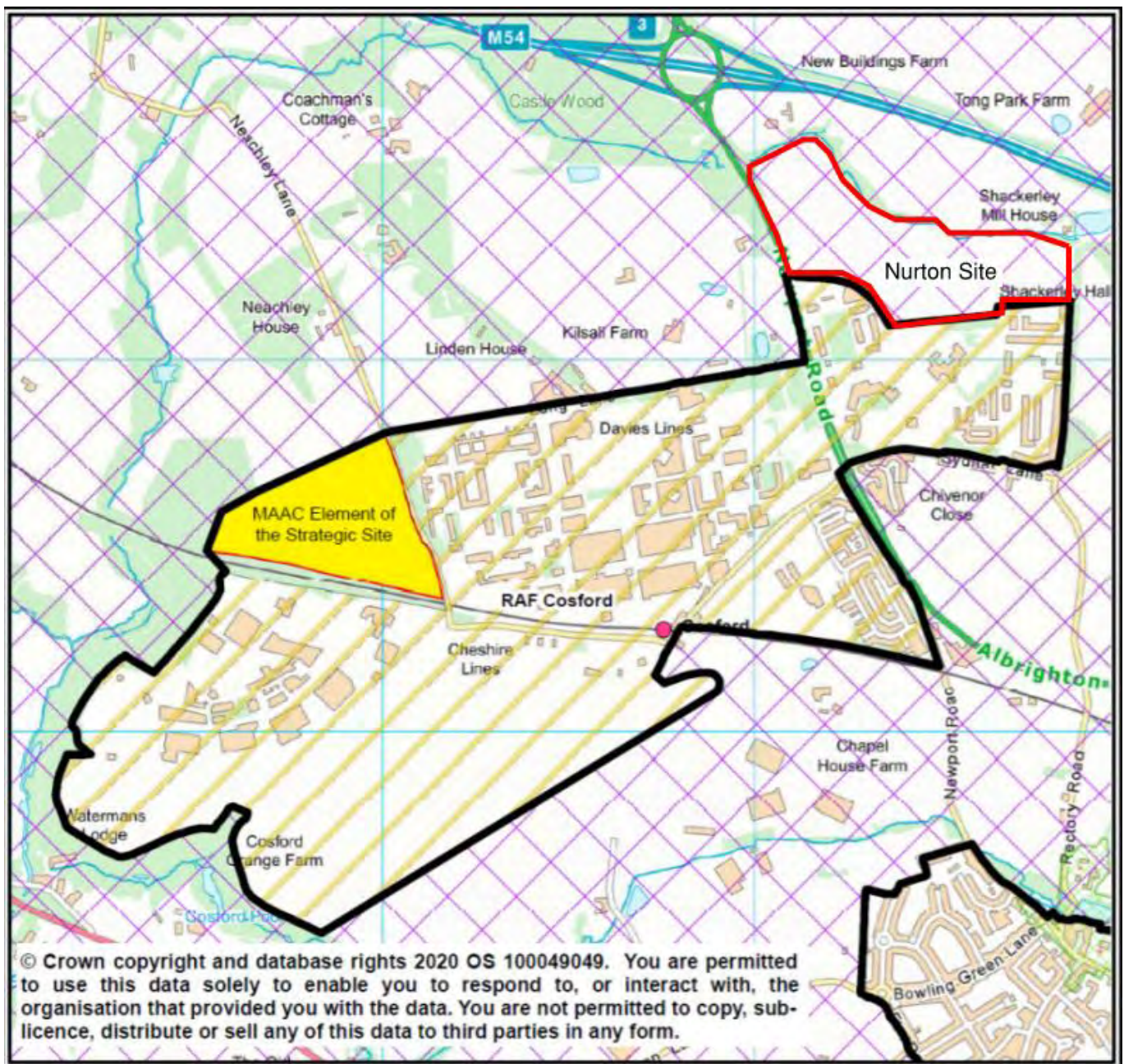
Figure 1 - Outline/Indicative Masterplan



3.0 Policy S21 – Strategic Site: RAF Cosford

3.1 As the below Figure demonstrates, RAF Cosford has been identified as a Strategic Site which is proposed to be released from the Green Belt. This will result in the settlement development boundary as currently proposed running directly adjacent to the south side of our client’s site as illustrated within Figure 2 below.

Figure 2 – RAF Cosford Strategic Site and location of Midlands Air Ambulance Charity (Nurton Site outlined in red)



3.2 As outline in the Introduction above, Policy S21 states that 'RAF Cosford will become a strategic site, complementing and enabling growth aspirations in the east of the County. Employment and training

provision on this strategic site will facilitate the sustainable growth of the local economy and contribute to meeting the employment needs of nearby Albrighton.'

- 3.3 RAF Cosford is currently a major part of the Defence College of Technical Training (DCTT). It is at the centre of the RAF's mission to deliver flexible, affordable, modern and effective technical training that meets the needs of the UK's Armed Forces now and into the future. In addition, as part of its future strategy, it is understood that the DCTT is reviewing capacity at RAF Cosford, and it is estimated that over the next 10+ years RAF Cosford could see in the region of an additional 1,500 people (staff and student population), which could potentially increase further, dependant on the outcome of the ongoing work. In order to make the site more sustainable the delivery of range of housing options should be considered in the context of the current local plan review as this level of growth will bring with it demand for housing within walking distance of the Base.
- 3.4 As Figure 2 illustrates, the Midlands Air Ambulance Charity (MAAC) also require a new headquarters, which will facilitate the co-location of MAAC operations in the Midlands. The location within the RAF Strategic Site will therefore help to provide
- further opportunities to improve the charity's operation;
 - essential public emergency services;
 - key fundraising facilities which will help to transform their potential to host events; and
 - high quality modern training facilities and office accommodation.
- 3.5 The proposals for RAF Cosford provide for new, mixed-use facilities, including training facilities; technical accommodation and domestic accommodation. Policy S21 also notes that proposals for new development and the intensification of the use of RAF Cosford are expected to be for military use and non-profit making uses rather than acting as a contribution to meeting Shropshire's future housing growth needs. The Proposals therefore focus on providing education opportunities, access to a skilled workforce, opportunities for the co-location of supply chain and opportunities for complementary employment offer, facilitating economic growth aspirations in the east of the County and therefore helping to complement and facilitate delivery of the Economic Growth Strategy.
- 3.6 Therefore, to deliver on these objectives, particularly in terms of the benefits accrued from retaining local talent within the M54 Growth Corridor, there will be a need to provide non-military, open market housing that will allow civilian staff, military staff, retired and people working in supporting services to purchase property close to where they work. The current development boundary proposed does not include sufficient land to deliver such open market housing in either the short or long term. Our Client's land offers the opportunity to deliver this critical component to support wider strategic objectives for the base and enable people working at the site to walk to work and with the chance to put down real roots by investing in local housing. As such, Shropshire should look to safeguard our Client's site to allow consideration for potential allocation within the next Local Plan iteration.
- 3.7 Policy S21(c) also states *'any development required to support the expansion of The RAF Museum Cosford will be of a high-quality design and layout which will complement existing iconic museum buildings and the relationship with an operational airfield.'* We believe that an adjacent housing offer would help to support the expansion of the Museum, which will adopt a high quality and sustainable

design, in line with the Policies' development objectives and site guidelines as defined within the high-level overarching masterplan will be prepared by the RAF in due course.

3.8 **Affordable Housing and Prioritising Service Personal and Civilian Staff**

3.9 One of the key objectives from reviewing Shropshire Council's Economic Growth Strategy is to retain more highly trained people in the County. The Strategy outlines that:

'We need to find ways of supporting a younger workforce and retaining the talent and skills of young people and graduates in the County. This is linked to the housing offer, affordability of the area, and supporting cultural and vibrant hubs in the key towns. We need to support the 'middle' range of our working population by encouraging those people who are likely to be professional individuals or couples and families to live and then stay in Shropshire. Providing the opportunities of good quality employment and future development potential in the work place for ambitious residents to progress are key factors for this demographic of the local population.'

3.10 To underpin this appropriately located housing is essential. By providing improved access to housing for both private sale and prioritised affordable provision, staying in the County becomes more likely and attractive.

3.11 To support this objective and ensure that housing is targeted to the new demand created by the Base, affordable units could include a first tier cascade in any S106 (or other legal mechanism) which ensured that they were prioritised to service personnel, ex service personnel and civilian employees at the base.

3.12 **Accessibility**

3.13 The Site is located approximately 650 m walking distance from local facilities in Cosford including, an M&S food store and petrol station, cafes and food outlets. Cosford Railway Station is also less than 1,200 m walking distance from the site. Approximately 1.5km south of the Site along Newport Road the Wyevale Garden Centre is located.

3.14 Policy S21 also proposes to create pedestrian and cycle links throughout the site, to include improvements to the existing links between the railway station, The RAF Museum Cosford and new Midlands Air Ambulance Charity headquarters. Given the location of our Client's Site, which lies adjacent to the northern boundary of the Base, these links to/from the Site could be readily delivered and would make a logical inter-connection.

3.15 Locating housing so that new residents working at the Base can cycle and walk to work, would make a contribution to the Council's Climate Change Agenda, which we consider is currently not paid due regard to in the Plan, making the current Strategic release unsound. Having sensibly located housing would rectify this situation.

3.16 The site also benefits from excellent connectivity with the local highway network, Junction 3 of the M54 motorway (which is only 400m to the north) and beyond.

3.17 **Summary**

3.18 Taking the above into consideration, we strongly urge Shropshire Council to consider our Client's site for allocation for housing now and/or safeguarding, particularly given the long-term growth aspirations for Cosford. It is evident that the development opportunities will attract further growth and investment, which aligns with the Economic Growth Strategy for Shropshire, and seeks to prioritise investment in strategic locations and growth zones along strategic corridors (of which the RAF Cosford

Strategic Site is located along the M54 growth corridor). This Economic Strategy needs however to recognise the requirement to deliver housing to support this growth.

- 3.19 It is understood that a high-level overarching masterplan will be prepared by the RAF in due course, however from the criteria set out within Policy S21, it is evident that employment provision and training is a key factor to help facilitate the sustainable growth of the local economy and meet local employment needs within the locality, particularly within Albrighton. The allocation of our Client's site would provide for circa 426 homes, which would be sustainably located being adjacent to the RAF Strategic Site, whilst also allowing for the Green Belt to be retained and protected between Cosford and Albrighton, helping to maintain a strategic gap and relieve pressure on Albrighton.
- 3.20 The issue of local Affordability, particularly with the tightly drawn development boundary around Albrighton, will be exacerbated if alternative housing provision is not provided in conjunction with the Strategic Growth of RAF Cosford.

4.0 Conclusions

- 4.1 We fully support the underlying principles Policy S21 and its development growth objectives, which will support and help to transform RAF Cosford into a Centre for Excellence, delivering a flexible, affordable, modern and effective technical training centre which meets the needs of the UK's Armed Forces now and into the future. It is evident that this Site has huge potential to grow as recognised by the RAFs figures. However we consider that the proposal is currently 'unsound' because of the failure to identify well located land for new housing to support this expansion, and to provide alternatives to RAF Base housing for Service Personnel, Retiring Service Personnel and Civilian Staff who will all be drawn to the area with the expansion of the site
- 4.2 By identifying RAF Cosford as a 'Strategic Site' and releasing it from the Green Belt, Shropshire Council will help to support the long-term sustainability of the site in terms of the Plans to turn the site into a Centre for Excellence, ensuring its continued use as a MOD facility and providing opportunity for future associated employment uses. This will support the Council's Economic Growth Strategy in terms of attracting more high skilled people to the County, however the failure to allocate land to provide housing choice within walking distance of the Base will undermine the objective of retaining people in Shropshire in the longer term.
- 4.3 We believe that our Client's Site provides a clear and necessary opportunity to deliver housing choice which will attract and retain higher skilled people in the area and should be prioritised for early housing delivery or protected for long-term housing need via safeguarding. Any development could be tailored to deliver a mix of private sector market housing and affordable provision aimed at services personnel, retired service personnel and civilian support staff. The release of the site will enhance choice and enable people to access property close to where they work, (helping to address the Climate Emergency) and also support the County's objective to retain and grow a skilled workforce.

Why do we consider the plan, as drafted, to be unsound?

- 4.4 The Plan is considered to be unsound because the Strategic release of the Cosford RAF Base is not supported by adequate provision for new housing choice to support the growth planned, to enable people live in locations where they can walk or cycle to work. This makes Policy S21 (Strategic Site RAF Cosford) unsustainable and fails to address the Climate Emergency declared last year by the Council.
- 4.5 The proposals are also considered unsound as they do not address the Council's own Sustainability Objectives set out in the Sustainability Appraisal (SO5 '*encouraging the use of sustainable means of transport*' and SO6 '*Reduce the need of people to travel by car*').
- 4.6 Furthermore, without sufficient suitably located housing land, the growth of the Base will put pressure on the important gap between Cosford and Albrighton and will exacerbate local affordability issues, which cannot be addressed in Albrighton due to the tightly drawn development boundary.

What changes do we propose?

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

APPENDIX 1

Land Promotion Document (August 2019)

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

T: +44 (0)28 9073 2493

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 906 4280

CAMBRIDGE

T: + 44 (0)1223 813805

CARDIFF

T: +44 (0)29 2049 1010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: + 44 (0)1392 490152

GLASGOW

T: +44 (0)141 353 5037

GUILDFORD

T: +44 (0)1483 889800

LEEDS

T: +44 (0)113 258 0650

LONDON

T: +44 (0)203 805 6418

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER

T: +44 (0)161 872 7564

NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

NOTTINGHAM

T: +44 (0)115 964 7280

SHEFFIELD

T: +44 (0)114 245 5153

SHREWSBURY

T: +44 (0)1743 23 9250

STAFFORD

T: +44 (0)1785 241755

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: + 353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)6 23 37 14 14