

1 June 2022

Planning Policy
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Dear Planning Policy Team,

RE: COVERING LETTER TO SUPPORT EIP HEARING STATEMENTS RELATING TO MATTER 1 AND MATTER 6 -NURTON DEVELOPMENTS LIMITED

This Covering Letter supports the Hearing Statements which SLR Consulting have produced on behalf of Nurton Developments. The purpose of this letter is to outline the context of Nurton Development's involvement in the Local Plan process during Regulation 18 and Regulation 19 stages.

SLR Consulting have been Instructed by Nurton Developments to promote their land at Shifnal (SHF035) and Cosford since 2019 and have submitted various comments and technical evidence to the Council in support the release of these two sites.

During the course of this involvement, various inconsistencies have come to light in terms of:

- the consideration of sites for release and safeguarding for housing delivery in the GB
- the site assessment process
- the Council's response to emerging policy like the changes to NPPF, and
- the validity of the technical evidence base on which decisions have been made

Our involvement has been related to specific locations and settlements, and therefore, in these Hearing Statements we highlight the Macro and Micro areas of concern as they relate to the preparation of a Sound Plan. In doing this we use the sites which we have considered to illustrate some of our concerns relating to the process and evidence base.

If these concerns are considered to be valid, it is our view that that these types of shortcomings are likely have prevailed in the consideration of other sites and location. We are however unable to comment on this wider picture, due to the scope of our instructions. Our points focus particularly on housing consideration; in terms of whether the Plan will deliver sufficient housing land to meet current requirements and provide land for future Plan periods avoiding successive plan reviews, and in this context, whether the Green Belt Review approach is robust and environmental matters properly addressed.

Given the affordability and demand profile for housing in Shropshire, (which is exacerbated by pressure from the Black Country Strategic Housing Market Assessment and people leaving the South of England), the Council have a critical duty to review the Green Belt and Safeguarded land appropriately; particularly with regard to the environmental assessments and the evidence base to support the scoring and selection of sites.

Based on some of the issues which we have identified through our representations, we consider that there is likely to, not only be a shortfall in housing land beyond the Plan period, but also that the technical evidence base to support the release of some sites has not been provided to demonstrate;

1. that they are preferable to other alternatives; and
2. they are technically deliverable without undesirable environmental impacts which would not be the case with alternative sites.

We would therefore ask the Inspector to duly consider our comments made in our Hearing Statements relating to Matters 1 and 6, in addition to the various previous submissions, which are referenced below for completeness.

Finally, we thank you for the opportunity to submit further comments as part of the ongoing Local Development Plan process and look forward to attending the Hearing Sessions.

Yours sincerely

SLR Consulting Limited

Elle Cass

Head of Planning and Development Consultancy (Europe)

List of the Nurton Evidence Base submitted to Shropshire Council (Land at Upton Lane, Shifnal)

- *Enclosure A. Sept 2020 Consultation 200930 Nurton Regulation 18 Stage 2&3 Assessment Reps FINAL(WA)R*
- *Enclosure A1. Sept 2020 Consultation 200930 Nurton Regulation 18 Stage 2&3 Assessment Reps FINAL*
- *Enclosure B. Sept 2020 Consultation NUR0444 EXHIBITION BOARD PLANS A3_OPT*
- *Enclosure C. Sept 2020 Consultation 21320-03a_Transport Appraisal Review*
- *Enclosure D. Sept 2020 Consultation 200930_Green Belt Appraisal Review Final*
- *Enclosure E. Sept 2020 Consultation 200930_LV Appraisal Review Final*
- *Enclosure F. Sept 2020 Consultation 200930_Heritage Appraisal Review Final*
- *Enclosure G. Sept 2020 Consultation 200930_Ecology Review Final*
- *Enclosure H. Sept 2020 Consultation 20200127jt(C1388) Flood Risk Review*
- *Enclosure J. Sept 2019 Consultation Covering Letter 9_09_2019*
- *Enclosure K. Sept 2019 Consultation Shifnal Site Promotion Rev G Final Draft to Issue*
- *Enclosure M. May 2020 Additional Information Requested by LPA Covering Letter 27_05_2020 Final*
- *Enclosure N. May 2020 Additional Information Requested by LPA NUR0444 VISION R7*
- *Enclosure O. May 2020 Additional Info_200526 Supplementary Green Belt & Landscape Appraisal Shifnal*
- *Enclosure P. May 2020 A21320-02_Site Appraisal Update final Access and Highways April 2020*
- *Enclosure Q. May 2020 Additional Info200504_406.02395.00004_Shifnal_HIA_V3 final*
- *Enclosure R. May 2020 200506_406.02395.00004_Shifnal_Ecological_Survey_Mitigation_Strategy*
- *Enclosure S. May 2020 Additional Info C1388-20190066 Shifnal Flood Risk 8.6.20 with append*
- *Enclosure T. February 2021 Regulation 19 Submission in respect of land at Upton Lane, Shifnal*