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ID 10 SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref	A0621
Matter	6: Green Belt and Safeguarded Land (Policy SP11)
Relevant questions nos	1 and 4-8 (inclusive)

SHROPSHIRE LOCAL PLAN
 INDEPENDENT EXAMINATION
 WRITTEN HEARING STATEMENT



MATTER 6
GREEN BELT AND SAFEGUARDED LAND

HARROW ESTATES
 RESPONDENT REFERENCE: A0621
 JUNE 2022

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1.0 Introduction

- 1.1 This examination hearing statement is submitted on behalf of Harrow Estates in respect of Matter 6 (Green Belt and Safeguarded Land - Policy SP11) of the Shropshire Local Plan examination in public.
- 1.2 The comments respond directly to the questions set out in the Planning Inspectors' Stage Matters, Issues and Questions document (ID7).
- 1.3 This statement should be read in conjunction with Harrow Estates' Regulation 19 representations (response reference: A0621).

2.0 Response to the Inspectors' questions

Issue	Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall approach to the Green Belt.
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- 2.1 The responses are made in accordance with the Inspectors guidance and in relation to Harrow Estates interests at Shifnal, specifically the employment allocations referenced SHF018b and SHF018d and their interests at the former draft housing allocation at SHF032.
- 2.2 The responses provided below further our position as set out in our Regulation 19 representations, made on behalf of Harrow Estates.
- Q1. What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? Is the Council's approach to the Green Belt assessment robust and in line with national guidance?**
- 2.3 Harrow Estates and Ruckley Estate generally support Shropshire Council's to Green Belt assessment and subsequent release of land to fulfil the urban focus, and transport corridor based, spatial strategy of the new Local Plan. Also to a achieve sustainable development patterns, in accordance with the NPPF paragraph 142.
- 2.4 More specifically, the basis of the review has been influenced by the need to deliver housing and employment growth along strategic corridors, specifically the A5 and M54 Corridors which have been recognised by the Local Plan as areas with significant potential for sustainable growth to meet the needs of the new Plan period. This is supported by Harrow Estates and the Ruckley Estate.
- 2.5 The methodology which has been applied by Shropshire Council in its assessment of the most suitable areas for amendment to the Green Belt is generally sound, particularly with regards to employment provision at Shifnal.
- 2.6 However, the approach taken regarding land to the east has over-estimated the level of harm when compared against the findings of the Sustainability Assessment. The consequence is that the promotion of sustainable development, as set out in NPPF paragraph 11 a) has not been fully realised, in particular through the omission of SHF018c, now inappropriately excluded from the wider allocation of safeguarded land (of higher sensitivity) at southwest Shifnal. It is advanced that SHF018c represents a more suitable alternative to southwest Shifnal, given its single ownership which can assure its deliverability and provide greater containment to the town, minimising harm to the Green Belt which has been recognised in the Shropshire Green Belt Assessment (EV049 that recognises SHF018c as performing only moderately against the NPPF purposes of the Green Belt.
- 2.7 This could be addressed through a Main Modification; the scale and level of growth at Shifnal would not be significantly changed nor would the overarching spatial strategy. It would further enhance the relationship of the strategy for

growth with the unmet needs of the Black Country and growth opportunity that exists within the M54 corridor.

Q4. Have discussions taken place with neighbouring authorities about whether they could accommodate some of Shropshire's identified housing and employment land needs?

2.8 It is considered that Shropshire Council has demonstrated the requisite discussions with neighbouring authorities to assess cross-boundary potential to accommodate the County's needs.

2.9 Publication of Statements of Common Ground have been made available which show how the Council has engaged with neighbouring Local Authorities to test their ability in potentially accommodating any of the Council's development requirements. This in direct accordance with Paragraph 27 of the National Planning Policy Framework (the 'NPPF') and more generally with the Duty to Cooperate.

2.10 It is acknowledged that alternatives have been pursued with neighbouring authorities to assess the potential of cross-boundary distribution of growth and that there are no achievable alternatives for this that would meet the requirements of sustainable development and achieve a sustainable development pattern. As such, this context contributes towards Shropshire Council's position that exceptional circumstances exist to review the Green Belt to accommodate this identified need for growth and in the locations identified (i.e. generally at Shifnal).

Q5. How have the conclusions of the Green Belt Review informed the Local Plan? Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development, and prioritise sites which are previously developed and/or well served by public transport? Where is this evidenced?

2.11 The Green Belt Review undertaken by Shropshire Council has justifiably recognised and responded to the sustainability and opportunity that growth within the M54 Corridor represents. Through the assessment methodology it establishes the most appropriate locations to release land from the Green Belt, to support a deliverable and suitable spatial strategy. Development at Shifnal is key to achieving a sustainable pattern of development, reflecting the role of the town in the settlement hierarchy, the opportunity to support greater self-containment, the locational requirements of employment provision and the functional relationship with the Black Country. This is entirely consistent with the NPPF paragraph 142.

2.12 Shifnal is well served by public transport, benefitting from a mainline rail station connecting it to strategically significant locations within the County, as well as beyond within the West Midlands metropolitan area. The settlement is also well served by local services and amenities, limiting the need to travel outside of the town for everyday needs. Consequently, it is generally considered that the strategy for Shifnal, in its capacity to release land from the Green Belt to accommodate development needs, is a sound approach.

2.13 Release of Green Belt land for allocation at Shifnal demonstrates an approach that achieves a sustainable pattern of development that accords with the requirements of Paragraphs 16a and 142 of the NPPF.

- Q6. Has meeting some of the housing and employment needs of the Black Country led to the need to release or safeguard more land from the Green Belt?**
- 2.14 The Statement of Common Ground between Shropshire and the Association of Black Country Authorities (the 'ABCA'), document reference EV041 demonstrates that the ABCA do not have the capacity to meet the entirety of their strategic development needs within their administrative boundaries. The same document confirms that Shropshire will contribute towards these unmet needs through accommodating 1500 dwellings and 30ha of employment land.
- 2.15 The Housing and Employment Topic Papers (GC4i and GC4n) submitted by Shropshire Council in response to the Inspectors Initial Questions (ID1), demonstrate how the authority have arrived at these figures through a review of the functional, strategic, and geographical ties between the Council and the Black Country.
- 2.16 This agreement has contributed towards Shropshire Council's position that Exceptional Circumstances exist in amending Green Belt boundaries to ensure sufficient land can be allocated to meet housing and employment needs of the new Plan period.
- 2.17 The Green Belt Revised Exceptional Circumstances Statement (EV050) at Paragraph 8.98 references that development within the M54/A4 Corridors, including Shifnal, will play a "key role" in contributing towards accommodating this unmet need by virtue of its demonstrable ties with the Black Country.
- 2.18 Accordingly, the release of Green Belt land at Shifnal and elsewhere in the strategic corridors of the A5 and M54 will inevitably, and justifiably, contribute towards accommodating this cross-boundary need. The plan is effective in this respect.
- 2.19 As set out in our matter 3 statement, the spatial strategy should therefore appropriately reference that that delivery of any unmet need should be directed towards locations with ties to the Black Country. The spatial aspect in Shropshire's contribution in accommodating unmet need should therefore be included in the Local Plan. However, it is not maintained that this amounts to a failure in the Local Plan's soundness in its ability to deliver strategic levels of growth.
- 2.20 Consequently, it is considered that clear recognition is required by the spatial strategy that locations, such as Shifnal where Green Belt is being released, can play a significant role in contributing towards accommodating unmet needs from the Black Country. This includes the employment allocations at SHF018b and SHF018d, as well the wider site interests of Harrow Estates which have been duly considered by Shropshire Council, but not included in its draft spatial strategy.
- Q7. Is the extent of safeguarded land sufficient to meet longer term needs beyond the plan period and are they justified?**
- 2.21 Harrow Estates contend that the strategy in establishing safeguarded land through the new Local Plan is sound and represents a positive approach to

planning. However, the identified safeguarded land to the southwest of Shifnal is not wholly justifiable.

- 2.22 The safeguarded land at Shifnal is established in the new Local Plan at Schedule S15.1(iii). This identifies such areas for longer term development potential beyond the emerging Plan period. It identifies that this safeguarded land also has the potential to deliver strategic infrastructure improvements in the form of a “*new strategic highway from the A464 (south) to the B4169*” and that the release of this land will result in a moderate to high harm to the Green Belt.
- 2.23 The safeguarded land at southwest Shifnal does not go far enough in delivering sufficient land to facilitate a practical strategic highway that is functionally capable of providing a bypass of Shifnal town centre. This is because the safeguarded allocation does not include land between the rail line to the west of Shifnal and the A464 (Priorslee Road) to the north.
- 2.24 As such, it does not provide a full connection between the B4169 (Stanton Road), the southern section of the A464 (Wolverhampton Road), and the A4169. Any delivered strategic highway through the safeguarded land, as it is currently allocated, will therefore not perform as a full bypass of Shifnal. The plan is ineffective and undeliverable in this respect.
- 2.25 Additionally, the safeguarded land cannot be further justified given that there are more appropriate and less sensitive options at Shifnal for the release of land from the Green Belt. This includes Harrow Estates land at SHF018c, which was regarded by the Shropshire Green Belt Assessment (EV049) as only moderately harming the Green Belt, if it were to be released for development. Furthermore, SHF018c also scored as ‘Good’ within the Shifnal Place Plan Areas Site Assessment, thus further demonstrating the appropriateness of SHF018c as an alternative option to the unjustified safeguarded land to the southwest of Shifnal.
- 2.26 The approach to safeguarded land by the Local Plan provides sufficient options to meet needs beyond the Plan period, but amendments are needed to the boundaries in order to demonstrate a sustainable and deliverable approach. In short, the strategy taken at Shifnal is not justified and the site at SHF018c, under control of Harrow Estates, provides an alternative, justifiable and sustainable option to ensure long term needs can be met at Shifnal. The safeguarding of this land would remain in accordance with the wider, strategic approach made by the new Local Plan in recognising safeguarded land to meet long term requirements, beyond the Plan period.
- Q8. Do the exceptional circumstances, as required by Paragraph 136 of the Framework, exist to justify the Local Plan’s proposed removal of land from the Green Belt, including safeguarded land?**
- 2.27 Ruckley Estate and Harrow Estates maintain that exceptional circumstances exist for the release of land and amendment to the boundary of the Green Belt within Shropshire.
- 2.28 The existence of these circumstances is supported by both the development need arising from within Shropshire; the strategy to realise the potential of the A5/M54 Corridors as locations of significant economic and housing growth and the arising

unmet need within the Black Country which is most suited to be delivered within these Corridors.

- 2.29 Finally, it is advanced that locally, circumstances exist in Shifnal to ensure that an appropriate scale of employment land can be delivered. This will encourage an internalisation of the jobs market. Given that the town currently suffers from under-employment opportunities and a “leakage” of working-age residents, through out-commuting, to other employment locations, there is an opportunity to further strengthen and align jobs and homes with reference to the wider / strategic needs and provision.