

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0586
Matter	Matter 6
Relevant questions nos	1, 2, 3, 5, 6, 7, 8 & 9

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

SHROPSHIRE LOCAL PLAN EXAMINATION: STAGE 1 MATTERS, ISSUES AND QUESTIONS

**Stage 1 Hearings – Session 11 – Matter 6: Green Belt and
Safeguarded Land**

Nurton Developments Ltd

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SLR 

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1.0 Question 1

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?

Nurton agree that the Green Belt Review has been borne from the need to accommodate housing land supply within Shropshire to meet the identified housing needs for both Shifnal and the wider Shropshire Local Plan area. However, the approach to the Green Belt assessment is inconsistent and has not been undertaken in line with national guidance. Perhaps this is best explained using examples of assessment inconsistency in Shifnal, see below.

Figure 1: Preferred Site Allocations and Preferred Safeguarded Land Plan Extract (SHF034 Notation Added)

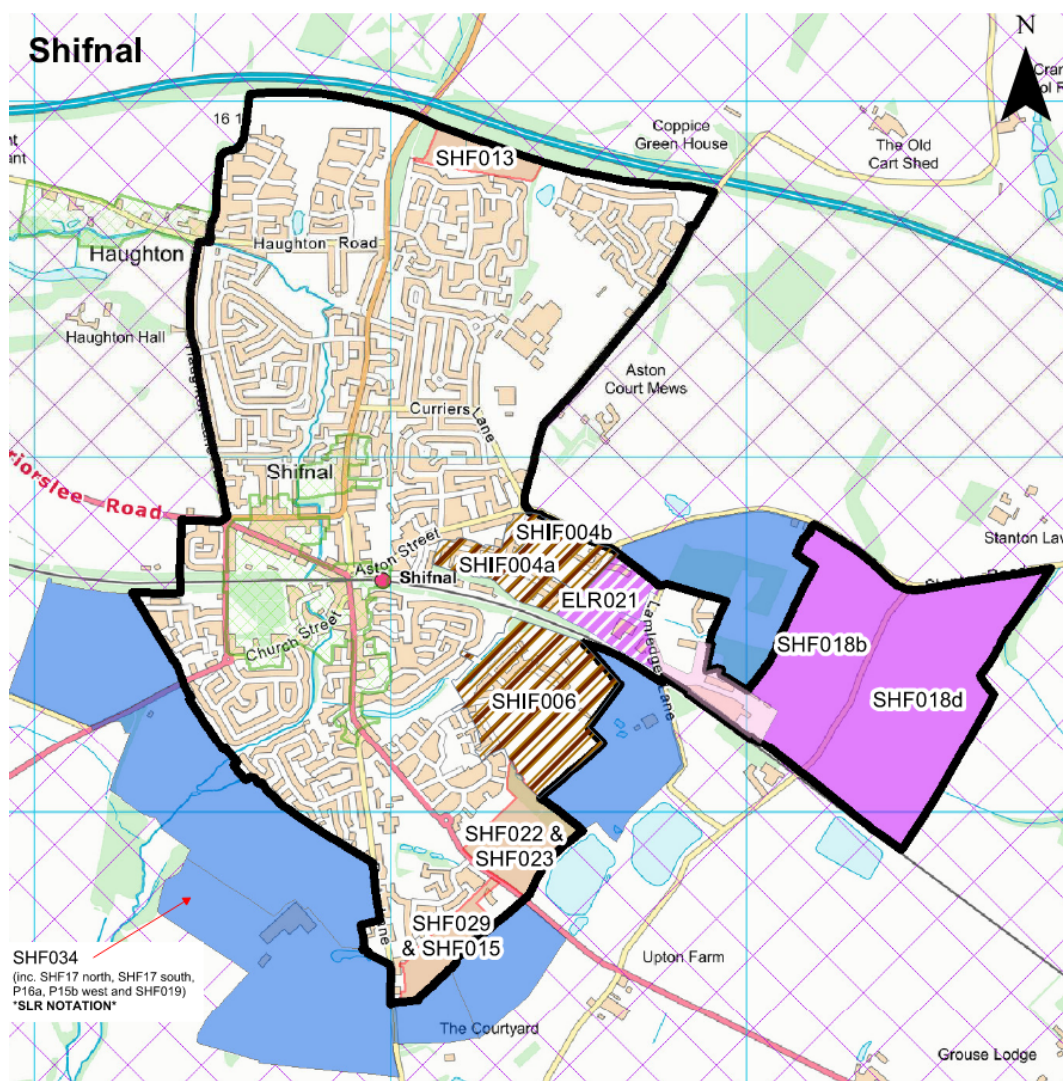


Figure 2: Site Location in Relation to Green Belt Parcels and Opportunity Areas Plan Extract (SHF035 Red Line Added)

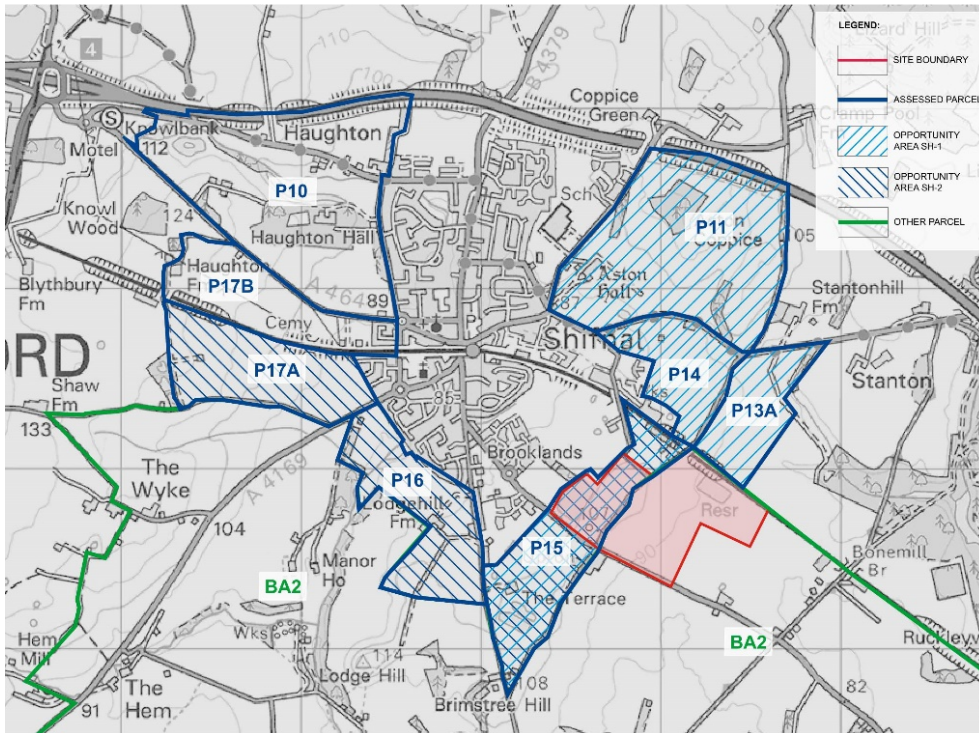
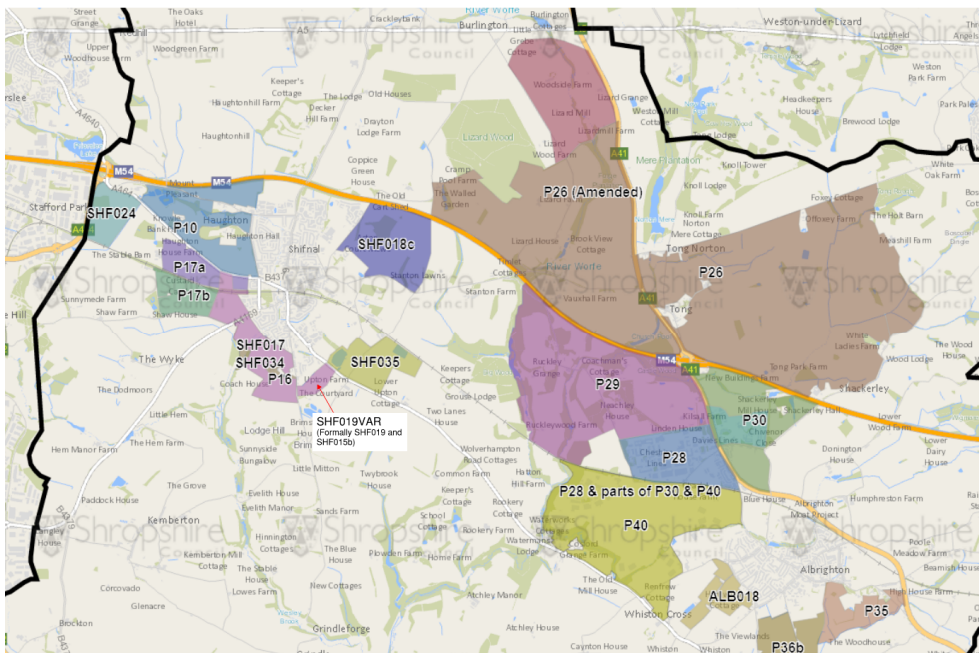


Figure 3: Strategic Sites Assessment – Options 2019 Map Extract (SHF019VAR Annotation Added)



*(Note: A3 Versions of the above plan extracts are provided within Appendix 1)
 (Note: Plan extracts are images taken from Local Planning Authority documentation with SLR annotations added)*

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 most notable 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']; which both formed part of SHF034 at the time of Green Belt Review being published), which also lies in the gap between Shifnal and Telford, but 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 SHF018b and SHF018d ('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 SHF018b and SHF018d, 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.
- 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. SLR has undertaken a detailed Green Belt and Landscape Capacity Assessment in support of SHF035 which has not been given due consideration in the assessment of this Site, nor its Sustainability Appraisal scoring.

If there are inconsistencies in Shifnal across site assessment, this points to this being the case in other settlements.

2.0 Question 2

Has a comprehensive assessment of capacity within built up areas been undertaken? How have all potential options on non-Green Belt land in the countryside been assessed and discounted?

Nurton agrees with the assessment of capacity within built up areas and that land within the Green Belt will need to be released to achieve the Housing Need for both Shifnal and the Shropshire Local Plan area. However, the release of Green Belt land for allocation and safeguarding should be reflective of the Strategic Housing Market Assessment (2020) and housing needs and affordability at a local level within Shropshire.

The Council has failed to assess the impact of Right to Buy on the supply and pool of affordable housing within Shropshire and particularly the less affordable settlements including Shifnal. *It would be useful to understand from the Council what level of housing has been lost through Right to Buy in Shropshire and in Shifnal?*

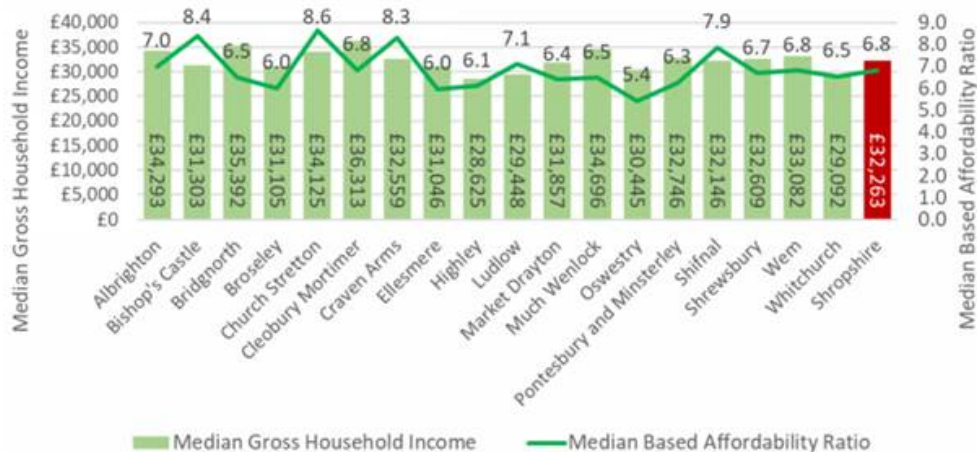
The Plan continues to fail to make allowance for additional Reserved Sites, which would meet any shortfall during this Plan period should there be an undersupply in delivery or an increase in housing affordability issues in location such as Shifnal. The recent Pandemic has already had an impact on house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

The current Strategy will result in successive Green Belt reviews, because it does not make adequate provision for sites not being delivered, locational demand (and how this varies across Shropshire) and the critical situation in respect of affordability in settlements such as Shifnal. This runs contrary to NPPF advice and provides another argument for the identification of additional Reserve Sites to make the Plan, sound, responsive and robust.

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).

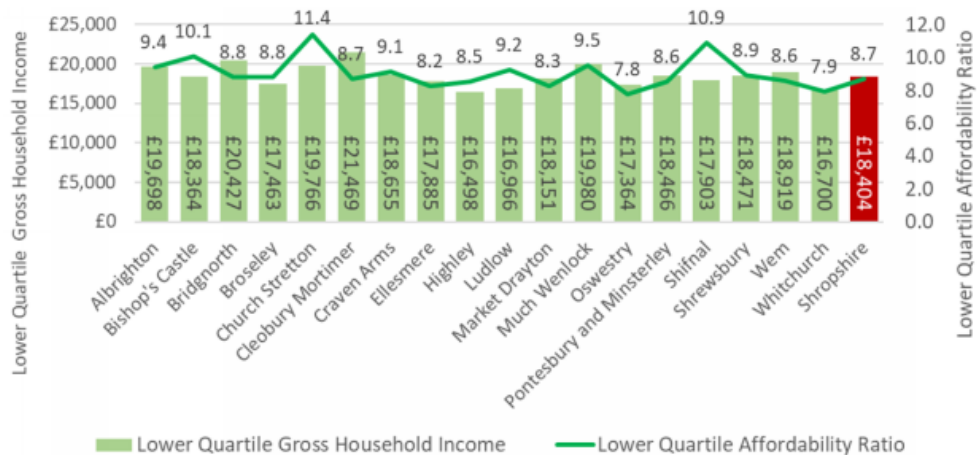
As highlighted by the tables below (taken from the Strategic Housing Market Assessment 2020), the Shifnal area has the 4th worst affordability ratio within the County based on median household income; house prices being 7.9 times the median gross household income. This is well in excess of the affordability ratio for the County as a whole which is identified as being 6.8 times the median gross household income.

Figure 4: Median Household Income (2019) by Shropshire Place Plan Area¹



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.

Figure 5: Lower Quartile Household Income (2019) by Shropshire Place Plan Area



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

On this basis, Shropshire Council should recognise the ongoing Housing Market pressures placed upon Shifnal and that restricting housing land provision within the town will place further pressure upon the affordability of housing stock in this area of the County in the longer term.

SLR would suggest that further sites be identified for housing land supply and safeguarded to ensure that such

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

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), or will require successive Green Belt reviews.

3.0 Question 3

Have opportunities to maximise capacity on non-Green Belt sites been taken (including increasing densities)?

Nurton agrees with the assessment of opportunities to maximise capacity on non-Green Belt sites.

4.0 Question 4

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

Nurton do not wish to comment on this question.

5.0 Question 5

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?

We believe that the Green Belt Assessment itself requires further review to ensure the Plan is sound, responsive and robust. We again, raise the following key points with regard to the Green Belt Assessment and 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. By way of example in the context of site SHF035 the land within broad area BA2, any evaluation is very limited because it is based on a much bigger parcel.
- There is inconsistency in the approach taken and 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 most notable in the differences between the consideration of sites SHF024 and SHF034, with the former being discounted due to the strategic importance of this gap. Whilst land within Green Belt Parcels P16, P17 and P17a; (part of SHF034 at the time of Green Belt Review being published), which also lies in the gap between Shifnal and Telford, are 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 and P15b (which is part of site SHF019VAR). 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. As part of the proposals advanced by Nurton at SHF035, significant enhanced open green space and linkages are provided. In addition, the Site represents a more sustainable option for future development given its proximity to other proposed residential/commercial allocations.
- 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 sites such as SHF035 where it extends into Broad Area BA2 (see Figure 2 above); 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.

On this basis (as well as other points raised in response to Matter 1), the applicable site scoring contained within the Sustainability Appraisal is therefore inaccurate and fails to suitably assess the most appropriate sites for Green Belt release in terms of promoting sustainable patterns of development and accessibility to shops, services and means of public transport. Nurton has previously submitted representations regarding these scoring inconsistencies within the Stage 2 and 3 Sustainability Assessments, especially with regard to Green Belt, Landscape and Visual, Highways, Flooding, Heritage and Ecology.

If these inconsistencies existing in the assessment of sites around Shifnal, it is likely that this has occurred across the assessment process, making the GB review conclusions unsound.

6.0 Question 6

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?

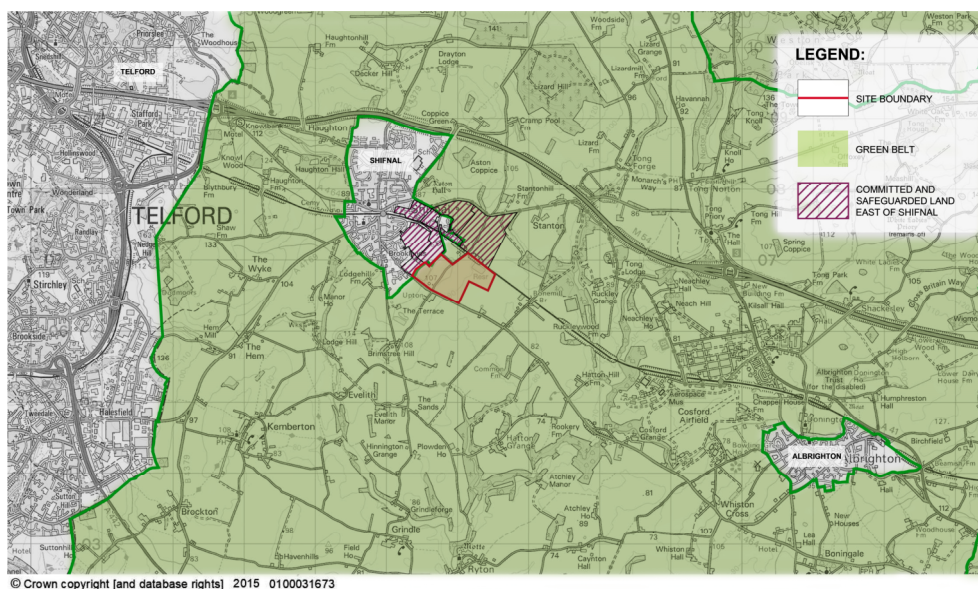
Nurton do not wish to raise comment on the release or safeguarding of additional Green Belt land to accommodate housing need arising from the Black Country. However, clearly locations such as Shifnal with good train links offer sustainable locations for the release of additional housing land if considered necessary. Further consideration should be given to affordability and the locational demands for housing given the findings of the Strategic Housing Market Assessment and the associated economic links to the urban conurbations to the east of Shropshire.

7.0 Question 7

Is the extent of safeguarded land sufficient to meet longer term needs beyond the plan period and are they justified?

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.

Figure 6: Green Belt Map with SHF035, Committed and Safeguarded Land East of Shifnal



Paragraph 140 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, detailed amendments to those boundaries may be made.

Paragraph 142 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 policymakers 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.

When defining Green Belt boundaries, paragraph 143 identifies the criteria which should be considered with Criteria C being notable i.e. to *'identify areas of safeguarded land...well beyond the plan period.'* Finally,

paragraph 145 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.

The site assessment and identification process has failed to identify sufficient areas for safeguarding well beyond the plan period. This fails to respond to the longer term needs of Shifnal for example, 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. This failure is likely to result in the LPA having to undertake a further Green Belt Review at the end of the current plan period contrary to advice in paragraph 143 of the NPPF.

Nurton do not consider that sufficient land has been safeguarded to meet the longer term needs beyond the Plan period, nor is the land proposed to be safeguarded, for example around Shifnal, the most appropriate from a housing need or sustainability perspective. Moreover, the Plan is silent on the *'compensatory improvements to the environmental quality and accessibility of remaining Green Belt land'*.

As part of the assessment process the benefits which would arise, for example from the future development of SHF035 relating to its overarching suitability for release from the Greenbelt, seem not to have been considered. Those benefits go beyond improved *'environmental quality and accessibility'* and include:

- a single ownership site which is available now and could ultimately deliver much needed development within a reasonably short timescale.
- a site that represents a sustainable option for future development given its proximity to other proposed residential/commercial allocations and direct walking and cycle routes to the town centre.
- capability for provision of significant on-site enhanced open green space and access.
- an early opportunity to improve highway safety in the event that the adjoining employment site is allocated. Specifically, potential highway improvements carried out by Nurton would prevent a "rat-run" of traffic and effectively act as a 'bypass.'
- other pedestrian/cycle linkages through the site could be provided, and
- preservation of the Windmill, a locally valued heritage asset.

These very material planning benefits appear not to have been included in the Council's assessment process, neither as a positive in relation to our Client's Site, nor as a negative for the Safeguarded Housing sites where this consideration is silent.

If this has occurred in Shifnal it is highly likely that there are other inconsistencies in the assessment process relating to Green Belt.

8.0 Question 8

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?

Nurton considers that the exceptional circumstances required by paragraph 140 of the NPPF have been met to justify the undertaking of a Green Belt review and subsequent removal of land from the Green Belt for both allocation and safeguarding purposes.

9.0 Question 9

Does the Local Plan seek compensatory improvements to the environmental quality and accessibility of the Green Belt?

Paragraph 002 (Reference ID: 64-002-20190722), of the PPG provides guidance on Green Belt release and identifies that where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-makers should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities, 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

In addition, Paragraph: 003 of the PPG identifies the scope for compensatory improvements and emphasises the need for early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. In this respect, consideration will need to be given to:

- land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought.
- the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability.

The LPA has failed to provide any or sufficient evidence that consideration has been given to compensatory improvements to the environmental quality and accessibility of the remaining Green Belt when undertaking the site assessment and identification process.

Such compensatory measures/benefits are however readily achievable as part of the Nurton Site as set in the Regulation 18/19 representations made on behalf of Nurton Developments Ltd by SLR (see also Q7 above).

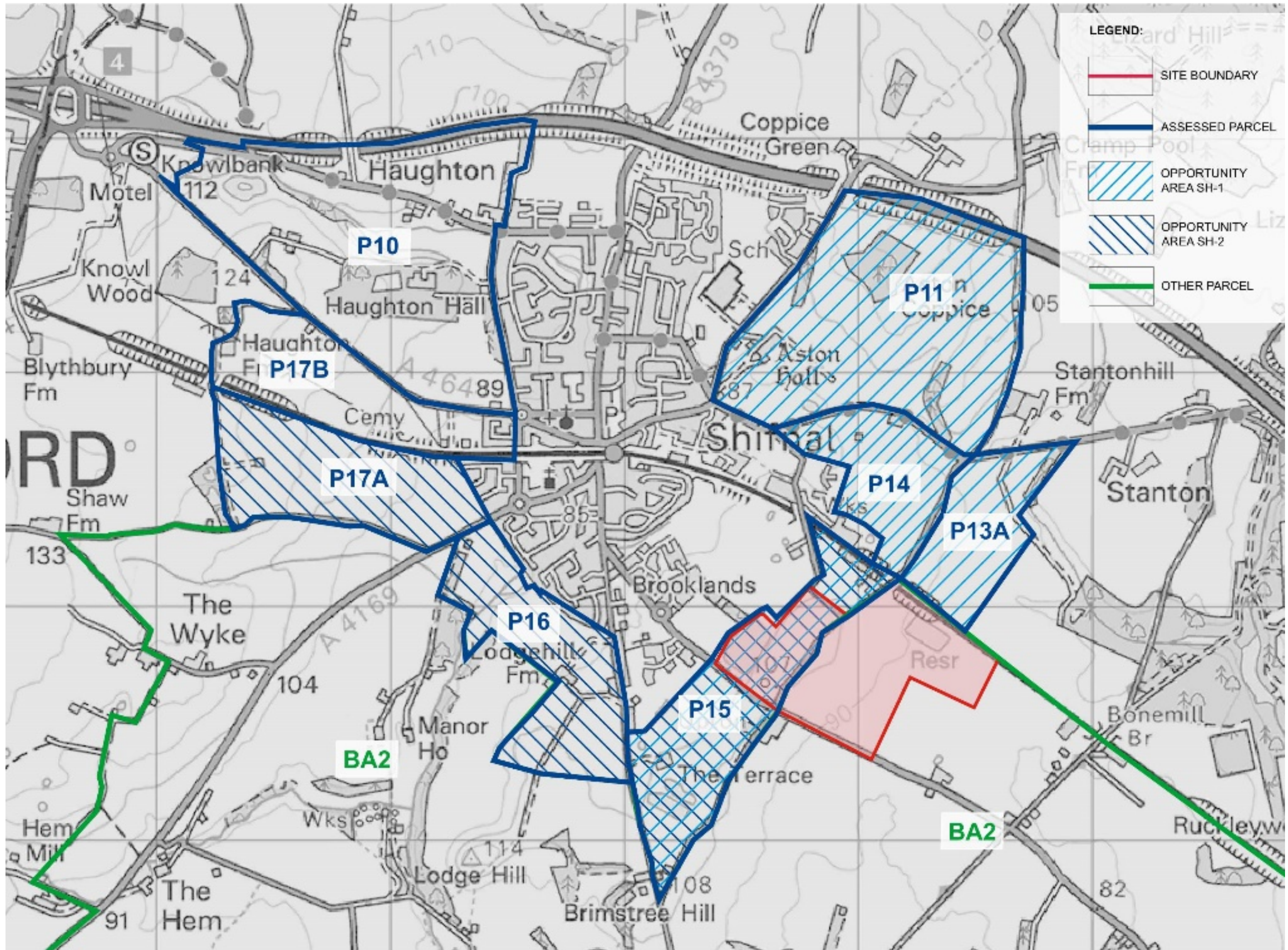
10.0 Question 10

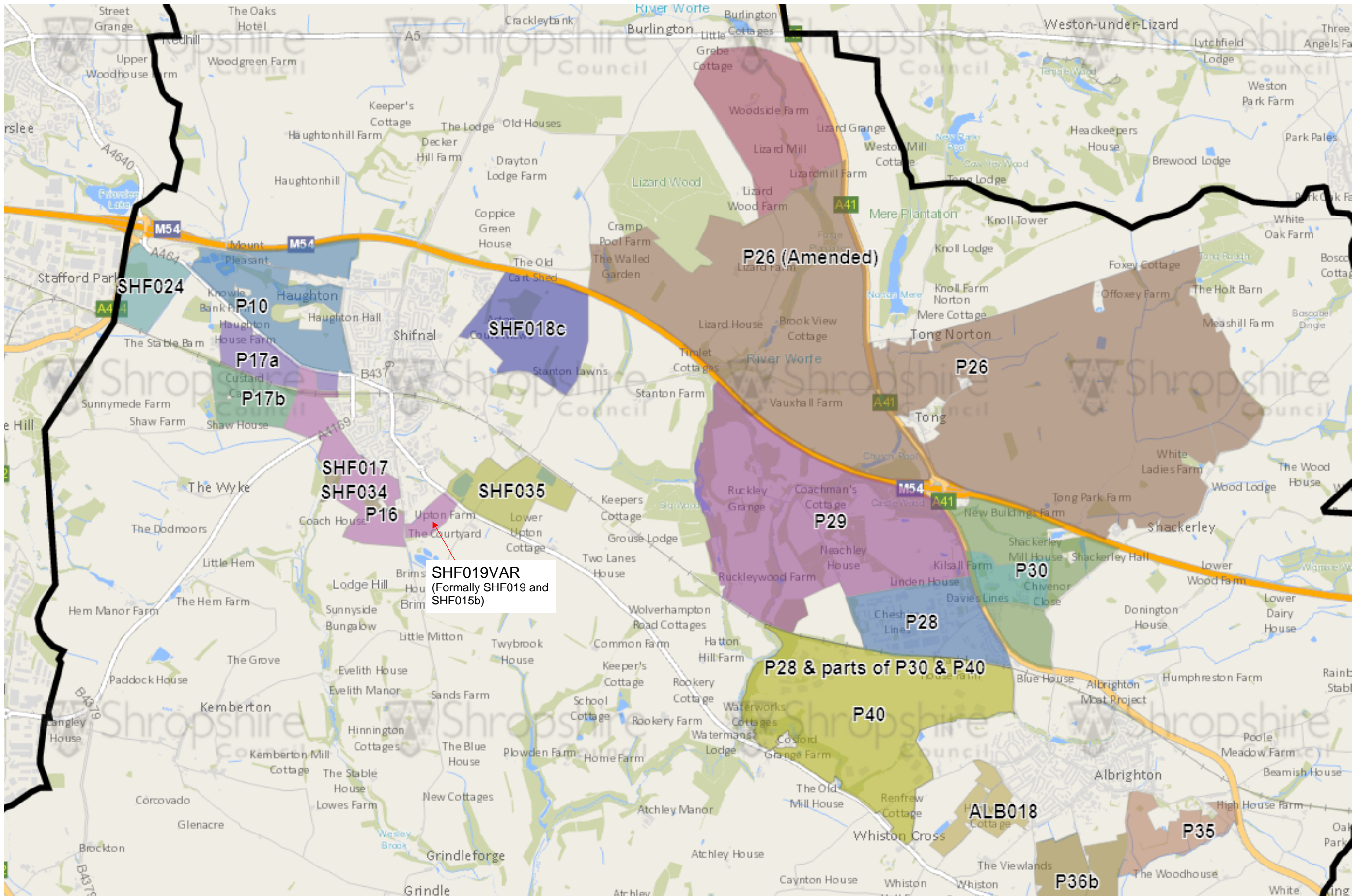
Are all the sites proposed for release or safeguarding and their boundaries clearly shown on a map?

Nurton do not wish to comment on this question.

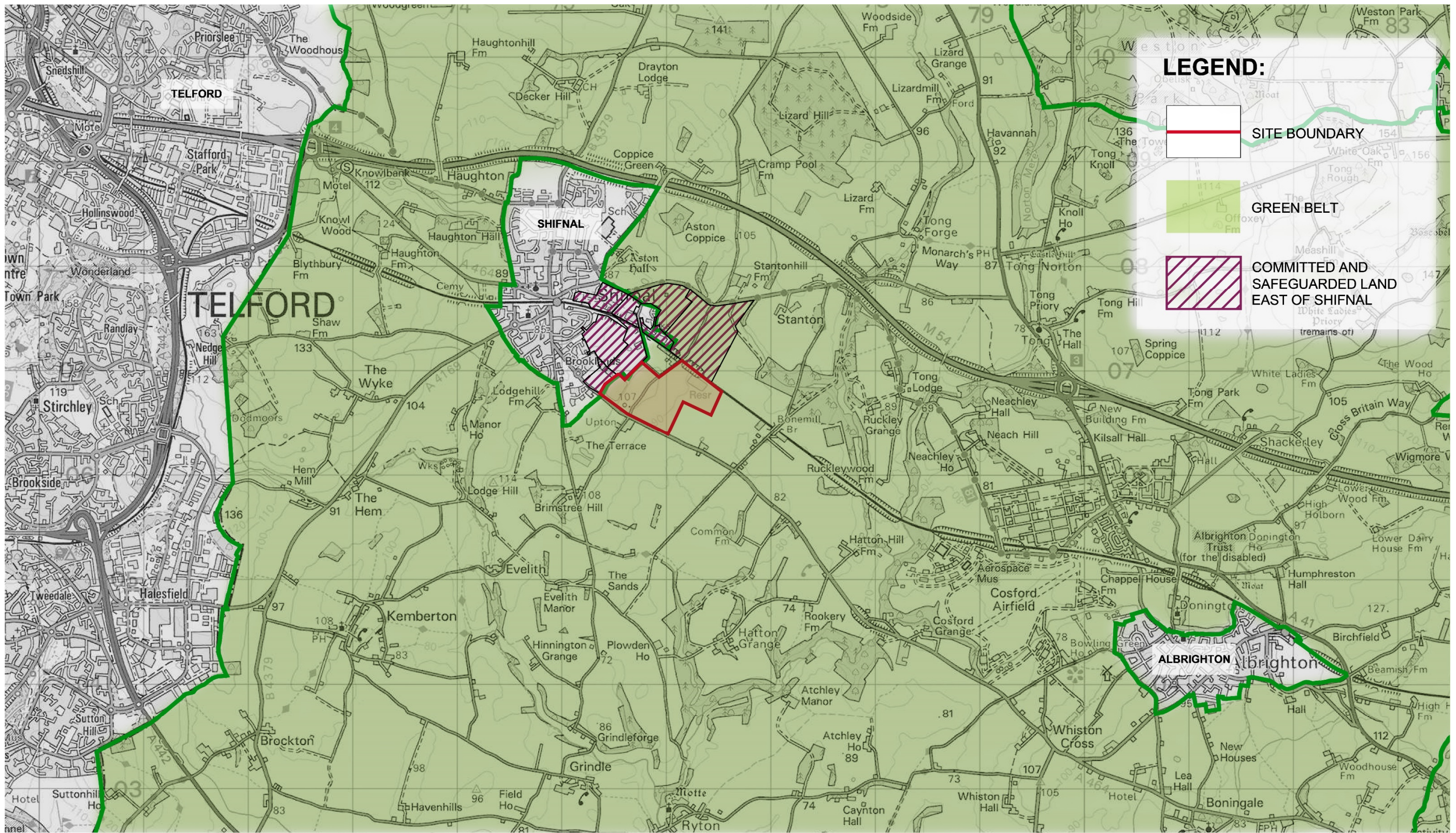
APPENDIX 1

Plan Extracts & Green Belt Plan





SHF019VAR
(Formerly SHF019 and
SHF015b)



LEGEND:



SITE BOUNDARY



GREEN BELT



COMMITTED AND SAFEGUARDED LAND EAST OF SHIFNAL

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