

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mrs Hannah Price (Fisher German) on behalf of Lone Star Land
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)*

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:
- (Please tick as appropriate).*

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to the enclosed representations.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our representations support the proposed allocation of BUR004 in the emerging local plan. We wish to participate in Examination Hearing Sessions to continue to support the allocation and respond to any queries/objections which may arise.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Date:

Office Use Only	Part A Reference:
	Part B Reference:

Regulation 19: Pre-Submission Draft Shropshire Local Plan

December 2020

Representations

Prepared by Fisher German LLP
on behalf of Lone Star Land Ltd



Project Title:

Land adjoining Boraston Drive and north of A456, Burford

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01 Introduction

- 1.1. These representations have been prepared by Fisher German on behalf of Lone Star Land Ltd, promoters of land adjoining Boraston Drive and the A456, Burford.
- 1.2. The land east of Boraston Drive and north of the A456 is included as a proposed allocation in the Regulation 19 Local Plan under Reference BUR004. **The proposed allocation is supported.** Lone Star Land are fully committed to bringing this site forward for residential development and recognise the important role that it will have in helping to deliver the Council's housing need and the sustainable growth of Burford.



Figure 1: Land promoted for residential development adjacent to Boraston Drive and the A456

02 Policy SP2: Strategic Approach

2.1. The Council's strategic approach as set out within Policy SP2, which aims to see Shropshire flourish, with new development that meets its needs and makes its settlements more sustainable, is supported and considered fully in accordance with the aims of the National Planning Policy Framework (NPPF) and associated guidance. Such an approach seeks to boost significantly the supply of housing and will support the wider delivery of the region by meeting unmet needs from neighbouring authorities. This approach is entirely sound and in compliance with the Duty to Cooperate.

2.2. We consider the Council's approach to deliver around 30,800 homes over the 2016 – 2038 Plan period is in full accordance with up to date guidance on setting a sound and robust housing requirement. It is recognised that this represents a 'high growth scenario', above the 25,894 dwelling figure generated by the Government's Standard Method (and delivering 1,500 dwellings to support the housing needs of the Black Country). We support the Council's position at paragraph 3.6 of the Plan that the higher housing requirement will provide flexibility in the supply and:

- a. Respond positively to specific sustainable development opportunities;*
- b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;*
- c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;*
- d. Support the diversification our labour force; and*
- e. Support wider aspirations, including increased economic growth and productivity".*

2.3. Whilst recent changes to the Standard Methodology (December 2020) have not directly impacted Shropshire's Local Housing Need, it will have a significant impact on the wider region. Both Wolverhampton (part of the Black Country) and Birmingham City had existing substantial levels of unmet need. The revisions to the Standard Methodology however have further increased housing need in these cities by 35%. There is a promise from Government that such centres will be supported financially to help increase delivery. Moreover, there will be further opportunities arising from changes to PD rights and likely evolving town-centres following Covid-19 recovery, which will likely see office and retail premises converting to residential. Despite this, considering the already significant level of unmet needs in the region, combined with the 35% increase, it is considered such measures will fail to mitigate further substantive increases in unmet need. Shropshire can absorb additional unmet need into its existing housing strategy, providing further assistance to the wider region. Moreover, it is highly likely, in a post Covid-19 world, that people will wish to live in homes with more outdoor space and with space for a home office. This suggests that there will not be demand for high density city living, whether or not it is allowed by PD rights. This further emphasises why Shropshire should take additional unmet need.

- 2.4. We support the Council's approach to ensuring there is sufficient land to support its growth aspirations by committing to keeping the availability of land 'under review', in order to ensure a continuous supply of suitable sites. This is especially critical when ensuring the delivery of new homes and we believe that the allocation of sites such as BUR004, which can deliver new dwellings, quickly, in the early years of the Plan period, is a positive step towards achieving a supply throughout the Plan period.
- 2.5. The Council's commitment to focusing development in the 'urban areas' (i.e. Shrewsbury, Principal and Key Centres, the Strategic Settlements and RAF Cosford Strategic Site) is noted.
- 2.6. However, as the Council recognise, the long-term sustainability of rural communities is essential and new development is needed to ensure the ongoing vitality and viability of local services for these communities. The approach of complimenting the growth of urban areas with growth, in particular, in the Community Hubs (including Burford) which function as 'rural service centres' and contain a range of services and facilities, which provide an important focus for smaller settlements nearby, is fully in accordance with the guidance contained within paragraph 78 of the NPPF.
- 2.7. Policy SP2 identifies Burford as a Community Hub Settlement. However, as the Council have set out within the Hierarchy of Settlements Assessment (2020), Burford is a very sustainable rural settlement; indeed it achieves a score that would enable it to be scored as a Key Centre. However, because many of the services attributed to Burford's score are located within adjoining Tenbury Wells, it was considered appropriate to identify the settlement as a Community Hub rather than a Key Centre. We accept this rationale behind the identification of Burford as a Community Hub and consider this to be a justified approach. However we do consider that the immediate proximity of services and facilities in Tenbury Wells should not be forgotten in recognising the sustainability of Burford, as it is more sustainable than a typical Community Hub Settlement.

03 Policy SP8: Managing Development in Community Hubs

- 3.1. The identification of Community Hubs (including Burford, which is more sustainable due to its proximity to Tenbury Wells), as ‘significant rural service centres’ and as the focus for development in the rural area where appropriate development will be permitted on allocated sites, is supported. This accords with national planning policy (NPPF paragraph 78) as it will enhance and maintain the vitality of rural communities. Moreover, it will allow these settlements to grow and thrive, in places where this will support existing local services.
- 3.2. A number of criteria (a to i) are proposed which new developments in the Community Hubs should comply with. These criteria are considered appropriate and are generally supported. With reference to site BUR004, we consider that our proposals adhere with the proposed criteria as follows:

Policy SP8: Criteria	Comment relating to BUR004
<p><i>a. It is of a scale, design and layout that is appropriate to the site and its surroundings, respects natural and heritage assets, safeguards residential amenity and is responsive to and in keeping with the character and identity of the settlement and its environs, consistent with relevant policies of this Local Plan.</i></p>	<p>As set out in more detail later in these representations, our proposal for Site BUR004 has been developed in response to the site-specific opportunities and constraints, which have been identified through relevant technical assessments. This means that the proposed development will be wholly appropriate to the site and its surroundings. Addressing natural assets sensitively and not resulting in any harm to heritage assets. The proposal will also safeguard residential amenity for both existing and proposed residents.</p>
<p><i>b. The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan.</i></p>	<p>The design of the proposed dwellings will adhere to the requirements of building regulations relating to energy efficiency. The proposed development will include a full integrated drainage strategy for the successful management of on-site surface water. In line with best practice this factors-in increased rainfall and flooding events associated with climate change. Moreover, surface water runoff from the proposal will be adequately managed by a Sustainable Urban Drainage System (SuDS) to ensure that flood risk is not increased elsewhere, the indicative location of the attenuation pond as part</p>

	of the SuDS is shown on the supporting Illustrative Masterplan.
<i>c. It maintains the integrity of strategically important gaps between settlements.</i>	BUR004 is not located within a strategically important gap between settlements.
<i>d. There is sufficient infrastructure capacity to support the development, or any infrastructure capacity constraints can be addressed through the development, consistent with relevant policies of this Local Plan.</i>	<p>There are no known infrastructure capacity issues which would prevent the proposal from coming forward.</p> <p>Moreover, any subsequent planning application will provide developer contributions where they are:</p> <ul style="list-style-type: none"> a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. <p>In line with the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and the NPPF.</p>
<i>e. Any residential development provides an appropriate mix of dwelling types, tenure and affordability in accordance with relevant policies of this Local Plan.</i>	As illustrated on the accompanying Illustrative Masterplan, the site is able to provide a mix of dwellings in accordance with emerging policy.
<i>f. The granting of permission would not result in the settlement's residential guideline being exceeded, taking into consideration completions since the start of the plan period and outstanding commitments (including site allocations). If it does, regard will be given to policy requirements identified within Paragraph 3 of Policy SP7 and any other relevant policies of this Local Plan.</i>	The proposed development of BUR004 will deliver 100 dwellings in line with the Council's proposed site allocation.
<i>g. Cumulatively, any employment development and other non-residential development, in combination with completions since the start of the plan period and any outstanding commitments (including site allocations), is considered appropriate and complements the size, character and identity of the settlement.</i>	N/A

<p><i>h. All necessary supporting studies in relation to site constraints, infrastructure and other development requirements specified by the policies in this Local Plan have been undertaken by a suitably qualified individual and the specified requirements can be provided and any identified adverse impacts satisfactorily mitigated through the development.</i></p>	<p>The proposed allocation of BUR004 is supported by a number of Technical Notes provided by suitability qualified professionals in the various relevant technical specialisms.</p> <p>Their advice has helped to identify the site's opportunities and constraints and ensure that there are no adverse impacts as a result of the proposal that cannot be satisfactorily mitigated through the development.</p> <p>Further technical evidence will continue to be prepared and will be submitted in support of an outline planning application. Lone Star is keen to continue to engage with the Council to ensure a timely planning application can be submitted in line with the Council's requirements.</p>
<p><i>i. It positively responds to design criteria and policies identified within relevant Neighbourhood Plans and Community Led Plans.</i></p>	<p>The site lies within the Tenbury and Burford Neighbourhood Plan Area (designated 2016). However, progress on preparing the Neighbourhood Plan has been limited. The group have not published a Plan for consultation under Regulation 14. As such there are currently no Neighbourhood Plan policies which would impact the site. However, this will be kept under review, and the site adhere to any policies, if they are in place at the time of submitting a planning application.</p>

04 Policy DP1: Residential Mix

- 4.1. Policy DP1 sets out that residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, in accordance with the Shropshire Council's Strategic Housing Market Assessment (SHMA).
- 4.2. Part 2 a) of Policy DP1 sets out a requirement that on sites of 5 or more dwellings, at least 50% of the open market dwellings must meet the profile of housing need set out within a Local Housing Need Survey (when undertaken through the 'Right Home Right Place' initiative). If a survey is not in place, then at least 25% of open market dwellings should be provided with 2 bedrooms or less and a further 25% of market dwellings with 3 bedrooms or less.
- 4.3. It is considered that the policy wording needs to be amended to reflect the need to have regard to an **up to date** Local Housing Need Survey to ensure that the delivery of housing reflects the Council's needs at the point in time an application is made; rather than a snap shot in time, sometime over the 22 year Plan period.
- 4.4. In respect of the alternative proposed split (when a Local Housing Need Survey is not in place), it is considered that this should be the starting point which schemes should have due regard to, not a definitive requirement. The delivery of open market housing should reflect individual site character, design and accessibility as well as current market demand.
- 4.5. The remaining open market dwellings are proposed to have "*a suitable mix and variety of dwelling sizes*". We generally support part 2 of this policy as it provides flexibility for proposals to respond to new evidence on housing need throughout the plan period. However, we suggest that the proposed policy wording is amended as follows in order to provide greater clarity and ensure the deliverability of sites.

*"The remainder of the open market dwellings will include a suitable mix and variety of dwelling sizes **having regard to housing market demand**".*
- 4.6. The requirements contained within the remaining parts of Policy DC1 are noted. The Illustrative Masterplan prepared for BUR004, shows how a range of different housing types can be accommodated within the site in line with emerging policy.

05 Policy DP2: Self Build and Custom Build Housing

- 5.1. The proposed requirement of part 2 of Policy DP2 is noted; that proposals of 5 or more dwellings in designated rural areas and 10 or more dwellings or sites of 0.5 ha or more elsewhere, are encouraged to make 10% of the dwellings available as serviced plots for Self-Build and Custom-Build developers, particularly where there is an identified need on the Self-Build Register.
- 5.2. In line with this emerging policy, BUR004 is able to provide 10% of the total 100 dwellings as plots for Self-Build/Custom-Build homes.

06 Policy DP3: Affordable Housing Provision

- 6.1. Another requirement for sites of 5 or more dwellings in designated rural areas and 10 or more dwellings or sites of 0.5 ha or more elsewhere, is to provide onsite affordable housing, in accordance with the percentages expressed in the policy and the geographic areas as defined in Figure DP3.1.
- 6.2. Burford falls within the south of the authority and therefore BUR004 is required to provide 20% affordable housing. Lone Star do not object to this requirement and have provided for 20% affordable within the Indicative Masterplan.
- 6.3. Requirements c. to f. of the proposed policy are noted. It is however considered that these are detailed matters for S106 Agreements and should be considered on a site by site basis e.g. it may not be appropriate on every site to deliver all the affordable dwellings by completion of 50% of the market dwellings, and for some areas depending on housing need the tenure split of the affordable may need to be varied from the 70/30 split proposed. Requirements c. to f. of Policy DP3 should be deleted to ensure flexibility and enable the Authority to best respond to its housing need at that time.

07 Policy S10.2 Community Hubs: Ludlow Place Plan Area

- 7.1. The identification of Burford as a Community Hub within the Ludlow Place Plan Area **is supported**.
- 7.2. As recognised within paragraph 5.141 of the Plan, Burford in combination with Tenbury Wells is an important service centre for surrounding communities, and as set out in response to Policy SP2 Burford could be a Key Centre, if the services and facilities in Tenbury Wells were also taken into account.
- 7.3. Within Burford there are a wide range of existing services and facilities, including a primary school, pre-school, sports club, pub and a petrol station with shop. Burford also contains a hospital and a fire station. Moreover, there are significant existing employment opportunities within Burford at the Upper and Lower Teme Business Parks, including the Kerry Foods Factory. Within Tenbury, there are a wide range of shops (including a supermarket) available on Teme Street/Market Street. Moreover, there are other services, such as a further primary school, a secondary school, library, doctors, dentists, a cinema/theatre and a swimming pool. In combination with the services available in adjoining Tenbury, Burford is therefore a highly sustainable location for development. Whilst they are referred to as two settlements, they are intrinsically linked, hence why Burford could be considered a Key Centre. Nevertheless, for the purposes of the Shropshire Local Plan, it is accepted that identifying Burford as a Community Hub is justified.
- 7.4. As recognised by the Council, the current SAMDev Plan has restricted growth in the locality. Indeed, as shown in Appendix 5 of the Plan, Burford has only had a total of 2 residential completions in the period 2016/17 to 2018/19. The allocation of around 190 dwellings at Burford in the emerging Local Plan provides an important opportunity to ensure the ongoing vitality and viability of the services and facilities in Burford, allowing the settlement to grow in a manner that is commensurate to its size and importance in the Ludlow Place Plan Area.
- 7.5. It is recognised that the 190 dwellings attributed to Burford is the higher 'Residential Guideline' attributed to the Community Hubs in the Place Plan Area. However, it is considered that this is appropriate having regard to the range of services and facilities in Burford and its position in the settlement hierarchy when the full range of services are considered with neighbouring Tenbury.
- 7.6. The delivery of new dwellings in Burford identified through the Local Plan's residential allocations; supplemented with appropriate small-scale windfall residential development within the development boundary (where it is consistent with Community Hub Policy SP7 and other relevant policies), is also supported as a way to ensure the growth assigned to the settlement is delivered.

08 Schedule S10.2 (i) Residential Site Allocations: Community Hubs in the Ludlow Place Plan Area

Land adjoining Boraston Drive on A456, Burford (BUR004) – 100 Dwellings

- 8.1. The proposed allocation of BUR004 for 100 dwellings, including a range of housing with potential for self-build, family housing, age specific/special needs housing and affordable homes **is supported**.
- 8.2. As illustrated on the accompanying Masterplan (shown on Figure 2 below), the site is able to deliver 100 homes which meet the range of houses required by the proposed development guidelines for the site allocation.



Figure 2: Illustrative Masterplan

8.3. The 100-dwelling capacity of the site has been tested through an initial technical assessment of the site's constraints and opportunities. The figures below illustrate the constraints and opportunities as identified and show how the proposal has been formulated in response to these:

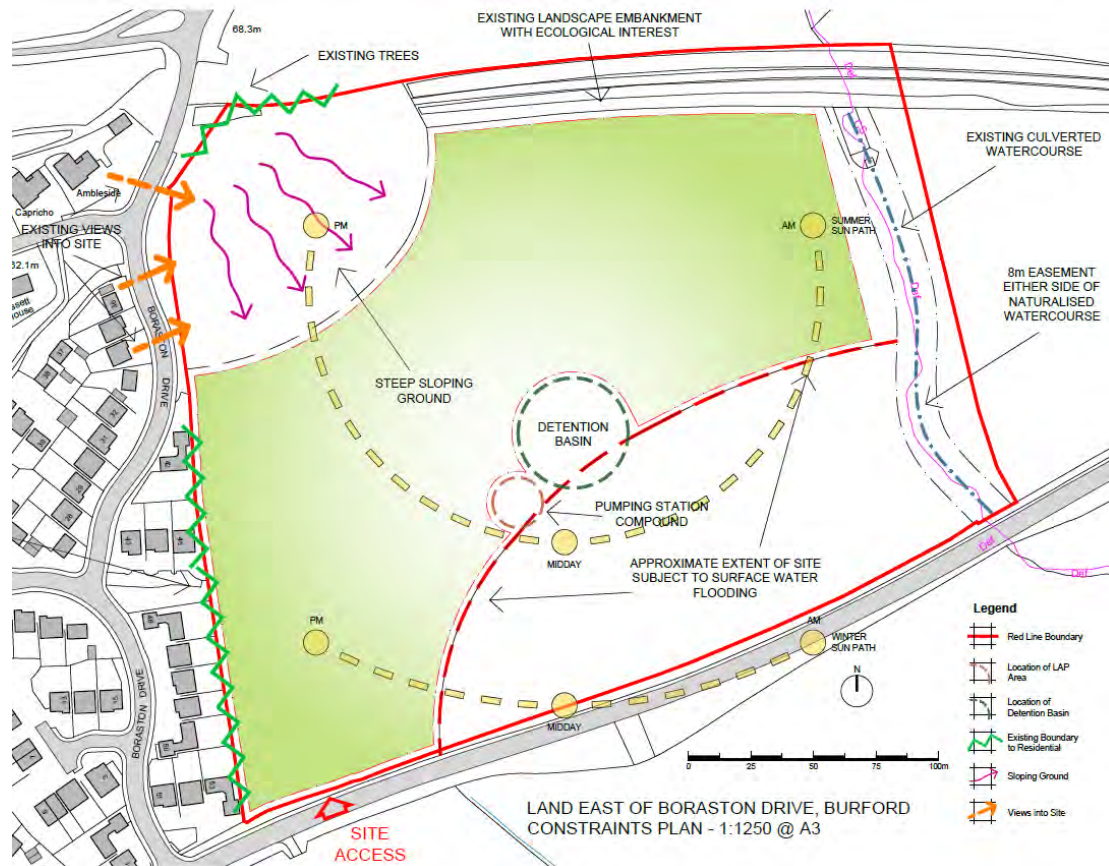


Figure 3: Site Constraints

Constraints

- Landscape –the visual impact of the proposed development from Boraston Drive has been carefully considered and the proposed dwellings have been sited away from the sloping ground to the northwest of the site.
- Surface Water Flood Risk – the risk of surface water flooding has been assessed. The development has been pulled back from the southeast of the site to ensure that there is no impact to the proposed development.
- Existing Watercourse – the development allows the re-naturalising of an existing culverted watercourse which is located to the east of the site, with an 8 m easement either side.
- Habitats/Biodiversity – The treed embankment to the north of the site, associated with the disused Tenbury - Bewdley rail line has been identified as being of ecological importance and therefore the proposal will ensure this is retained as part of proposed landscaping.

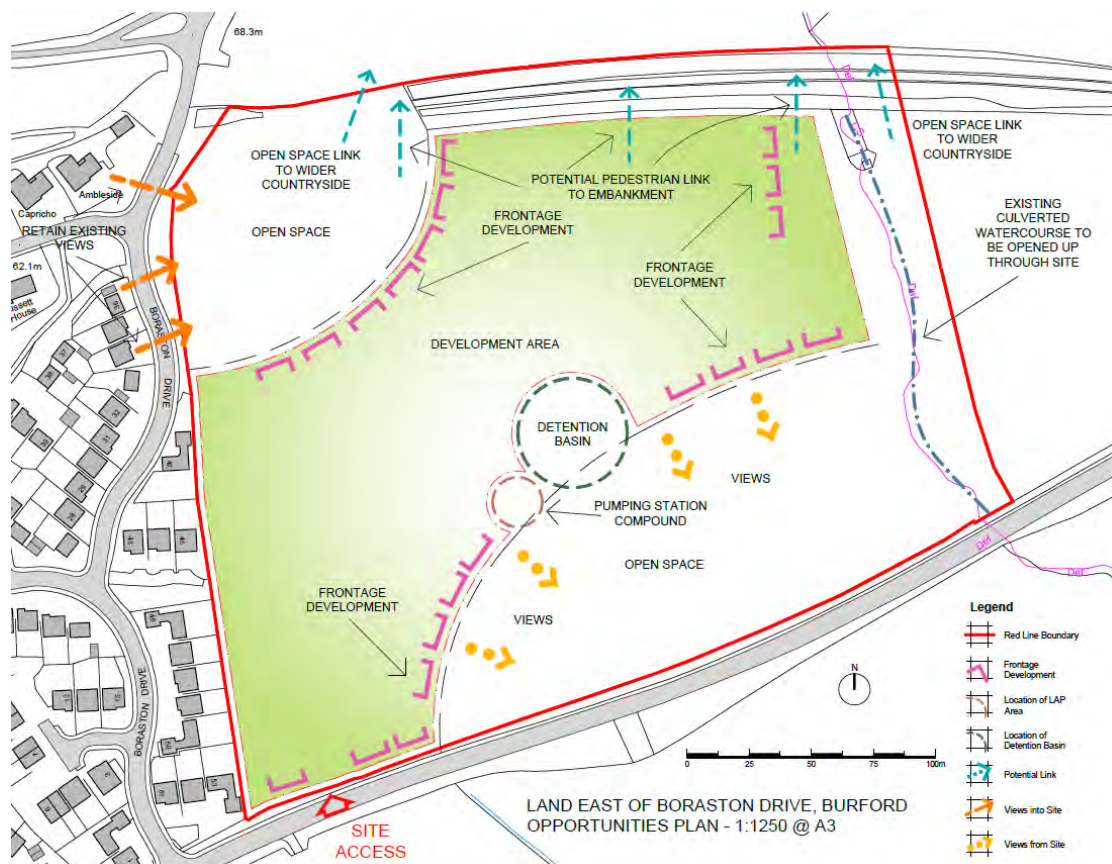


Figure 4: Site Opportunities

Opportunities

- Landscape – the development will create an attractive and soft new settlement edge.
- Open space – will be provided to the northwest and southeast of the site. The north western open space will help to limit the development’s impact on existing views from the north of Boraston Drive over the site. To the southeast, the proposed open space will provide an attractive green edge to Burford and soften the appearance of development from the A456. Landscaping and ecological enhancements can also be delivered as part of the proposed open space areas.
- New pedestrian links – can be formed to the Tenbury – Bewdley railway line to the north of the site, linking the site with the wider countryside. The feasibility of a secondary pedestrian access to Boraston Drive will be confirmed ahead of an outline planning application being prepared on the site.
- Access off the A456 – will provide the primary vehicular and pedestrian access to the development.
- Re-naturalising of the watercourse to the east of the site – will provide significant ecological benefits and potentially provide a betterment to surface water flood risk by enabling flood flows and volumes to be consolidated along the watercourse corridor.

- 8.4. The proposed Development Guidelines for BUR004 are set out within Schedule S10.2 (i) of the Local Plan Review.
- 8.5. Comments on each of these have been provided in turn below:

Site proposed for broad range of housing uses with potential for self-build, family housing, age specific / special needs housing and affordable provision.

The land adjacent to Boraston Drive and the A456 will deliver a wide range of housing in line with the Council's emerging planning policies.

Large open site with reduced capacity (100 dwellings) will accommodate this broad range of housing within a masterplan to address material considerations including landscape quality, habitat protection, biodiversity, trees and hedgerows, heritage and archaeology, surface water drainage, highway accessibility, green infrastructure, open space (with equipped play provision) in a high specification development on this prominent site on the eastern edge of town.

The proposed developable area of the site has been defined after identifying the site's constraints, and the layout of the development will respond to all of the above matters. When further detailed site-specific surveys are undertaken ahead of the submission of an outline planning application on the site (including a Topographical Survey and more detailed hydraulic modelling), the developable area of the site will be refined further. As such, it is requested that the capacity of the site is expressed as 'approximately 100 dwellings', in order to allow a reasonable amount of flexibility in dwelling numbers, in response to a more detailed assessment of the site's capacity.

Masterplan will indicate preferred location for open space within green infrastructure to the north-west to create recreational / parkland with structural planting linking to Tenbury - Bewdley rail line, protecting significant habitat and mitigating any biodiversity impacts subject to detailed ecological and arboricultural assessments. Development should respect surrounding heritage and the archaeological potential of the site particularly the historic route of the Tenbury – Bewdley Railway across the northern boundary of the site.

The proposed development will provide new public open space and green infrastructure which will benefit both new and existing residents of Burford. The open space proposed to the north west of the site will provide a link to the former Tenbury – Bewdley railway to the north of the site. Moreover, the open space will also help to ensure that any habitats of value associated with the railway embankment are retained and appropriate buffers between these and the proposed built form are maintained. The development will respect the heritage of the Tenbury – Bewdley railway. The Heritage Note prepared for the site concludes that there are no major archaeological constraints to the residential development of the site as any below ground remains relating to the railway would not be of a significance that would prevent development.

Green infrastructure to the north-west and south-east of the site will improve the open character of this large prominent site. These open areas will reduce impacts on views from A456 and surrounding landscape by softening the existing urban aspect along the eastern edge of town and to integrate the development into the valley of the River Teme.

The significant areas of proposed open space within the site will assist in retaining its open character. New landscape planting will soften the edge of the settlement and help it to assimilate with the River Teme Valley.

Open space to the north west will contain an area of potential ground contamination (north-west), provide amenity and recreation uses and provide access to the route of the Tenbury – Bewdley Railway as a Green Infrastructure corridor.

The outline planning application for the site can be accompanied by a Phase 1 Ground Investigation to fully scope the potential for ground contamination. The development of the site will ensure that the site is safely remediated.

Open space to the south and east will accommodate the SuDs, de-culverted watercourse and land for surface water flood storage capacity, to hold and manage the discharge of surface water and protect the River Teme as an SSSI. This area will also provide value as amenity land and landscaping to the site frontage on A456.

It is recognised that concerns were raised during the Regulation 18 consultation in respect of the impact the development may have on surface water flows in the locality and concerns were expressed that the development would result in increased surface water runoff to properties on Boraston Drive.

The proposed scheme has intentionally been set back from areas of known or suspected flood risk and will include open space to the south and east of the site that will be able to accommodate existing flooding, as well as a separate new attenuation pond for the proposed development drainage. All surface water runoff from the development will be directed to the attenuation pond to ensure no flows are directed towards neighbouring properties on Boraston Drive. Best practice Sustainable Drainage Systems (SuDS) methods will be used which will be designed to discharge clean water from the attenuation pond into the watercourse (at a low greenfield equivalent run off rate). This will help to lessen the impact on the River Teme SSSI, as this currently suffers from water pollution as a result of agricultural run-off.

Existing flood risk will be assessed in further detail as part of any preparatory works to a planning application. It is also proposed that the existing culverted watercourse to the east of the site will be re-naturalised to provide significant ecological benefits and potentially provide a betterment to surface water flood risk by increasing flood storage available on the site within a defined natural corridor.

Site specific flood risk assessment to inform green infrastructure to the south and east to de-culvert the existing watercourse and provide SuDS to manage and improve drainage through the site from the Clee Hills (north) to River Teme SSSI (south) subject to further hydraulic assessment.

A site-specific Flood Risk Assessment and Sustainable Drainage strategy will be submitted alongside the future planning application on the site. Hydraulic modelling will be undertaken to better understand the risk of flooding from the existing watercourse, surface water flooding and the available developable area.

A456 will provide direct highway access with appropriate and suitably located junction and with footway and cycleway access to Boraston Drive to facilitate active travel to local services. Site will also benefit from existing footway along A458 with improvements, highway drainage and re-positioning of 30mph speed restriction to the east, with traffic calming measures.

The proposed development will be served by a new primary vehicular and pedestrian access off the A456. A new priority-controlled T-Junction will be provided onto the A456 and residents will be able to access Burford on foot via the existing footway along the A456.

The feasibility of delivering a secondary pedestrian/cycle access to Boraston Drive will be confirmed ahead of an outline planning application being prepared on the site.

Any necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).

This Development Guideline has been added to the Plan, following the previous Regulation 18 Pre-Submission Plan consultation. It is noted that a comment from Highways England was raised during the previous consultation, which states that the applicant will need to consider the development's impact on the A49/A456/Wyson Lane junction (at Woofferton).

Our Highways Consultant has reviewed the Highways England comment and have advised that, based on a 100 dwelling scheme, as a worst case scenario, the site would likely generate approximately 60 two-way vehicle trips during a typical weekday peak hour (AM and PM). They would expect approximately 10% of vehicle trips associated with the site to pass through the A49/A456/Wyson Lane crossroads junction, translating to just six two-way vehicle trips during a typical weekday peak hour. Spread evenly through the hour, that would be one vehicle every 10 minutes, but even if all six vehicles arrived at the junction at the same time (highly unlikely given the distance between the site and the junction), they wouldn't expect there to be a lasting issue. Indeed, our consultants have stated that a much larger proportion of development traffic than 10% could route through to the junction, before impacts would begin to be felt. Therefore, it is not expected that the proposed development would result in an impact on the operation of the A49 / A456 / Wyson Lane crossroads junction and it is not expected that mitigation works at this location would be necessary.

Capacity of utilities for this larger development should be assessed and any infrastructure constraints to the delivery of the development should be addressed as part of the development including the servicing of the proposed site for self-build plots.

A Utilities Assessment will be provided to support the planning application of the site and confirm the ability of existing utilities apparatus to serve the site.

09 Sustainability Appraisal

- 9.1. The Council's Sustainability Appraisal (SA) of the Regulation 18: Pre-Submission Draft Local Plan assessed BUR004's overall sustainability as 'Good'. This is the highest score achievable within the SA and the highest score attributed to the three proposed site allocations in Burford.
- 9.2. We generally agree with the findings of the SA and consider the site to be worthy of its 'Good' score. However, within our previous representations we noted that the scoring criteria 5 attributes positive '+' scores when a site is within 480m of one or more of the facilities listed. We consider that this criteria doesn't reflect that proposed developments have the ability to provide facilities such as children's playgrounds, amenity green space and accessible natural green space, which would further enhance the site's sustainability. It is therefore requested that consideration is given to allotting further 'positive' scores when a site proposal will provide such benefits.
- 9.3. We note that the scoring has not been amended in the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft Local Plan and therefore we request that consideration is given to amending this scoring.

10 Use of Site for Tenbury Show

- 10.1. Comments were raised during the Regulation 18 consultation regarding the site previously been used as car parking for the Tenbury Show. We wish to highlight that this use of the site was only allowed on a temporary basis, at the discretion of the site's landowner.
- 10.2. The arrangement does not constitute a formal use, nor does it impact on the site's ability to come forward for residential development.