



Raby Estate

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# RESPONSE TO SUBMISSION DRAFT OF LOCAL PLAN

Response to the consultation under Regulation 19  
of the submission draft of the Shropshire Council  
Local Plan





Raby Estate

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# **RESPONSE TO SUBMISSION DRAFT OF LOCAL PLAN**

Response to the consultation under Regulation 19 of the submission draft of the Shropshire Council Local Plan

**REPRESENTATIONS (FINAL) CONFIDENTIAL**

**PROJECT NO. 62262201**

**DATE: FEBRUARY 2021**



Raby Estate

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Response to the consultation under Regulation 19 of the  
submission draft of the Shropshire Council Local Plan

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# 1 INTRODUCTION

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- 1.1.1. We have prepared this consultation response on behalf of the Raby Estate in response to the Regulation 19 Consultation on the submission draft of the plan. The Raby Estate is a substantial landowner and rural business within Shropshire and strongly advocates an effective local plan that delivers on Shropshire's Economic Growth Strategy.
- 1.1.2. In our view the Regulation 19 draft Plan fails the 'tests of soundness' because it is:
- **Not positively prepared** – the plan does not fully meet the area's objectively assessed needs, and does not adequately accommodate unmet need from neighbouring areas;
  - **Unjustified** – the plan's strategic approach is not appropriate; it does not take account of reasonable alternatives and is not based on proportionate evidence;
  - **Ineffective** – the plan is undeliverable over the plan period and is based on ineffective joint working which does not properly deal with strategic matters;
  - **Inconsistent with national policy** – the plan prevents the delivery of sustainable development.
- 1.1.3. We set out our views in detail below and make recommendations as to how the plan should be amended to meet the tests of soundness. We strongly recommend that the plan should not be submitted for examination until these fundamental issues have been resolved.
- 1.1.4. Section 2 assesses the Strategic Housing Policies of the local plan and recommends amendments to:
- increase the contribution to current and future needs of neighbouring authorities;
  - increase the housing target to respond adequately to the market and deliver on the objectives of the Shropshire Economic Growth Strategy;
  - provide a buffer of sites to safeguard against plan failure;
  - reduce the reliance on windfall site; and
  - allocate Beslow Garden Village as a strategic site to contribute towards the growth identified and the buffer to safeguard against plan failure and to reduce the reliance on windfalls.
- 1.1.5. Section 3 considers the strategic policies relating to the preparation of Whole Estate plans and recommends amendments to:
- make it clear how endorsed Whole Estate Plans should be considered in decision making;
  - ensure that development in the countryside is supported where it comes forward as part of an endorsed Whole Estate Plan; and
  - trigger the designation of Community Clusters through the Whole Estate plan making process.
- 1.1.6. Section 4 considers the settlement policies and recommends amendments to the settlement policies affecting the Much Wenlock place plan area to:
- allocate Shore Lane Cressage (CES002) ensure sufficient housing and employment land is allocated to meet the needs of the settlement and respond to the Council's strategy for growth corridors;
  - ensure that the growth needs of the settlement are deliverable over the plan period in a way that addresses the vitality of the community.

## 2 STRATEGIC POLICIES FOR THE DELIVERY OF A SUFFICIENT SUPPLY OF HOUSING

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### 2.1 INTRODUCTION

- 2.1.1. We have significant concerns with the strategic approach taken towards housing requirements and housing delivery in the Regulation 19 Pre-Submission Draft of the Shropshire Local Plan (December 2020).
- 2.1.2. In most aspects, the Regulation 19 plan carries forwards the flawed approach of the Regulation 18 Pre-Submission Draft Local Plan (August 2020), which we also had significant concerns with. As well as identifying various failings with the Plan, our representations to the Regulation 18 stage were accompanied by a thorough Housing Needs Assessment (September 2020) ('HNA'), which:
- highlighted the approach that Shropshire Council is required to follow by the Government;
  - assessed an appropriate housing requirement figure; and
  - recommended changes necessary to make the plan 'sound'. For completeness, our HNA is enclosed with these representations at Appendix 1.2.1.
- 2.1.3. This section assesses the Strategic Housing Policies of the local plan and recommends amendments to the local plan to:
- increase the contribution to current and future needs of neighbouring authorities;
  - increase the housing target to respond adequately to the market and deliver on the objectives of the Shropshire Economic Growth Strategy;
  - provide a buffer of sites to safeguard against plan failure;
  - reduce the reliance on windfall site; and
  - allocate Beslow Garden Village as a strategic site to contribute towards the growth identified and the buffer to safeguard against plan failure and to reduce the reliance on windfalls.
- 2.1.4. Section 2 of this report should be read in conjunction with the following documents previously submitted to the local plan review consultations:
- Appendix 1.2.1 – Housing Needs Assessment
  - Appendix 2.2.1 – Representation to Reg 18: Pre-submission draft: Beslow Garden Village
  - Appendix 2.2.2 – Beslow Garden Village Summary document
  - Appendix 2.3.1 – Strategic Sites Representation: Beslow Garden Village
  - Appendix 2.3.2 – Strategic Sites Questionnaire: Beslow Garden Village
  - Appendix 2.3.3 – Strategic Sites Covering letter: Beslow Garden Village
  - Appendix 2.3.4 – Strategic Sites Representation: Beslow Garden Village Vision Document
  - Appendix 2.4.1 – Officer Correspondence: Beslow Garden Village
  - Appendix 2.4.2 – Broad Locations for new settlement
  - Appendix 2.4.3 – Raby Estate plan

### 2.2 HOUSING REQUIREMENT – POLICY SP2 (STRATEGIC APPROACH)

- 2.2.1. As raised in our Regulation 18 representations and our HNA (Appendix 1.2.1), we are concerned that the housing requirement which underpins the strategic approach in Policy SP2 is flawed and fails the tests of soundness. By setting an unambitious housing target which fails to accommodate



unmet need from neighbouring areas or take account of market conditions, the plan has not been 'positively prepared', it is 'unjustified', 'ineffective' and 'inconsistent with national policy'.

- 2.2.2. Paragraphs 11, 35, 60 and 65 of the NPPF make clear that housing requirement figures should as a minimum meet the authority's objectively assessed needs. This is underpinned by the Government's objective of significantly boosting the supply of homes at paragraph 59.
- 2.2.3. Policy SP2 of the Regulation 19 draft Plan sets out a requirement for around 30,800 new dwellings over the plan period 2016 to 2038 (1,400 dwellings per annum ('dpa')). This remains unchanged from the Regulation 18 draft Plan. We undertook a thorough assessment of Shropshire's housing needs within Section 3 of our HNA – at Table 3-3, we highlighted numerous housing requirement figures which have been identified and considered throughout the plan's preparation.
- 2.2.4. At Section 4 of our HNA (September 2020), we advocated the application of the emerging draft standard method figure contained in the Government's 'Changes to the current planning system' consultation (August 2020) on the assumption that this would be carried forward into policy and be relevant to the Examination of the Plan. For Shropshire, this would have resulted in a much more ambitious minimum housing requirement figure of 2,120 dpa.
- 2.2.5. We acknowledge that there has been a subsequent 'U-turn' in Government policy – on 16 December 2020, the Government published its response to the consultation, and in parallel amended Planning Practice Guidance ('PPG') accordingly. This confirmed that the existing February 2019 standard method approach was still appropriate, albeit with an uplift applied to the 20 most populated cities and urban centres in England. For Shropshire, this means that the figure remains unchanged at 1,177 dpa.
- 2.2.6. However, the Government's response to the 'Changes to the current planning system' consultation paper (16 December 2020) re-affirms that this figure is only a starting point for setting a housing requirement:

*“Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made.”*

- 2.2.7. This reflects the Government's statement at PPG paragraph 010 of the 'Housing and economic needs assessment' section (Reference ID: 2a-010-20201216) that “there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates”.
- 2.2.8. As we explore in our representations below, it is our view that the housing requirement figure of 1,400 dpa set out in Policy SP2 does not represent a sound approach to significantly boost the supply of homes above the standard method figure of 1,177 dpa. Given that Shropshire is relatively unconstrained, there are other factors which ought to have been considered, including unmet need from neighbouring areas and current and future demographic trends and market signals.

## UNMET NEED FROM NEIGHBOURING AREAS

- 2.2.9. Paragraphs 11, 35, 60 and 65 of the NPPF and PPG paragraph 010 make clear that to be 'positively prepared', housing requirement figures should as a minimum meet the authority's own needs as well as any needs that cannot be met within neighbouring areas, and that this need should be accommodated where it is practical to do so and is consistent with achieving sustainable development.
- 2.2.10. Shropshire is a large County which forms part of the West Midlands region and is adjoined by several authorities, and there are areas beyond this which it shares a functional relationship with. At a meeting of its Cabinet on 20 July 2020, Shropshire Council resolved to agree the principle of accepting up to 1,500 dwellings from the Association of Black Country Authorities (ABCA) as part of its housing requirement up to 2038 and to distribute them in accordance with the strategic approach in Policy SP2.
- 2.2.11. As raised in our Regulation 18 representations and our HNA (Appendix 1.2.1), we have two main concerns with this approach:
- 1 There is no explanation as to why Shropshire can only accommodate 1,500 homes (when it is relatively unconstrained and there are deliverable sites in the Raby Estate's ownership which could accommodate growth) – **this is 'unjustified'**; and
  - 2 In the absence of anything to the contrary, our suspicion is that this is simply a result of the current standard method figure of 1,177 dpa (i.e. the 'minimum' that Shropshire has to provide) being 'rounded up' to 1,400 dpa and being repackaged as meeting unmet housing needs of ABCA – the Plan **has not been 'positively prepared'**.
- 2.2.12. In addition, there is a further concern which has arisen at this Regulation 19 stage. The revised standard method (December 2020) will have significant implications on plan making across the region which needs to be properly considered and explored collaboratively with neighbouring areas. Whilst in other respects unchanged, the revised 2020 standard method applies a 35% uplift to the post-cap number generated by the standard method to Greater London and to the local authorities which contain the largest proportion of the other 19 most populated cities and urban centres in England.
- 2.2.13. The West Midlands contains four of England's largest populated cities and urban centres of Birmingham, Coventry, Stoke-on-Trent and Wolverhampton. As illustrated by Table 2-1, there is an additional 2,298 dpa now required above the previous standard method figures published in February 2019.

**Table 2-1 - The effect of the standard method 35% uplift in the West Midlands**

LPA	2019 Standard Method (dpa)	2020 Revised Standard Method (dpa)	Difference (dpa)
Birmingham	3,577	4,829	+1,252
Coventry	1,722	2,325	+607
Stoke-on-Trent	495	675	+180
Wolverhampton	750	1,013	+263
<b>Total</b>	<b>6,544</b>	<b>8,842</b>	<b>+2,298</b>

- 2.2.14. This is a significant change and is important because, as we explored in sections 3.3 and 4.2 of our HNA, many West Midlands authorities were already struggling to accommodate their own needs within their own boundaries, prior to the 35% uplift coming into effect.

2.2.15. The problem stems from the centre – heavily urbanised authorities like Birmingham are extremely constrained and unable to meet their own housing needs within their own boundaries. The result is a ‘ripple effect’, whereby neighbouring areas attempt to accommodate some of these unmet needs but are unable to do so entirely, and so these areas in turn look to their neighbours to ‘pick up the slack’, and so the effect ripples outwards to areas like Shropshire.

The impact of this across relevant West Midlands authorities is illustrated by Table 2-2.

**Table 2-2 - Comparison of housing requirement and delivery figures in the West Midlands**

Local Authority	Adopted requirement (dpa)	Emerging requirement (dpa)	2019 Standard Method (dpa)	2020 Revised Standard Method (dpa)	2016-2019 Average Delivery (dpa)
<b><i>Shropshire</i></b>					
Shropshire	1,375	1,400	1,177	1,177	1,737
Telford and Wrekin	864	-	510	510	1,135
<b><i>West Midlands</i></b>					
Birmingham	2,555	-	3,577	4,829	4,025
Coventry	1,230	-	1,722	2,325	1,718
<b><i>Association of Black Country Authorities (ABCA)</i></b>					
Dudley	806	-	636	636	732
Sandwell	1,074	-	1,488	1,488	669
Walsall	599	-	882	882	743
Wolverhampton	671	-	750	1,013	780
<b><i>Staffordshire</i></b>					
Cannock Chase	241	284	276	276	597
East Staffordshire	682	-	425	430	750
Lichfield	478	430	321	321	631

Local Authority	Adopted requirement (dpa)	Emerging requirement (dpa)	2019 Standard Method (dpa)	2020 Revised Standard Method (dpa)	2016-2019 Average Delivery (dpa)
Newcastle-under-Lyme	285	586	355	355	263
South Staffordshire	175	270	254	254	251
Stoke-on-Trent	570	804	495	675	919
<b>Worcestershire</b>					
Bromsgrove	368	-	379	379	342
Wyre Forest	200	276	231	231	189

- 2.2.16. In our view, the ‘ripple effect’ impacts the agreement that Shropshire has with the ABCA authorities of Dudley, Sandwell, Walsall and Wolverhampton – this needs to be revisited as a matter of urgency.
- 2.2.17. As recognised in our HNA, ABCA’s Urban Capacity Study (December 2019) identified a shortfall of about 26,920 homes which cannot be accommodated within ABCA’s boundaries and therefore needed to be met in neighbouring areas – a higher requirement for Wolverhampton will increase this shortfall further. In addition, increases for Birmingham, Coventry and Stoke may mean that existing agreements that ABCA has with its other neighbours to accommodate unmet need (i.e. Bromsgrove, Cannock Chase, Lichfield and South Staffordshire) will also need to be revisited. This illustrates a high level of uncertainty surrounding unmet needs across the region – this is ‘ineffective’.
- 2.2.18. We appreciate that, given that the new standard method was published two days before consultation on the Regulation 19 draft Plan was launched, the Council will not have had an opportunity to properly consider the implications. However, it does have the ability to pause preparation of the plan and not to submit for Examination until it has fully explored and reached agreement with neighbouring areas through the Duty to Cooperate, and then make consequent changes to the Plan – without doing so would be ‘inconsistent with national policy’.
- 2.2.19. Notwithstanding this, in the interim, Shropshire’s agreement in principle to accommodate a total of 1,500 dwellings of unmet needs from ABCA over a 22 year plan period (equating to an additional 68 dpa) remains extremely unambitious. It remains our strong view that the housing requirement should be increased significantly higher above 1,400 dpa to accommodate more unmet needs from ABCA and other areas.
- 2.2.20. To be positively prepared, effective and consistent with national policy Shropshire should increase its contribution to meeting the unmet needs from ABCA and address the future impact of the 35% uplift in the largest cities of the West Midlands. Shropshire is unconstrained and therefore well

placed to provide a substantial contribution. We recommend Shropshire should accommodate 250dpa over the plan period or 5,500 dwellings in total.

- 2.2.21. We have provided evidence to previous consultations on the local plan on the suitability of the Beslow Garden Village for accommodating housing and employment growth. See Appendices 2.2.1 to 2.4.3.

## **CURRENT AND FUTURE DEMOGRAPHIC TRENDS AND MARKET SIGNALS**

- 2.2.22. Paragraph 60 of the NPPF explains that to determine the number of homes needed, strategic policies should be informed by the standard method, unless there are exceptional circumstances that justify an alternative approach, which also reflects current and future demographic trends and market signals.

### **Planning for different groups**

- 2.2.23. Paragraph 61 of the NPPF states that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. In rural areas, paragraph 72 requires policies to be responsive to local circumstances and support housing developments that reflect local needs, while paragraph 78 stresses that such housing should be located where it will enhance or maintain the vitality of rural communities.
- 2.2.24. Section 3.6 of our HNA (Appendix 1.2.1) set out our analysis of affordability in Shropshire. It is considered that the authority struggles to provide affordable housing for those on low incomes, which indicates that a higher level of affordable housing is needed amongst lower income households compared to similar authorities, and nationally. This is recognised and highlighted in part one of the SHMA (2020).
- 2.2.25. When considering the Place Plan Areas (Policies S1-S18), parts of the Raby Estate in Much Wenlock (Policy S13) is considered far less affordable than the rest of Shropshire, and the country. The SHMA indicates that Much Wenlock needs higher levels of affordable housing if it is to reduce its affordability ratio (9.5) to be in conformity with the rest of Shropshire (8.7).
- 2.2.26. In our view, increasing the overall housing requirement would place the Council in a much better position to meet its affordable housing target – as a proportion of new homes delivered. Therefore, an increase in houses delivered will mean an increase in affordable houses delivered. This increased supply in both affordable and market housing will increase the availability of housing for those on low incomes or are trying to get onto the housing ladder. As identified, Much Wenlock (including the settlement of Cressage and the wider Raby Estate) is one such place where housing is considered unaffordable, therefore this would be a logical area to increase housing provision.
- 2.2.27. Without a sufficient increase in the housing requirement above the figure of 1,400 dpa, the needs of different groups in the community will not be met and therefore the Plan has not been ‘positively prepared’ and is ‘inconsistent with national policy’.

### **Dwelling completion rates**

- 2.2.28. PPG paragraph 010 (Reference ID: 2a-010-20201216) acknowledges that situations where previous levels of housing delivery in an area are significantly greater than the outcome from the standard method could justify a higher housing requirement than the standard method indicates.
- 2.2.29. As reported in sections 3.2 and 3.5 of our HNA, Shropshire has witnessed higher delivery rates than both the existing the housing requirement of 1,375 dpa and the emerging requirement of 1,400 dpa

in Policy SP2. The 2019 Housing Delivery Test (HDT) results revealed that an average of 1,876 dpa were completed over the previous three years. Similarly, the latest 2020 HDT results (published 19 January 2021) reveal that an average of 1,737 dpa were completed over the previous three years.

- 2.2.30. In our view, this illustrates that Shropshire’s housing market, even operating under existing policies (which have been relatively restrictive), can comfortably sustain higher delivery rates. This gives confidence that with more allocations and supportive policies, a higher housing requirement figure can be achieved over the plan period. In these terms, a housing requirement which is lower than recent completion rates cannot be considered ambitious – and therefore the Plan has not been ‘positively prepared’.

### **Economic Growth Strategy**

- 2.2.31. Thirdly, PPG paragraph 010 (Reference ID: 2a-010-20201216) acknowledges that where there are deliverable growth strategies for local authority areas this could also justify a higher housing requirement than the standard method indicates.
- 2.2.32. As explored at section 3.4 of our HNA, the Economic Growth Strategy for Shropshire (2017-2021) sets out the Council’s commitment and ambition to grow the economy of the County. The strategy identifies the need for a ‘step change’ in Shropshire’s economy to reduce levels of out-commuting, retain employment and skills locally, increase productivity and address housing affordability issues. It will be delivered, in part, by Policy SP12 (Shropshire Economic Growth Strategy) of the Regulation 19 draft Plan.
- 2.2.33. We note that Part 5(a) of this policy states that the delivery of employment will be supported by investment in “housing of the right type, quality, tenure and affordability that will support the move towards increased home/agile working, in the right locations with jobs, services, facilities and leisure to make Shropshire a good place to live, work and play”.
- 2.2.34. In our view, these economic growth aspirations will not be realised if the investment potential in housing delivery will be frustrated through an unambitious and modest increase in the housing requirement above the standard method and below recent delivery rates – again, in these terms therefore, the Plan has not been ‘positively prepared’.
- 2.2.35. To respond adequately to the market trends and the economic growth strategy a more appropriate housing requirement would be 2,000dpa and Strategic Policies of the local plan should be updated accordingly.

## **2.3 HOUSING SUPPLY – POLICIES SP2 (STRATEGIC APPROACH) AND POLICIES S1-S21 (SETTLEMENT/STRATEGIC SETTLEMENT/SITE POLICIES)**

- 2.3.1. As raised in our Regulation 18 representations and our HNA (Appendix 1.2.1), we are concerned that the housing supply which underpins the strategic approach in Policy SP2 is flawed and fails the tests of soundness. By allocating an insufficient supply of sites, relying too heavily on windfalls and strategic sites and failing to accommodate a ‘safety buffer’, the Plan has not been ‘positively prepared’, it is ‘unjustified’, ‘ineffective’ and ‘inconsistent with national policy’.
- 2.3.2. Paragraphs 11, 23 and 67 of the NPPF require authorities to allocate sufficient sites to bring land forward at a sufficient rate to address needs and to deliver the strategic priorities of the area. Again,



this is underpinned by the Government’s objective of significantly boosting the supply of homes at paragraph 59.

- 2.3.3. Collectively in Policies S1-S21, the Plan allocates 9,110 dwellings over the plan period 2016 to 2038. This has decreased from the Regulation 18 stage when 9,245 dwellings were proposed to be allocated.
- 2.3.4. Within Section 4 of our HNA, we undertook a thorough assessment of Shropshire’s housing land supply. We have been advocating that Shropshire should therefore allocate a greater number of sites to ensure there is a truly plan-led approach to development in the County.
- 2.3.5. Regardless of whether the Council or the Inspector considers that the housing requirement should be increased (as we set out in our representations above), we believe there are significant failings in the supply of homes proposed in the Plan that need to be addressed regardless of the conclusion of that matter. Should the housing requirement indeed be increased above 1,400 dpa (as is our view), then this position is exacerbated further and there is a much stronger need to significantly increase the supply of homes. It is quite clear from our perspective that Shropshire Council cannot progress the Plan further until this has been resolved.

**RELIANCE ON WINDFALLS**

- 2.3.6. Paragraph 70 of the NPPF states that “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends”.
- 2.3.7. At Sections 4.1 and 4.3 of our HNA, we raised our concerns that the Regulation 18 plan placed too much reliance on windfalls. From Appendix 5 of the Regulation 19 draft Plan, we understand that there is a proposed windfall allowance of 2,682 dwellings over the plan period (122 dpa between 2016 and 2038). This has increased from the Regulation 18 stage when it was 2,551 dwellings or 116 dpa.
- 2.3.8. Whilst we acknowledge that there is historic evidence of windfall delivery in Shropshire, in our view, the ability of windfalls to sustain these levels of delivery will diminish over time and such a reliance should not be used as a reason to not allocate sufficient sites – therefore the Plan has not been ‘positively prepared’.
- 2.3.9. Paragraph 15 of the NPPF reminds us that the planning system should be genuinely ‘plan-led’ and provide a positive vision for the future of an area, while paragraphs 11, 23 and 67 require authorities to allocate sufficient sites to bring land forward at a sufficient rate to address needs and to deliver the strategic priorities of the area. Shropshire Council should therefore allocate a greater number of sites to ensure there is a truly plan-led approach to development in the County.
- 2.3.10. However, in contrary to the spirit of this goal, 23% of the residual housing requirement of 11,792 dwellings (i.e. excluding completed dwellings, dwellings with planning permission and those already allocated by the SAMDev Plan) is expected to be delivered on windfall sites, as illustrated by Tables 2-3 and 2-4. This has increased from the Regulation 18 stage when it was 22%.

**Table 2-3 - Regulation 19 draft Plan total housing breakdown**

Supply category	No.	%
Completions since 2016 (as at 31 March 2019)	5,629	18%

Sites with PP (as at 31 March 2019)	10,083	32%
SAMDev Allocations without PP (as at 31 March 2019)	3,626	12%
Proposed allocations	7,360	24%
Proposed Ironbridge Strategic Settlement	1,000	3%
Proposed Clive Barracks, Tern Hill Strategic Settlement	550	2%
Windfall Allowance	2,682	9%
<b>Total</b>	<b>30,930</b>	<b>100%</b>

**Table 2-4 - Regulation 19 draft Plan residual housing breakdown**

Supply category	No.	%
Proposed allocations	7,360	63%
Proposed Ironbridge Strategic Settlement	1,000	8%
Proposed Clive Barracks, Tern Hill Strategic Settlement	750	6%
Windfall Allowance	2,682	23%
<b>Total</b>	<b>11,592</b>	<b>100%</b>

- 2.3.11. Whilst we do appreciate that windfalls can and do play a part in meeting housing requirements, such a heavy reliance on windfalls in this case, in our view, increases the risk of the plan's failure as it undermines its robustness. This was acknowledged in the Inspector's Report for the Site Allocations and Management of Development Plan (30 October 2015), which stated "Reliance on windfalls to achieve the housing requirements of the area clearly does not provide the same level of certainty and commitment as secured through planned allocated sites".
- 2.3.12. In particular, we have concerns that the windfall allowance may not be achievable given the tight boundaries drawn around settlements (such as Cressage) which limits opportunities for such windfalls from occurring. In addition, windfall sites may not necessarily be in the most sustainable locations or have good access to local services and facilities. Their development can sometimes be at odds with other policies, be at the expense of competing land uses, lead to the loss of valued assets or may not be aligned with the community's aspirations.
- 2.3.13. In our view more sites including the Beslow Garden Village (see Appendices 2.2.1 to 2.4.3) should be allocated as an additional site for the plan to be positively prepared and windfalls can provide a buffer of supply above requirement to backfill allocations which do not come forward or do not yield the anticipated numbers. Using the windfall allowance as a buffer and allocating sites to meet the requirement is a positively prepared and justified means of ensuring the housing requirement is met.
- 2.3.14. In our view, by placing too much reliance on meeting the housing requirement from windfall sites, at the expense of allocations, the Plan has not been 'positively prepared', it is 'unjustified' and is 'ineffective'.

## **SETTLEMENT HIERARCHY AND DISTRIBUTION OF DEVELOPMENT**

- 2.3.15. Paragraphs 11, 23 and 67 of the NPPF require authorities to allocate sufficient sites to bring land forward at a sufficient rate to address needs and to deliver the strategic priorities of the area. Paragraph 72 suggests 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.
- 2.3.16. As stated at section 4.1 of our HNA, we have significant doubts over Shropshire's ability to meet the 1,400 dpa housing requirement through the growth that is currently proposed to be directed to Shrewsbury and the Principal and Key Centres and Strategic Settlements (in Policy SP2).



- 2.3.17. As illustrated by Table 3, the Council has identified a total of 31,130 dwellings to be delivered in Shropshire in the plan period (between 2016 and 2038). Compared to the proposed plan requirement of 30,800 dwellings identified in Policy SP2, this supply equates to a surplus of just 330 dwellings or 1%. Clearly this is a dangerously low ‘safety buffer’ which places the plan at risk of failure – this is ‘ineffective’.
- 2.3.18. In addition, the strategy assumes 44% of the total supply is delivered on sites with planning permission or sites allocated but without planning permission. There is a risk that sites with planning permission may not come forward as expected. There is also a significant question surrounding the continued reliance on sites for supply that were SAMDev allocations but have not come forward despite favourable market conditions in Shropshire. Placing reliance on 12% of the overall supply being delivered on saved allocations that have not yet secured permission is a significant risk.
- 2.3.19. Furthermore, the strategic approach set out in Policy SP2 focuses on bringing forward two new strategic settlements at Clive Barracks and the Former Ironbridge Power Station for a total of 1,550 dwellings. Together, these new settlements represent around 5% of the total housing supply or 14% of the residual housing supply. However, should one of them not be delivered, or come forward at a slower rate than anticipated, then this leaves the plan at significant risk of failure. In addition, by virtue of their small scale, in our view they will not provide the critical mass required to form a self-sufficient new settlement as envisaged by paragraph 72 of the NPPF.
- 2.3.20. By not allocating a sufficient supply and mix of sites in sustainable sites, the Plan has not been ‘positively prepared’, it is ‘unjustified’, ‘ineffective’ and ‘inconsistent with national policy’. Increasing the number of strategic sites by including the Beslow Garden Village, promoted in earlier representations (see Appendices 2.2.1 to 2.4.3) would help spread the risk of relying on strategic sites and help the plan meet the tests of soundness.

### **DELIVERABILITY AND LACK OF A SAFETY BUFFER**

- 2.3.21. Paragraph 35 of the NPPF states that, in order to be considered ‘effective’, plans must be deliverable over the plan period. However, as stated above, when comparing the proposed housing requirement of 1,400 dpa against the identified supply (including the windfall allowance), there is an ‘identified’ surplus of just 330 dwellings or 1%. Clearly this is an inadequate ‘safety buffer’ which places the plan at significant risk of failure.
- 2.3.22. Policy SP2 part 2 states “This Local Plan ensures that sufficient land is available to achieve these growth aspirations, however the availability of land will be kept under review to ensure a continuous supply of suitable sites is available”.
- 2.3.23. Paragraph 3.10 adds that “Whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will ‘balance out’ to ensure that the housing requirement is achieved”. Furthermore, paragraph 3.13 states “The annual assessment of the five-year housing land supply will also highlight any issues with the supply or delivery of new dwellings, and whether there is a need to respond through such measures as preparation of a Housing Delivery Action Plan or Local Plan Review”.
- 2.3.24. In our view, these poorly defined and non-committal statements need to be strengthened to allay fears that the appropriate action will be taken at the appropriate time (i.e. to remedy any issues with the supply or delivery of new dwellings). In our view, there is a very high risk that the surplus of 330

dwellings could quickly be eroded, and so we recommend more comfort within the Plan that Shropshire will indeed undertake a five-yearly review and implement the required action(s) – without this, the Plan is ‘ineffective’.

2.3.25. As we set out in Section 4.4 of our HNA (Appendix 1.2.1), the Council has a few alternative options available to give greater confidence that Shropshire’s identified housing requirement will indeed be met within the plan period – the fact that such reasonable alternatives have been rejected without consideration illustrates that the Plan is ‘unjustified’.

2.3.26. In our order of preference, these options are as follows:

- Allocate additional sites for development within the plan period;
- Allocate ‘Plan B’ sites that can be released for development when needed;
- Identify broad ‘Areas of Search’;
- Commit to an early/immediate plan review.

2.3.27. The Beslow Garden Village promoted in earlier representations would be a suitable additional site (first option), or a “Plan B” site for release when needed.

2.3.28. To reduce the risk of plan failure the safety buffer should amount to 10% of the overall housing requirement to meet the requirements of Paragraph 73 of the NPPF. Without incorporating one or more of the above options, in our view the Plan has not been ‘positively prepared’, it is ‘unjustified’, ‘ineffective’ and ‘inconsistent with national policy’.

## SUMMARY OF PLAN MODIFICATIONS

2.3.29. We have identified significant failings with the Regulation 19 draft Plan in respect of its approach to the housing requirement and housing supply, as explored above.

2.3.30. In order to make the plan ‘sound’ (i.e. to be ‘positively prepared’, ‘justified’, ‘effective’ and ‘consistent with national policy’), we request that the following amendments are made:

- **Revisit the strategic approach** – specifically the proposed settlement hierarchy and distribution of development;
- **Accommodate more unmet need from ABCA** – as there is a lack of transparency behind why Shropshire can only accommodate 1,500 homes – in reality, it can support much more. It is unambitious and does not match the County’s economic growth aspirations and we recommend that Shropshire should take 5,500 homes to meet the current needs and the anticipated additional requirement resulting from the uplift of 35% of housing requirement in the West Midlands’ largest cities;
- **Respond to market signals and growth strategy** – evidence of recent completion rates demonstrates the capacity of the county to deliver more and the Economic Growth Strategy demands that. A more appropriate growth strategy would be 2,000dpa.
- **Place less reliance on windfalls** – as currently they represent 23% of the residual housing requirement. The Council ought to be allocating a greater number of sites to ensure there is a truly plan-led approach to development in the County.
- **Identify an additional buffer of sites** – there is a 1% ‘safety buffer’ which places the plan at significant risk of failure. We have identified four potential options to increase confidence in the plan (in order of preference) – allocating additional sites for development within the plan period; allocating ‘Plan B’ sites that can be released for development when needed; identifying broad Areas of Search; or committing to an early/immediate plan review. The buffer should amount to 10% of the total housing requirement; and



- **Allocating more sites, strategic sites and new settlements** – on deliverable sites within the Raby Estate (including at Cressage and Beslow), to ensure that the housing requirement will indeed be met over the plan period.

2.3.31. We would be happy to discuss our representations and suggested amendments in more detail with the Council, prior to Examination with an Inspector.

## 3 REG 19 – WHOLE ESTATE PLANS

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### 3.1 INTRODUCTION

- 3.1.1. This Section considers the strategic policies relating to the preparation of Whole Estate plans and recommends amendments to:
- make it clear how endorsed Whole Estate Plans should be considered in decision making;
  - ensure that development in the countryside is supported where it comes forward as part of an endorsed Whole Estate Plan; and
  - trigger the designation of Community Clusters through the Whole Estate plan making process.
- 3.1.2. This Section should be read in conjunction with the following documents, both submitted to stages of the local plan review consultations and correspondence with planning policy officers:
- Appendix 3.2.1 – Representation to Reg 18: Pre-submission draft: Whole Estate Plans Policy
  - Appendix 3.3.1 – Representation to Strategic Sites Consultation: Whole Estate Plans Policy
  - Appendix 3.4.1 – Officer Correspondence – note of meeting: Whole Estate Plans Policy
  - Appendix 3.4.2 – Officer Correspondence – briefing note: Whole Estate Plans policy
- 3.1.3. Our Regulation 18 consultation representations (Appendix 3.2.1) welcomed the inclusion of a policy on Whole Estate Plans but raised concerns that the wording of the policy would prevent Estates from bringing forward plans that comprehensively respond to local economic, environmental and social conditions. Our Regulation 18 representations suggested amendments to the wording of two policies (Whole Estate Plans and Managing Development in the Countryside).
- 3.1.4. We note that a minor change has been made to the wording of the Whole Estate Plan policy (SP15), however it is disappointing that the more substantial changes we suggested, which would have allowed the full potential of a Whole Estate Plan to be realised, have not been taken forward. Further, we are disappointed that none of the amendments we proposed to the Managing Development in the Countryside policy have been made. Consequently, it is our view that the policy is not compliant with the requirements of the NPPF.
- 3.1.5. For the Whole Estate Plan policy to be effective and provide clear guidance to decision takers, when looking at the plan as a whole, the policy must have an express weight and must be cross referenced in other policies that would otherwise limit development to that when they are applied together they can be without conflict and there clear guidance on the weight to be afforded to Whole Estate Plans as a means of achieving sustainable rural development.

### 3.2 WHOLE ESTATE PLANS – POLICY SP15

- 3.2.1. The amended wording of the Whole Estate Plan policy (SP15) does not adequately address the concerns raised in the previous representation. At 1a) the policy wording has been changed from ‘...complement and do no conflict with the objectives and policies of the local plan’ in the Regulation 18 draft to ‘...complement and are consistent with the objectives and policies of the local plan’ in the Regulation 19 draft.
- 3.2.2. The amended wording removes the requirement for a Whole Estate Plan not to conflict with the Local Plan, which is welcomed. However, it is our view that the wording as proposed is vague, with no clarity within the policy or explanatory notes as to what ‘consistent’ means in this case. It is our view that the policy as written does not provide decision makers with a clear and unambiguous

policy, as required by Part D of Paragraph 16 of the NPPF, against which to assess Whole Estate Plans submitted to the Council for endorsement.

- 3.2.3. The policy as written will continue to prevent the Estate using a Whole Estate Plan to bring forward projects that conflict with Local Plan, undermining proposals that could contribute to the achievement of locally led sustainable development.
- 3.2.4. It is our view that the wording proposed as part of our Regulation 18 submission would provide a clear and unambiguous policy that would support the delivery of sustainable development in rural Shropshire. Therefore, the following changes (in bold) are proposed to Policy SP15 – Whole Estate Plans:
- 3.2.5. Add additional wording to section a) so that it reads:

*1. Whole Estate Plans are a method by which Estates can articulate their long-term vision for their land and premises interests and how these will be achieved. In recognition of the nature of Shropshire, and the potentially important role they play in managing land within the County, Whole Estate Plans prepared by Estates will be endorsed by the Council **and will be given significant weight** in decision making where they have demonstrated all of the following:*

- a. The objectives, policies and land use proposals of the Whole Estate Plan **are in general conformity** with the strategic policies of the Local Plan;*
- b. It has been prepared in collaboration with relevant external organisations, including statutory bodies; and*
- c. It has been subject to meaningful public consultation.*

- 3.2.6. This change would provide a significantly clear decision-making framework for Whole Estate Plans being considered for endorsement. The policy wording proposed is considered to be in accordance with the requirements set out in the NPPF.

### **3.3 MANAGING DEVELOPMENT IN THE COUNTRYSIDE – POLICY SP10**

- 3.3.1. Given the rural nature of Shropshire it is likely that Whole Estate Plans will be prepared for areas that encompass land that falls outside any identified development boundary/settlement type. It is therefore surprising that Policy SP10 (Managing Development in the Countryside) does not refer to Whole Estate Plans in either the policy text or supporting explanatory text to support development that comes forward in accordance with an endorsed Whole Estate Plans. This was the original intention of policy officers when they sought to include a Whole Estate Plan Policy within the local plan (See Appendix 3.4.1).
- 3.3.2. The policy should be amended to ensure that the approach is consistent with the NPPFs requirements for plans to be positively prepared and the requirement that policies are clearly written and unambiguous so that it is clear for decision makers how they should react to proposals (NPPF paragraph 16). The plan in its current format does not provide decision makers with any guidance on how to assess a development proposal in countryside locations that are contained within an endorsed Whole Estate Plan.
- 3.3.3. To address this short coming, and ensure the plan accords with the requirements of the NPPF, additional wording should be added to Policy SP10 to set out how decision makers should positively consider development proposals in the Countryside that are included in endorsed Whole Estate Plans. Policy SP10 should be amended as follows (amendments in bold):

1. The management of development in the countryside will reflect the Plan's urban focused development strategy which seeks to direct the majority of new development to the Strategic, Principal and Key Centres and new Strategic Settlements. Within the rural area, the Plan identifies Community Hubs and Community Clusters as the focus for new development, whilst also supporting new affordable housing provision for evidenced local needs and fostering appropriate rural employment opportunities, subject to the further controls over development that apply to the Green Belt, the AONB and other designated areas.

#### *Economy & Community*

2. Employment, business, operational defence, renewable energy and community development in the countryside will be considered against national policy and the criteria in other relevant policies of this Local Plan which together recognise the need for flexibility in delivering development to support and meet economic, community and associated needs whilst ensuring that development does not result in unacceptable adverse impacts.

3. Sustainable employment, tourism, leisure, other business and community development proposals in the countryside will be positively considered, where they maintain or enhance countryside vitality and character, including through the use of previously developed land, and are consistent with national Green Belt policy and the wider policies of this Local Plan and relate to:

a. Small-scale new economic development diversifying the rural economy, including farm diversification schemes;

b. The retention and appropriate expansion of an existing established business, unless relocation to a suitable site within a settlement or other established or allocated employment location would be more appropriate taking into account operational requirements, infrastructure capacity, environmental and amenity impacts and other relevant material considerations;

c. Agricultural, horticultural, forestry, or mineral related development and other uses related to the management of the land on which they are located, although proposals for large scale new development will be required to demonstrate that there are no unacceptable adverse environmental impacts or that they can otherwise meet the requirements set out in DP12 and DP13 and other relevant policies of the Plan, including for mineral development Policies SP16, DP30, DP31;

d. Sustainable rural tourism, sustainable leisure or sustainable recreation proposals which require a countryside location, in accordance with Policy DP10 (Tourism, Culture and Leisure);

e. Required community uses and infrastructure which cannot be accommodated within settlements; and

f. The sustainable reuse of redundant or disused buildings or replacement of suitably located buildings for small scale economic development / employment generating use.

**g. Employment, business, renewable energy and community development that comes forward as part of a Whole Estate Plan endorsed in accordance with Policy SP15.**

#### *Housing*

4. New market housing will be strictly controlled outside the development boundaries of the Strategic Centre of Shrewsbury, the Principle Centres, the Key Centres, the new Strategic Settlements and



*the Community Hubs. Within Community Clusters only new market housing which meets Community Cluster Policy SP9 criteria will be acceptable. Outside these areas, subject to the further controls that apply in Green Belt, residential development proposals will be positively considered where they meet all the relevant requirements of Local Plan policies, do not lead to an adverse cumulative impact on the character of communities and relate to:*

- a. Suitably designed and located affordable exception site dwellings, entry level exception sites and cross subsidy exception housing schemes which meet evidenced local housing needs and the other requirements of Local Plan Policies relating to affordable exception provision and Green Belt in DP3, DP4, DP5, DP6, DP7 and SP11 where this applies;*
- b. Gypsy and traveller development that meets the requirements of Policy DP8;*
- c. Residential conversions of permanent buildings in locations which are not isolated and are reasonably accessible to services and facilities. Minimal alteration or rebuilding should be required to achieve the development and the conversion scheme must respect any heritage significance the building has, its setting and the local landscape character and avoid harm to natural assets in accordance with Local Plan Policies SP5, SP11, DP12, DP17, DP23, and DP24;*
- d. The optimum viable and sustainable reuse of buildings with heritage significance, particularly where this also secures retention of the building as a significant landscape feature and/or achieves environmental enhancement, and meets the criteria set out in Local Plan Policies SP5, SP11, DP12, DP17, DP23, and DP24. Where buildings are not of heritage significance, any proposal for reuse should evidence how the development will result in an enhancement of the immediate setting which is sympathetic to the local character and context and that the benefits of the development are not otherwise outweighed by other sustainability, Green Belt or Local Plan policy considerations. For all buildings, minimal alteration, extension or rebuilding should be required to achieve the development;*
- e. Schemes for the sympathetic subdivision of existing dwellings which do not exceed the ability of local infrastructure to service the additional dwellings;*
- f. Replacement dwelling houses, where it can be demonstrated the dwelling to be replaced is a permanent structure with an established continuing residential use and that the proposal also meets the general criteria for replacement buildings set out below. Replacement dwellings should not be materially larger and must occupy the same footprint, unless the dwelling is outside the Green Belt and it can be demonstrated why this should not be the case. In the case of replacement rural workers dwellings, it must also be demonstrated that the size and type of dwelling proposed will not prejudice the on-going financial viability of the agricultural holding. Where the original dwelling had been previously extended or a larger replacement is approved, permitted development rights will normally be removed;*
- g. Essential rural workers dwellings, where these are geographically and functionally closely linked to an activity relating to the management of the land, for agriculture, forestry or another land based rural business, on which the dwelling is proposed to be located and where applicants have demonstrated that:*
- i. There are no other existing suitable and available dwellings or other buildings which could meet the need, including any recently sold or otherwise removed from the ownership of the rural business; and*

ii. in the case of a primary dwelling to serve a business without existing permanent residential accommodation, relevant financial and functional tests are met, and it is demonstrated that the business is viable in the long-term and that the cost of the dwelling can be funded by the business. If a new dwelling is permitted and subsequently evidenced as no longer required as an essential rural workers' dwelling, a financial contribution to the provision of affordable housing will be required, calculated in accordance with the current prevailing target rate in relation to the floorspace of the dwelling or, iii. in the case of an additional dwelling to provide further accommodation for a worker who is required to be present at the enterprise for the majority of the time, a functional need is demonstrated, the dwelling and any garage meet the size requirements set out in Paragraphs 1(f) of Policy DP6 in relation to single plot affordable dwellings and if a new dwelling is permitted and subsequently evidenced as no longer required as an essential rural workers' dwelling, a financial contribution to the provision of affordable housing, equivalent to 50% of the difference in the value between the restricted occupancy dwelling and market dwelling will be required.

**h. Suitably designed and located dwellings and housing schemes which meet evidenced local housing needs that come forward as part of a Whole Estate Plan endorsed in accordance with Policy SP15.**

*It will be expected that all such dwellings will be subject to restrictive occupancy conditions and where appropriate any existing dwellings associated with the rural business may also be subject to occupancy restrictions. For primary and additional rural workers' dwellings permitted prior to March 2011, where occupancy restrictions are agreed to be removed, an affordable housing contribution will be required at the current prevailing target rate and related to the floorspace of the dwelling.*

*5. The use of existing holiday let properties as permanently occupied residential dwellings will only be supported if the buildings are of permanent construction, have acceptable residential amenity standards for full time occupation; and, the dwellings are restricted as affordable housing for local people; or, the dwelling design is of exceptional quality (as defined in NPPF paragraph 79); or, the use provides the only viable option to continue to preserve a building which is a heritage asset and, in both cases, any necessary affordable housing contribution necessary is made . All applications would need to demonstrate that the loss of the holiday use would not be detrimental to the local visitor economy.*

#### *General Development Requirements*

*6. To further protect countryside character and safeguard its natural and heritage assets, whilst recognising the significant role of agriculture and land-based activities in Shropshire and supporting rural vitality by retaining a range of community facilities, housing and employment opportunities:*

*a. Proposals for the replacement of buildings which contribute to the local distinctiveness, landscape character and historic environment, will be resisted unless other sustainability considerations can be demonstrated and the requirements of Historic Environment Policy DP23 can be met. Any negative impacts associated with the potential loss of these buildings, including the loss of embodied energy, will be weighed with the need for the replacement of damaged, substandard and inappropriate structures and the benefits of facilitating appropriate rural economic development.*

*b. Where proposals for the re-use of existing buildings require planning permission, if required in order to safeguard their heritage significance and/or other elements of the character of the*



*converted buildings and/or their setting, Permitted Development Rights will be removed from any planning permission.*

*c. Buildings and sites used by community facilities and services such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, will be protected from change of use to dwellinghouses or redevelopment to housing unless it can be satisfactorily demonstrated that the continuing use as a community facility or service, including alternative community uses, would not adversely impact on the well-being the local community in accordance with the Policy SP6 (Health & Well Being) and would be unviable in the longer term.*

*d. Planning applications for agricultural development will be permitted where it can be demonstrated that the development is:*

*i. Of a size/ scale and type which is consistent with its required agricultural purpose and the nature of the agricultural enterprise or business that it is intended to serve;*

*ii. Well designed and located in line with the other requirements of relevant Local Plan policies and where possible, sited so that it is functionally and physically closely related to existing farm buildings; and*

*iii. There will be no unacceptable impacts on environmental quality, including the historic environment and existing residential amenity, and the proposal complies with the requirements of all the other relevant policies of this Local Plan including DP12, DP17, DP18, DP19, DP23 and DP24.*

*e. Development design and layout should positively respond to our changing climate by taking opportunities to maximise energy efficiency (including maximising opportunities for solar gain), minimise carbon emissions and makes efficient use of water, in accordance with relevant policies of this Local Plan.*

*f. Where appropriate, mitigation measures will be required to remove any adverse effects from development on the integrity of internationally designated sites identified within the Habitats Regulations Assessment of the Local Plan and in accordance with Policy DP12.*

## **3.4 MANAGING DEVELOPMENT IN THE COMMUNITY CLUSTERS – POLICY SP9**

- 3.4.1. Policy SP15 requires that Whole Estate Plans are based on proportionate evidence and collaboration with the stakeholders to qualify for endorsement. This process would justify a strategy and proposals to be brought forward in the Whole Estate Plan. In certain circumstances the socio-economic needs of areas within Whole Estate Plans may identify individual or groups of small rural settlements of varying function but with aspirations to maintain or enhance their sustainability through modest levels of appropriate development and therefore suitable for designation as a Community Cluster. However, the draft plan makes no provision for the designation of a community cluster accept through the Neighbourhood Plan process. This is overly restrictive and inconsistent with national policy.
- 3.4.2. Paragraph 11 of the NPPF requires that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.
- 3.4.3. Paragraph 77 requires that in rural areas, planning policies should be responsive to local circumstances and support housing developments that reflect local needs.

3.4.4. Paragraph 81 of the NPPF requires that planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

To ensure consistency with the local plan we recommend a modification to Policy SP9 as follows (shown in bold):

- 1. Community Clusters consist of individual or groups of small rural settlements of varying function but with aspirations to maintain or enhance their sustainability through modest levels of appropriate development.*
- 2. Residential development will be delivered:*
  - a. On saved SAMDev allocations;*
  - b. Through the conversion of existing buildings within or immediately adjoining the built form of the settlement; and*
  - c. On suitable small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings; and*
  - d. By affordable exception sites, cross-subsidy exception sites and entry level exception sites meeting evidenced need and the other requirements of Local Plan Policies.*
- 3. Employment development which is of a type and scale appropriate to the settlement and other non-residential development that benefits the rural community by providing required community facilities and infrastructure will be supported where it can be achieved through the reuse of existing buildings or on suitable sites within or immediately adjoining the built form of the settlement and meets other requirements of Local Plan Policy.*
- 4. To be considered appropriate, development proposals within Community Clusters must also comply with all of the following:*
  - a. Be 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.*
  - b. The design and layout of development positively responds to our changing climate by taking opportunities to maximise energy efficiency (including maximising opportunities for solar gain), minimise carbon emissions and makes efficient use of water, in accordance with relevant policies of this Local Plan;*
  - c. It maintains the integrity of strategically important gaps between settlements.*
  - 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.*
  - e. Any residential development provides an appropriate mix of dwelling types, tenure and affordability in accordance with relevant policies of this Local Plan.*

*f. Cumulatively, any 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.*

*g. 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. h. It positively responds to design criteria and policies identified within relevant Neighbourhood Plans and Community Led Plans.*

*5. The rural area outside the immediate built form of the settlement and between Community Cluster settlements is considered countryside, as such development will be managed in accordance with Policy SP10 and any other relevant policies of this Local Plan.*

*6. Existing Community Clusters are identified within Schedule SP2.2 of Policy SP2. New Community Clusters can be brought forward ~~by the community~~ through the Neighbourhood Plan **or Whole Estate Plan Endorsement** process and will be subject to this Policy and the other requirements of the Local Plan.*

3.4.5. In conclusion, the inclusion of a Whole Estate Plan policy with the Regulation 19 Pre-Submission Draft Local Plan is welcomed, however for the policy to be effective and provide clear guidance to decision makers when looking at the plan as a whole, the policy and associated policies as referred to above need to be amended so they can be applied together without conflict and provide clear weight/precedence to Whole Estate Plans. This is essential for the plan to be considered 'sound' changes need to be made to policy text of Policy SP15 (Whole Estate Plans) and SP10 (Managing Development in the Countryside). In addition to making the plan 'sound' these amendments would allow the full range of benefits of Whole Estate plans to be realised.

3.4.6. The proposed amendments are as follows:

- Add additional wording to Policy SP15 (Whole Estate Plans) to clearly set out how proposals in a Whole Estate Plan that conflict to some extent with the Local Plan should be assessed.
- Add additional wording to Policy SP10 (Managing Development in the Countryside) to include specific reference to Whole Estate Plans.
- Amend the wording of Policy SP9 to allow Community Clusters to be designated through the Whole Estate Plan making process.

## 4 SETTLEMENT POLICIES

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### 4.1 INTRODUCTION

4.1.1. Section 4 considers the settlement policies and recommends amendments to the settlement policies affecting the Much Wenlock place plan area to:

- allocate Shore Lane Cressage (CES ensure sufficient housing and employment land is allocated to meet the needs of the settlement and respond to the Council's strategy for growth corridors;
- ensure that the growth needs of the settlement are deliverable over the plan period in a way that addresses the vitality of the community.

4.1.2. Section 4 should be read in conjunction with the following documents submitted to Shropshire Council either as part of previous reps or as officer correspondence:

- Appendix 4.1.1 – Transport objection to Site ref CES005
- Appendix 4.2.1 – Representations to Reg 18: Pre-submission Draft: Cressage Hub Policies
- Appendix 4.2.2 – Sketch Masterplan of land at Shore Lane
- Appendix 4.2.3 – Community engagement document
- Appendix 4.3.1 – Officer Correspondence - Note of Development Parameters and Benefits
- Appendix 4.3.2 – Shore Lane Transport and Highways Strategy
- Appendix 4.3.3 – Shore Lane Baseline Tree Survey
- Appendix 4.4.1 – Representation to Preferred Sites Consultation: Cressage Hub Policies

### 4.2 MUCH WENLOCK PLACE PLAN AREA

4.2.1. Policy S13 and its associated schedules are unsound. The strategy for the area, and specifically the strategy for Cressage is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, it is not deliverable over the plan period and is inconsistent with national policy.

#### MEETING LOCAL NEEDS

4.2.2. Paragraph 77 requires that local circumstances and local needs should be taken into account in planning policies. The following local circumstances relevant to Cressage and its hinterland should be taken into account in determining future sustainable growth to enhance vitality:

- When assessed via the Barriers to Housing and Services deprivation indices the Severn Valley Ward (within which Cressage is located) ranks among the top 5% of most deprived LSOAs in the country<sup>1</sup>;
- When assessed via the Living Environment deprivation indices the Severn Valley Ward (within which Cressage is located) ranks among the top 4% of most deprived LSOAs in the country<sup>2</sup>;

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<sup>1</sup> Index of Multiple Deprivation (IMD) 2019

<sup>2</sup> Index of Multiple Deprivation (IMD) 2019

- Cressage lacks opportunities for people to live and work in the same area: no significant employment opportunities were recorded in 2017<sup>3</sup>;
- Cressage has no amenity greenspace<sup>4</sup>;
- Improvements to highway safety are required through the village including improving visibility at the War Memorial Junction<sup>5</sup>.

4.2.3. To address local circumstances the draft settlement policies relating to Cressage would need to:

- improve barriers to housing by providing a sufficient supply of high-quality homes to meet the needs of Cressage and its hinterland;
- deliver **employment** opportunities to ensure that residents can choose to live and work in the village;
- deliver adequate **amenity green space** to meet the needs of the whole settlement; and
- deliver **highway safety improvements** at locations identified within the place plan.

4.2.4. The draft policies for Cressage fail to meet the criteria set out above as required by Paragraph 77 of the NPPF and the policies are therefore inconsistent with national policy. As set out in our representations of September 2020 (Appendix 4.2.1) the site and scheme proposed by the Raby Estate responds to local needs by bringing forward a site of sufficient scale to accommodate the future housing needs along with highway safety improvements, amenity green space and local employment. We request a modification to the plan to allocate land at Shore Lane. In the proceeding sections we provide an analysis of the relevant settlement policies of the local plan and the modifications needed to ensure that the local plan is sound.

## LOCAL NEEDS AND STRATEGIC GROWTH ASPIRATIONS

4.2.5. Policy S13 and its subsections are unsound as they do not provide a sufficient supply of homes to address either local needs or the strategic objectives of the local plan and Economic Growth Strategy for Shropshire and are therefore not positively prepared and are inconsistent with national policy.

4.2.6. The number of households recorded in Shropshire in the 2011 census was 129,6746. The number of households in the Much Wenlock Place Plan area at the 2011 census was 2,1397, 1.7% of the total households in Shropshire.

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<sup>3</sup> Shropshire Council Hierarchy of Settlements (2017)

<sup>4</sup> Ibid

<sup>5</sup> Much Wenlock and Surrounding Area Place Plan 2019/2020

<sup>6</sup> ONS - 2011 Census (KS206EW)

<sup>7</sup> ONS – 2011 Census for Buildwas, Cressage, Harley, Kenley, Much Wenlock, Sheinton, Shipton and Much Wenlock parish authority areas.

- 4.2.7. Policy S13.2 of the draft local plan sets a residential guideline of around 80 dwellings. The residential guideline for Much Wenlock is 120 dwellings. This amounts to a total of 9dpa for the draft plan period or 0.9% of the total housing requirement set out in the draft local plan.
- 4.2.8. If growth across Shropshire were planned to be proportionate to the existing distribution of population then the approach for Much Wenlock Place Plan area would equate to approximately half of what it should be. However, the strategic approach – in response to the Economic Growth Strategy (2017-2021) is to focus growth along strategic corridors including the Eastern Belt (M54/A5/A41/A464/A5 and A454/A458)<sup>8</sup>. This growth in the Eastern Belt supports Shropshire's links to the West Midlands region and the role of the West Midlands Combined Authority<sup>9</sup>. In this context Much Wenlock is to act as a Key Centre and contribute towards strategic growth objectives in the east of the County<sup>10</sup>.
- 4.2.9. The policies for the Much Wenlock Place Plan area fail to deliver on the draft plan's strategic objectives: they do not provide sufficient growth to meet the growth projections of the Place Plan area and do not propose additional growth above the needs of the Place Plan area to deliver the Economic Growth Strategy or contribute to the links between Shropshire and the West Midlands region.
- 4.2.10. Due to the inconsistency between Policy S.13 and Policy SP2 and SP14 the plan is not positively prepared. For the policies to be consistent SP13 must meet the growth expectations of the Place Plan area plus the strategic growth objectives that direct investment towards the A458 strategic growth corridor.
- 4.2.11. A positive step towards achieving soundness of policies of the local plan would be to increase the residential guideline in Cressage and to ensure that any development coming forward within Cressage is a mixed residential and employment scheme.

### **DELIVERING HOUSING NEEDS IN CRESSAGE**

- 4.2.12. The residential guideline for the settlement of Cressage is 80 dwellings. As we have set out above in Sections 2 of this report, this amount should be increased to meet the strategic objectives of the local authority area and local needs. With reference to the draft local plan housing requirement, to meet the needs of Cressage and its hinterland, the housing requirement for the village should be 140 dwellings being the expected growth in Cressage plus a proportion of the growth in the hinterland. With reference to our recommended uplift in the overall housing requirement for the Shropshire the housing requirement for the village should be around 220 dwellings.
- 4.2.13. However, even when seeking to meet the 80 dwellings currently proposed, the plan allocations are inadequate to meet the minimum requirement, rendering the plan strategy undeliverable over the plan period and its policies **not effective**.
- 4.2.14. Draft local plan policy S13.2 allocates two sites:

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<sup>8</sup> Draft Local Plan, Policy SP2 and Policy SP14

<sup>9</sup> Draft Local Plan, paragraph 3.28

<sup>10</sup> Draft Local Plan, Policy S13.1(1)



- Land adjoining The Vicarage on A45 for 60 dwellings (CES005)
  - The Eagles public house on A458 for around four dwellings
- 4.2.15. The balance would be provided on windfall sites, assuming the two proposed allocations come forward and yield the number of dwellings suggested. We come back to this point later.
- 4.2.16. Concerning the windfall yield, there is no certainty these can be delivered, not least as Cressage has a tight settlement boundary and policy does not support housing outside settlement boundaries. Indeed, evidence confirm this as only eight dwellings have been completed in the draft local plan period, and not all within the settlement boundary proposed in Policy S13. This leaves a balance of eight dwellings (plus employment) to be delivered over the course of the plan period on windfall sites.
- 4.2.17. Turning to the proposed allocations. Firstly, there is insufficient evidence to demonstrate that site CES005 can be delivered and technical deficiencies with the site access have been identified by Mode Transport Planning (Appendix 4.1.1). Mode conclude that the site relies on land in third party control to deliver sufficient visibility splays for all scenarios, including a reduction in the speed limit. This is a serious and apparently insurmountable shortcoming.
- 4.2.18. Even if the site were deliverable, there is no evidence that 60 dwellings could be provided on site CES005 without significant conflict with other draft policies of the local plan. Draft Policy SP5 of the local plan requires that new development maintains and enhances the character, appearance and historic interest of settlements, street scenes, groups of buildings, individual buildings and the landscape. It also requires that consideration is given to the context, place and local distinctiveness. Similarly Paragraphs 126 and 127 of the NPPF set out national design considerations including the requirement to respond to local character including the surrounding built environment.
- 4.2.19. Site CES005 is 2.2 hectares and therefore the residential density would need to be around 27 dwellings per hectare (gross) to achieve the yield set out in Policy S13.2. This residential density could not be achieved in compliance with SP5 as it would require a density and scheme out of keeping with the character of Cressage and its settlement pattern. If the site were suitable for development, then an appropriate development would yield far fewer dwellings, leaving a shortfall.
- 4.2.20. To further explain this point, consideration should be given to local evidence of residential density consented in other Community Hubs in Shropshire in recent years. Schedule A5(ii) of Appendix 5 of the Draft Local Plan provides evidence of both completions between 2016 and 2019 and sites with planning permission or prior approval as at March 2019 in Community Hubs. We have considered this and also reviewed the details of the planning permissions available on the Shropshire Council planning explorer site in order to identify typical residential densities for sites of a similar size to site CES005. We found that residential density within Community Hubs ranges from 13dph to 20dph. The evidence is presented in Table 3-1 below.

**Table 4-1 – Dwelling density in Shropshire Rural Hubs**

Application Reference	Community Hub	Site Area (ha)	Dwellings	Dwellings per hectare
16/00790/REM	Hinstock	2.59	47	18
16/01747/REM	Baschurch	1.31	25	19

17/02954/REM	Baschurch	2.33	34	15
16/05474/FUL	Shawbury	3.49	50	14
15/05061/REM	Hadnall	1.63	28	17
20/03882/VAR	Hodnet	2.5	51	20
14/02406/OUT	Cross Houses	2.05	40	20
15/00539/OUT	Cross Houses	2.11	28	13

- 4.2.21. This is not surprising given the local characters, housing typologies, local needs and planning policies.
- 4.2.22. Based on this evidence the Harley Road site would only yield 29 to 45 dwellings, (between 31 and 15 dwellings less than the draft policy suggests it can. As such the proposed 60 dwellings is not achievable on the site in a form of development that would meet the design, open space and other policies of the plan. It is thus not sound to rely on the site delivering 60 dwellings, and it ought to be revised down to 40 dwellings.
- 4.2.23. The Eagles pub site has been subject to planning applications for its redevelopment in recent years. A recent appeal in 2019 (ref: [APP/L3245/W/18/3210027](#)) against the refusal of a planning application for the erection of four dwellings within the grounds of the public house plus the conversion of the public house to two dwellings was dismissed on grounds including the loss of a community facility and the harm to a heritage asset. The planning inspector found numerous constraints relating to the redevelopment of the site relating to design matters with effects on the historical significance of the public house and adverse impacts on the street scene. Due to the constraints of the site it cannot be relied on to provide dwellings at all, and certainly not the four dwellings set out within the draft local plan.
- 4.2.24. Therefore, with the concerns over the proposed allocations and windfall deliverability, Cressage is very likely to not be able to meet its housing needs.
- 4.2.25. For all the reasons set out above Policy S13 is **not effective** and modifications to Policy S13.2 are required to ensure the plan is sound. The Raby Estate site at Shore Lane should be allocated as this site is able to deliver the amount of residential development required at a density appropriate to the character of the settlement. The part of the site proposed for residential development is 4.2 hectares and could therefore yield between 55 and 84 dwellings based on the evidence in Table 3-2 above.

## PROVIDING EMPLOYMENT OPPORTUNITIES

- 4.2.26. Policy S13 states that ‘within Cressage, new employment development will be delivered through appropriate small-scale windfall employment development within the settlement’s development boundary’. The delivery of employment development therefore relies on there being suitable land available within the settlement boundary. As we pointed out in Section 4.1.16 above the available space within the settlement boundary provides very limited opportunities for either residential or employment development. This approach is therefore not sound as it is **not effective** and has limited prospects of needed employment being delivered within the plan period.



- 4.2.27. Paragraph 31 requires that policies should be underpinned by relevant and up-to-date evidence. The following evidence should be considered for positively planning for the employment needs of the Much Wenlock Place Plan and specifically Cressage:
- There are no significant employment opportunities in Cressage;<sup>11</sup>
  - Cressage is located within the Eastern Belt strategic corridor where economic activity and investment is prioritised<sup>12</sup>;
  - The large rural areas are home to the majority of Shropshire's small and micro businesses which account for 98.4% of all businesses<sup>13</sup>;
  - The current COVID-19 pandemic has dramatically altered working patterns, with the number of people working from home rising exponentially since the lockdown began in March 2020
- 4.2.28. This evidence establishes the need for employment development in Cressage, the suitability of the location and the need for this to provide flexibility in response to changing patterns of work and provide support for home working activity. The draft plan accepts this in principle but is **not effective** in ensuring delivery and is therefore **not positively prepared** as it does not provide a strategy that meets the objectively assessed needs of the village.
- 4.2.29. The NPPF requires that planning policies should enable the sustainable growth and expansion of all types of business in rural areas at paragraph 83.
- 4.2.30. In order to be effective and provide certainty over the delivery of employment development the policies of the plan should be modified to bring forward a mixed-use scheme within Cressage that provides flexible spaces. Site CES002 is promoted by the Raby Estate as a mixed-use scheme. Section 4.6 of our representation of September 2020 set out the approach to employment space with a mix of uses providing employment space for approximately 23 workers and support for home working through provision of shared facilities and meeting spaces. A modification should be made to the local plan requiring a mixed-use scheme to be delivered on site CES002 (Shore Lane) providing 500sqm of flexible employment space for light industrial and office use.

### **AMENITY OPEN SPACE**

- 4.2.31. To achieve sustainable development the NPPF paragraph 8 requires that the planning system must support strong, vibrant and healthy communities by inter alia fostering a well-designed and safe built environment with accessible services and open spaces that reflect current and future needs. Cressage lacks amenity green space<sup>14</sup> and to be consistent with national policy amenity green space should form a significant part of any new development proposal.
- 4.2.32. At section 4.4 of representation of September 2020 we set out the Raby Estate's approach to the delivery of Green Space and provided an indicative site layout plan showing 1.1 hectares of amenity green space in the centre of the settlement plus 0.68 hectares of amenity green space within the

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<sup>11</sup> Shropshire Council Hierarchy of Settlements (2017)

<sup>12</sup> Draft Local Plan, Paragraph 3.28

<sup>13</sup> Shropshire Economic Development Needs Assessment : Interim Report, Paragraph 2.32 and Table 5.4

<sup>14</sup> Shropshire Council Hierarchy of Settlements (2017)

mixed-use area of the site. This would meet the social objectives set out in the NPPF as it would reflect the current and future amenity green space needs of the community.

- 4.2.33. A modification to policy S13 is recommended that allocates Site CES002.

### **HIGHWAY SAFETY IMPROVEMENT**

- 4.2.34. At Section 4.11 of our representations of September 2020 we set out the Raby Estate's strategy to improving highway safety in the settlement in response to the local needs identified in the Much Wenlock Place Plan.
- 4.2.35. Paragraph 77 of the NPPF requires that in rural areas planning policies should be responsive to local circumstances and support housing developments that reflect local needs and where they will enhance or maintain the vitality of rural communities.
- 4.2.36. To be consistent with national policy the most appropriate strategy for Cressage would be to bring forward site CES002 in order to make improvements to highway safety. We request this modification to the Local Plan with reference to highway safety improvements in the criteria for the development.

### **DELIVERABILITY & CERTAINTY**

- 4.2.37. Raby have a development partner ready to bring the Shore Lane site forward and are committed to delivering employment should the allocation be forthcoming.

### **OTHER BENEFITS**

- 4.2.38. The benefits of the Shore lane site were set out in the representation to the Regulation 18 consultation (Appendix 4.2.1). These are summarised as follows:

#### **Ongoing collaboration with the Community**

- 4.2.39. Raby Estate commits to meaningful and ongoing community participation in the development of the Shore Lane site: this is fundamental to resilient and high quality placemaking. Section 3 of our Regulation 18 representation sets out the Raby Estate's current and ongoing strategy for community collaboration and engagement.

#### **Land value captured for benefit of the local community**

- 4.2.40. Value would be captured for the benefit of the community through the Raby Estate's commitment to delivery of the development through a long term 'patient capital' approach to investment. The estate and its approach to land value capture for the Shore Lane proposal is explored in Section 3 of our Regulation 18 representation.

#### **Long-term stewardship**

- 4.2.41. Community assets and shared spaces incorporated into the proposal will be managed for the long-term benefit of the Cressage community. The Raby Estate is committed to long-term stewardship of the community assets in partnership with the local community. Section 3 of our Regulation 18 representation set out the estate's approach to stewardship for the Shore Lane proposal.

#### **A diverse and sufficient supply of homes**

- 4.2.42. The right number of homes as identified above would be delivered with a housing mix established through robust local evidence.

### A strengthened job offer

4.2.43. Employment space, fully integrated with the residential development, would be delivered to provide a local job offer. New homes would include enough space and the technical capacity for homeworking. Section 4 of our Regulation 18 representation set out the Estate’s approach to supporting a strong local job offer.

### High quality homes

4.2.44. Attractive and imaginatively designed homes with gardens would create a healthy community. Section 4 of our Regulation 18 representation presents Raby Estate’s track record in terms of quality design and shows the progress made so far by leading master planners for the Shore Lane proposal (a layout plan of the site is at Appendix 4.2.2)

### A distinctive place resilient to climate change

4.2.45. The natural and historic environment would be enhanced: heritage assets would inform the character of the built environment and contribute to the sense of place; green infrastructure is incorporated into the designs; net biodiversity gains would be delivered within the village itself or within walking distance on Raby Estate land; and climate resilience in terms of carbon, energy technology and water and waste efficiency would be designed into the proposal. Section 4 of our Regulation 18 representation explores this in detail.

### Movement and connectivity would be enhanced

4.2.46. Accessibility and connectivity in the village would be improved with new walking routes through the village, improvements to highway safety and safer access to public transport. Section 4 of our Regulation 18 representation provides detail on these matters.

## RECOMMENDED AMENDMENTS TO POLICY S13

The table sets out the recommended amendments and additions to Policy S13 to ensure the soundness of the settlement policies of the plan.

### S13.2. Community Hubs: Much Wenlock Place Plan Area

Within the Much Wenlock Place Plan Area, Cressage has been identified as a Community Hub. The residential development guidelines for Cressage is identified below:

Community Hub Settlements	Residential Guideline
Cressage	<b><u>Around 140 dwellings</u></b>
<p>2. Within Cressage, new residential development will be delivered through new residential allocations identified in the Local Plan; appropriate small-scale windfall residential development within the settlements development boundary, as shown on the Policies Map, where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan; and appropriate cross-subsidy and exception development where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan.</p> <p>3. Within Cressage, <b>500sqm floor space of</b> employment development will be delivered through <b><u>a mixed-use allocation</u></b> <del>appropriate small-scale windfall employment development within the settlements development boundary, as shown on the Policies Map,</del> where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan.</p>	

4. Local Plan site allocations within Cressage Community Hub are identified in Schedule S13.2(i) below and identified on the Policies Map. Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan.

5. Development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs.

Schedule S13.2(i). Site Allocations: Community Hubs in the Much Wenlock Place Plan Area

Site Allocation	Development Guidelines	Provision
Cressage Community Hub		
<u>Land at Shore Lane (CES002)</u>	<p><u>Site proposed for broad range of housing with dwelling types and sizes to help meet local housing needs including entry level housing. Site will incorporate employment, amenity green space with improved pedestrian linkages through the village.</u></p> <p><u>The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water risks will be managed by excluding development from the affected areas which will form part of the Green Infrastructure network. Water management measures must not displace water elsewhere.</u></p> <p><u>Access from A458 through new highway access. Traffic calming measures along site frontage and off site highway improvements to be delivered at the Memorial junction in consultation with the local highway authority and local community.</u></p> <p><u>Relevant supporting studies to be undertaken particularly transport assessments, drainage, heritage and especially archaeology interest, ecology, tree and hedgerow surveys and arboriculture surveys.</u></p> <p><u>Recommendations of studies to be clearly reflected in the development scheme.</u></p>	<p><u>Mixed-use development including 80 dwellings and 500sqm light industrial / office floorspace</u></p>



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## 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:	Guy Maxfield
------------------------	--------------

#### 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:	<input type="text"/>	Policy:	<input type="text" value="SP15"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### 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.

The amended wording of the Whole Estate Plan policy (SP15) does not adequately address the concerns raised in the previous representation. At 1a) the policy wording has been changed from '...complement and do no conflict with the objectives and policies of the local plan' in the Regulation 18 draft to '...complement and are consistent with the objectives and policies of the local plan' in the Regulation 19 draft.

The amended wording removes the requirement for a Whole Estate Plan not to conflict with the Local Plan, which is welcomed. However, it is our view that the wording as proposed is vague, with no clarity within the policy or explanatory notes as to what 'consistent' means in this case. It is our view that the policy as written does not provide decision makers with a clear and unambiguous policy, as required by Part D of Paragraph 16 of the NPPF, against which to assess Whole Estate Plans submitted to the Council for endorsement.

The policy as written will continue to prevent the Estate using a Whole Estate Plan to bring forward projects that conflict with Local Plan, undermining proposals that could contribute to the achievement of locally led sustainable development.

For our full response, please see section 3 of the attached 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.

It is our view that the wording proposed as part of our Regulation 18 submission would provide a clear and unambiguous policy that would support the delivery of sustainable development in rural Shropshire. Therefore, the following changes (in bold) are proposed to Policy SP15 – Whole Estate Plans:

Add additional wording to section a) so that it reads:

1. Whole Estate Plans are a method by which Estates can articulate their long-term vision for their land and premises interests and how these will be achieved. In recognition of the nature of Shropshire, and the potentially important role they play in managing land within the County, Whole Estate Plans prepared by Estates will be endorsed by the Council **and will be given significant weight** in decision making where they have demonstrated all of the following:

- a. The objectives, policies and land use proposals of the Whole Estate Plan **are in general conformity** with the strategic policies of the Local Plan;
- b. It has been prepared in collaboration with relevant external organisations, including statutory bodies; and
- c. It has been subject to meaningful public consultation.

This change would provide a significantly clear decision-making framework for Whole Estate Plans being considered for endorsement. The policy wording proposed is considered to be in accordance with the requirements set out in the NPPF.

For our full response, please see section 3 of the attached Representations.

(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:**

To raise issues with the un-sound nature of the Plan, which is considered to be inconsistent with the NPPF, if it proceeds to examination without modification.

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Part A Reference:

Part B Reference:

(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:

G. Maxfield

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:



## Representation Form

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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:	Guy Maxfield
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#### Q1. To which document does this representation relate?

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- 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:	<input type="text"/>	Policy:	<input type="text" value="S1-S21"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (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.

<p>We are concerned that the housing supply which underpins the strategic approach in Policy SP2 is flawed and fails the tests of soundness. By allocating an insufficient supply of sites, relying too heavily on windfalls and strategic sites and failing to accommodate a 'safety buffer', the Plan has not been 'positively prepared', it is 'unjustified', 'ineffective' and 'inconsistent with national policy'.</p> <p>Paragraphs 11, 23 and 67 of the NPPF require authorities to allocate sufficient sites to bring land forward at a sufficient rate to address needs and to deliver the strategic priorities of the area. Again, this is underpinned by the Government's objective of significantly boosting the supply of homes at paragraph 59.</p> <p>Collectively in Policies S1-S21, the Plan allocates 9,110 dwellings over the plan period 2016 to 2038. This has decreased from the Regulation 18 stage when 9,245 dwellings were proposed to be allocated.</p> <p>Within Section 4 of our HNA, we undertook a thorough assessment of Shropshire's housing land supply. We have been advocating that Shropshire should therefore allocate a greater number of sites to ensure there is a truly plan-led approach to development in the County.</p>
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Regardless of whether the Council or the Inspector considers that the housing requirement should be increased (as we set out in our representations above), we believe there are significant failings in the supply of homes proposed in the Plan that need to be addressed regardless of the conclusion of that matter. Should the housing requirement indeed be increased above 1,400 dpa (as is our view), then this position is exacerbated further and there is a much stronger need to significantly increase the supply of homes. It is quite clear from our perspective that Shropshire Council cannot progress the Plan further until this has been resolved.

For our full response, please see section 2 of the attached 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.**

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We have identified significant failings with the Regulation 19 draft Plan in respect of its approach to the housing requirement and housing supply, as explored above.

In order to make the plan 'sound' (i.e. to be 'positively prepared', 'justified', 'effective' and 'consistent with national policy'), we request that the following amendments are made:

Revisit the strategic approach – specifically the proposed settlement hierarchy and distribution of development;

Accommodate more unmet need from ABCA – as there is a lack of transparency behind why Shropshire can only accommodate 1,500 homes – in reality, it can support much more.

It is unambitious and does not match the County's economic growth aspirations and we recommend that Shropshire should take 5,500 homes to meet the current needs and the anticipated additional requirement resulting from the uplift of 35% of housing requirement in the West Midland's largest cities;

Respond to market signals and growth strategy – evidence of recent completion rates demonstrates the capacity of the county to deliver more and the Economic Growth Strategy demands that. A more appropriate growth strategy would be 2,000dpa.

Place less reliance on windfalls – as currently they represent 23% of the residual housing requirement. The Council ought to be allocating a greater number of sites to ensure there is a truly plan-led approach to development in the County.

Identify an additional buffer of sites – there is a 1% 'safety buffer' which places the plan at significant risk of failure. We have identified four potential options to increase confidence in the plan (in order of preference) – allocating additional sites for development within the plan period; allocating 'Plan B' sites that can be released for development when needed; identifying broad Areas of Search; or committing to an early/immediate plan review. The buffer should amount to 10% of the total housing requirement; and

Allocating more sites, strategic sites and new settlements – on deliverable sites within the Raby Estate (including at Cressage and Beslow), to ensure that the housing requirement will indeed be met over the plan period.

For our full response, please see section 2 of the attached Representations.

*(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.**

Office Use Only	Part A Reference:
	Part B Reference:

**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:**

To raise issues with the un-sound nature of the Plan, which is considered to be inconsistent with the NPPF, if it proceeds to examination without modification.

*(Please continue on a separate sheet if necessary)*

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Signature:

G.Maxfield

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Guy Maxfield
------------------------	--------------

#### 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:	<input type="text"/>	Policy:	<input type="text" value="S13"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (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.

Policy S13 and its associated schedules are unsound. The strategy for the area, and specifically the strategy for Cressage is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, it is not deliverable over the plan period and is inconsistent with national policy. For our full response, please see section 4 of the attached 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.**

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To address local circumstances the draft settlement policies relating to Cressage would need to:

- improve barriers to housing by providing a sufficient supply of high-quality homes to meet the needs of Cressage and its hinterland;
- deliver employment opportunities to ensure that residents can choose to live and work in the village;
- deliver adequate amenity green space to meet the needs of the whole settlement; and
- deliver highway safety improvements at locations identified within the place plan.

As such, the following wording is recommended for modification:

**S13.2. Community Hubs: Much Wenlock Place Plan Area**

Within the Much Wenlock Place Plan Area, Cressage has been identified as a Community Hub. The residential development guidelines for Cressage is identified below:

Community Hub Settlements

Residential Guideline

Cressage

Around 140 dwellings

2. Within Cressage, new residential development will be delivered through new residential allocations identified in the Local Plan; appropriate small-scale windfall residential development within the settlements development boundary, as shown on the Policies Map, where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan; and appropriate cross-subsidy and exception development where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan.

3. Within Cressage, 500sqm floor space of employment development will be delivered through a mixed-use allocation appropriate small-scale windfall employment development within the settlements development boundary, as shown on the Policies Map, where it is consistent with Community Hub Policy SP8 and other relevant policies of this Local Plan.

4. Local Plan site allocations within Cressage Community Hub are identified in Schedule S13.2(i) below and identified on the Policies Map. Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan.

5. Development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs.

Schedule S13.2(i). Site Allocations: Community Hubs in the Much Wenlock Place Plan Area

Site Allocation

Development Guidelines

Provision

Cressage Community Hub

Land at Shore Lane (CES002)

Site proposed for broad range of housing with dwelling types and sizes to help meet local housing needs including entry level housing. Site will incorporate employment, amenity green space with improved pedestrian linkages through the village.

Mixed-use development including 80 dwellings

Office Use Only

Part A Reference:

Part B Reference:

	<p><u>The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water risks will be managed by excluding development from the affected areas which will form part of the Green Infrastructure network. Water management measures must not displace water elsewhere.</u></p> <p><u>Access from A458 through new highway access. Traffic calming measures along site frontage and off site highway improvements to be delivered at the Memorial junction in consultation with the local highway authority and local community.</u></p> <p><u>Relevant supporting studies to be undertaken particularly transport assessments, drainage, heritage and especially archaeology interest, ecology, tree and hedgerow surveys and arboriculture surveys. Recommendations of studies to be clearly reflected in the development scheme.</u></p>	<p><u>and 500sqm light industrial / office floorspace</u></p>
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For our full response, please see section 4 of the attached Representations.

*(Please continue on a separate sheet if necessary)*

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- 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:**

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Signature: G. Maxfield

Date: 26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:



## Representation Form

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### Part B: Representation

Name and Organisation:	Guy Maxfield
------------------------	--------------

#### 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:	<input type="text"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
- (Please tick as appropriate).

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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.

We are concerned that the housing requirement which underpins the strategic approach in Policy SP2 is flawed and fails the tests of soundness. By setting an unambitious housing target which fails to accommodate unmet need from neighbouring areas or take account of market conditions, the plan has not been 'positively prepared', it is 'unjustified', 'ineffective' and 'inconsistent with national policy'.  
For our full response, please see section 2 of the attached 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.**

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We have identified significant failings with the Regulation 19 draft Plan in respect of its approach to the housing requirement and housing supply, as explored above. In order to make the plan 'sound' (i.e. to be 'positively prepared', 'justified', 'effective' and 'consistent with national policy'), we request that the following amendments are made:

- Revisit the strategic approach – specifically the proposed settlement hierarchy and distribution of development;
- Accommodate more unmet need from ABCA – as there is a lack of transparency behind why Shropshire can only accommodate 1,500 homes – in reality, it can support much more. It is unambitious and does not match the County's economic growth aspirations and we recommend that Shropshire should take 5,500 homes to meet the current needs and the anticipated additional requirement resulting from the uplift of 35% of housing requirement in the West Midlands's largest cities;
- Respond to market signals and growth strategy – evidence of recent completion rates demonstrates the capacity of the county to deliver more and the Economic Growth Strategy demands that. A more appropriate growth strategy would be 2,000dpa.
- Place less reliance on windfalls – as currently they represent 23% of the residual housing requirement. The Council ought to be allocating a greater number of sites to ensure there is a truly plan-led approach to development in the County.
- Identify an additional buffer of sites – there is a 1% 'safety buffer' which places the plan at significant risk of failure. We have identified four potential options to increase confidence in the plan (in order of preference) – allocating additional sites for development within the plan period; allocating 'Plan B' sites that can be released for development when needed; identifying broad Areas of Search; or committing to an early/immediate plan review. The buffer should amount to 10% of the total housing requirement; and
- Allocating more sites, strategic sites and new settlements – on deliverable sites within the Raby Estate (including at Cressage and Beslow), to ensure that the housing requirement will indeed be met over the plan period.

For our full response, please see section 2 of the attached Representations.

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- 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:**

Office Use Only	Part A Reference:
	Part B Reference:

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*(Please continue on a separate sheet if necessary)*

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Signature: G. Maxfield

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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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:	Guy Maxfield
------------------------	--------------

#### 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.

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Policy SP15 requires that Whole Estate Plans are based on proportionate evidence and collaboration with the stakeholders to qualify for endorsement. This process would justify a strategy and proposals to be brought forward in the Whole Estate Plan. In certain circumstances the socio-economic needs of areas within Whole Estate Plans may identify individual or groups of small rural settlements of varying function but with aspirations to maintain or enhance their sustainability through modest levels of appropriate development and therefore suitable for designation as a Community Cluster. However, the draft plan makes no provision for the designation of a community cluster accept through the Neighbourhood Plan process. This is overly restrictive and inconsistent with national policy. For our full response, please see section 3 of the attached 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.**

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The following modifications to the wording of Policy SP9 are proposed: "6. Existing Community Clusters are identified within Schedule SP2.2 of Policy SP2. New Community Clusters can be brought forward ~~by the community~~ through the Neighbourhood Plan **or Whole Estate Plan Endorsement** process and will be subject to this Policy and the other requirements of the Local Plan."

For our full response, please see section 3 of the attached Representations.

(Please continue on a separate sheet if necessary)

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Yes, I wish to participate in hearing session(s)

(Please tick one box)

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Signature: G. Maxfield

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Guy Maxfield
------------------------	--------------

#### Q1. To which document does this representation relate?

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- 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:	<input type="text"/>	Policy:	<input type="text" value="SP10"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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Given the rural nature of Shropshire it is likely that Whole Estate Plans will be prepared for areas that encompass land that falls outside any identified development boundary/settlement type. It is therefore surprising that Policy SP10 (Managing Development in the Countryside) does not refer to Whole Estate Plans in either the policy text or supporting explanatory text. This approach is not considered to be consistent with the NPPFs requirements for plans to be positively prepared and the requirement that policies are clearly written and unambiguous so that it is clear for decision makers how they should react to proposals (NPPF paragraph 16). The plan in its current format does not provide decision makers with any guidance on how to assess a development proposal in countryside locations that are contained within an endorsed Whole Estate Plan.

For our full response, please see section 3 of the attached Representations.

(Please continue on a separate sheet if necessary)



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To ensure the plan accords with the requirements of the NPPF, additional wording should be added to Policy SP10 to set out how decision makers should positively consider development proposals in the Countryside that are included in endorsed Whole Estate Plans. Policy SP10 should be amended as follows.

It is proposed that '4g' is inserted into Policy SP10 after '3f'. This should say: **"g. Employment, business, renewable energy and community development that comes forward as part of a Whole Estate Plan endorsed in accordance with Policy SP15."**

Further, it is proposed that '4h' is inserted into Policy SP10 after '4gii'. This should say: **"h. Suitably designed and located dwellings and housing schemes which meet evidenced local housing needs that come forward as part of a Whole Estate Plan endorsed in accordance with Policy SP15."**

For our full response, please see section 3 of the attached Representations.

*(Please continue on a separate sheet if necessary)*

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Signature: G. Maxfield

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference: