

# **Shropshire Draft Local Plan Representations to Regulation 19 Submission Draft Consultation**

**Land at Wolverhampton Road, Shifnal**

L&Q Estates Ltd

February 2021

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## 1.0 Introduction

### Purpose

- 1.1 These representations have been prepared by Lichfields on behalf of L&Q Estates (formally Gallagher Estates). They have been prepared in response to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan ('DSLPL') consultation.
- 1.2 The representations focus on the elements of the DSLPL relating to housing and residential site allocations and are written in the context of the L&Q Estates' land interests at Shifnal, which are being actively promoted for residential development. The location of the sites are shown within the accompanying Vision Document, enclosed at **Appendix 1**.
- 1.3 L&Q Estates is seeking the residential allocation of the following:
- SHF022 and SHF023 (Land between Windmill View and The Monument on A464 and which is currently identified as a draft allocation in the DSLPL for 100 dwellings); and
  - Land between Revells Rough, Lamledge Lane and the eastern rail line, (which is currently identified in the DSLPL as existing safeguarded land).
- 1.4 It is a statutory requirement that every development plan document must be submitted for independent examination to assess when it is "sound", as well as whether other statutory requirements have been satisfied (s.20(5) of the 2004 Act). By s.19 of the 2004 Act, in preparing a development plan document a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the National Planning Policy Framework [the Framework].
- 1.5 There is no statutory definition of "soundness". However, the Framework states that to be sound a Local Plan should be:
- 1 **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - 2 **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - 3 **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
  - 4 **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.
- 1.6 In addition, the Framework [para 11] states that:
- "Plans and decisions should apply a presumption in favour of sustainable development.*
- For plan-making this means that:*
- a *Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*



- b *Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - i *The application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

1.7 This report demonstrates that the policy approach within the DSLP require amendments in the context of the tests of soundness established by the Framework.

### Structure of Representations

1.8 Representations to the following Local Plan chapters and policies are provided in this report:

Chapter	Policy
3: Strategic Policies	SP2: Strategic Approach
	SP3: Climate Change
	SP6: Health and Wellbeing
	SP7: Managing Housing Development
	SP11: Green Belt and Safeguarded Land
4: Development Management Policies	DP1: Residential Mix
	DP3: Affordable Housing Provision
	DP20: Water Efficiency
	DP25: Infrastructure Provision
	DP28: Broadband and Mobile Communications Infrastructure
5: Settlement Policies	S15: Shifnal Place Plan Area

### Background to Land at Wolverhampton Road, Shifnal

#### Site Context

- 1.9 The Site is situated to the south-east of Shifnal. The Site currently comprises of agricultural fields and buildings associated with New Park Farm. It extends to 14.20 hectares.
- 1.10 As a whole, the Site is broadly apportioned into three parcels: land to the north-west allocated for housing under SHIF006; land to the east currently proposed as safeguarded land; and land to the south proposed as a housing allocation under SHF022 and SHF023.
- 1.11 To the northern boundary, the Site is defined by the railway line and partial embankment. The eastern boundary of the Site, comprising the safeguarded land, is defined by Lamledge Lane and the southern boundary by the A464 Wolverhampton Road. To the south-east lies RH Fisheries and associated ponds. The western boundary forms the recently consented residential development on behalf of Taylor Wimpey and Gallagher Estates (now L&Q Estates) (Ref: 14/00062/OUT). Access to the safeguarded land would be delivered through the new residential development to the west. The Vision Document at **Appendix 1** sets out in further detail the site and its surroundings.

- 1.12 The Site is located approximately 0.9km south of the town centre which offers a range of shops and services including a doctors' surgery, dentist, optician, pharmacy, post office, newsagent and garage. St Andrews C of E Primary School is located within 0.8km of the Site with Shifnal Primary School within 1.8km and Isdall Secondary School 2km from the Site. Employment opportunities are also within walking distance of the Site along Aston Road and Lamledge Lane.

**Site Promotion**

- 1.13 These representations build on previous representations submitted on behalf of L&Q Estates to the following consultations:
- Shropshire Local Plan Review Consultation on Preferred Sites (November 2018 – February 2019) (submitted under their previous name of Gallagher Estates)
  - Regulation 18: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 (August 2020)

## 2.0 Chapter 3: Strategic Policies

### Policy SP2: Strategic Approach

- 2.1 Principally, L&Q Estates supports the Council's choice to pursue a higher growth option to deliver around **30,800** new dwellings over the 22-year plan period from 2016 to 2038; however, it considers that an increased housing requirement is necessary on the following accounts:
- **Unmet Housing Need (Duty to Cooperate):** given the identified functional relationship with the Black Country Authorities, a contribution of 1,500 dwellings is considered insufficient and should therefore be increased.
  - **Affordable Housing:** the SHMA estimates a need for 799 affordable dwelling per annum, representing a significant step change when compared against recent affordable housing completions, therefore an uplift to the housing requirement is critical to account for acute affordable housing need.
  - **Infrastructure and Economic Growth:** the DSLP's strategic approach responds directly to the Economic Growth Strategy for Shropshire and it is therefore critical that additional housing is delivered in the appropriate locations to complement and facilitate delivery of this Strategy.
  - **Housing Supply:** the Council is only proposing to deliver 1,400 dpa (i.e. existing commitments and new allocations) against an identified housing requirement of 1,400 which consequently does not include any flexibility or headroom.
  - **Housing Trajectory:** the trajectory fails to set out quantified rates of anticipated delivery from site allocations and therefore it is unclear in assessing how each specific site will realistically deliver over the plan period.
- 2.2 The DSLP<sup>1</sup> confirms the Council has undertaken an assessment of its local housing need ('LHN') using the Standard Methodology, indicating a housing need of **25,894** dwellings over the plan period from 2016 to 2038, as at April 2020. L&Q Estates considers this approach is correct and in line with the requirement of NPPF paragraph 60.
- 2.3 The NPPF and Planning Practice Guidance ('PPG') are clear that the LHN figure generated by the standard method is a minimum starting point (i.e. actual housing need may be higher than this figure). It goes on to state that it would be appropriate for a higher figure to be adopted on the basis of employment, infrastructure, unmet housing needs<sup>2</sup>, or affordable housing<sup>3</sup>.
- 2.4 In this regard, the Council purports that the proposed housing requirement not only meets its local housing need, but incorporates a contribution to the unmet housing shortfall of the neighbouring Black Country<sup>4</sup>, as well as providing flexibility and an opportunity to<sup>5</sup>:
- a Respond positively to specific sustainable development opportunities;
  - b Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;
  - c Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;

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<sup>1</sup> Paragraph 3.5

<sup>2</sup> PPG ID: 2a-010-20190220

<sup>3</sup> PPG ID: 2a-024-20190220

<sup>4</sup> Paragraph 3.7

<sup>5</sup> Paragraph 3.6

- d Support the diversification our labour force; and
- e Support wider aspirations, including increased economic growth and productivity.

2.5 It is understood the additional requirement of **4,906** dwellings therefore comprises **1,500** dwellings to meet the unmet housing needs of the Black Country, and **3,406** dwellings to provide flexibility in response to the above opportunities (i.e. increased affordable housing, increased specialist housing, and increased economic growth). The table below demonstrates our understanding of the Council’s proposed housing need and requirement for the plan period 2016-2038.

Table 2.1 Housing need and proposed housing requirement 2016-2038

Housing need/requirement	Dwellings (total)	Dwellings (annual)	Source
Local housing need (standard method)	25,894	1,177	Para. 3.5 <sup>6</sup>
Additional dwellings to provide flexibility	3,406	155	Para. 3.6
Contribution to Black Country unmet need	1,500	68	Para. 3.7
<b>Proposed housing requirement</b>	<b>30,800</b>	<b>1,400</b>	

Source: Draft Shropshire Local Plan

- 2.6 With the proposal to plan for an additional 4,906 dwellings, L&Q Estates welcomes the Council’s implicit recognition that its local housing need figure is a minimum starting point.
- 2.7 It is unclear as to how a figure of 3,406 dwellings to provide flexibility has been derived and specifically to what needs it accommodates.
- 2.8 Although paragraph 3.6 of the DSLP confirms the needs to which this provision responds (that being to support the provision of affordable housing and specialist housing, and to support economic growth), no explicit evidence has been provided which robustly demonstrates whether this quantum of uplift is sufficient in addressing said recognised needs.
- 2.9 Moreover, the Council has failed to demonstrate how a contribution of 1,500 dwellings to meet the Black Country shortfall is appropriate or justified, particularly in the absence of any detailed analysis into the functional economic relationship between Shropshire and the Black Country.
- 2.10 Consequently, L&Q Estates considers that further evidence is required to robustly demonstrate whether an uplift of 4,906 dwellings is sufficient to address the following factors:
- Unmet housing need (Duty to Cooperate);
  - Affordable housing; and
  - Infrastructure and economic growth.
- 2.11 Before these considerations, however, it is worth noting the shortcomings in the Sustainability Appraisal<sup>7</sup> (‘SA’) underpinning the Council’s preferred option for a higher housing growth scenario. Chapter Five confirms that three Housing Requirement Options were assessed against the respective Sustainability Objectives<sup>8</sup>. The Housing Requirement Options are replicated below.

<sup>6</sup> Whilst the Government published an updated version of the standard method following the ‘Changes to the Current Planning System’ consultation of August 2020, the local housing need figure for Shropshire remains unaffected.

<sup>7</sup> Regulation 18 Pre-Submission Draft Shropshire Local Plan 2016 to 2038 – Sustainability Appraisal and Site Assessment – Environmental Report (July 2020)

<sup>8</sup> Paragraph 5.1, page 59

Table 2.2 Housing Requirement Options assessed through the SA

Housing Requirement Scenario <sup>9</sup>	Total number of dwellings	Annual number of dwellings
Option 1: Moderate Growth	26,250	1,325
Option 2: Significant Growth	27,500	1,375
Option 3: High Growth	28,750	1,437

Source: Regulation 18 Pre-Submission Draft Shropshire Local Plan 2016 to 2038 – Sustainability Appraisal and Site Assessment – Environmental Report (July 2020)

- 2.12 Although L&Q Estates supports the sufficient distinction between the reasonable alternatives, as advised by the PPG<sup>10</sup>, the approach is considered flawed on two grounds.
- 2.13 Firstly, the total number of dwellings tested in the ‘Option 3: High Growth’ scenario (28,750 dwellings) does not reflect the 30,800 dwellings identified in the DSLP, thus resulting in the sustainability implications of the proposed housing requirement not being accurately considered.
- 2.14 Secondly, the annualised housing requirement for each of the three options suggests a 20-year plan period has been utilised, as opposed to a 22-year plan period (2016-2038) as proposed in the DSLP. Again, this suggests the sustainability implications of the proposed housing requirement has not been accurately considered.
- 2.15 **L&Q Estates therefore recommends that the Council re-run the appraisal of housing growth options through the SA in order to reasonably conclude on a preferred option which has been robustly tested.**

### **Unmet Housing Need (Duty to Cooperate)**

- 2.16 NPPF paragraph 11b is clear that strategic policies should, as a minimum, provide for housing needs and other uses ‘as well as any needs that cannot be met within neighbouring areas.’
- 2.17 It is also clear that Local Plans should be ‘based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground’ (paragraph 35c).
- 2.18 Principally, L&Q Estates welcomes the Council’s recognition of its functional relationship with the Black Country and commends the positive dialogue undertaken between the relevant bodies through preparation of the DSLP<sup>11</sup>.
- 2.19 However, there is significant concern regarding the quantum of the proposed contribution at 1,500 dwellings.
- 2.20 Within its evidence base, the Council has published its correspondence with the Association of Black Country Authorities (‘ABCA’) comprising the following communications:
- 12.07.2018 - ABCA with Shropshire Council
  - 08.02.2019 - ABCA with Shropshire Council
  - 26.04.2019 - Shropshire Council with ABCA
  - 13.05.2019 - ABCA with Shropshire Council
  - 30.09.2019 - ABCA with Shropshire Council

<sup>9</sup> Pages 62-71

<sup>10</sup> PPG ID: 11-018-20140306

<sup>11</sup> DSLP, paragraph 2.24

- 2.21 In its correspondence of 13.05.2019, Wolverhampton Council (on behalf of the Black Country Authorities) welcomes the opportunity to provide additional evidence to enable Shropshire Council 'to make a positive recommendation to members to allocate land at M54 junction 3 for employment-led mixed use development'<sup>12</sup>.
- 2.22 Crucially, the Black Country Authorities not only indicate a broad location considered appropriate in meeting their employment and housing shortfall, but suggest that a quantum of 3,000 dwellings would be an appropriate contribution:
- 'With the exception of Shropshire, and those areas summarised above, other local authorities are either not currently progressing Local Plan reviews, have very limited physical capacity themselves or consider themselves to be too remote from the Black Country to be able to reasonably meet our needs.*
- In this context, the strategic opportunity at M54 J3 of some 50ha of employment land, supported by provision of 3,000 homes to contribute towards meeting both the employment and housing needs of the Black Country would therefore make significant quantitative headway in addressing unmet needs for both employment land and housing in the Black Country.*<sup>13</sup> [Emphasis added]
- 2.23 ABCA later submitted further communications on 30.09.2019 strongly supporting the potential for land at M54 Junction 3 to be allocated in the DSLP, as well providing further justification relating to the strong functional economic relationship between Shropshire and The Black Country.
- 2.24 **Resultingly, L&Q Estates strongly objects to the Council's proposed contribution of 1,500 dwellings to the Black Country unmet housing need, as opposed to a significantly larger contribution of 3,000 dwellings as suggested by ABCA.**
- 2.25 Moreover, following consultation on 'Changes to the current planning system' in August 2020, the Government published its response in December 2020 confirming that the 20 most populated cities will see an uplift 35% to their local housing need figure.
- 2.26 Wolverhampton is included within the urban centres uplift and therefore its local housing need will increase from 750 dwellings per annum to 1,013 dwellings per annum.
- 2.27 The Black Country Urban Capacity Review (December 2019) confirmed an identified shortfall of around 26,920 dwellings up to 2038. It is therefore clear that the urban centres uplift will exacerbate this shortfall and consequently it is critical that those neighbouring authorities with physical and functional links, such as Shropshire, accommodate the unmet need.
- 2.28 In accommodating increased need from the urban centres uplift, the PPG<sup>14</sup> advises:
- "Where should the cities and urban centres uplift be met?"***
- This increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations. In considering how need is met in the first instance, brownfield and other under-utilised urban sites should be prioritised and on these sites density should be optimised to promote the most efficient use of land. This is to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the service they rely on, making travel patterns more sustainable."* [Emphasis added]

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<sup>12</sup> Page 3

<sup>13</sup> Page 3

<sup>14</sup> PPG ID: 2a-035-20201216

- 2.29 Whilst there is an expectation for Wolverhampton and thus the Black Country to meet the uplift themselves, the PPG confirms this is only expected “*unless it would conflict with national policy.*” In this instance, the Black Country has declared a housing shortfall of 26,920 dwellings up to 2038 and has concluded that that exceptional circumstances exist to trigger a Green Belt review, under NPPF paragraph 138, in order to meet these needs.
- 2.30 Given the under-bounded and constrained nature of Wolverhampton and Sandwell, it is inevitable that the Black Country will be unable to provide for its own housing needs, as required by NPPF paragraph 11(b). L&Q Estates therefore considers it entirely appropriate for the DSLP to incorporate an increased contribution within the housing requirement.
- 2.31 In the absence of a statement of common ground confirming ABCA’s agreement to this quantum of contribution, the Council risks its plan being considered unsound by failing to satisfy NPPF paragraph 35c requiring ‘*joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.*’
- 2.32 Consequently, L&Q Estates considers it entirely appropriate for the existing safeguarded land at Land between Revells Rough, Lamledge Lane and the eastern rail line in Shifnal to be allocated for housing in order to further contribute to the Black Country’s unmet housing need.
- 2.33 This land has already been removed from the Green Belt and safeguarded through the Shropshire Adopted Core Strategy to meet future housing needs. It is therefore already recognised as being suitable for development and is available now in order to come forward through the early years of the new plan period.

**Affordable Housing**

- 2.34 The PPG is clear that ‘*an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*’<sup>15</sup>
- 2.35 As previously discussed, the DSLP proposes to plan for an additional 3,406 dwellings beyond its LHN figure, but it is unclear as to how this additional provision has been derived and to what precise needs it accommodates (i.e. whether this uplift is included to directly meet unmet affordable housing need).
- 2.36 In identifying affordable housing need, the DSLP<sup>16</sup> defers to the Strategic Housing Market Assessment (September 2020) (‘SHMA’), which concludes that 17,574 households will require affordable housing over the plan period 2016-2038, resulting in an estimated need for **799 affordable dwelling per annum**<sup>17</sup>. Such need is significantly greater when compared against recent affordable housing completions:

Table 2.3 Open Market and Affordable Housing Completions in Shropshire

Year	Total Housing Completions (Net)	Affordable Housing Completions (Net)	Percentage of Total Housing Completions that are Affordable (Net)
2014/15	1,155	324	28.1%
2015/16	1,402	227	16.2%
2016/17	1,910	445	23.3%
2017/18	1,876	459	24.5%
2018/19	1,843	260	14.1%
<b>5 Year Total</b>	<b>8,186</b>	<b>1,715</b>	<b>21.0%</b>

<sup>15</sup> PPG ID: 67-008-20190722

<sup>16</sup> Paragraph 4.46

<sup>17</sup> Shropshire Council Strategic Housing Market Assessment Report: Part 2. Paragraph 4.150

Source: Shropshire Council Strategic Housing Market Assessment Report: Part 2. Table 37

2.37 Firstly, it should be noted that the DSLP<sup>18</sup> erroneously indicates an estimated need of ‘799 *households per year*’ as opposed to affordable  *dwellings*  per year. It is therefore requested that this is amended accordingly to reflect the need for dwellings and not households.

2.38 Secondly, L&Q Estates wholly disagrees with the observations and assertions of the SHMA and subsequently its conclusion to not recommend an uplift to the housing requirement based on acute affordable housing need:

- *‘To deliver the aspirations for affordable housing as identified through the assessment of affordable housing need... total housing development would have to be approximately 83,686 dwellings over the Local Plan period from 2016 to 2038 or 3,804 dwellings per annum, more than 3 times the calculated LHN... This significantly exceeds expected demand and crucially is considered undeliverable and inappropriate within the Shropshire housing market.’* (paragraph 4.152)
- *‘...the extent to which the housing requirement would need to exceed the LHN in order to meet aspirations for affordable housing would be undeliverable and inappropriate in a Shropshire context.’* (paragraph 4.154)
- *‘If an adjustment cannot be made that would help to deliver the required number of affordable dwellings, there is a need to consider whether any adjustment is appropriate. Ultimately any such adjustment must not result in the housing requirement becoming undeliverable and be delivered through a plan led approach. As such any decision regarding the housing requirement is a policy consideration.’* (paragraph 4.155)

2.39 Principally, this approach is considered wholly unjust as it prematurely disregards an uplift to the LHN before assessing whether an increased housing requirement would be deliverable in the context of the Plan’s deliverability.

2.40 Moreover, it is considered unreasonable to assert that an uplift to the LHN would render the housing requirement undeliverable when compared against historic annual housing completions:

Table 2.4 Total Housing Completions in Shropshire (2016/17-2018/19)

Financial Year	Annual Requirement	Total Housing Completions	Over Provision/Shortfall
2016/17	1,390	1,910	+520
2017/18	1,390	1,876	+486
2018/19	1,390	1,843	+453

Source: Shropshire Council Five Year Housing Land Supply Statement (16th March 2020) Table 4

Note: Annual requirement identified using housing trajectory from the supporting text of Policy CS10 of the Core Strategy.

2.41 Given that recent annual housing completions have been, on average (1,876 dpa), approximately 60% greater than the current LHN (1,177 dpa), L&Q Estates consider that an uplift to account for acute affordable housing need is unlikely to render the housing requirement, and thus the Plan as a whole, undeliverable.

2.42 Conclusively, L&Q Estates recommends that the Council affords further consideration to an uplift of its LHN to account for acute affordable housing need, and subsequently adjusts its housing requirement to reflect this.

<sup>18</sup> Paragraph 4.46



## **Infrastructure and Economic Growth**

- 2.43 The PPG highlights that where there are *'strategic infrastructure improvements that are likely to drive an increase in the homes needed locally'*<sup>19</sup>, it may be appropriate to plan for a higher figure than the standard method indicates.
- 2.44 The DSLP<sup>20</sup> makes clear that the proposed strategic approach *'responds directly to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections.'*
- 2.45 In particular, the Economic Growth Strategy for Shropshire ('EGS') identifies a number of strategic corridors and growth zones, most notably the M54/A5 East growth corridor<sup>21</sup>. It also recognises that the *'delivery of high quality infrastructure to meet the needs of businesses and residents is essential to the implementation of this economic growth strategy for Shropshire'*<sup>22</sup>.
- 2.46 In this respect, L&Q Estates considers the Council should consider whether an increase in the LHN figure would be required to support such strategic infrastructure improvements, as advised by the PPG.
- 2.47 By way of example, an increase in the housing requirement could provide the funding required to invest in services and facilities and provide the funding required to improve and support the infrastructure packages identified in the EGS. Notably, the EGS recognises that given the *'ever tightening public purse and the increasingly competitive environment to secure public investment into infrastructure'*, the Council must *'look at innovative ways to deliver schemes'*<sup>23</sup>.
- 2.48 Crucially, funding and investment are likely to be seen as significant limitations for delivery of local infrastructure projects. An increase in the delivery of housing, and thus private investment associated with this, can offer the funding necessary to facilitate this.
- 2.49 In this regards, L&Q Estates considers that the safeguarded site at 'land between Revells Rough, Lamledge Lane and the eastern rail line' at Shifnal should instead be allocated for housing to meet needs within the plan period rather than beyond 2038.
- 2.50 Moreover, the settlement of Shifnal is strategically located within the M54 corridor: accordingly, the Economic Growth Strategy seek to prioritise investment in strategic locations and growth zones along strategic corridors. Additionally, Shifnal is identified as a sequentially preferable location for major employment development into the County under draft Policy SP14 (Strategic Corridors), including 39 hectares Land east of Shifnal Industrial Estate, located within walking and cycling distance of 'land between Revells Rough, Lamledge Lane and the eastern rail line'.
- 2.51 It therefore prevails that should the Council be required to identify new sites for housing, allocating 'land between Revells Rough, Lamledge Lane and the eastern rail line' would align with the proposed growth distribution strategy and, moreover, locating housing nearby to employment helps prevent unsustainable commuting patterns.
- 2.52 A Vision Document has been prepared and is submitted alongside these representations. It demonstrates that the land at sites SHF022 and SHF023 is capable of delivering 100 dwellings, with the safeguarded land able to deliver a further 240 dwellings, alongside open space and necessary highway infrastructure.

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<sup>19</sup> PPG ID: 2a-010-20190220

<sup>20</sup> Paragraph 3.26

<sup>21</sup> Page 9

<sup>22</sup> Page 18

<sup>23</sup> Page 19

## Housing Supply

- 2.53 The Council is only proposing to deliver 1,400 dpa (i.e. existing commitments and new allocations) against an identified housing requirement of 1,400 dpa<sup>24</sup> and therefore does not include any flexibility as per NPPF paragraph 11 which requires that Local Plans should be “sufficiently flexible to adapt to rapid change”.
- 2.54 In practice, this means ensuring a housing trajectory has sufficient land supply across the plan period so that it can adjust and accommodate any unforeseen circumstances, such as a degree of flexibility in delivery rates and densities. Critically, this means that to achieve a housing requirement a Local Plan must release sufficient land, or allow sufficient headroom so that there is an appropriate buffer within the overall planned supply.
- 2.55 At present, the Council’s proposed growth strategy would only just meet the proposed 30,800-dwelling housing requirement. It does not allow for any flexibility to respond to changing circumstances. If any single component of supply does not come forward or if, for example, the strategic allocations fall behind the timescales implied by the Council, the housing figure is unlikely to be fulfilled and the housing needs will not be met.
- 2.56 As such, it is necessary for the Council to identify additional suitable land supply (i.e. more than needed to meet the housing requirement) to ensure that there is the flexibility to respond to failures to deliver the required dwellings in the allotted time frames and across the whole plan period.
- 2.57 In essence, it is strongly recommended that greater flexibility be built into the Local Plan Review. To this end, L&Q Estates recommends that a circa 5-10% headroom should be included in the housing requirement. In doing so, the Council will need to identify sites to facilitate the delivery of between **circa 1,500–3,000 dwellings**.
- 2.58 Such an approach has been considered appropriate and thus supported by various Inspectors through Local Plan Examinations, for example through the Aylesbury Vale Local Plan and, more recently, at the Local Plans for Cherwell District Council and South Oxfordshire District Council.
- 2.59 In the case for Aylesbury Vale, supported the Council’s approach to include a 5.2% buffer in its proposed housing requirement: “*I have previously agreed with AVDC that it is appropriate to apply a 5.2% buffer to cover uncertainties of delivery.*”<sup>25</sup>

## Housing Trajectory

- 2.60 Appendix 7 of the DSLP provides information on expected delivery timescales for Local Plan allocations. However, the trajectory fails to set out quantified rates of anticipated delivery from site allocations and therefore it is unclear in assessing how each specific site will realistically deliver over the plan period.
- 2.61 This proposed approach clearly does not accord with NPPF paragraph 73 which requires:  
*“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.”*
- 2.62 Given that the Council has not included any buffer to its land supply in meeting housing needs, it is critical that the anticipated annualised rate of delivery for the proposed strategic allocations is set out. Such an approach in including a trajectory is highly advised by the Planning Advisory Service (‘PAS’) in its Good Plan Making Guide:

<sup>24</sup> Paragraph 3.10-3.11

<sup>25</sup> Page 1 of ‘Inspector’s response to Council’s reply to his Discussion Document D5’, Doc. Ref. ED181

*“The local plan should contain a housing trajectory or provide a Housing Implementation Strategy in the evidence base (sometimes this is combined with an Infrastructure Delivery Strategy. This is used to demonstrate housing delivery against housing need. Some authorities are seeking to “backload” their housing trajectories citing the poor housing market as a reason for doing so. However, the point about the trajectory is that it should relate to housing need. There is little point in planning to provide additional housing in the latter part of the plan period if the need is for housing in the early plan period. Thus to be effective housing policies need to be closely related to where and when the housing need is anticipated.” (Paragraph 6.13)*

2.63 From the trajectory, the Council assumes that a number of larger strategic sites will begin delivering in the short- to medium-term (2020/21 to 2029/30) including:

- Strategic Settlement: Clive Barracks Tern Hill (indicative capacity of 750 dwellings)
- Strategic Settlement: Ironbridge Power Station (1,000 dwellings)
- Sustainable Urban Extension: Land between Mytton Oak Road and Hanwood Road, Shrewsbury (SHR060, SHR158 & SHR161) (1,500 dwellings)

2.64 Clearly, these represent unrealistic delivery rates which not only justifies the need for a quantified housing trajectory set out on an annualised basis, but warrants the Council to decrease the figure assumed for supply within the plan period. Additionally, approximately 80% of the sites identified within the trajectory are anticipated to deliver during a 5-year period in the medium term (2025-30), representing a heavily skewed and disproportionate approach.

2.65 In considering the likely lead-in times and delivery rates of large strategic settlements, Lichfield’s *Start to Finish* research has informed several Independent Examinations (including the adopted North Essex Shared Strategic Plan; the adopted Ashford Local Plan; the emerging Mendip Local Plan; and the emerging Doncaster Local Plan).

2.66 *Start to Finish* (Second Edition) identifies that the average timescale of validation of an outline application to completion of the first dwelling for sites of between 500-999 dwellings is **5 years**<sup>26</sup>. Additionally, the research also finds that the average build-out rate for sites of between 500-999 dwellings is **68 dpa**<sup>27</sup>.

2.67 L&Q Estates therefore recommends that the Council provides additional quantitative detail to the trajectory in order to clearly illustrate the anticipated delivery rates of sites across the plan period.

### **Policy SP3: Climate Change**

2.68 Policy SP3(1)(f) requires new development to reduce carbon emissions through a number of means, including *“wherever possible, integrating electric vehicle charging infrastructure into new development, in line with the requirements of DP12”*.

2.69 L&Q Estates are supportive of the encouragement for the use of electric and hybrid vehicles but consider this should be secured through a national standardised approach implemented through the Building Regulations. This will ensure a consistent approach to future proofing the housing stock.

2.70 In this regard, the Department of Transport undertook a consultation on *Electric Vehicle Charging in Residential and Non-Residential Buildings* in July 2019. This consultation set out

<sup>26</sup> Lichfields *Start to Finish* (Second Edition) Figure 4

<sup>27</sup> Lichfields *Start to Finish* (Second Edition) Figure 7

the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which was expected to come into force in 2020.

2.71 The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and considered a proposal for one charge point per dwelling rather than per parking space.

2.72 The Government estimated installation of such charging points add on an additional cost of approximately £976 per car parking space for an average home<sup>28</sup>.

2.73 The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible:

*'However, we recognise that the cost of installing chargepoints can be high in areas where significant electrical capacity reinforcements are needed. To mitigate any potential negative impact on housing supply as a result of these regulations, this consultation seeks views on an appropriate exemption from the chargepoint installation requirement based on the grid connection cost. The consultation proposes the threshold for the exemption is set at £3600, which is three times the high scenario cost of the average electrical capacity connection required for one chargepoint.'*

2.74 In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied:

*'The EPBD also sets out requirements for residential buildings undergoing major renovation with more than 10 parking spaces. As a starting point, the government proposes to transpose the EPBD requirements for major renovations - i.e. the installation of cable routes in all parking spaces in scope as we think this is a proportionate requirement. However, the consultation seeks views on the possibility of going further than the EU requirements.'*

2.75 The requirement for EVCPs should be deleted given the Government's proposed changes to Building Regulations are still at the consultation stage and therefore have not been finalised.

2.76 Notwithstanding, L&Q Estates endorses the Council's requirement for development to support the transition to a zero-carbon economy and considers that its land interests at Shifnal would look to support this transition to a zero-carbon economy.

## **Policy SP6: Health and Wellbeing**

2.77 L&Q Estates supports the Council's proposed approach to Policy SP6, and particularly the requirement that *'new development should ensure the health and well-being of individuals, communities and places.'*

2.78 In this respect, L&Q Estates considers that its land interests at Shifnal are well situated to accommodate residential development, as new dwellings would be located close to existing green spaces and the proposed site layout will promote walking and cycling.

2.79 Additionally, the proposed development is well located to existing and future planned employment opportunities, community facilities and transport connections, and should therefore be considered favourably in the context of Policy SP6(3).

2.80 A Vision Document supporting these representations is enclosed at **Appendix 1**, and further outlines how the proposed development in well placed to align with the objectives of Policy SP6.

<sup>28</sup> DfT (July 2019) *Electric Vehicle Charging in Residential and Non-Residential Buildings*, page 7

## **Policy SP7: Managing Housing Development**

2.81 Paragraph 3.51 of the Explanation text confirms that *‘Appendix 7 of the Local Plan provides information on expected delivery timescales for Local Plan allocations.’*

2.82 NPPF paragraph 73 requires the following:

*‘Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites.’*

2.83 As per its response to Policy SP2, L&Q Estates raises significant concern regarding the form of the proposed housing trajectory in that it fails to adequately detail the specific expected rate of housing delivery over the plan period.

2.84 The failure to outline specific delivery rates from the identified housing allocations renders the Policy SP7 unsound given its conflict with the requirement of NPPF paragraph 73.

## **Policy SP11: Green Belt and Safeguarded Land**

2.85 The NPPF allows for the identification of areas of safeguarded land between the urban area and the Green Belt to meet longer term development needs stretching well beyond the plan period.

2.86 NPPF paragraph 139(d) makes clear that the safeguarded land is not allocated for development at the present time and that planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development.

2.87 DSLP Policy SP11(2) confirms that *‘safeguarded land, being land removed from the Green Belt for future development needs beyond the current Local Plan period, is shown on the Policies Map.’* DSLP paragraph 3.103 further outlines:

*“Whilst safeguarded land has been removed from the Green Belt it has been specifically identified in order to meet any sustainable development needs that may exist beyond the Plan period and remains unavailable for permanent development until allocated by a future Local Plan. The Policies Map shows the locations of safeguarded land in Shropshire”*

2.88 Principally, whilst L&Q Estates supports the Council’s overall strategy in safeguarding land, it considers the approach taken as to the quantum of safeguarded land is over-cautious.

2.89 Instead, it recommends that safeguarded land is allocated for housing through this Local Plan review to meet the needs within this plan period, rather than beyond 2038, for the following reasons:

- 1 An increased housing requirement under draft Policy SP2 is necessary (see response to Policy SP2) to ensure:
  - a Flexibility is built in to identified housing land supply;
  - b The ‘duty to cooperate’ is satisfied;
  - c Affordable housing needs are met;
  - d Infrastructure and economic needs are met.
- 2 In identifying additional sites to deliver an increased housing requirement, safeguarded sites should be considered ahead of other sites given that they have been assessed and identified as acceptable in principle for development.

2.90 Table SP11.1 outlines the Green Belt release by location and type, as replicated below.

Table 2.5 Green Belt Release by Location and Type

Location	Housing (ha)	Mixed Use (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded Land (ha)	Total (ha)
Albrighton	-	-	-	-	19.9	<b>19.9</b>
Alveley	1.4	2.4	-	-	3.6	<b>7.4</b>
RAF Cosford Strategic Site	-	-	-	214.2	-	<b>214.2</b>
Shifnal	-	-	39.0	-	92.8	<b>131.8</b>
Stanmore (Bridgnorth)	-	-	11.4	-	-	<b>11.4</b>
<b>Total</b>	<b>1.4</b>	<b>2.4</b>	<b>50.4</b>	<b>214.2</b>	<b>116.3</b>	<b>384.7</b>

Source: DSLP, Table SP11.1

- 2.91 As above, the DSLP through draft Policy SP11 identifies three areas of safeguarded land, in Albrighton, Alveley and Shifnal respectively, to meet longer-term development needs. The Council does not specify to what development type this land relates (whether for housing, employment, or mixed-use) and consequently does not indicate an indicative capacity which, if released for development beyond 2038, could be accommodated.
- 2.92 In respect of housing needs beyond 2038, the Council's local housing need figure amounts to 1,177 dpa: using this as a basis for quantifying longer term development needs, this would amount to circa 5,900 dwellings over the 5 years beyond 2038. The Council has not specified a period beyond 2038 for which the safeguarded land is intended to accommodate, however 5 years in this instance is considered appropriate.
- 2.93 As currently proposed, the total amount of safeguarded land at 116.3 ha could yield between circa 2,900 and 3,500 dwellings (at a density of between 25 and 30 dwellings per hectare respectively).
- 2.94 Additionally, it is evident that there are other sources of housing supply that will help meet longer term housing needs in addition to the areas of safeguarded land. In particular, it is likely that the following allocations will continue to contribute to meeting the housing needs of Shropshire in the period beyond 2038:
- Strategic Settlement: Clive Barracks Tern Hill (indicative capacity of 750 dwellings)
  - Strategic Settlement: Ironbridge Power Station (1,000 dwellings)
  - Sustainable Urban Extension: Land between Mytton Oak Road and Hanwood Road, Shrewsbury (SHR060, SHR158 & SHR161) (1,500 dwellings)
  - Tasley Garden Village, Bridgnorth (BRD030) (1,050 dwellings and 16ha employment land)
  - Strategic Site: RAF Cosford
- 2.95 As set out in its response to draft Policy SP2, L&Q Estates considers that the Council's 'Forecast of Delivery Timescales for Local Plan Allocations' (Schedule A7) lacks sufficient details on the anticipated delivery rates of allocations; resultingly, the DSLP assumes an unrealistic and over-ambitious build-out rate of housing within the plan period, and thus a number of sites including the above strategic sites are likely to continue to deliver beyond 2038.
- 2.96 Consequently, the combined housing figure for these three sites, and numerous other sites in the trajectory, in the period beyond 2038 could be in the order of 3,000 dwellings. In addition to the 116.3 ha of safeguarded land, the Council can clearly identify a supply of more than 5,900 dwellings over the 5 years beyond 2038.

- 2.97 In this regards, L&Q Estates considers that the safeguarded site at 'land between Revells Rough, Lamledge Lane and the eastern rail line' in Shifnal should instead be allocated for housing to meet needs within the plan period rather than beyond 2038.
- 2.98 Not only will it be able to contribute to an increased housing requirement necessary for the delivery of Policy SP2 (Strategic Approach), but the settlement of Shifnal is identified favourably as a location for growth: under both the proposed distribution of development through Policy SP2(5), and as a sequentially preferable location for major employment development into the County under draft Policy SP14 (Strategic Corridors).
- 2.99 It therefore prevails that should the Council be required to identify new sites for housing, allocating 'land between Revells Rough, Lamledge Lane and the eastern rail line' would align with the proposed growth distribution strategy and, moreover, locating housing nearby to employment helps prevent unsustainable commuting patterns.
- 2.100 A Vision Document has been prepared and is submitted alongside these representations. It demonstrates that the land at sites SHF022 and SHF023 is capable of delivering 100 dwellings, with the safeguarded land able to deliver a further 240 dwellings, alongside open space and necessary highway infrastructure.

## 3.0 **Chapter 4: Development Management Policies**

### **Policy DP1: Residential Mix**

- 3.1 Policy DP1(3) requires that *'all affordable dwellings will achieve the nationally described space standard'* and that *'all open market dwellings are strongly encouraged to comply with the nationally described space standard'*.
- 3.2 Should the Council wish to apply the optional nationally described space standards ('NDSS') to both market and affordable new-build dwellings, this should be done in accordance with Footnote 46 of NPPF Paragraph 127(f): policies may *'make use of the nationally described space standard, where the need for an internal space standard can be justified.'*
- 3.3 In justifying the requirement for NDSS on affordable dwellings, it is noted that an explanation is provided through the DSLP at paragraphs 4.7-4.16. However, whilst the justification makes reference to the SHMA, at paragraph 4.11-4.12, it is noted that the SHMA itself undertakes no assessment or analysis of the need for NDSS on either affordable or market new-build dwellings. Consequently, it is understood that justification for this policy requirement is set out solely through the DSLP at paragraphs 4.7-4.16.
- 3.4 As set out under Paragraph 31, all policies should be *'underpinned by relevant and up-to-date evidence'*, and *'should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned.'* Additionally, the PPG<sup>29</sup> sets out:  
*'Where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Local planning authorities should take account of [need, viability and timing]'*
- 3.5 In this regard, paragraph 4.11 refers to a finding of the SHMA which identified overcrowding in 11% of social rented accommodation. Clearly, social rented accommodation represents only one tenure of affordable housing; such a finding disregards other affordable housing tenures, whereby households in Shropshire may not necessarily experience overcrowding, and thus does not represent the overall trend.
- 3.6 The Council also speculates on the impact of the 'bedroom tax' on overcrowding within the social rented sector; it provides no further evidence otherwise justifying the need for NDSS on new-build affordable housing.
- 3.7 L&Q Estates consider the Council has erroneously conflated the issue of overcrowding with the need for NDSS. Simply put, NDSS assists in mitigating impacts from overcrowding and does not in itself reduce the level of overcrowding. Whilst overcrowding in the region may be an issue requiring tackling, the Council should consider it a symptom of an under-supply of housing<sup>30</sup>.
- 3.8 Before adopting the NDSS, the Council should provide an accurate local assessment evidencing the case for Shropshire as this has not been demonstrated, and thus the policy requirement fails the test of soundness and should be removed.

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<sup>29</sup> PPG ID: 56-020-20150327

<sup>30</sup> Wilson & Barton (2020) *Tackling the under-supply of housing in England*, House of Common Briefing Paper No. 07671



### **Policy DP3: Affordable Housing Provision**

- 3.9 As concluded in its response to draft Policy SP2 (Strategic Approach), L&Q Estates recommends that the Council affords further consideration to an uplift of its LHN to account for acute affordable housing need, and subsequently adjusts its housing requirement to reflect this.

### **Policy DP20: Water Efficiency**

- 3.10 Policy DP20(1) requires that *'new housing will be expected to meet the Building Regulations 110 litres per person per day standard for water as recommended by the Shropshire Water Cycle Study.'*
- 3.11 In determining the standard which should be applied to new dwellings, the PPG<sup>31</sup> confirms:  
*'All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.'*
- 3.12 Should the Council wish to adopt the higher optional standard for water efficiency of 110 litres per person per day, a clear need for this should be established based on the following, as also advised by the PPG:
- existing sources of evidence.
  - consultations with the local water and sewerage company, the Environment Agency and catchment partnerships.
  - consideration of the impact on viability and housing supply of such a requirement.
- 3.13 The *Shropshire Water Cycle Study (2020)*, which forms part of the Council's evidence base, confirms that the regions served by Severn Trent and United Utilities are areas of 'moderate' water stress and that Shropshire is not in an area of high water stress compared with the south and east of England<sup>32</sup>.
- 3.14 The requirement for the higher water efficiency standard is unsound because it is unjustified and inconsistent with national policy. This policy requirement should be deleted.

### **Policy DP25: Infrastructure Provision**

- 3.15 L&Q Estates supports the Council's proposed approach to Policy DP25, and particularly the requirement that *'new development only take place where there is sufficient existing infrastructure capacity available.'*
- 3.16 In this respect, L&Q Estates considers that its land interests at Shifnal are well situated to accommodate residential development, as new dwellings would be located close to existing green spaces and the proposed site layout will promote walking and cycling.
- 3.17 Additionally, the proposed development is well located to existing and future planned employment opportunities, community facilities and transport connections, and should therefore be considered favourably in the context of Policy DP25.
- 3.18 A Vision Document supporting these representations is enclosed at **Appendix 1**, and further outlines how the proposed development is well placed to align with the objectives of Policy DP25.

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<sup>31</sup> PPG ID: 56-014-20150327

<sup>32</sup> Shropshire Water Cycle Study (2020) paragraph 4.6.1

## **Policy DP27: Broadband and Mobile Communications Infrastructure**

- 3.19 Policy DP27(3) requires that residential development will be expected to deliver ‘*gigabit-capable broadband infrastructure using ‘fibre to the premises’ technology wherever practical’ or ‘alternative gigabit-capable technologies where justified for reasons including viability, distance from the network or other constraints preventing “fibre to the premises”.*
- 3.20 DP27(4) requires residential development to deliver ‘*passive ducting wherever possible, to facilitate the delivery of competitive fibre broadband services.*’
- 3.21 L&Q Estates consider the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in the statutory Building Regulations.
- 3.22 In the Budget 2020<sup>33</sup>, the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband<sup>34</sup>.
- 3.23 The Department for Digital, Culture, Media and Sport subsequently outlined its intentions on the practical workings of this legislation through ‘*Press Release: New-build homes to come gigabit-speed ready*’<sup>35</sup>:
- 3.24 ‘*The government will amend building regulations to guarantee that all new homes have the right infrastructure to support gigabit broadband and housing developers must work with network operators to install internet speeds of over 1,000 megabits per second (Mbps) in new-build homes, up to a cost cap of £2,000 per dwelling.*’
- 3.25 The Press Release confirmed the requirement will apply to all to new builds development, and that the new measures will place responsibilities on both developers and network operators. It also confirms that the legislation is to be laid as soon as parliamentary time allows and will be laid as secondary legislation so that it can be introduced quicker.
- 3.26 As a result, the proposed requirements of Policy DP27 are unnecessary and repetitive of Building Regulations and should therefore be deleted.

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<sup>33</sup> HM Treasury (11<sup>th</sup> March 2020)

<sup>34</sup> Paragraph 2.79, page 77

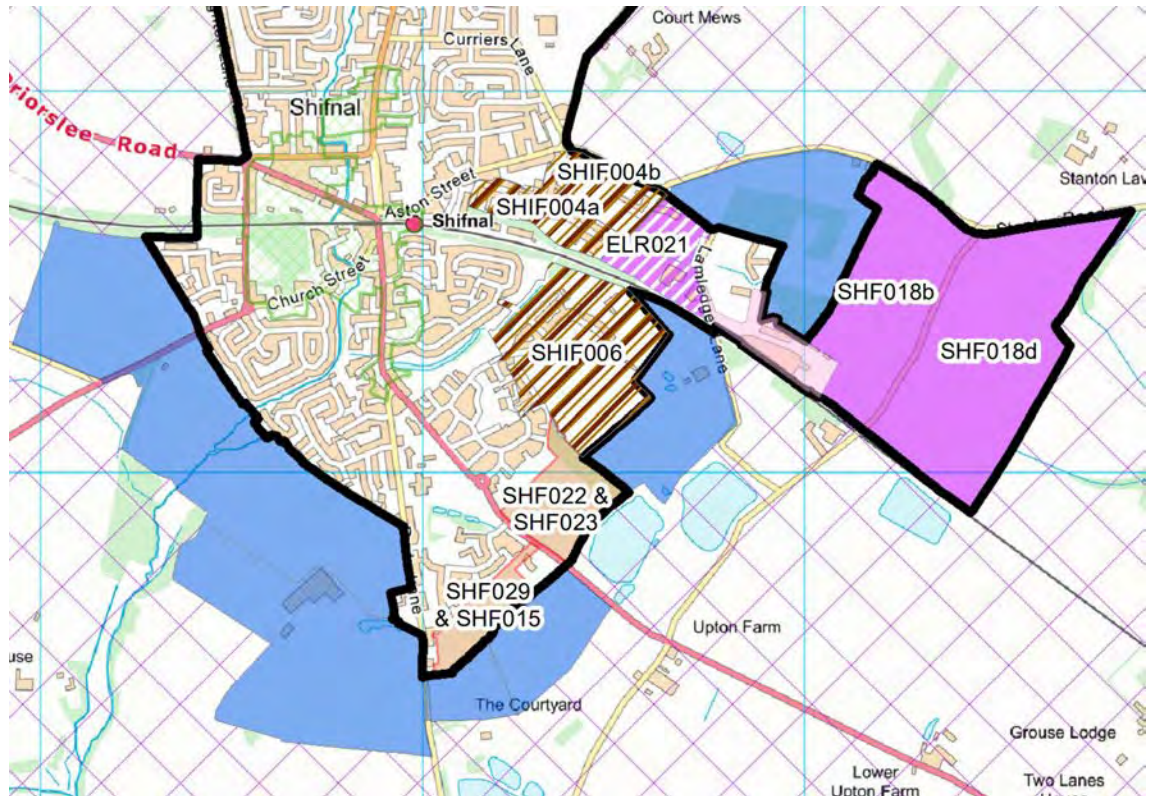
<sup>35</sup> DDCMS (17<sup>th</sup> March 2020)

## 4.0 Chapter 5: Settlement Policies

### Policy S15: Shifnal Place Plan Area

- 4.1 Principally, L&Q Estates supports the retention of ‘saved’ allocation SHIF006 (Land north of Wolverhampton Road) as well as the housing allocation of SHF022 and SHF023 (Land between Windmill View and The Monument on A464):

Figure 4.1 Shifnal Place Plan Area Policies Map



Source: SDLP Policies Map

- 4.2 However, L&Q Estates disagree with the proposed approach to the safeguarding of land between Revells Rough, Lamledge Lane and the eastern rail line and considers that this land should be allocated for housing in order to meet an increased housing requirement as outlined in its response to Policy SP2 (Strategic Approach).
- 4.3 A Vision Document for the wider site, enclosed at **Appendix 1**, has been informed by extensive technical analysis and demonstrates the suitability, availability and deliverability of the site for housing.
- 4.4 The proposed Concept Masterplan illustrates the provision of up to **340 dwellings (100 dwellings at SHF022 & SHF023 and a further 240 on the safeguarded land)**, as demonstrated in the land use schedule below, including 20% affordable housing.

Table 4.1 Land use schedule

Safeguarded Land	
Total development area (inc. residential, open space and drainage)	14.1 ha
Density to achieve 240 dwellings	26.6 dph
Draft allocations SHF022 & SHF023	

Southern parcel area	2.3 ha
Adjacent SHF022 Parcel	1.7 ha
Woodland	1.4 ha
Total development area (inc. residential, open space and drainage)	4.0 ha
Density to achieve 240 dwellings	24.8 dph

Source: Vision Document

- 4.5 The main access to the safeguarded land will be taken through the existing consented Taylor Wimpey development to the west, ensuring a safe and accessible site for all modes of transport. The layout proposes a main street in a broad 'u' shape with smaller roads and lanes branching off to create variation and assist in reducing vehicle speeds through the development.

### **Safeguarded Land: Land between Revells Rough, Lamledge Lane and the eastern rail line**

- 4.6 In justifying the safeguarded status of land between Revells Rough, Lamledge Lane and the eastern rail line, the Council provides the following in its Explanation:

*'There is a single area of safeguarded land remaining from the SAMDev Plan. This land can currently only be accessed from Lamledge Lane which is a narrow and inadequate rural lane accessed either from the narrow humpback bridge over the rail line (north) or from the equally inadequate Upton Lane (east) which has a constrained and potentially unsafe junction to the A464. The release of this land is awaiting a more strategic development proposal possibly requiring more land to be released from the Green Belt, or requires an access solution involving a route past Revells Rough (south) as indicated in the development guidelines for allocated site SHF023. The relative isolation of this land is reflected in: its access constraints; and in the tranquillity of the area around Lamledge Lane and Upton Lane, south of the rail line. This suggests the release of this safeguarded land should await a subsequent review of the Local Plan.'*

- 4.7 The supporting Vision Document and Concept Masterplan demonstrate that the site is accessible from the development to the north, thus countering the perceived or relative isolation of the safeguarded land.

- 4.8 The supporting Transport Assessment, which includes a sensitivity test, demonstrates that the local highway would continue to operate within capacity utilising the existing accesses that serve the Taylor Wimpey scheme.

- 4.9 In the Explanation text justifying Policy S15 (Shifnal Place Plan Area), the Council comment on the status of the safeguarded land to the south and west of the town:

*'At this time, it is expected the land releases to the south and west of the town will be safeguarded for a strategic housing extension capable of creating a new neighbourhood community to deliver:*

*a. A new strategic highway from the A464 (south) to the B4169 [...]' (paragraph 5.214)*

- 4.10 Although it is not expressly set out within the draft policy which parcels of safeguarded land this requirement relates, L&Q Estates consider that this should not be expected from the future delivery of land currently safeguarded between Revells Rough, Lamledge Lane and the eastern rail line. For clarity, it is considered this should be the case given that the A4169 falls to the west of the town and any link between these two roads does not logically pass through the site.

### **Schedule S15.1(1) Residential Allocation: Shifnal Key Centre – Site Allocation SHF022 and SHF023**

- 4.11 Proposed site allocations SHF022 and SHF023 – set out within the schedule of sites pursuant to Policy S15 – are supported by L&Q Estates. Supported by the technical assessments undertaken to date, the Concept Masterplan for the site, at **Appendix 2**, has been formulated having regard to the key considerations and place-making principles for development that are set out in the draft allocation. In particular, L&Q Estate’s vision for the site demonstrably achieves against the following objectives and requirements set out in the policy:
- A broad range of dwelling types and sizes to meet a variety of local housing needs.
  - Creation of a vehicular access and pedestrian/cycle links with the A464 to serve development for SHF023.
  - Landscaping to protect existing trees and central hedgerow (running between the two allocation sites).
  - Provision of new open space, including consideration given to equipped play provision.
  - Protection and buffering of Revels Rough (a band of mature deciduous woodland between the allocation sites and the land to the north).
  - Consideration of the Windmill monument as a designated heritage asset located to the east of the allocation sites.
  - Incorporation of sustainable drainage techniques, with residual surface water flood risk to be managed by providing SuDS (forming part of the green infrastructure network).
  - Consideration given to potential traffic-related noise from the A464 in devising the layout for development e.g. inclusion of a stand-off area, enhanced by landscaping.
  - A strong boundary with the Green Belt adjoining from the east.
  - The assessment of technical / environmental matters, including ecology, trees, archaeology, heritage, flood risk, noise and highway related impacts.
- 4.12 Policy S15.1 and specifically site allocations SHF022 and SHF023 – which can be delivered by L&Q Estates without third-party constraints – are considered to be robust and deliverable for plan-making purposes as demonstrated by the Vision Document and Concept Masterplan enclosed at Appendix 1 and Appendix 2 respectively.

# **Appendix 1 Vision Document**





**LICHFIELDS**

Land North of Wolverhampton Road  
**VISION DOCUMENT**

**L&Q** Estates

September 2020



Front cover image: Thomas Beddoes Court, Shifnal

**L&Q** Estates

LICHFIELDS

**Stuart Field**  
**L&Q ESTATES**

**Jon Kirby**  
**LICHFIELDS**

T: 07384517097  
E: jon.kirby@lichfields.uk

**Nick Thompson**  
**LICHFIELDS**

T: 07710 364012  
E: nick.thompson@lichfields.uk

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# 1.0 Introduction

- 1.1 This Vision Document has been prepared on behalf of L&Q Estates (formerly Gallagher Estates) to support an allocation in the emerging Shropshire Local Plan for residential development on land north of Wolverhampton Road, Shifnal.
- 1.2 The vision and its underlying principles represent the next chapter for achieving sustainable growth at Shifnal. The transformation of this area has been underway for a decade; the initial development of new housing around what is now Thomas Beddoes Court (Lloyd Grove and Stone Drive) has helped to facilitate the ongoing delivery of a new 250-home neighbourhood to the north.
- 1.3 Centred upon a new town park and with a fourth phase now underway, the new neighbourhood – which is being jointly delivered by Gallagher Estates (now L&Q Estates) and Taylor Wimpey – provides a firm foundation upon which to deliver a future extension to Shifnal that is of an appropriate scale and is able to make a meaningful contribution to meeting local housing needs.
- 1.4 The proposal by L&Q Estates seeks to deliver an exciting new phase of development which shall comprise approximately 340 residential dwellings across two sites in a mix of types and tenures, linked by legible pedestrian and cycle routes and well-defined green infrastructure. With its design replicating the high-quality place-making principles upon which the neighbouring scheme has been conceived, the development would form a distinctive and characterful residential area.
- 1.5 Importantly, the site offers a logical and spatially contained location for growth that is well-placed to meet the strategic need for the future release of land for new housing in Shropshire Council's administrative area. Ensuring that there is a sufficient land available to meet future housing needs will be a critical issue.
- 1.6 The revised Standard Method for calculating housing need, set out in the Government's consultation on '*Changes to the current planning system*', is set to result in an 80% increase to Shropshire's annualised local housing need figure – from 1,177 to 2,129 dwellings. This coupled with the need to address cross-boundary issues of unmet need (e.g. that arising in the Black Country region), will require the Council to ensure that there are suitable sites available in sustainable locations such as Shifnal to meet its requirements during the next plan period.

- 1.7 The Council's recognition of the land north of Wolverhampton Road as a sustainable location for future housing delivery is borne out in proposed allocations SHF022 and SHF023 in the draft Local Plan; SHF023 comprises land that forms the southern part of L&Q Estates' site which is being promoted for development. Whilst this is supported, there is a compelling need to ensure that the northern part of the site can be brought forward for housing delivery during the next plan period.
- 1.8 This Vision Document is intended to support the Council in evolving the current status of the northern part of L&Q Estates' site from one of 'safeguarded land', as presently identified in the draft Local Plan, to a single allocation which will enable the comprehensive planning and delivery of the proposed extension to Shifnal.







Left: View south east adjacent to new housing looking to Shropshire Homes site and Revell's Rough.

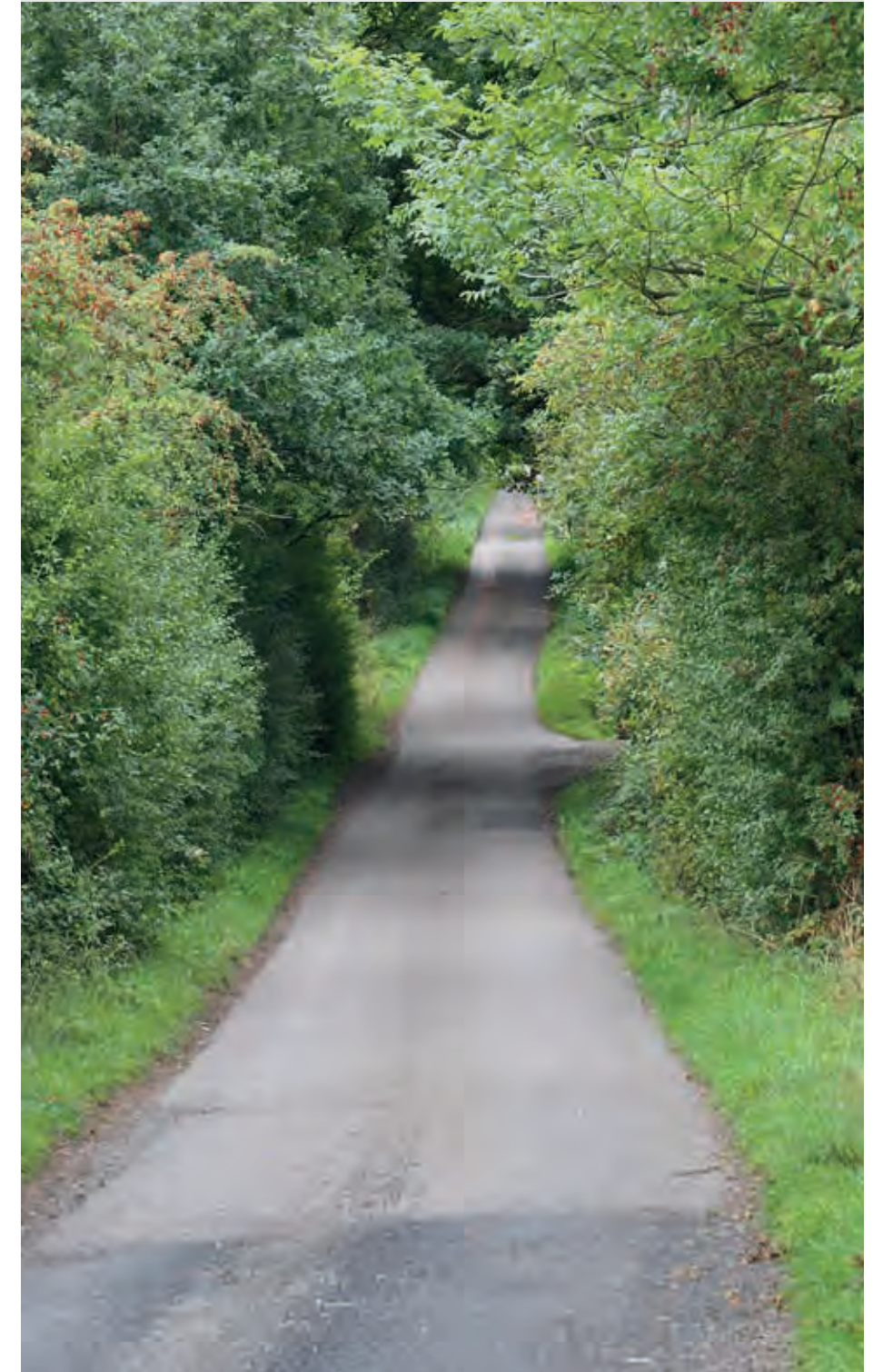


Below: View north to east across western parcel of land. Revell's Rough and southern hedgerow form attractive boundaries.



## 2.0 Site Context and History

- 2.1 The land controlled by L&Q Estates is effectively formed of two components – a southern part which adjoins – and is directly accessible from – the A464 Wolverhampton Road, and a larger parcel to the north, which is separated by Revell's Rough – a 1.6 -hectare area of mature woodland. Collectively, the respective parts equate to a total area of 14.2 hectares.
- 2.2 The southern part of the site is bounded by the A464 to the south; land which in third party control and forms the area identified by draft allocation SHF022 adjoins to the west; a man-made carp fishery – whose two lakes were created in 2002 and 2015 – adjoins to the east; and Revell's Rough defines the boundary to the north.
- 2.3 The northern part of the site adjoins the 250-dwelling extant allocation area (SHF006) from which vehicular access is provided from the west. Bounding the site to the north is the Shrewsbury to Wolverhampton railway line; to the east is Lamledge Lane with the carp fishery beyond; and Revell's Rough defining the boundary to the south.
- 2.4 The majority of the site comprises agricultural pasture land, although the northern part includes agricultural buildings and an extensive area of hardstanding used for caravan storage as part of New Park Farm. The southern part is formed of a single, regular-shaped field parcel, whilst the northern part includes five field parcels, defined by hedgerows and isolated wooded pockets – principally around the farm buildings.
- 2.5 The area to the west of the site has largely been developed for residential use. This commenced in 2010 with a 178-dwelling scheme which was delivered by Taylor Wimpey and forms the area around Lloyd Grove and Stone Drive (BR/APP/OUT/08/0869).
- 2.6 The initial scheme has enabled successive phases of development to be delivered to the north of Lloyd Grove, as part of a separate outline planning permission (14/00062/OUT). This forms the extant allocation area SHF006 in the SAMDev and is centred around a new town park (delivered as a first phase pursuant to R16/00645/REM). The final phase of this development is now underway, following the granting of a separate outline and reserved matters planning permission (17/06087/OUT and 19/01527/REM).



Lamledge Lane – attractive route and mixed planting defining boundary of site (to right of photograph).



The 2km isochrone indicates a walk of approximately 25 minutes from the centre of the northern portion of the site.

Destination: Shifnal Primary School/  
Idsall Secondary School and  
Leisure Centre  
Aproximate walking time: 23-26 minutes

Route:  
Along Curriers Lane via Aston Road  
provides footways on either side of the  
road with dropped kerbs and tactile  
paving.  
Aston Road is equipped with street  
lighting and two pedestrian refuge islands  
one located at the end of the road  
towards the roundabout and another  
located on Curriers Lane about 25m from  
the roundabout.

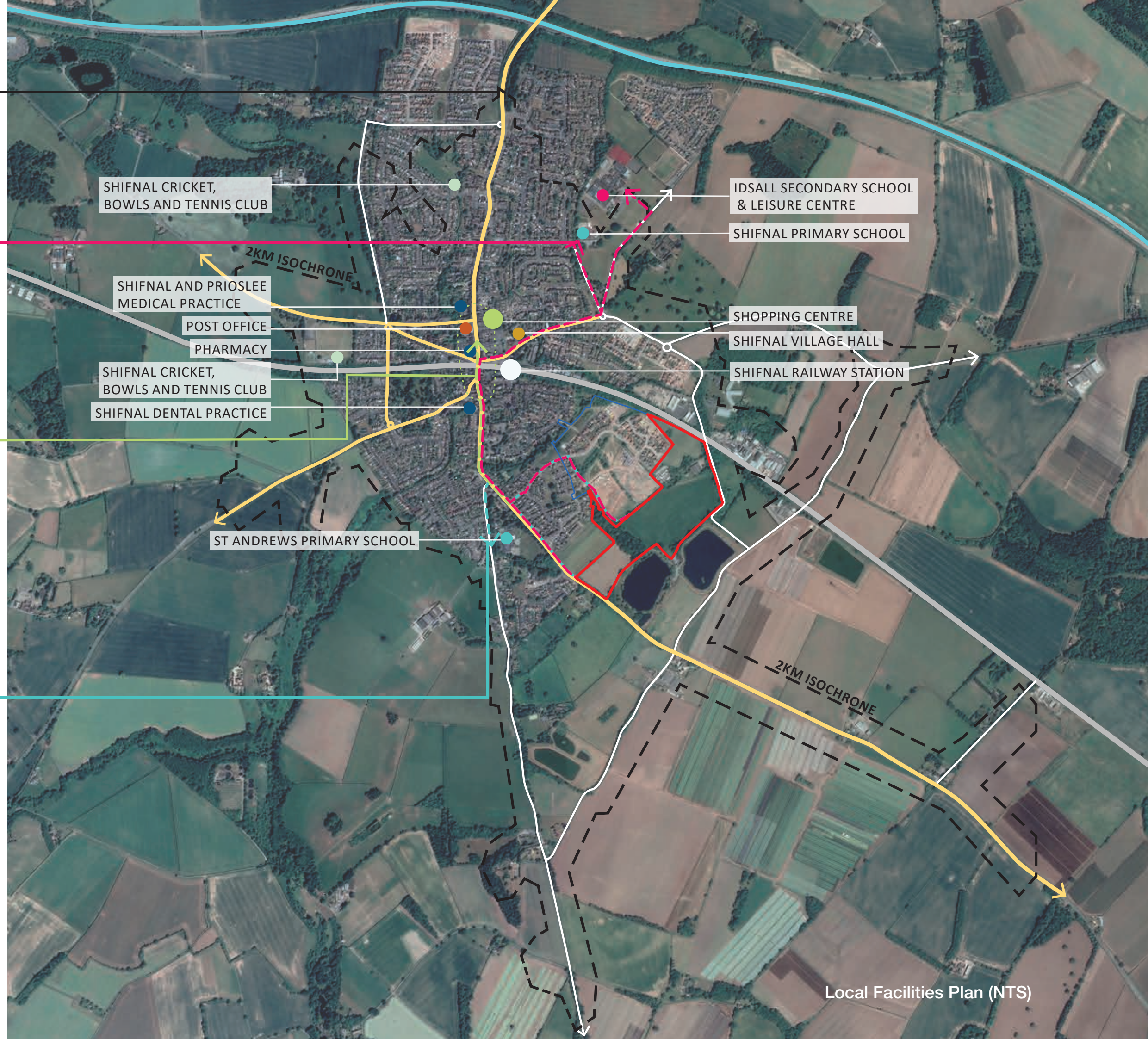
Destination: Shifnal Railway Station  
Aproximate walking time: 13 minutes

Destination: Town Centre  
Aproximate walking time: 15 minutes

Route:  
Heading north on Park Street provides  
footways on either side and an  
uncontrolled crossing equipped with a  
pedestrian refuge island and dropped  
kerbs.

Destination: St Andrews Primary School  
Aproximate walking time: 10 minutes

Route:  
The existing footway along the A464  
Wolverhampton Road provides a link to  
St Andrews Primary School via Park Lane.  
The A464 Wolverhampton Road provides  
an uncontrolled crossing with a pedestrian  
refuge island some 120m west of the site  
and dropped kerbs and tactile paving at  
the roundabout a further 150m west.





## Sustainability

2.7 The site is located within a highly sustainable location, being readily accessible to a range of local facilities, services and transport connections. These are considered in more detail below.

### Highway Network

2.8 The site benefits from being accessible to the A464, which connects Shifnal town centre (0.6 km) to the north and Wolverhampton to the south. This in turn provides a connection with junction 3 of the M54 motorway via the A41, linking the national highway network.

2.9 There is the ability to create an access to the southern part of the site via a new priority T- junction with the A464, whilst the northern part would be served by an existing access road from the adjoining development, which is controlled by L&Q Estates and therefore not subject to third-party constraints.

### Pedestrian / Cycle Facilities

2.10 There is an existing pedestrian footway which runs along the northern side of the A464 and would be extended into the site. This would in turn link with the northern part of the site via a shared pedestrian and cycleway, which could form an attractive and legible route through Revell's Rough. New pedestrian and cycle links would also be facilitated by connecting the northern part of the site to the neighbouring development area. Connectivity would be enhanced development that is based on a legible layout, aided by well-defined routes with good levels of surveillance and attractive wayfinding signage.

### Public Transport

2.11 The site is within 800 metres' distance of local bus services, with stops along the A464 providing connections to Bridgnorth, Telford and Wolverhampton (services include nos. 115, 116, 891 and 892). Shifnal railway station, located in the heart of the town centre and approximately 0.6 km to the north-east of the site, provides regular rail connections to Birmingham, Wolverhampton, Telford and Shrewsbury.

### Shopping and Leisure

2.12 The site is within a 15-minute walk of Shifnal town centre, which offers a foodstore (Co-operative), convenience store and post office (One Stop), a pharmacy (Boots) and other independent retailers, including a butcher and florist.

2.13 Whilst the town is well-served in terms of meeting residents' essential day-to-day needs, it is readily accessible for larger-scale convenience and comparison retail provision in Telford and Wolverhampton, together with out-of-centre facilities at Wrekin Retail Park at Arleston (10 km west of Shifnal).

2.14 The shopping facilities in the town centre are complemented by a number of independent cafes, restaurants, take-aways

and pubs, providing an attractive daytime and evening leisure offer and contributing to the overall vitality and viability of the town centre for both existing and future local residents.

### Health and Community

2.15 The site is well-placed for health facilities that are concentrated in and around Shifnal town centre. These include a GP surgery at Shrewsbury Road (Shifnal and Priorslee Medical Practice) approximately 1.4 km or 17 minutes walk from the site, a dental surgery (Shifnal Dental Practice) at Park Street 1.0 km distance (11 minutes walk) from the site, and an optician. Health facilities are also available at Telford, which benefits from a regular direct bus service.

2.16 Local community interests are served by Shifnal Library in the town centre and facilities at Shifnal Village Hall on Aston Street.

### Recreation

2.17 The site is well-placed for both indoor and outdoor recreational facilities in Shifnal. These include Idsall School Leisure Centre (2 km to the north of the site), whose facilities are open to the public and include a sports hall, fitness gym, all-weather pitch, a football pitch and tennis courts. Approximately 1.9 km to the west of the site is the Shifnal Cricket, Bowls and Tennis Club at Priorslee Road. The club operates on a membership basis.

2.18 Future residents at the site would also benefit from access to the new town park, forming part of the adjoining new neighbourhood area to the north of Lloyd Grove. Further opportunities for formal and informal recreation, including children's play provision, will form an integral part of the green infrastructure provided within the site.

### Education

2.19 The site is within a 10-minute walk (0.9 km) of St Andrew's Church of England Primary School, located on Park Lane, whilst Shifnal Primary School is approximately 1.8 km to the north, at Curriers Lane. Secondary education provision is available at Idsall School, which is adjacent to Shifnal Primary School.

2.20 Early Years education needs in Shifnal are met through a variety of nurseries and playgroups, some of which are linked to the primary schools in the area. This includes Pinefields Pre-School and Hopscotch Nursery at Curriers Lane, and Barn Owls Pre-School.

### Employment

2.21 Two banks (Barclays and Llyods) are located within the town centre. Shifnal Industrial Estate is accessed from Lamledge Lane. This area and the draft employment allocations SHF018b and d are approximately 2.4km from the site.







spotlight  
ACCOUNTING

BROWN'S  
OF SHIFNAL

Christiansburg

FIELDS  
SOLD  
1952-40000

THE DOLL HOUSE

CP  
FINANCIAL LTD

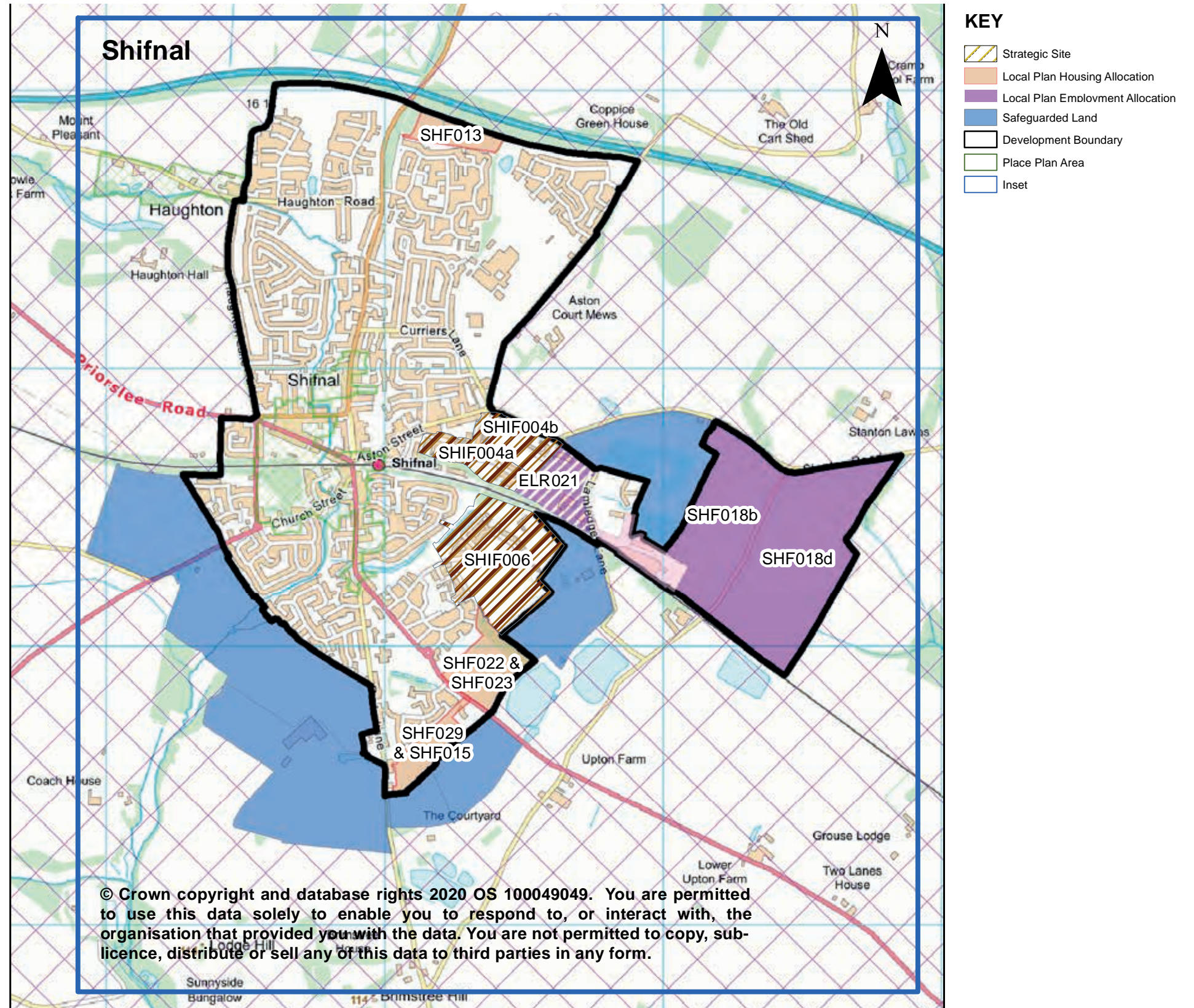
SPIN

WATER



# 3.0 Planning Policy Context

- 3.1 The site is located within the administrative area of Shropshire Council and adjoins the south-eastern boundary of Shifnal – defined as a Key Centre in the settlement hierarchy for the purposes of both the adopted Core Strategy and draft Local Plan.
- 3.2 The Council's preparation of the draft Shropshire Local Plan commenced in 2016 and is currently at Pre-Submission Draft (Regulation 18) stage. Upon its anticipated adoption in late 2021, the new Local Plan will replace the Core Strategy (2011) and the Site Allocations and Management of Development (SAMDev) (2015), which comprise the currently adopted Local Plan.
- 3.3 The Shropshire Council Site Allocations and Management Development Plan (SAMDev) was adopted in December 2015.
- 3.4 The SAMDev has already established the principle of sustainable growth to the east of Shifnal, which is borne out in housing allocation policy SHIF006 and forms the 250-home neighbourhood being delivered by L&Q Estates and Taylor Wimpey on land accessed from Lloyd Grove and Stone Drive.
- 3.5 The draft Local Plan will provide the framework for development in Shropshire for the 2016 to 2038 period. Through Policy SP2 *Strategic Approach*, the draft Local Plan currently sets out a housing requirement of 30,800. The requirement is comprised of 25,894 dwellings to meet the local housing need in Shropshire – based on the Government's adopted standard method figure (1,177 per annum); a contribution of 1,500 dwellings towards meeting the Black Country's unmet need; and a 12% surplus (3,400 dwellings) attributed to boosting affordability and supporting economic growth.
- 3.6 The Council's recognition that it must meet Shropshire's objectively assessed housing needs, as well as a proportion of the unmet need arising from the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is welcomed by L&Q Estates. This issue is explored in detail within the representations that accompany this Vision Document, which raise important considerations for the Council, including the implications arising from the Government's new Standard Method and increased unmet need generated by the Black Country.



Regulation 18 Presubmission Draft Shropshire Local Plan  
Inset S15 Shifnal Place Plan Area Extract (NTS)



**Key**

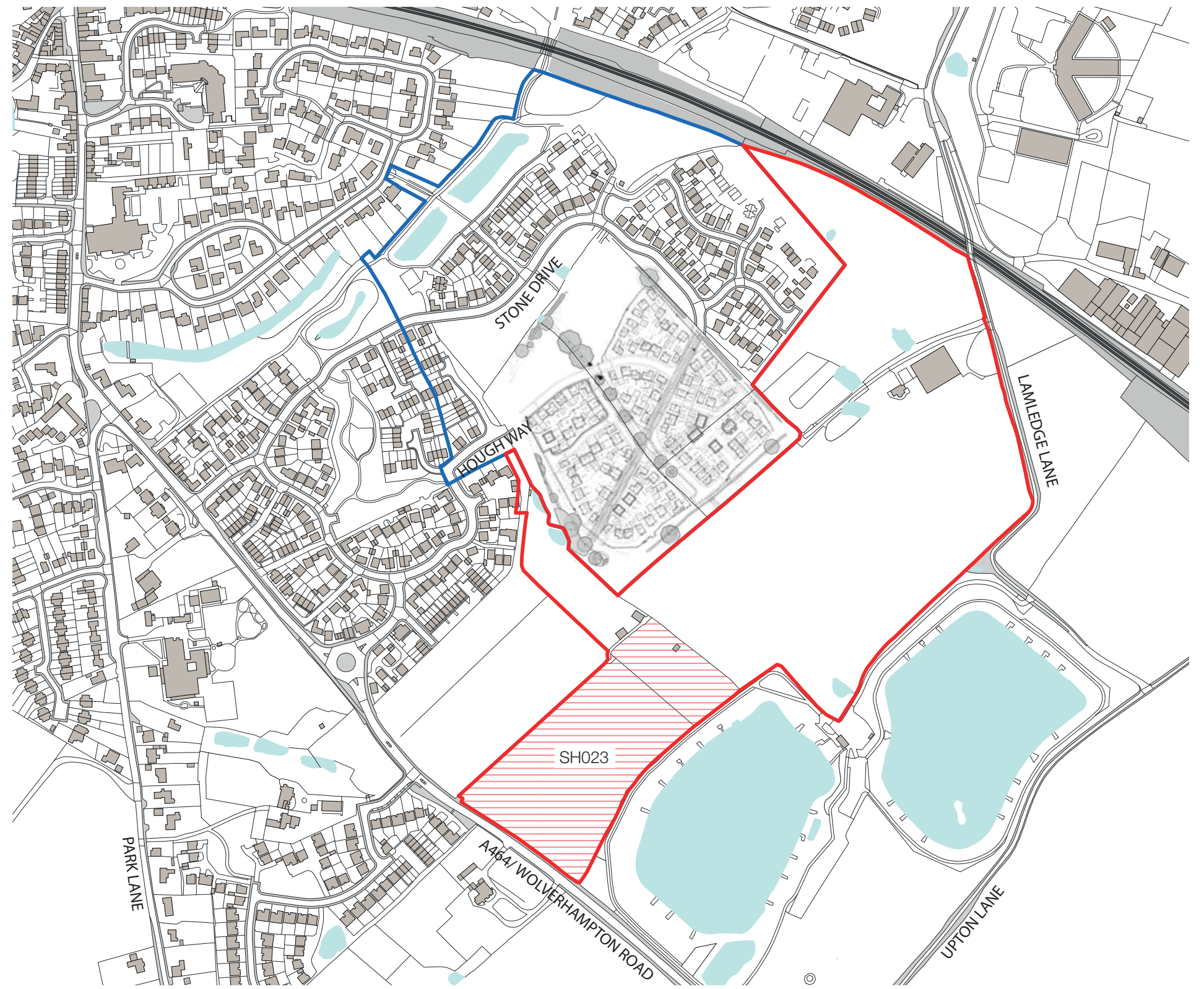
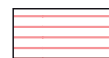
Site boundary



Phase 1 site benefiting from planning permission



Draft Plan Site Allocation SHF023



Site Plan (NTS)



## Sustainable Distribution of Growth

- 3.7 At Shifnal, growth which is appropriate to the scale of the settlement, together with its role and function, can be accommodated by extending the allocated area currently proposed for land north of Wolverhampton Road (SHF022 and SHF023 100 dwellings) to encapsulate the more comprehensive 340-dwelling opportunity now proposed by L&Q Estates.
- 3.8 The northern part of the site has been removed from the designated West Midlands Green Belt by virtue of its existing safeguarded status, thus demonstrating the Council's support for the principle of future development in this area. An allocation of the site in its entirety would ensure that the development is sufficient in scale to support the delivery of related infrastructure and its associated benefits for local people.
- 3.9 The Council will also be aware of the importance in demonstrating the deliverability of all sites that are proposed for allocation when the Local Plan is examined for soundness. The vision for land north of Wolverhampton Road is predicated upon evidence which ensures that there are no environmental or technical constraints which could otherwise preclude development of the site. Its deliverability is also enabled by the single, unified approach of the landowners which is conveyed through this document.
- 3.10 Policy S15.1 of the draft Local Plan sets out the Council's proposed development strategy for Shifnal. It recognises that Shifnal will have a key role in providing homes, jobs, services and facilities to the Place Plan area, as well as serving other Green Belt communities and the M54/A5 Strategic Corridor.
- 3.11 At present, Policy S15.1 assigns the delivery of 1,500 additional homes to Shifnal during the future plan period – just under 5% of the total requirement identified for Shropshire in draft Policy SP2. However, with Shropshire's objectively assessed need set to increase significantly during the plan period – resulting from the new Standard Method – and a potentially greater proportion of cross-boundary unmet need which it may be required to accommodate, there will be a compelling case for the Council to review its position with regard to Shifnal's growth.
- 3.12 A modest uplift of less than 20% to the assigned housing figure could be accommodated within the entirety of the site controlled by L&Q Estates to the north of Wolverhampton Road, whilst remaining proportionate in scale to the existing settlement.
- 3.13 **Schedule S15.1(i)** in the draft Local Plan sets out the residential allocations currently proposed at Shifnal. Allocation

sites SHF022 and SHF023 – *Land between Windmill View and The Monument on A464, Shifnal* – jointly cover the southern part of L&Q Estates' site and assign a capacity of 100 dwellings for delivery during the plan period.

- 3.14 The allocations – in particular SHF023 - are supported by L&Q Estates and set the key considerations and place-making principles for development in this area. Specifically, the draft policy seeks to achieve:
- A broad range of dwelling types and sizes to meet a variety of local housing needs.
  - Creation of a vehicular access and pedestrian/cycle links with the A464 to serve development for SHF023.
  - Landscaping to protect existing trees and central hedgerow (running between the two allocation sites).
  - Provision of new open space, including consideration given to equipped play provision.
  - Protection and buffering of Revell's Rough (a band of mature deciduous woodland between the allocation sites and the land to the north).
  - Consideration of the Windmill monument as a designated heritage asset located to the east of the allocation sites.
  - Incorporation of sustainable drainage techniques, with residual surface water flood risk to be managed by providing SuDS (forming part of the green infrastructure network).
  - Consideration given to potential traffic-related noise from the A464 in devising the layout for development e.g. inclusion of a stand-off area, enhanced by landscaping.
  - A strong boundary with the Green Belt adjoining from the east.
  - The assessment of technical / environmental matters, including ecology, trees, archaeology, heritage, flood risk, noise and highway related impacts.
- 3.15 The above considerations have been drawn upon in formulating the vision for the wider site, such that it is suitably aligned with the Council's aspirations and requirements. The vision also has regard to other emerging policy requirements, including those set out in Policies DP15 (Green Infrastructure), DP16 (Open Space), DP17 (Landscaping of New Development), and DP18 (Landscape and Visual Amenity) – as set out in the draft Local Plan.









## 4.0 Site Appraisal

4.1 This section presents a series of summaries for each technical discipline. The findings of the technical assessments undertaken to date have been given careful consideration in evolving the masterplan for the site. This is necessary to ensure that the delivery of the proposals set out in this document are not precluded by any environmental or technical constraints.

### Archaeology

4.2 An assessment of the archaeological potential of fields forming part of the site has previously been undertaken.

4.3 No pre-medieval archaeological sites or artefact findspots are recorded inside or within the immediate vicinity of the Site on the Shropshire Historic Environment Record (HER). Ridge and furrow earthworks relating to medieval and post medieval agricultural activity are recorded within part of the site. A study of the 1840 Shifnal title map has established that part of the site was used for clay extraction and brick manufacture.

4.4 Whilst archaeological remains in the form of brick kilns and clay extraction pits may be present within part of the site, there is no evidence arising from the assessment to date that significant archaeology is present within the site.

### Arboriculture

4.5 Whilst the site is intersected between the northern and southern parts by a notable area of mature deciduous woodland (Revell's Rough), the remainder is typically characterised by unmanaged hedges interspersed with occasional hedgerow trees. Native species found within the site include hawthorn, blackthorn, hazel, sycamore, English Oak and Common Ash.

4.6 Whilst the proposal for the site would be subject to an Arboricultural Impact Assessment at the planning application stage, the vision for development seeks the retention of all existing mature trees and hedgerows where possible. Illustrated in further detail on the masterplan, these existing assets will form part of the green infrastructure connecting through the development, with opportunities for additional native planting to bolster their ecological value.

### Geo-environmental

4.7 A geo-environmental desk study has been undertaken for the site. Based on the qualitative risk assessment, the critical receptors are considered to be human health (female child for a residential development), the controlled water bodies of

the adjacent fishing lakes to the east and a Principal Aquifer beneath the site. However, due to the unlikely presence of contamination, the potential risk to the identified receptors is considered to be very low to negligible. Any residual risk is likely to be mitigated by the use of physical barriers including cover layers and contaminant resistant water supply infrastructure.

4.8 The potential risk from hazardous ground gas is also considered to be low. It is considered that any risk may be mitigated by the use of physical barriers comprising gas resistant membranes. Based on the expected geology, it is considered that traditional strip or pad foundations should be appropriate for lightly loaded structures at the site.

### Flood Risk and Drainage

4.9 A Flood Risk Assessment and Drainage Strategy has been prepared for the site. The site is located within Flood Zone 1 based on Environment Agency records and therefore low-risk in terms of fluvial flooding, rendering it sequentially preferable for residential development.

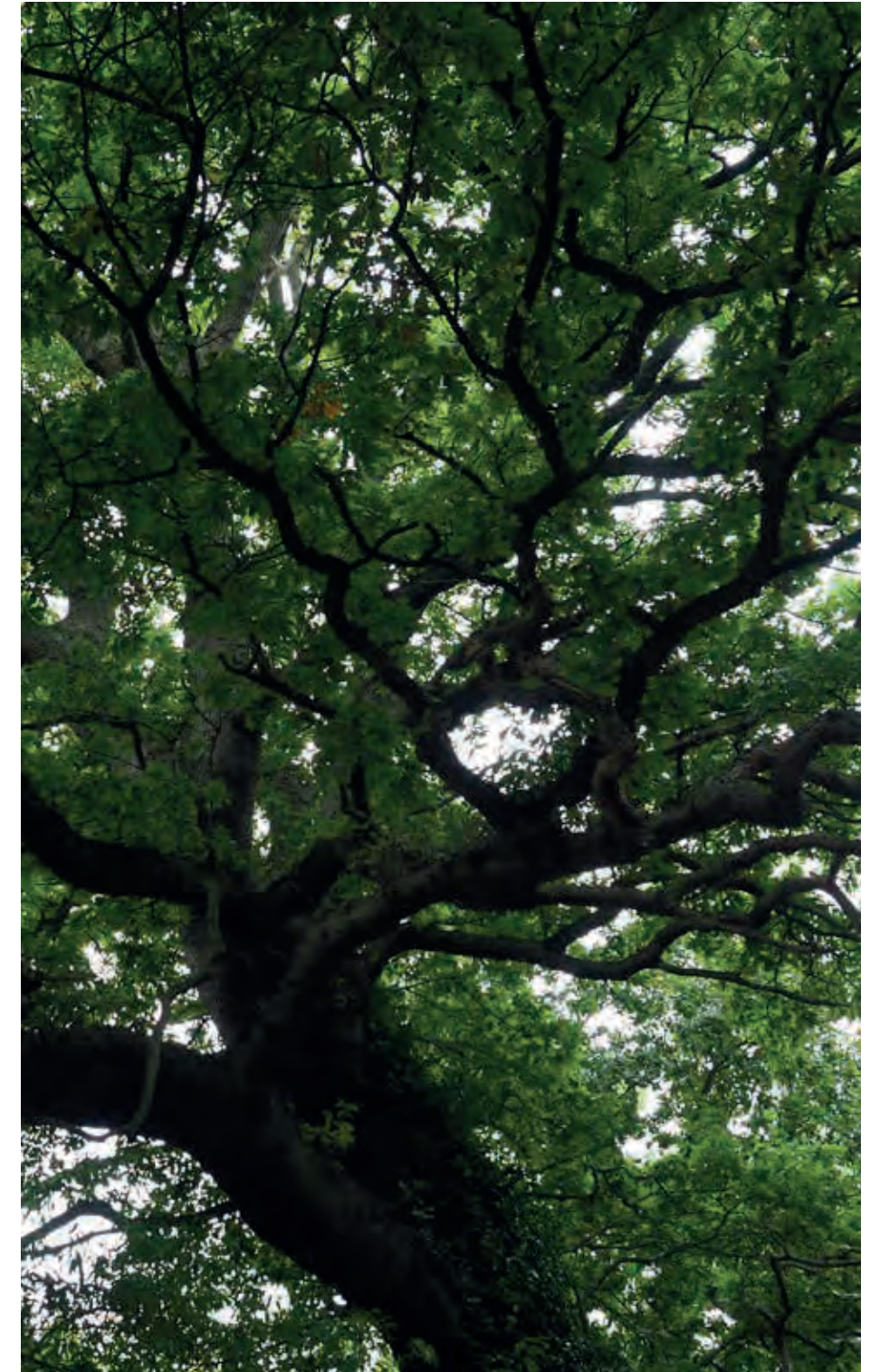
4.10 The southern portion of the site is not considered to be at risk from overland or surface water flooding. Similarly, flooding from sewers and groundwater do not pose a significant risk.

4.11 The drainage strategy for the site demonstrates that an appropriate drainage system for both foul and surface water can be provided, which discharges to a suitable outfall. The incorporation of sustainable drainage techniques such as an attenuation basin could provide ecological benefits as well as additional water quality benefits through the dilution, infiltration and settlement of solid particles.

### Ecology

4.12 Investigations confirm that there are no statutory designations covering any part of the site. There are no nationally or locally important designations present within 3 km of the site. One internationally important designation is present within 10km of the site, which is Motte Meadows SAC (it is also an NNR managed by Natural England and SSSI) c. 9.5km north-east of the site.

4.13 The SAC is a lowland hay meadow with limited influence of agricultural intensification, identified as National Vegetation Classification MG4 *Alopecurus pratensis*-*Sanguisorba officinalis* grassland (meadow foxtail grass-great burnet community) with snake's head fritillary *Fritillaria meleagris* at



Various mature trees on edge of site. Consider role in layout of the development. Protection and use in defining vistas/place.





View across eastern parcel, with railway and new development defining edge of site



its most northern native locality, occurring very sparsely. It is valued at local importance for its breeding waders (snipe and curlew) and skylark habitat, brown hare population, varied mosaic of rush and fen pasture.

- 4.14 The SAC/NNR/SSSI is not considered to be a constraint to development in terms of increased visitor pressure, both because of its distance from the proposed residential housing; and, due to the fact that public access to the Motte Meadows is limited to permit holders only, apart from guided walks and a permissive path (open only from 1 June to 31 August). Finally, there are no references to international sites at this distance from developments, within local policies.
- 4.15 Whilst an ecological impact assessment and details of any required mitigation measures would be undertaken at the planning application stage, previous investigations in the vicinity of the site indicate bat roost potential and terrestrial habitat for Great Crested Newts. Whilst trees will be subject to assessment for bat roosts, they would be retained and incorporated in the development where possible, together with linear boundary vegetation features (e.g. hedgerows) to promote habitat connectivity.
- 4.16 Any trees that are to be removed will need to be subject to further assessment for their potential to contain a bat roost and possibly a licence applied for if one is found.
- 4.17 Revell's Rough woodland, adjacent to the south-west of the site, contains many trees with bat roost potential and provides good habitat. Any lighting scheme for future development on the site will be carefully considered in this context and agreed with the Council at the planning application stage; this will be required to minimise light on key foraging and commuting routes such as Revell's Rough and hedgerows within the site.

### Noise

- 4.18 A Noise Assessment has previously been undertaken in the vicinity of the site, which was scoped and agreed with the Council.
- 4.19 The noise environment at the proposed site has been established by undertaking a 24-hour period of on-site noise monitoring at one monitoring location adjacent to the dominant noise source, the Shrewsbury to Wolverhampton railway line. The results indicated that, depending on the location and layout of dwellings, mitigation may be required to meet prevailing noise level standards.

- 4.20 The results of the assessment also indicated that consideration of layout and good design, installation of standard thermal double glazing and suitable attenuated passive ventilation systems could reduce internal and external noise levels.

### Access and Highways

- 4.21 A vehicular access serving the southern part of the site can be achieved from A464 Wolverhampton Road, which would accord with the requirement set out in draft allocation site policy SHF023.
- 4.22 The ability to create an access onto the A464 would not be hindered by development coming forward on third-party land to the north, as the respective access would be taken from Windmill View, in accordance with the policy requirement for SHF022.
- 4.23 The northern part of the site would connect with the existing 250-dwelling development to the west, over which L&Q Estates has control. As such, the ability to create a vehicular access is not constrained by issues of third-party ownership. Whilst the principal access into this part of the site would be via the existing development, there would be the potential to create an emergency access onto Lamledge Lane, if required.
- 4.24 Previous traffic accumulation surveys indicate that the surrounding highway network operates well within capacity and therefore the quantum of development envisaged for the site could be accommodated without adverse impact. An earlier assessment of ten local road junctions indicated no issues in terms of impact or safety arising from development in this area.
- 4.25 The site is considered to be accessible for a range of local facilities by non-car travel modes. Subject to investigation at the planning application stage, there is the potential to enhance accessibility by extending a bus loop into the northern part of the site, via the existing development to the west. Any proposal would also be supported by a Travel Plan in order to reduce dependency on the car by encouraging increased use of sustainable transport modes including walking, cycling and public transport. This would include welcome packs for new residents, promotion of cycling to access local facilities and amenities, promotion of car sharing and use of local footways to access local services and amenities, and pedestrian improvements.

### Landscape and Visual

- 4.26 The site is well-related to the existing urban area of Shifnal, with the town centre and mainline railway station located

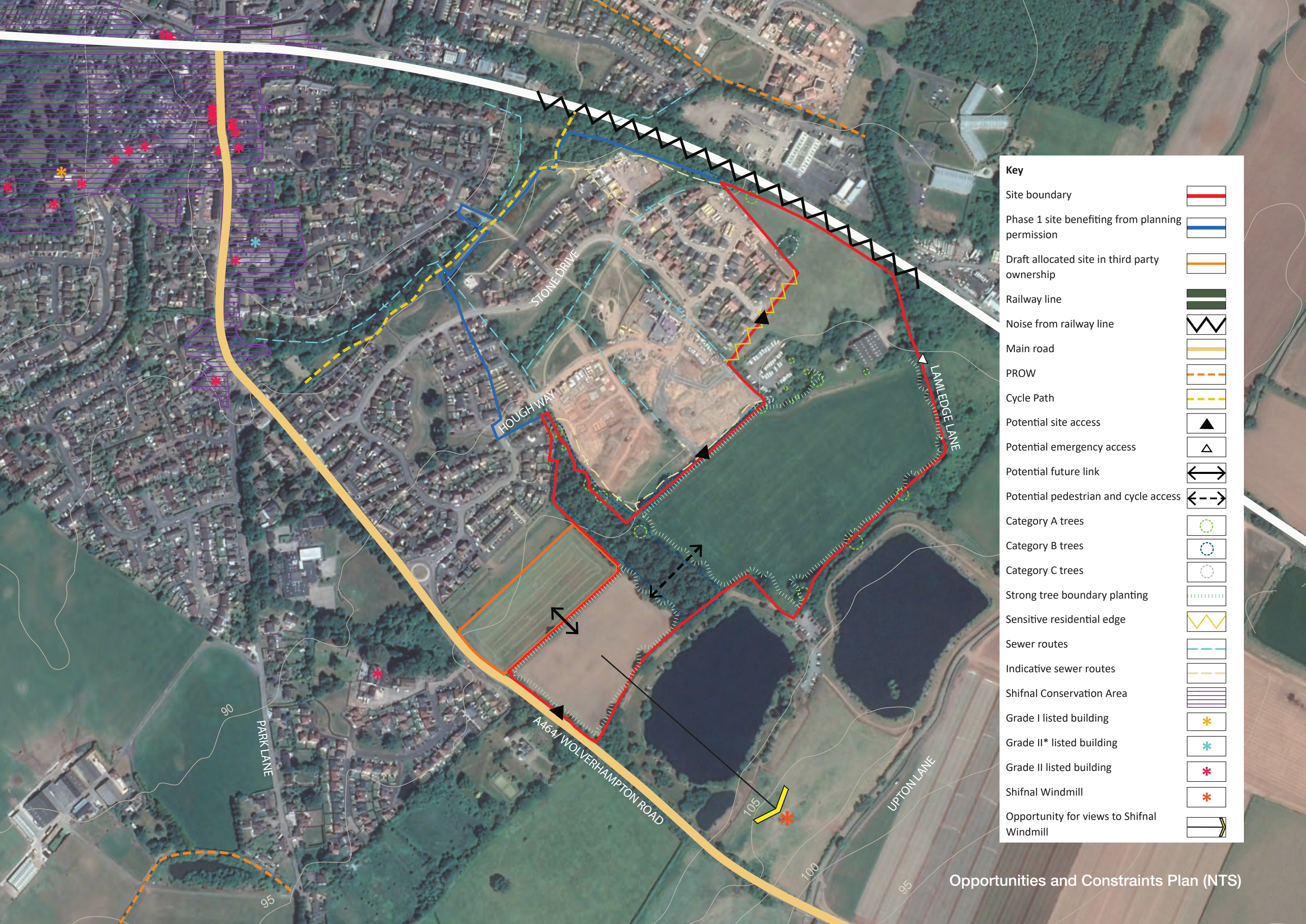


View north west along A464.



View south east A464.





Key	
Site boundary	
Phase 1 site benefiting from planning permission	
Draft allocated site in third party ownership	
Railway line	
Noise from railway line	
Main road	
PROW	
Cycle Path	
Potential site access	
Potential emergency access	
Potential future link	
Potential pedestrian and cycle access	
Category A trees	
Category B trees	
Category C trees	
Strong tree boundary planting	
Sensitive residential edge	
Sewer routes	
Indicative sewer routes	
Shifnal Conservation Area	
Grade I listed building	
Grade II* listed building	
Grade II listed building	
Shifnal Windmill	
Opportunity for views to Shifnal Windmill	



approximately 0.5km to the north west. The development to the west, adjoining the northern part of the site, provides an urbanised influence in this area. The site is not constrained by any statutory designation for landscape, scientific or nature conservation interest.

4.27 There is limited tree cover in the majority of the site, with the exception of the area of woodland at Revell's Rough and the dense mixed hedgerows which define individual field boundaries. The northern site boundary is formed by the embankment of the Wolverhampton to Shrewsbury Railway Line, which rises several metres above the north western corner of the site, tapering off eastwards as the railway passes beneath Lamledge Lane at the north eastern corner of the site.

4.28 The embankment is typically heavily vegetated with mature trees such as ash, birch and willow, although the vegetative cover declines eastwards permitting views across the railway to the rear of the adjoining Shifnal Industrial Estate.

4.29 To the north east, the boundary with Lamledge Road is defined by an overgrown hedgerow and tree line. A block of broadleaf woodland marks the site access to New Park Farm, with a tall, mixed hedgerow and trees following the south eastern boundary along the access leading to the caravan storage area.

4.30 The site is generally considered to be of medium landscape quality, although slightly less adjacent to the north boundary, where the railway and the industrial units are more conspicuous.

4.31 The principal near distance views are those from the properties of the adjacent residential development to the west. Views are, however, restricted in some locations due to the presence of mature trees, boundary hedgerows and vegetation within the gardens of the properties. There are occasional glimpsed views from the public highway within the existing development.

4.32 To the east of the site, the ridgeline on which the ruined windmill is located precludes opportunities for views from this direction, including Upton Lane and the agricultural landscape beyond. Views from the private fishing lakes at Monument Carp Fisheries are limited by intervening vegetation and by the low-lying nature of the site, although there is a partial view towards the site from the higher ground adjacent to the access to the fisheries.

4.33 There will be glimpsed views available to travellers on the

railway, although these will largely be restricted to the northern section of the boundary, where the embankment vegetation is largely absent. There are also views from the bridge which passes over the railway line at Lamledge Lane. Views towards the northern part of the site from the A464 are substantially screened by the mature woodland block at Revell's Rough and by the existing development to the west.

4.34 Additional landscaping at the margins of the site and within open space retained within the development will mitigate any loss of visual amenity from nearby dwellings and will have some positive benefits as the landscape enhancements mature. It is considered that the site can be developed without harm to the wider landscape, and in a manner consistent with the existing pattern of development within Shifnal.

4.35 The plan opposite (p. 18) shows the opportunities and constraints derived from field work, technical studies and site appraisal in this section. It highlights the following key considerations:

- Strong potential for comprehensive development of the site to make efficient use of land and minimising Green Belt release.
- Opportunity for access from A464/Wolverhampton Road and from adjacent development to the west.
- Opportunity to protect and enhance Revell's Rough and high quality trees and hedgerows.
- Opportunity to reinforce boundary planting at the eastern site edge towards the Green Belt.
- Opportunity to extend and enhance the existing sustainable transport network.
- Opportunity to provide public open space integrating play areas and drainage features.
- Opportunity to create views from development to Shifnal Windmill monument.

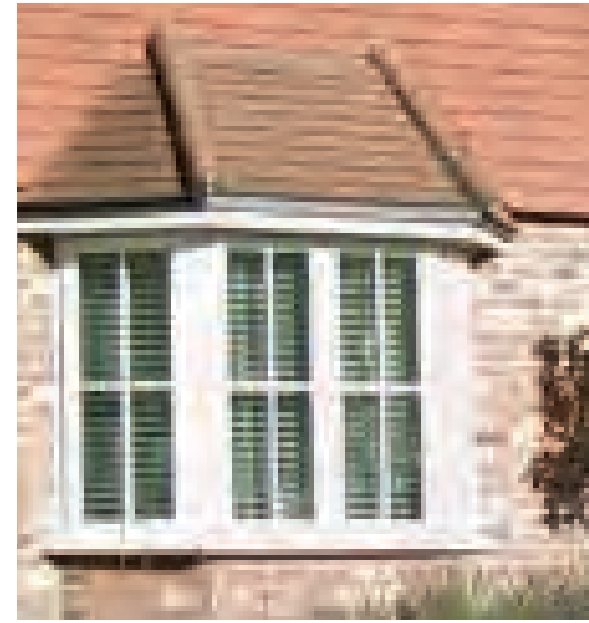


View south to the monument. Incorporate views into the layout of new development.













Key	
Site Boundary	
Phase 1 site benefiting from planning permission	
Draft allocated site in third party ownership	
Loop access connecting into Phase 1 site	
Proposed main vehicular spine route	
Proposed minor routes	
Proposed footpath/cycleways	
Proposed housing	
Proposed housing frontage	
Proposed pitches and play areas	
Proposed orchards	
Proposed street trees	
Proposed boundary tree planting	
Proposed attenuation pond	



# 5.0 Illustrative Concept

- 5.1 The analysis in the previous section demonstrates that the site has potential to deliver a comprehensive extension to Shifnal.
- 5.2 An illustrative concept has been shaped by the technical assessments and draft Local Plan Policy S15 requirements, and following the design principles set out below:
  - A comprehensive approach to deliver a broad mix of housing to help meet local needs, open space including play provision, protection and enhancement of existing woodland and trees, and provision of appropriate sustainable drainage.
  - Vehicular access to the southern parcel from the A464/ Wolverhampton Road. Access to the northern achieved by extensions to the road network serving the adjacent development to the west via Stone Drive and Lloyd Grove off A464/Wolverhampton Road which were designed to serve the wider housing growth identified in the immediate area. A potential emergency access could be achieved off Lamledge Lane to the northern parcel.
  - Proposed cycle and pedestrian access from A464/ Wolverhampton Road, with a possible route through Revell's Rough forming a sustainable connection to the northern parcel. The footpath and cycleway network links to Lamledge Lane leading to the public right of way and National Cycle Route 81 north of the site, and south east with connections to existing routes towards the fisheries and Upton Lane. A green buffer to A464 Wolverhampton Road with additional landscaping to mitigate potential noise associated with vehicular traffic.
  - Green infrastructure buffers and landscaping incorporated to provide protective buffers to Revell's Rough, the hedgerow along the western edge of the southern site parcel and to existing trees.
  - Significant tree planting to create a strong eastern boundary edge to the Green Belt.
  - The integration of a sustainable drainage strategy which

includes attenuation pond features incorporated into open spaces.

- A permeable and well connected movement network. Housing frontages addressing the street and green areas to create natural surveillance of routes and amenity spaces.
  - Potential vistas to Shifnal Windmill monument created with the alignment of key routes through the southern parcel with views to the east.
- 5.3 In accordance with the draft allocation, the southern parcel could deliver 100 dwellings. In a comprehensive development of the whole site, the illustrative concept could achieve up to 340 dwellings as shown in the land use schedule.

### Land use schedules

#### Northern Parcel

Total development area (inc. residential, open space and drainage)	14.1 ha
Density to achieve 240 dwellings	26.6 dph

#### Draft allocations SHF022 & SHF023

Southern parcel area	2.3 ha
Shropshire Homes land	1.7 ha
Woodland	1.4 ha
Total development area (inc. residential, open space and drainage)	4.0 ha
Density to achieve 240 dwellings	24.8 dph







2000  
A.D.

Green Acres Farm

1998

PH

96

N  
E  
S  
W