



REPRESENTATIONS TO REGULATION 18: PRE-SUBMISSION DRAFT OF THE SHROPSHIRE LOCAL PLAN 2016 TO 2038

LAND SOUTH AND WEST OF SHIFNAL

WALLACE LAND INVESTMENTS

30 September 2020

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Pegasus Group

Queens House | Queen Street | Manchester | M2 5HT

T 0161 393 3399 | W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

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APPENDIX PROVIDED SEPERATELY

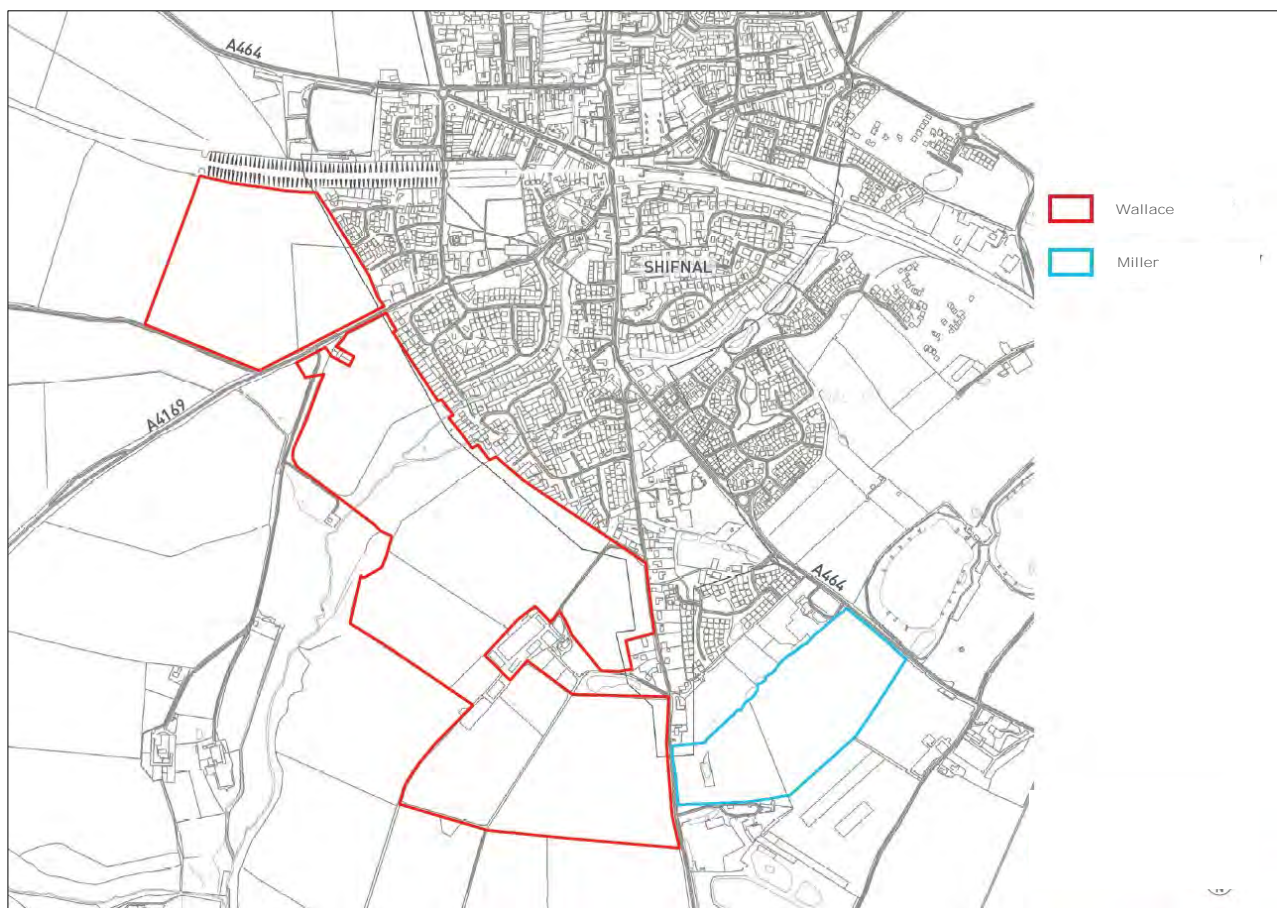
APPENDIX 1: DEVELOPMENT FRAMEWORK DOCUMENT FOR THE JOINT WALLACE AND MILLER SITE

APPENDIX 2: SHROPSHIRE FIVE YEAR HOUSING LAND SUPPLY

EXECUTIVE SUMMARY

These representations have been prepared by Pegasus Group for Wallace Land Investments (Wallace) and provides their comments on the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038 (Regulation 18 Local Plan). Overall, Wallace consider the Council have prepared a strong Regulation 18 Local Plan and support its content in respect of many of its policies, but they respectfully request that the Council consider the comments made in these representations.

Wallace and Miller Homes Ltd (Miller) are jointly working together to deliver new homes and associated infrastructure at a circa 65ha site that extends around the south and west of Shifnal (the Site). The Site extends from the western railway line in the north to the A464 (south) and is dissected by the A4169 and Park Lane. The land between the western railway line and Park Lane is controlled by Wallace, while the land between Park Lane and the A464 (south) is controlled by Miller.



The Site

The Site is proposed to be released from the Green Belt and safeguarded in the Regulation 18 Local Plan and there are exceptional **circumstances to do so, including the Site's potential to provide:**

- Around 1,265 new homes including policy-compliant affordable homes which will increase expenditure and support investment in the town, support the economic growth strategies for the town and M54/A5 Strategic Corridor, and assist in addressing some of the unmet needs of the Black Country;

- Homes for the working age population, which together with the employment land proposed within the town, will help address the low-levels of self-containment;
- Land for retail facilities to provide a choice and reduce expenditure leakage out of the town;
- Land for a primary school to improve capacity within town;
- A link road from the A464 (south) to the A4169 helping ease capacity issues in the town;
- The potential for a future link up to the A464 (west); and,
- **Improved access and drop off for St Andrew's Primary School which will relieve traffic congestion on Park Lane.**

The Site is proposed to be safeguarded for future development needs beyond the plan period in the Regulation 18 Local Plan, under policy *S15.1 Development Strategy: Shifnal Town*. Wallace support this position but ask that the Council consider its allocation or the inclusion of a flexible safeguarded policy in the plan, should the need arise to bring forward the Site earlier than 2038. Matters for consideration in the context of an allocation or flexible safeguarded policy are set out in these representations. In summary:

- The identified housing supply within the plan falls short of the housing requirement by around 3,000 homes and the rural Community Clusters are not considered suitable to accommodate most of this shortfall;
- The housing requirement may increase significantly when calculated using the **Government's draft** revised standard method for calculating local housing need;
- **There may be a requirement to provide more homes to assist with meeting the Black Country's** unmet housing need; and,
- The housing supply includes around 3,500 homes from SAMDev Plan allocations which are yet to be delivered, and which have not been reassessed in the Sustainability Appraisal or site assessments.

If more land does need to be identified to achieve the housing requirement or a higher requirement resulting from the revised standard method and needs of the Black Country, this Site represents a perfectly suitable and sustainable site to allocate now. Indeed, it:

- Is in the right place to strengthen the economic growth strategy for the town and M54/A5 Strategic Corridor;
- Can provide a thoroughly considered development in a highly sustainable location;
- Can be delivered from when there is very limited housing development planned in Shifnal;
- Can bring substantial and unique benefits to the town in the plan period; and,
- Scores best of all the other safeguarded land in Shifnal in the Sustainability Appraisal (comments on the Sustainability Appraisal in relation to this Site are included in Section 6 of these representations).

Should the Council ultimately arrive at the same position and deem the Site suitable for allocation now, Wallace would be willing to discuss the following options to ensure the Site is suitably masterplanned and phased in terms of the delivery of housing, employment floorspace delivery and local infrastructure:

- A phasing policy that allocates the Site; and/or,
- A masterplanning and infrastructure framework requirement set out within the Site policy that would have to go through an informal approval process with the Council; or,
- An SPD process (dealing with masterplanning and infrastructure delivery) that would have to go through a more formal approval process with the Council.

Should the Council wish to maintain the safeguarded status of the Site in the emerging Local Plan, Wallace respectfully request that the Council removes **the 'very special circumstances'** requirement set out in policy *S15.1 Development Strategy: Shifnal Town*, which is not consistent with NPPF, and consider including a **robust monitoring / 'Plan B' policy in the plan** instead. Such policies would allow safeguarded sites to come forward before the end of the plan period if they are required, for instance should the Council:

- Not be able to demonstrate a five year supply of housing land;
- Not be able to achieve the housing requirement in the plan because of, for instance:
 - **A relevant change / increase in the Council's housing requirement** because of the revised standard method or a requirement to take more of the unmet need to the Black Country;
 - Any evidence coming to light that demonstrates large housing allocations cannot be delivered; or,
 - Any other material consideration that would impact on the housing requirement.

We have provided an example from the adopted West Lancashire Local Plan in Section 4 of these representations. The Local Plan Inspector commended the authority on this approach and stated:

'...While the site allocations have been rigorously tested in the Examination and ought to provide an adequate housing land supply, Plan B is intended to provide a further safeguard should unexpected circumstances lead to one or more of the larger allocated sites not coming forward as anticipated. It is a constructive response to the uncertainty inherent in planning for housing provision.'

'...In order for the Plan B mechanism to be effective, it needs to form part of a formal policy in the Local Plan.'

It is also noted that the Site is depicted as falling outside of the proposed Shifnal settlement boundary. This does not have to be the case. The NPPF simply confirms that safeguarded sites should be located between the existing urban area and Green Belt land. This means the settlement boundary can lie either side of the safeguarded allocation. Including the Site within the settlement boundary, would provide a helpful visual indication that such sites are deemed to be suitable for development (even if this is at a point in time in the future).

1. INTRODUCTION

- 1.1 Pegasus Group is instructed by Wallace to make representations to the Regulation 18 Local Plan. Once adopted, the plan will replace the Core Strategy (2011) and Site Allocations and Management of Development Plan (2015) (SAMDev Plan), except for the SAMDev Plan allocations which are yet to be delivered.
- 1.2 Wallace and Miller are jointly working together to deliver new homes and associated infrastructure at a circa 65ha site that extends around the south and west of Shifnal (the Site). The Site extends from the western railway line in the north to the A464 (south) in the south and is crossed by the A4169 and Park Lane. The land between the western railway line and Park Lane is controlled by Wallace, while the land between Park Lane and the A464 (south) is controlled by Miller. It is understood that Turley are submitting representations separately on behalf of Miller.
- 1.3 The Development Framework Document at Appendix 1 is provided to show how the joint Wallace and Miller Site can be delivered.
- 1.4 In addition to these representations the submission documents include the following:
- Appendix 1 - Development Framework Document for the Joint Wallace and Miller Site, Pegasus Group (September 2020), including:
 - Appendix 1.1 - Development Framework Document for the Wallace Site, Pegasus Group (September 2020), including:
 - Appendix 1.1.1 – Preliminary Landscape and Visual Appraisal, Pegasus Group (March 2020);
 - Appendix 1.1.2 – Historic Environment Desk Based Assessment, Nexus Heritage (March 2020);
 - Appendix 1.1.3 – Ecological Assessment, FPCR (March 2020); and,
 - Appendix 1.1.4 – Flood Risk Assessment, SWECO (March 2020).
 - Appendix 1.2 - Vision Framework for the Miller Site, Turley (February 2019);
 - Appendix 1.3 - Consideration of Site Against Technical Evidence for the Miller Site, Turley (March 2020); and,
 - Appendix 1.4 - Phasing Strategy and Access Arrangement for the Joint Wallace and Miller Site, SWECO (September 2020).
 - Appendix 2 – Shropshire Five Year Housing Land Supply, Pegasus Group (August 2020).
- 1.5 Wallace has an excellent track record of successfully promoting medium to large sites through the plan process, and a reputation for bringing land to the market, which has subsequently been developed by housebuilders who have a reputation for delivering land with viable planning permissions. A local example of this includes the recently completed high-quality residential

development at the Coppice Green Lane site in Shifnal, developed by Barratt West Midlands/David Wilson Homes.

1.6 After this introductory section, these representations are set out in the following sections:

- Section 2 provides an overview of the exceptional circumstances that warrant the release of Green Belt land at Shifnal, and at this Site in particular;
- Section 3 sets out the matters for consideration in relation to the housing requirement for Shifnal including the current housing supply, the revised standard method for calculating local housing needs, and the unmet housing needs of the Black Country;
- Section 4 comments on the proposed housing growth strategy for Shifnal as set out in the Regulation 18 Local Plan;
- Section 5 presents the options for this Site including an option to allocate the Site, and an option to provide a flexible safeguarded land policy;
- Section 6 comments on the Sustainability Appraisal underpinning the plan, with a focus on how this Site has been considered in the appraisal;
- Section 7 considers the evidence base documents which underpin the plan;
- Section 8 to Section 10 comment on policies within the Regulation 18 Local Plan divided into the strategic policies, development management policies and the settlement policies for the Shifnal Place Plan Area; and,
- Section 11 summarises the representations.

The Site

1.7 Wallace and Miller have a collective interest in the proposed safeguarded Site, which is positioned immediately adjacent to Shifnal and extends in a broad arc around the south and west of the town (Figure 1 overleaf).

1.8 The Site is proposed to be released from the Green Belt in the Regulation 18 Local Plan. Wallace **commend the Council's proposal to remove the Site from the Green Belt**. Not only do exceptional circumstances exist to do so, but it is set out in the appendix to the representations that the development of the Site would have low-moderate harm on the Green Belt.

1.9 In the Regulation 18 Local Plan, the Site is safeguarded for future development needs beyond the plan period (Figure 2 overleaf). Again, Wallace support the decision to safeguard the Site, but ask the Council to consider the options set out in these representations and include it within the settlement boundary. Indeed, the Site would form a logical extension to the settlement boundary.

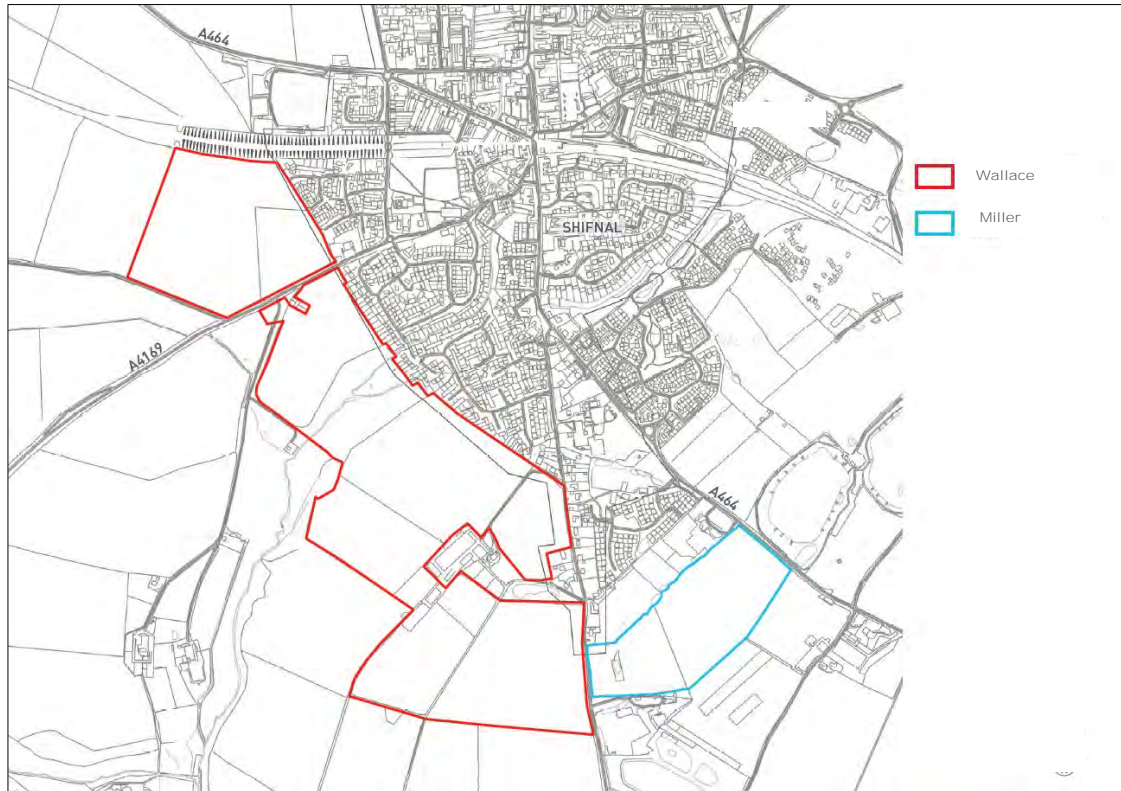


Figure 1: The Site

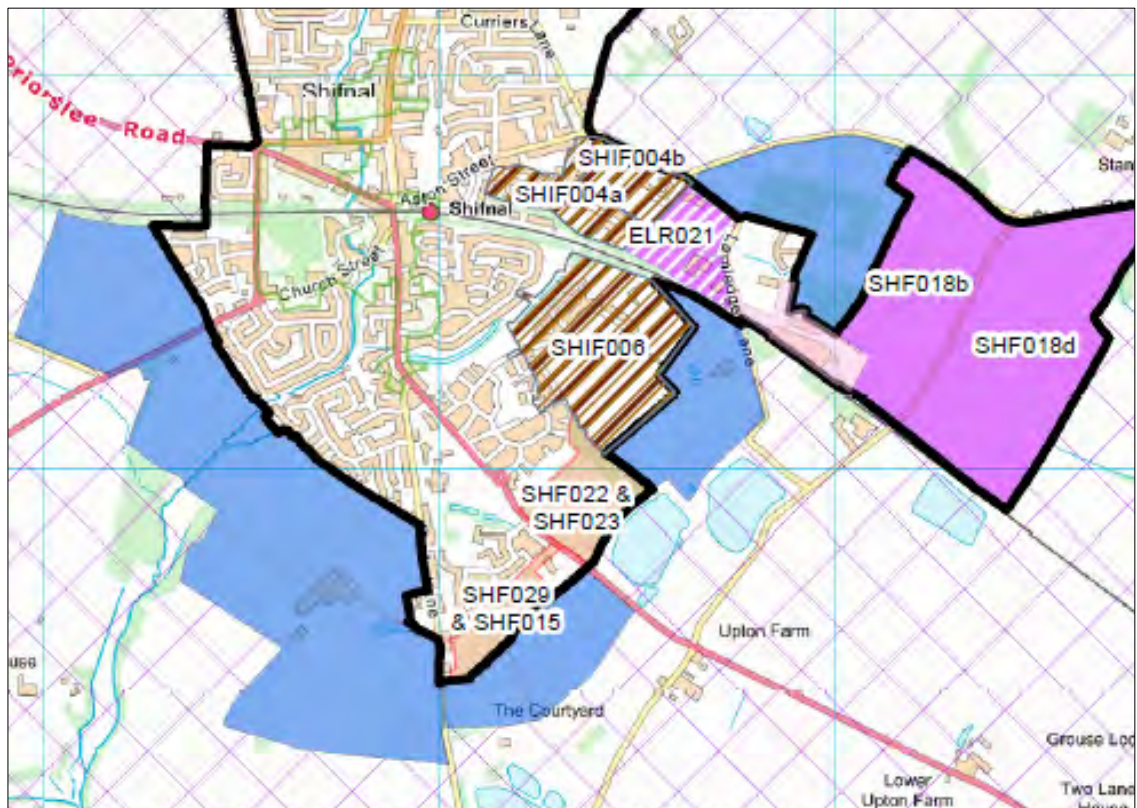


Figure 2: Policies Map Inset for Shifnal Place Plan Area (extract)

1.10 Full details of the Site opportunities and constraints are set out in Appendix 1, but in summary:

- It occupies a highly accessible location;
- There are no national or international ecological designations within the Site or within 2km;
- There are no local ecological designations within the Site;
- There is one Local Wildlife Site within 1km of the Site; Knowl Wood, which also includes an ancient woodland;
- Most of the Site is Flood Zone 1, with a small part being in Flood Zone 2/3 along Wesley Brook, which is left undeveloped as part of the proposed development; and,
- There are no heritage constraints that would prevent the Site coming forward for housing.

Proposed Development

1.11 Full details of the proposed development are again set out in Appendix 1, but in summary it can provide:

- Up to 1,265 new homes, including policy compliant affordable homes, over a phased period;
- A link road from the A464 (south) to the A4169, to reduce the need for traffic to travel through the town;
- The potential for a future link from the A4169 to the A464 (west);
- A parent drop-off/pick-up area **for St Andrew's Primary School**;
- Land for retail facilities;
- Land for a primary school;
- A new public park along Wesley Brook;
- Formal open spaces including play areas and sports provision;
- Informal amenity and semi-natural green spaces;
- Extensive planting and landscaping throughout and around the Site;
- Sustainable urban drainage systems; and,
- Improved access to the countryside in the Green Belt.

1.12 In addition, reasonable s106/CIL contributions would arise from the development of the Site which could be utilised to assist in infrastructure and service projects identified in the Shifnal and Surrounding Area Place Plan and policy *S15.1. Development Strategy: Shifnal Town* of the Regulation 18 Local Plan.

1.13 Development of the Site will provide a co-ordinated investment in Shifnal of around £120 million. The development will bring about significant environmental, economic and social benefits which are again set out fully in the appendix. In summary the Site will:

- Assist with easing highways capacity issues in the town;
- Assist with relieving traffic congestion on Park Lane;
- Provide policy compliant affordable homes;
- Generate indirect economic spin-offs in the region of £341 million, most of which can be reasonably expected to be directed to Shifnal;
- Provide land for retail facilities to provide a choice and retain expenditure within the town;
- Provide land for a primary school to improve capacity within the town; and,
- Create around 335 indirect and direct local jobs per annum.

1.14 The landscape strategy aims to maintain and enhance the existing green infrastructure network and provide a series of proposals for existing and new green infrastructure that respond to local landscape characteristics such as landform, field boundaries, tree belts etc. It shows that the Site can accommodate a sensitively designed housing scheme with only limited landscape and visual effects at a localised level which can successfully be avoided or reduced through effective mitigation.

1.15 Other technical matters are addressed in Appendix 1 such as highways, ecology, drainage, and heritage matter informed by the technical evidence documents that have been prepared including:

- Preliminary Landscape and Visual Appraisal, Pegasus Group (March 2020);
- Historic Environment Desk Based Assessment, Nexus Heritage (March 2020);
- Ecological Assessment, FPCR (March 2020);
- Flood Risk Assessment, SWECO (March 2020); and,
- Phasing Strategy and Access Arrangements, SWECO (September 2020).

2. EXCEPTIONAL CIRCUMSTANCES TO RELEASE GREEN BELT

Shropshire

- 2.1 In Shropshire, the Green Belt adjoins the eastern border with Staffordshire, extending from the A5 southwards to the border of Wyre Forest District and as far west as Bridgnorth. In addition, around 23% of Shropshire forms part of the Shropshire Hills Area of Outstanding Natural Beauty (AONB). Policy *DP26. Shropshire Hills Area of Outstanding Natural Beauty* limits the scale and extent of development in the AONB.
- 2.2 Policy *SP2. Strategic Approach* recognises that **Shropshire's** needs arise across the whole of the County and provides a suitable pattern of development to address those needs. The policy identifies the Key Centres of Shifnal and Albrighton as being suitable to accommodate significant housing and employment development. These Key Centres are inset within the Green Belt.
- 2.3 This has helped inform the Council's **decision to** undertake a new review of the Green Belt boundary in Shropshire. **Wallace commend the Council's approach** in considering the Green Belt, particularly in light of the requirement to ensure that Green Belt boundaries are consistent with the strategy for meeting identified requirements for sustainable development set out in policy *SP2. Strategic Approach* and endorsed through paragraph 139(a) of the NPPF.

Shifnal

- 2.4 Shifnal is the largest Key Centre in Shropshire, and the largest settlement inset in the Green Belt. Furthermore, it is the primary service centre for not only its resident population but also the rural hinterland that surround it, which is washed over by the Green Belt and therefore has very limited capacity for growth.
- 2.5 Paragraph 138 of the NPPF states that when drawing up or reviewing Green Belt boundaries, as the Council are currently doing, the need to promote sustainable patterns of development should be taken into account including the review of Green Belt land around towns and villages inset within the Green Belt. It goes on to confirm that plans should give first consideration to land which has previously been developed and / or is well-served by public transport.
- 2.6 There is very little capacity for new homes from previously developed land in Shifnal. Appendix D of the SLAA identifies that just 35 new homes could come forward from five small sites in the town.
- 2.7 Shifnal has a train station and is well served by the main Shrewsbury to Birmingham rail line which provides two trains per hour weekdays and Saturdays from around 6.00am until 11.00pm, offering a sustainable commuter route to these two key centres and Wolverhampton. The town also benefits from bus links to several locations including Telford to the west, Bridgnorth to the south and Wolverhampton to the east.
- 2.8 Paragraph 138 of the NPPF goes on to state that when drawing up plans:

"They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

2.9 With regards to this Site, the linear green infrastructure corridor proposed along Wesley Brook is identified **as an opportunity in the Council's** Green Infrastructure Strategy (July 2020). Not only will this corridor incorporate a new public park which extends between the Green Belt to the west and the settlement edge, it also provides an opportunity to promote active travel routes along the brook to the town, as endorsed by the Shifnal Neighbourhood Plan (December 2016).

2.10 The exceptional circumstances to release Green Belt land at Shifnal are comprehensively set out in **the Council's** Green Belt Release Exceptional Circumstances Statement (August 2020). The exceptional circumstances, in short, include:

- The potential to ease the effects of past housing restraint by:
 - Increasing demand for and improving investment in services and facilities in the town;
 - Delivering investment in infrastructure of the town;
 - Increasing expenditure in retailing;
 - Improving the affordability of homes;
- The potential to make a significant contribution to economic growth within the M54/A5 Strategic Corridor;
- The potential to increase the self-containment of the working population in the town and in doing so improve its sustainability; and,
- The potential to assist with the identified unmet housing need of the Black Country.

2.11 **These exceptional circumstances have informed the Council's decision to** release 131.8ha of land from the Green Belt at Shifnal in the Regulation 18 Local Plan, including 39.0ha to the east of the town for employment and 92.8ha to the east, south and west of the town for future housing, including approximately 65ha at this Site. Wallace endorse this strategy, concur with the overall exceptional circumstances cited above, and add the following remarks in relation to each.

Easing the Effects of Past Housing Restraint

2.12 Historic housing restraint in and around Shifnal, due to Green Belt boundaries, has played its part in generating pent up demand for housing in the town. However, more recently, the release of land and the housing allocations in the adopted SAMDev Plan has resulted in residential expansion of the town at an average 200 dwellings per annum since 2016. This number of completions is **unsurprising given Shifnal's location within Shropshire and its rail links to Shrewsbury, Wolverhampton, Birmingham and the West Midlands.**

- 2.13 This rapid growth has increased the demands placed on the **town's** services and facilities and retail offer. Development of this Site will help **improve Shifnal's sustainability** by increasing the **investment in the town's services and facilities**, providing land for retail facilities to add to the **town's offer**, retaining expenditure within the town, and providing land for a primary school.
- 2.14 The past housing restraint has also resulted in capacity issues on the highway network through and around the town which requires strategic improvements to principal junctions and minor improvements to local roads and junctions. Development of this Site will help alleviate some of these capacity issues by providing a link road from the A464 (south) to the A4169 around the town **and improving the access and drop off for St Andrew's Primary School** which will relieve traffic congestion on Park Lane.
- 2.15 The past housing restraint in Shifnal has also affected the affordability of housing in the town, making it one of the most exclusive markets in the County. This is recognised in the Green Belt Release Exceptional Circumstances Statement which states the following at paragraphs 8.20 to 8.22:

"The slower rate of housing development in Shifnal has affected the affordability ratio in the town making Shifnal one of the most exclusive markets in the County. The evidence on this matter contends that for a household on a median income (£30,944) to purchase a median priced house in Shifnal (£230,998) they would require 7.5 times their income (the affordability ratio). This exceeds the Shropshire average ratio of 6.6 and slightly exceeds the national average, taking into account the London market.

For a household on a lower quartile income (£16,783) to purchase a lower quartile house (£169,950), they would require 10.1 times their income (the affordability ratio). This exceeds the Shropshire average ratio of 9.0 and the national average of 8.9. These are key statistics as they affect those people who might seek work in the larger employment sectors in Shifnal and those who might be employed in keyworker occupations.

Where the historical restraint does not continue to be lifted to refresh the supply of new housing in Shifnal, as evidenced since 2015-16 then the affordability of housing in Shifnal will continue to lie beyond the means of many wishing to enter this local housing market."

- 2.16 The delivery of affordable homes is a key component of the NPPF. Numerous affordable homes will be delivered as part of this Site **and Wallace's position is that there is strong merit in seeking to** address such needs sooner rather than later.

M54/A5 Strategic Corridor

- 2.17 A critical consideration and justification for the Site being identified for development is that Shifnal is the only principal settlement in Shropshire located within the M54/A5 Strategic Corridor. This is a key east-west road and rail transport corridor between Shropshire and the West Midlands, and a key strategic gateway for both Shropshire and its neighbouring local authorities. It is therefore identified as a key growth corridor for both employment and housing development, resulting from

its strong transport links and the presence of nationally significant education, training and employment opportunities.

- 2.18 The Economic Growth Strategy for Shropshire 2017-2021 identifies the M54/A5 Strategic Corridor as a significant development location for economic growth linked to clustering and supply chain opportunities. It also identifies key growth sectors that are performing well in Shropshire, particularly those with an emphasis on technology and innovation, within which there is considered significant growth potential.
- 2.19 When planning for economic growth paragraph 81 of the NPPF says that planning policies should:
- "a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
 - b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
 - c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
 - d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."*
- 2.20 In line with the guidance provided in the NPPF, the Regulation 18 Local Plan recognises the importance of M54/A5 Strategic Corridor, as well as other strategic corridors in the County. Policy *DP9. Strategic Corridors* seeking to focus major economic growth and employment development along these corridors.
- 2.21 In Shropshire, the M54/A5 Strategic Corridor runs through the Green Belt. However, the Regulation 18 Local Plan proposed to release Green Belt land along the corridor to support economic growth and employment development. As mentioned, at Shifnal, the plan is seeking to release 39ha of land from the Green Belt and allocate for employment use, which is ideally placed to provide additional / supply chain companies that support the growth in the strategic corridor.
- 2.22 Shifnal is also less than 5km from RAF Cosford which is easily accessed via road or rail. The plan is also seeking to release 220.9ha of land from the Green Belt here, to create a Strategic Site for economic growth with an **expected increase of 1,500 plus staff and students at Cosford's Defence College of Technical Training** over the next ten years.
- 2.23 The growth in employment within the strategic corridor at Shifnal, RAF Cosford and elsewhere, will inevitably increase housing demand in Shifnal. The Regulation 18 Local Plan is therefore also looking to release 92.8ha of land from the Green Belt at Shifnal for housing development beyond the plan period, including this Site. Again, Wallace fully support this strategy. However, considering

the economic growth proposal within the M54/A5 Strategic Corridor, it is not implausible to think that this housing land may be needed before the end of the plan period.

Improving Self-Containment and Sustainability of Shifnal

2.24 There is a significant pool of economically active people in Shifnal due largely to it having a station stop on the rail line between Shrewsbury and Birmingham. The situation of the town places the community within easy commuting distance of Shrewsbury, Wolverhampton, Birmingham and the West Midlands. This is enhanced by the strategic road network and accessibility to other local railway stations at Telford, Cosford, Albrighton, Codsall and Bilbrook. This road and rail accessibility, together with facilities for parking at the locally accessible rail stations, conveys Shifnal to **'commuter' households.**

2.25 However, this has resulted in Shifnal currently having a low level of self-containment, recognised in the Green Belt Release Exceptional Circumstances Statement which states at paragraphs 8.91:

"Shifnal has a low level of self-containment with only 25% of the resident population working in the town and these people occupying only about 17% of the employment in the town. This significantly underutilises the community asset in Shifnal which has a relatively younger population than most of Shropshire with an average age of 44 years. This has provided a larger pool of people of working age (61%) with a higher level of economic activity (81%) that is expressed in a higher level of employment (77%) with the majority seeking employee jobs with businesses in and beyond the town (86%)."

2.26 The proposed allocation of 39ha of employment land at Shifnal will go some way to easing the low level of self-containment of the working age population. It may also encourage others who work close by to move into the town if there is sufficient housing to support them.

Unmet Needs of the Black Country

2.27 The Black Country has a significant level of unmet need in the order of 27,000 homes up to 2038, as identified in the Black Country Urban Capacity Review (December 2019).

2.28 It is noted that the Regulation 18 Local Plan is currently seeking to provide 1,500 homes to help meet the unmet needs of the Black Country. However, given that their needs are much more than this, and there will need to be an agreed statement of common ground on the duty to co-operate, it is not implausible that there may eventually be a requirement for the County to take more of the unmet need.

2.29 Shifnal is ideally placed to deliver of housing to satisfy some of the unmet need of the Black Country as it is within the migrant key area of search. Whilst the Local Plan is seeking to assist with meeting the unmet housing needs of the Black Country, this need could be higher than currently anticipated, which will inevitably increase housing demand in Shifnal.

Summary

2.30 Development of this Site could deliver a new neighbourhood community, which will assist in addressing the issues outlined above, by providing:

- Around 1,265 new homes which in turn will:
 - Increase expenditure that is directed to the town;
 - Support **investment in the town's services and facilities;**
 - Support the economic growth strategy for the town and M54/A5 Strategic Corridor; and,
 - Assist in addressing some of the unmet needs of the Black Country.
- Policy compliant affordable homes;
- Homes for the working age population, which together with the employment land proposed within the town, will help address the low-levels of self-containment;
- Land for retail facilities to provide a choice and retail expenditure that is leaking out of the town;
- Land for a primary school to improve capacity within town;
- A link road from the A464 (south) to the A4169 helping ease capacity issues in the town;
- The potential for a future link up to the A464 (west); and,
- **Improved access and drop off for St Andrew's** Primary School which will relieve traffic congestion on Park Lane.

3. ACHIEVING THE HOUSING REQUIREMENT

Current Housing Supply

- 3.1 There is a risk that the current housing supply within the plan period may not meet the housing requirement set out in the plan.
- 3.2 The Regulation 18 Local Plan provides a guideline of the number of homes that are expected to come forward in the plan period at Appendix 5 and Appendix 7, which are summarised in Table 1.

Table 1: Residential Guidelines in Regulation 18 Local Plan

Settlement	Total Completions (2016-19)	Total Residential Commitments			Windfall	Total
		Sites with PP or Prior Approval (31/03/19)	SAMDev Plan Allocations without PP (31/03/19)	Local Plan Allocations		
Strategic Centre	1,743	3,019	798	2,560	505	8,625
Principal and Key Centres	2,005	3,697	2,236	3,295	1,417	12,650
Strategic Settlements	-	-	-	1,750 ¹	-	1,750 ¹
Community Hubs	952	1,289	530	1,640	629	5,040
Community Clusters	-	-	-	-	-	-
TOTAL	4,700	8,005	3,564	8,495	2,551	28,065

¹ Within and beyond plan period

- 3.3 The current supply falls short of the housing requirement of 30,800 homes by up to around 3,000 homes (depending on how many homes come forward at Clive Barracks in the plan period). Whilst it is noted that no figures are provided for the Community Clusters these rural areas are not considered to be suitable to take much of the shortfall.
- 3.4 The current supply also includes around 3,500 homes from SAMDev Plan allocations which are yet to be delivered, and which have not been reassessed in the Sustainability Appraisal or site assessments. As such, it is not technically known whether they are still suitable for housing development as of today, irrespective of the fact that they have previously been found to be acceptable as part of previous development plan examinations.

Revised Standard Method for Calculating Local Housing Need

- 3.5 The housing requirement within the plan at 30,800 homes, is informed by the current standard method for calculating local housing need. However, the Government is currently consulting upon a revised standard method and it is envisaged that the new guidance will be published towards the end of 2020 or the beginning of 2021. Given the timetable of the emerging plan, if there is any slippage or delay at the publication and / or submission stage, the housing requirement may need to be recalculated based on the revised standard method¹.

¹ <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/>

- 3.6 For information, Pegasus Group has utilised the **Government's** revised standard method to calculate the local housing need of Shropshire, which is coming out at 46,838 homes over the plan period / 2,129 homes per annum. Indeed, there may be compelling circumstances to justify a higher housing requirement such as the growth strategies for the area and to help meet the needs of the Black Country, but for now it is safe to say that this would be the minimum number of homes that would need to be planned for if the Government endorse the revised standard method, unless exceptional circumstances justified an alternative approach to calculating housing need.
- 3.7 Wallace recognise that limited weight can be given to the revised standard method figure at this point in time, particularly bearing in mind recent press coverage of the revised standard method figures, but it is plausible that the figure could be endorsed before the end of 2020. As such, it is entirely relevant to consider what implications this could have on the plan in the future.
- 3.8 The Council would need to identify more housing sites that could be delivered in five years, as based on the current supply of sites in the plan there would only be 4.77 years supply. Pegasus Group has provided an assessment of the five year housing land supply position for information, which can be found at Appendix 2.
- 3.9 The Council would also need to identify significantly more housing sites that could be developed over the plan period. Based on the current supply there would be a significant shortfall of just under 19,000 homes.
- 3.10 In the event that there is a significant increase in local housing need arising from the revised standard method, it would be a proactive and positive approach to consider at this stage of the emerging Local Plan what further land is suitable for housing allocation in the Local Plan.

Meeting the Needs of the Black Country

- 3.11 The Black Country has a significant level of unmet need in the order of 27,000 homes up to 2038. It is noted that the Regulation 18 Local Plan is currently seeks to provide 1,500 homes to help meet these needs but given that their needs are much more than this, and there will need to be an agreed statement of common ground on the duty to co-operate, it is not implausible that there may eventually be a requirement for the County to provide much more than 1,500 homes for this purpose.

4. COMMENTS ON THE HOUSING GROWTH STRATEGY FOR SHIFNAL

- 4.1 The Regulation 18 Local Plan seeks to provide 1,500 new homes in Shifnal between 2016 and 2038. However, whilst this is the highest residential guideline of all the Key Centres in the County, almost half of these new homes already exist (605 homes) and many already have planning permission and will likely be delivered in the next few years (573 homes). A smaller portion of the homes will come from new allocations (230 homes). These allocations were previously safeguarded in the SAMDev Plan, so have been in the pipeline for several years and are also likely to come forward quickly.
- 4.2 The speed with which the new homes could be delivered is recognised at paragraph 5.204 of the Regulation 18 Local Plan which states:
- "The development of housing in Shifnal has achieved high rates of delivery at around 200 dwellings per annum from 2016. If these rates of delivery are sustained over the early period of the Plan, then the supply of housing land is likely to be delivered, in its entirety, well before the end of the current decade and possibly as early as 2025. The town would then have a lengthy period of respite from housing development before any of the safeguarded land is released for development."*
- 4.3 The reason why the Council have taken this position is set out at paragraph 5.204 of the plan, that is, to allow the community and infrastructure to assimilate the high levels of growth that has already taken place and the levels of growth that are expected in the next few years.
- 4.4 Wallace have no doubt that the planned new homes will be delivered by 2025 given the demand in this area. However, Wallace have every confidence that the capacity of services, facilities and highways infrastructure can be aligned with higher levels of housing growth in Shifnal. Any qualifying housing development would be required to make reasonable s106/CIL contributions to mitigate any impacts, including this Site. There are policies in place within the plan to this effect and this would be tightly controlled and monitored through the development management and annual monitoring processes.
- 4.5 Indeed, one of the benefits of this Site it its potential to alleviate pressure on the road and junction within the town by creating a link road from the A464 (south) to the A4169 and potentially on towards the A464 (west) in the future. This is unique to the Site as there are no other prospects for any similar intervention to be delivered from development elsewhere in Shifnal.
- 4.6 As such, the strategy in the plan may be unnecessarily constraining housing growth at Shifnal. This could have implications on the economic growth aspirations for town, particularly if there is insufficient housing to support and retain the working population in the town.
- 4.7 Furthermore, the strategy set out in the plan may be an extremely risky one. For instance, if the **Council's supply of housing land falls below five years there could be a threat of housing development** outside the development boundary in Shifnal. This threat is strengthened by the

Government's direction of travel for the revised standard method for calculating local housing need which is expected to see a significant increase in local housing needs in the County.

- 4.8 **The Site's allocation or a monitoring / 'Plan B' policy would allow** the Council to react to such a scenario more efficiently, compared to the option of having to review the Local Plan again. These options are set out in more detail in the following section.

5. SITE OPTIONS

5.1 **Wallace fully support the Council's decision to remove** the Site from the Green Belt. Wallace also welcome the safeguarding of the Site. In theory, as drafted, this would mean the Site may not deliver new homes (including affordable homes) and employment land until 2038 and beyond.

5.2 Wallace fully understand the reasons why the Council have chosen to safeguard rather than allocate the Site, with the position set out at paragraph 5.204 of the plan, which states:

"The demands placed on the town, and the response of the development industry may have the effect of seeking to foreshorten this period of respite particularly to address shortfalls in land supply within the sub-regional area, and along the M54 corridor. These pressures will be resisted to provide the necessary time for the community to assimilate the significant and rapid growth of the town since 2016. This respite is important to also provide the opportunity for pipeline infrastructure investments to be implemented and for the investment works associated with the 'lead in' for the proposed new employment area to be undertaken."

5.3 As previously noted, Wallace have an excellent track record of delivering sites in the town and would like to continue to positively engage with the Council through this Local Plan process and beyond to ensure that the Site is delivered when required and when justified by evidence.

Allocation

5.4 Should it become clear that the Site is required to deliver homes and employment floorspace sooner rather than later, Wallace (and Miller) would equally support this and endorse the Site being allocated for development within this plan. Indeed, there are already compelling reasons to allocate the Site in the plan now, as follows:

- Is in the right place to strengthen the economic growth strategy for the town and M54/A5 Strategic Corridor;
- Its delivery can be phased / aligned to when there is very limited housing development planned in Shifnal;
- The benefits associated with the development of the Site could come forward earlier;
- It would assist in ensuring the plan meets its overall housing requirement; and,
- **It would show the Council's commitment to achieving a higher housing requirement, which may be necessary in any event once the revised standard method to calculate local housing comes into force.**

5.5 Should the Council ultimately arrive at the same position and deem the Site suitable for allocation now, **Wallace would be willing to discuss the following options to ensure the Site's delivery is suitably masterplanned and phased in terms of the delivery of housing, employment floorspace, and local infrastructure:**

1. A phasing policy that allocates the Site; and/or,

2. A masterplanning and infrastructure framework requirement set out within the Site policy that would have to go through an informal approval process with the Council; or,
3. An SPD process (dealing with masterplanning and infrastructure delivery) that would have to go through a more formal approval process with the Council.

5.6 A suggestion as to how the Site can be delivered is set out in Table 2 for illustrative purposes. It assumes the delivery of around 120 homes per annum over a 12-year period, and that the link road between the A464 (south) and the A4169 would be completed by the second phase. Wallace would be willing to discuss this strategy further with the Council if necessary.

5.7 For ease, the table utilises the same time brackets used by the Council in the trajectory for the new allocations at Appendix 7 of the plan and is shown for illustrative purposes. That said, the first phase(s) could be triggered earlier than 2025/26 to assist the Council in achieving a five year housing land supply or the housing requirement, if required.

Table 2: Phasing and Delivery of Site

Phase ¹	Land	Residential Guideline	2020/21 - 2024/25	2025/26 - 2029/30	2030/31 - 2034/35	2035/36 - 2037/38	2038+
1A	Land between the A464(south) and Park Lane	200					
1B-1C	Land between Park Lane and the A4169	440					
2A-2C	Land between Park Lane and the A4169	370					
3	Land between A4169 and the western railway line	255					

¹ Phasing shown in the joint Wallace and Miller Development Framework Document in more detail

5.8 A policy could be included in the plan that requires a Site masterplan and infrastructure framework to be agreed with the Council prior to any development coming forward which could include mitigation measures and an infrastructure plan. This masterplan and infrastructure framework could be agreed informally with the Council or formally approved as an SPD.

5.9 It is noted that by allocating this Site and including it within the settlement boundary the residential guidelines in the town would increase from around 1,500 homes to around 2,765 homes. However, whilst this may seem like a significant increase, 605 of these homes have already been built and a further 573 homes are committed. Shifnal is also suitable for this level of growth, particularly with the necessary infrastructure in place to support it, which can be secured through reasonable s106/CIL contributions. As also mentioned, one of the unique benefits of the Site is its potential to alleviate pressure on the roads and junctions within the town.

Flexible Safeguarded Land Policy

5.10 Should the Council wish to maintain the safeguarded status of the Site in the emerging Local Plan, it is respectfully requested that the following be considered.

5.11 The Regulation 18 Local Plan, at Part 7 of policy *S15.1 Development Strategy: Shifnal Town* states:

*"Land beyond the development boundary that is not part of the Green Belt is safeguarded for Shifnal's future development needs, beyond the Plan period. This extensive land release from the Green Belt is shown in Schedule S15.1(iii) and on the Policies Map. Development of this land during the Plan period will only be permitted in **'very special circumstances'** to meet Shifnal's longer term development needs in accordance with national and local Green Belt policies."*

- 5.12 Wallace welcome the flexibility that this policy provides but it is noted that the NPPF does not require very special circumstances to be demonstrated to bring forward safeguarded land. As such, this policy is not consistent with national policy, which is a key test of soundness.
- 5.13 As an alternative control mechanism for delivery of safeguarded land, Wallace would respectfully **request that the Council consider including a robust monitoring / 'Plan B' policy in the plan.** It is noted that there are no monitoring policies set out within the plan at this stage, which will need addressing regardless of the specific points made below.
- 5.14 **In relation to the safeguarded Site at Shifnal, a monitoring / 'Plan B' policy (and other supporting policies within the plan) would provide the ability for the Council to 'update' the plan in an efficient and speedy manner should there be clear evidence that the delivery of the Site is required sooner rather than later.** This approach would accord with paragraph 139(d) of the NPPF.
- 5.15 **The monitoring / 'Plan B' policy could plausibly include a range of criteria that would automatically 'update' the plan should monitoring of the plan identifies that these criteria have been triggered,** for example, should the Council;
- Not be able to demonstrate a five year supply of housing land;
 - Not be able to achieve the housing requirement in the plan because of, for instance:
 - **A relevant change / increase in the Council's housing requirement such as the revised standard method or a requirement to take more of the unmet need to the Black Country;**
 - Any evidence coming to light that demonstrates other key allocate sites cannot be delivered;
 - Any other material consideration that would impact on housing requirements in Shifnal.
- 5.16 An example where this has been effective is contained within the adopted West Lancashire Local Plan (October 2013) as contained under policies *GN2 – Safeguarded Land* and *RS6 – A 'Plan B' for Housing Delivery*.
- 5.17 Of particular note is that West Lancashire included all of their safeguarded sites within the proposed settlement boundaries of each relevant settlement (unlike the suggested approach at Shropshire) **and split their safeguarded sites into two categories allowing an opportunity for 'Plan B' sites to come forward under certain circumstances.**

5.18 The Inspector noted in his final report on the West Lancashire Local Plan, at paragraph 139 and 141 that:

"...While the site allocations have been rigorously tested in the Examination and ought to provide an adequate housing land supply, Plan B is intended to provide a further safeguard should unexpected circumstances lead to one or more of the larger allocated sites not coming forward as anticipated. It is a constructive response to the uncertainty inherent in planning for housing provision.

...In order for the Plan B mechanism to be effective, it needs to form part of a formal policy in the Local Plan."

5.19 These policies are copied below for the Council to consider and Wallace would welcome a further discussion with the Council about these options or something similar in the context of Shifnal.

Policy GN2

Safeguarded Land

The land identified on the Policies Map as safeguarded land is within the settlement boundaries but will be protected from development and planning permission will be refused for development proposals which would prejudice the development of this land in the future. This safeguarding is necessary for one of the following two reasons:

- **It is allocated for the "Plan B"** – such land will be safeguarded from development for the needs of the "Plan B" should it be required. If the "Plan B" is not required then this land will be safeguarded from development until 2027 for development needs beyond 2027.
- It is safeguarded from development for the needs beyond 2027- these sites will only be considered for development after 2027 if there is not sufficient supply of other suitable sites within the settlement boundaries to meet any identified development needs at that time.

The following sites will be safeguarded from development (potential capacity for housing and / or employment land in brackets):

a) "Plan B" sites

- i. Land at Parr's Lane, Aughton (400 dwellings)
- ii. Land at Ruff Lane, Ormskirk (10 dwellings)
- iii. Land at Red Cat Lane, Burscough (60 dwellings)
- iv. Land at Mill Lane, Up Holland (120 dwellings)
- v. Land at Moss Road (west), Halsall (240 dwellings)

b) Safeguarded until 2027

- i. Land at Yew Tree Farm, Burscough (500 dwellings and 10 ha of employment land)
- ii. Land at Moss Road (east), Halsall (210 dwellings)

The safeguarded land at Yew Tree Farm is not marked on the Policies Map as it is part of the wider Policy SP3 allocation for a strategic development site and a subsequent masterplan for this allocation will define the precise boundary of the land to be safeguarded until 2027 within this site.

Policy RS6

A "Plan B" for Housing Delivery in the Local Plan

The "Plan B" sites safeguarded in Policy GN2 will only be considered for release for housing development if one of the following triggers is met:

- Year 5 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 5 years of the Plan period, then the **Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.**

- Year 10 review of housing delivery

If less than 80% of the pro rata housing target has been delivered after 10 years of the Plan period, then the **Council will release land from that safeguarded from development for "Plan B" to enable development to an equivalent amount to the shortfall in housing delivery.**

- Housing target increasing as a result of new evidence

If, at any point during the 15 year period of the Plan, the Council chooses to increase its housing target to reflect the emergence of new evidence that updates the existing evidence behind the housing target and which would undermine the existing target, then an appropriate amount of land will be released from that safeguarded from **development for "Plan B" to make up the extra land supply** required to meet the new housing target for the remainder of the Plan period.

- 5.20 Critically these policies allow West Lancashire Council to update their Local Plan as they see fit under the relevant circumstances. This can be undertaken quickly and effectively and represents a **'pro-active' and 'constructive' response to the uncertainty and change inherent in planning for housing**, which is arguably more prevalent than ever noting the current pandemic, Brexit, and anticipated planning reforms.

6. SUSTAINABILITY APPRAISAL

6.1 The Sustainability Appraisal process and a separate site assessment process have been conflated into a single document, the Sustainability Appraisal and Site Assessments Environmental Report (July 2020). No issue is taken with this *per se*, but the approach makes it somewhat difficult to navigate the document and the site selection process hard to follow.

6.2 Table 3 below summarises the findings for the sites at Shifnal included in the Regulation 18 Local Plan. The Site is SHF034.

Table 3: Sustainability Appraisal Summary for Shifnal Sites

Reference	Sustainability Appraisal Score (Stage 2a)	Recommendation in Detailed Assessment of Sites (Stage 3)
SHIF006	N/A	N/A
SHIF0004a	N/A	N/A
SHIF004b	N/A	N/A
SHF022 & SHF023 (in part)	Poor	Allocate
SHF015 & SHF029	Poor	Allocate
SHF013	Good	Allocate
Rest of SHF023	Poor	Safeguard
P14	Fair	Remove from Green Belt and safeguard
SHF034	Good ²	Remove from Green Belt and safeguard except for land north of western railway line

6.3 It is set out in the document that the Sustainability Appraisal represents Stage 2a of the site assessment process³. A summary of the overall scores for each site is provided in the main part of the document with the full appraisals for Shifnal provided as Appendix P. SHF034 **scores 'good' in the Sustainability Appraisal** and is the best score of all the safeguarded land in Shifnal. Indeed, it scores better than two of the three allocations. Wallace concur with this score, as the Site is highly sustainable.

6.4 It is set out in the document that the Screening of Sites represents Stage 2b of the site assessment process. This is presented as a series of proforma for each site. The proforma for the sites in Shifnal is also provided at Appendix P, and they include a summary of the findings of the SLAA and an overview of the availability and achievability of the site with a recommendation on whether it should be considered in the next stage of the process. Ultimately SHF034 was found to be available and achievable at this stage and recommended to be considered in the next stage.

6.5 The Detailed Assessment of Sites represent Stage 3 of the site assessment process. This is again presented as a series of proforma for those sites which were taken forward from Stage 2b. The

² SHF034 scores 'good' in the body text of the Sustainability Appraisal, Appendix T which considers strategic sites and in the proforma at Appendix P, but not the tables in Appendix P which is a typographical error that Wallace respectfully request is reviewed by the Council.

³ Stage 1 of the site selection process being the consideration of sites in the SLAA.

proforma include a summary of the strategic considerations for each site and officer commentary on highways, ecology, trees and public protection. Ultimately, it is recommended in the proforma that SHF034 be removed from the Green Belt and safeguarded other than land north of the western railway line, which was recommended to be retained in the Green Belt. Wallace have no issue with these findings as the Site can be delivered in a suitable and sustainable manner. However, they would like to stress that the land north of the western railway line has the potential to extend the proposed link road up to the A464 (west), and by choosing not to release this land from the Green Belt now the Council are preventing this benefit from coming forward until the next review of the Green Belt boundary.

6.6 On a final point, and with regards to methodology, it is respectfully requested that the SAMDev Plan housing allocations that are proposed to be retained as allocations in the Regulation 18 Local Plan be given consideration in the Sustainability Appraisal and the site assessment process. This is considered to be a necessary step before a conclusion can be drawn on whether these allocations are still suitable for housing and so they can be compared to the reasonable alternative of other sites which are not currently allocated coming forward instead, such as this Site. It is understood that the SAMDev Plan housing allocations underwent a Sustainability Appraisal at the time of that plan, but different assessment criteria was used and it is safe to say that the spatial context within which the sites were considered will have changed since then. A failure to consider the SAMDev Plan allocations may be seen as a significant oversight on the basis that the PPG requires Sustainability Appraisals to develop Local Plan options including reasonable alternatives and evaluate the likely effects of the Local Plan and alternatives⁴.

⁴ Paragraph: 013 Reference ID: 11-013-20140306

7. EVIDENCE BASE DOCUMENTS

7.1 This section considers some relevant evidence base documents that have been published alongside the Regulation 18 Local Plan, including:

- Green Belt Release Exceptional Circumstances Statement (August 2020);
- Green Belt Review: Stage 2 (LUC, November 2018);
- Landscape and Visual Sensitivity Assessment (Gillespies, November 2018); and,
- Green Infrastructure Strategy (LUC, July 2020).

7.2 These documents are considered insofar as any references to the Site are concerned and where necessary a critique is provided on their methodology.

Green Belt Review: Stage 2 (LUC, November 2018)

7.3 The Green Belt Review considers the contribution of individual parcels to the five purposes of the Green Belt. The Site is covered by parcels P15, P16, and P17a. Unfortunately, these parcels do not coincide with the boundaries of the Site, and in some instances extend much further.

7.4 The Green Belt Review also considers the overall harm that would result if opportunity areas were removed from the Green Belt. The Site is also covered by opportunity areas Sh-1a, Sh-2 and Sh-3, but again since these cover large areas these do not coincide with the Site.

7.5 This is not an uncommon approach to Green Belt assessments but it is noted that there is no assessment within the evidence base which considers the contribution of this Site to the five purposes of the Green Belt and the harm that would arise should it be removed from the Green Belt.

7.6 Pegasus Group have provided a bespoke Green Belt assessment for the Wallace site (P16 and P17a), set out in Appendix 1. The assessment ultimately finds that at best the land within the Wallace site makes no contribution and at worst a moderate contribution to the five Green Belt purposes, and that the release of the Wallace site from the Green Belt would have low-moderate harm overall.

7.7 Wallace support these findings but recommend that a Site specific assessment is included in the Council's Green Belt evidence documents, **to prevent any unnecessary scrutiny of the Council's** decision to release the Site from the Green Belt further down the line.

Green Belt Release Exceptional Circumstances Statement (August 2020)

7.8 This document comprehensively sets out the exceptional circumstances that warrant the release of Green Belt land in Shifnal. Wallace commend the thorough account of the exceptional circumstances and agree that such circumstances exist in Shifnal.

7.9 It goes on to consider where the new boundaries of the Green Belt would be drawn. At the Site, new Green Belt boundaries are identified as taking the form of roads, the western railway line, and structural planting and landscaping to those edges which are currently field boundaries or tree belts. These are strong and defensible boundaries, which are endorsed.

Landscape and Visual Sensitivity Assessment (Gillespies, November 2018)

7.10 This document divides the landscape around Shifnal into four parcels for the purposes of the study. The Site falls within parcels B and C although forms a relatively small proportion of the overall parcel areas. In relation to housing development it concludes that for parcel B, the landscape **sensitivity is 'medium' and visual sensitivity is also 'medium', and for parcel C concludes that landscape sensitivity is 'low-medium' and visual sensitivity is 'medium-high'**. Wallace consider that the judgements on sensitivity, support not only the proposed safeguarding of the Site, but its allocation within the plan.

7.11 The introduction to the document defines its purpose, noting that:

"The conclusions of this study when considered alongside the other information being gathered as part of the Strategic Land Availability Assessment (SLAA) will enable Shropshire Council to determine which areas warrant further planning appraisal and ultimately inform spatial development options for the Local Plan and provide a sound basis for decision making in the determination of planning applications."

7.12 Going on to state that:

"This is a strategic assessment which provides the context for more detailed studies of individual sites. It does not make judgements on the appropriateness of specific developments on individual sites (and does not consider specific development proposals where these might exist). More detailed studies relating to specific site allocations and development proposals will be undertaken at a local authority level as part of the Development Plan and development management process."

7.13 As such, Pegasus Group have undertaken a Preliminary Landscape and Visual Appraisal for the Site to fulfil this recommendation, which is provided in Appendix 1. This assessment ultimately finds that the Site can accommodate a sensitively designed residential scheme with only limited landscape and visual effects at a localised level and that such impacts can successfully be avoided or reduced through effective mitigation.

Green Infrastructure Strategy (LUC, July 2020)

7.14 The purpose of the Green Infrastructure Strategy is to inform land use planning and policy in respect of the necessary and appropriate protection, enhancement and creation of green infrastructure. It notes the importance of, and positive planning for green infrastructure, particularly in respect of design, stating that:

"GI can help to create high quality, attractive and functional places that will provide a setting for day-to-day living, enhance the character and diversity of the landscape and protect heritage assets that contribute to the area's unique sense of place and cultural identity."

- 7.15 How development can contribute more effectively to the provision of high quality green infrastructure is a key driver of the Green Infrastructure Strategy; consequently, its focus has been toward areas where the greatest amount of development within Shropshire is proposed in the Regulation 18 Local Plan. This includes opportunities within the Strategic Settlement (Shrewsbury), in Principal Centres (e.g. Bridgnorth, Ludlow, Market Drayton, Oswestry and Whitchurch) and at Key Centres (including Shifnal).
- 7.16 It sets out a series of objectives, including one related to 'protect, strengthen and enhance existing assets, and deliver new Green Infrastructure'. This includes reference to several 'appraisal themes' within which 'Landscape, Heritage and Culture' are included. This reflects the potential for green infrastructure to restore degraded landscape character as well as the restoring the setting of historic features and enhancing their aesthetic value and promoting a sense of place.
- 7.17 The 'Findings and Recommendations' include more generic opportunities as well as specific assessments for 'Settlement and Sites'. Opportunities common within the document include:
- Planting new, or strengthening existing habitat corridors to provide connectivity (for example strengthen and expand habitat networks along transport corridors and along historic hedgerow alignments);
 - Increasing access to existing open spaces; and
 - Provision of open space within new developments.
- 7.18 For the more specific assessment of the Key Centre of Shifnal (included at Appendix A), several assets and constraints are defined which relate to the site and its context, including:
- The existing open space that is located between the railway and the A464 (west);
 - The corridor of Wesley Brook; and
 - Walking routes to the south of the A4169 and west of Park Lane (broadly focussed on existing public rights of way).
- 7.19 An extract from Appendix A showing the Green Infrastructure Opportunities at Shifnal is provided at Figure 3 overleaf.

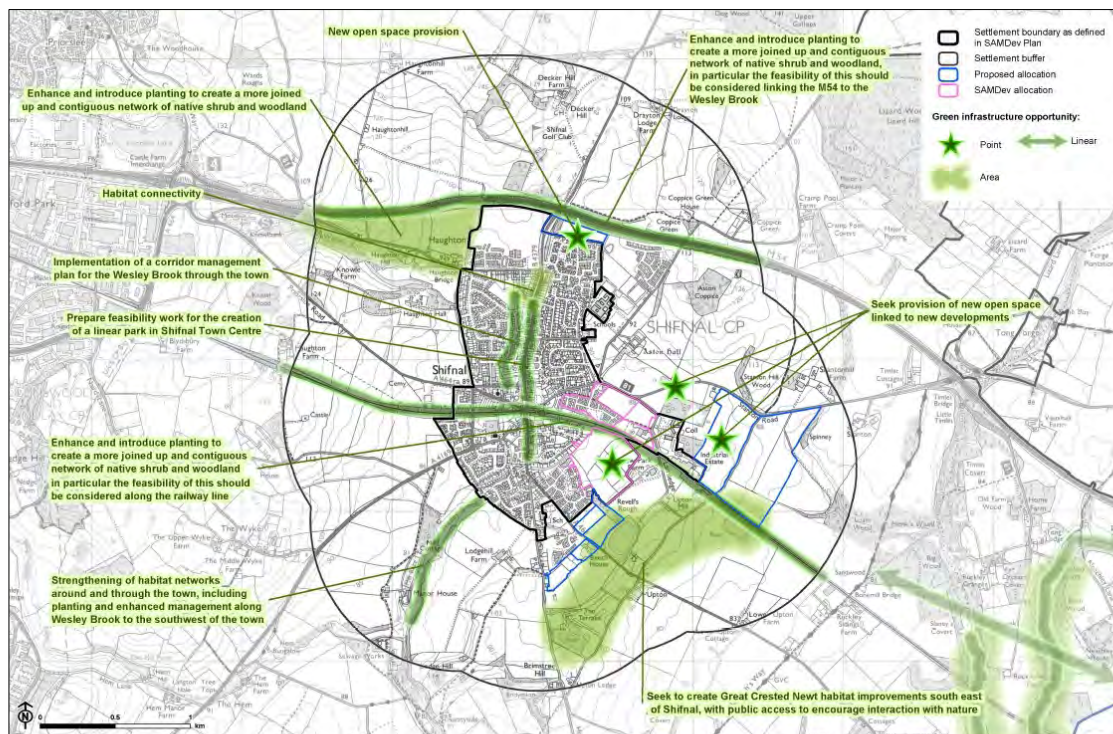


Figure 3: Green Infrastructure Opportunities at Shifnal (from Appendix A of the Green Infrastructure Strategy)

7.20 Also, in relation to the Site and its context, it defines the railway and Wesley Brook as linear green infrastructure corridors, noting that other relevant key opportunities include:

- Implementation of a corridor management plan for the Wesley Brook through the town, and considering vegetation management including control of invasive species;
- Promotion of Walkway Routes within Shifnal as required by the Shifnal Neighbourhood Plan (2016) and extending the public rights of way network;
- Strengthening of habitat networks around and through the town, including planting and enhanced management along Wesley Brook to the southwest of the town (with access improvements);
- Enhance and introduce planting to create a more joined up and contiguous network of native shrub and woodland, in particular the feasibility of this should be considered along the railway line, south of the M54 and linking the M54 to the Wesley Brook; and
- Seeking provision of new open space linked to new developments, particularly focussed to the south of the town, and seeking improvements to existing open spaces, in particular the facilities at Wheatfield Recreation Ground.



Figure 4: Illustrative Masterplan

7.21 Overall, the proposed development and emerging illustrative masterplan set out in Appendix 1 and shown at Figure 4 above, is considered to present a positive approach to green infrastructure that complements and enhances the aims and objectives of the Green Infrastructure Strategy.

8. STRATEGIC POLICIES

8.1 This part of the representations provide comment on some of the strategic policies in the Regulation 18 Local Plan. In addition to those policies which are referred to in this section, Wallace retain the right to comment any other policies in the emerging plan in the future.

SP1. The Shropshire Test

8.2 Wallace support the overarching vision of the County set out in this policy. It recognises that development will need to contribute to meeting local needs and make settlements more sustainable with the right mix of housing, employment, and other types of development. It also recognises that proposals should also seek to reflect relevant considerations in community-led plans, local economic growth strategies (including the Shrewsbury Big Town Plan), the Local Transport Plan, and the Public Health Strategy.

SP2. Strategic Approach

8.3 Part 2 of this policy proposes a housing requirement of around 30,800 homes over the plan period / 1,400 per annum. It is set out in the supporting text, that this housing requirement has been informed by the current standard method for calculating local housing need at 25,894 homes over the plan period / 1,177 homes per annum, and incorporates an element of flexibility as set out a paragraph 3.6 of the plan, and includes 1,500 homes to support the unmet need of the Black Country.

8.4 Wallace expect the housing requirement figure to be kept under review as the plan progresses given the ongoing work which may have implications for the housing requirement such as the statement of common ground on cross-boundary issues with the Black Country and the anticipated publication of the revised standard method for calculating local housing need.

8.5 The supporting text in the plan, at paragraph 3.11, suggests that the expected rate of delivery of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery. However, there is no annual trajectory provided within the plan showing how the housing requirement would be achieved year-on-year over the plan period and broken down into settlements. It would be useful if the plan included an annual trajectory and Wallace retain the right to comment on this should one be provided.

8.6 Part 5 of the policy says that to achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas. Wallace supports this approach as the urban areas are the most sustainable locations within the County and should be afforded the lion share of development. It goes on to set out the pattern of development for the urban areas, saying that development will be focused on the Strategic Centre of Shrewsbury (Part 5a), with significant development at both the Principal and Key Centres (Part 5b), and new sustainable communities at the Strategic Settlements (Part 5c). Wallace support the broad pattern of development set out in Part 5, particularly Part 5b which groups the Principal

and Key Centres, as both these categories have settlements where significant development can be accommodated.

8.7 Schedule SP2.1. Urban Locations lists the settlements under the headings of Strategic Centre, Principal Centres, Key Centres and Strategic Settlements. Wallace consider that the Principal Centres and Key Centres could be grouped together in the schedule under the heading Principal and Key Centres, to be consistent with the grouping and wording at Part 5b of the policy.

8.8 Part 6 of the policy recognises the importance of ensuring the long-term sustainability of rural communities, and that growth in urban areas will be complemented by appropriate new development within Community Hubs and Community Clusters to maintain or enhance their sustainability. However, Appendix 5 of the Regulation 18 Local Plan identifies a large proportion of the planned housing growth will be directed to the Community Hubs alone, and no figures are given for the Community Clusters. The proportion of homes to the rural areas could be considered to contradict the complementary nature of these areas and weaken the focus of development to the urban areas.

SP4. Sustainable Development

8.9 Wallace **welcome the Council's commitment to taking a positive approach to** sustainable development and this policy is considered to be in line with paragraph 11 of the NPPF.

SP6. Managing Housing Development

8.10 Wallace support Part 1 of the policy which says that in addition to housing development at the allocations set out in policies S1-S20, there will be positive consideration of other sustainable housing development where this does not conflict with the policies of the plan.

8.11 Wallace is also supportive of the wording of Part 3 of the policy, as it allows the residential guidelines to be exceeded where this is demonstrated to be appropriate. It is important that the residential **guidelines are not seen as cap, as they are 'guidelines' after all, and settlements may be suitable** for more housing growth than the residential guidelines suggest.

8.12 The first part of Part 4 says that additional market housing development outside the development boundaries shown on the Policies Map will be controlled in line with policy *SP9. Managing Development in the Countryside*. Wallace take no issue with this part of the policy although do comment separately on policy SP9 below.

8.13 Part 4 of the policy goes on to say that development outside settlement boundaries would only be considered acceptable where there is clear evidence that the residential guidelines appear unlikely to be met or where there are specific considerations set out in the Settlement Policies. Obviously, the deliverability and the developability of sites in the plan may change over time, so there needs to be an element of flexibility to allow other sites to come forward, so this part of the policy is commended. However, it is suggested that the Council also add to this policy a hierarchy of sites

that would be considered suitable for development in the event that the Council are unable to demonstrate a five year supply of housing land or in the event of other criteria being triggered. This should include the potential delivery of safeguarded sites before non-allocated sites. Such an approach would be aided by a monitoring / 'Plan B' policy similar to that applied by West Lancashire in their Local Plan. This would negate the requirement to formally review and update the plan before safeguarded land is brought forward.

- 8.14 In this case, it is also noted that the Site is depicted as falling outside of the proposed Shifnal settlement boundary. This does not have to be the case. The NPPF simply confirms that safeguarded sites should be located between the existing urban area and Green Belt land. This means the settlement boundary can lie either side of the safeguarded allocation. However, including the safeguarded sites within the settlement boundary, would provide a helpful visual indication that such sites are deemed to be suitable for development (even if this is at a point in time in the future).

SP9. Managing Development in the Countryside

- 8.15 Part 1 of this policy says:

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

- 8.16 This part of the policy clearly reflects the plans emphasis on the larger towns meeting the majority of the County's needs. However, Part 4 goes on to say:

"New market housing will be strictly controlled outside the development boundaries of the Strategic Centre of Shrewsbury, the Principle Centres, the Key Centres, the new Strategic Settlements and the Community Hubs. Within Community Clusters only new market housing which meets Community Cluster Policy SP8 criteria will be acceptable. Outside these areas, subject to the further controls that apply in Green Belt, residential development proposals will be positively considered where they meet all **the relevant requirements of Local Plan policies and relate to...**"

- 8.17 It then goes on to list several criteria relating to affordable housing exception sites, gypsy and traveller development, reuse of building with heritage significance, sub-division of dwellings, replacement dwellings and essential rural worker dwellings. The criteria listed are generally consistent with the NPPF's rural exception policy (paragraph 64d) and isolated homes in the

countryside policy (paragraph 79a-d). Wallace do not have any particular comments to make in relation to the set criteria.

- 8.18 In this instance, the Site is safeguarded and also depicted as falling outside of the proposed settlement boundary. As such, this policy would also apply to the Site and arguably reads as though the Council would favour residential development in more rural locations over and above additional homes coming forward on the edge of the key settlements on sites located outside the settlement boundaries.
- 8.19 Whilst it is understood that the Council will wish to protect the open countryside around key settlements beyond those sites allocated, this policy wording further reinforces our view that the **Site should be included within Shifnal's new development boundary** – regardless of whether it is ultimately allocated or safeguarded in the plan. By including the Site within the proposed settlement boundary this provides greater scope to then add a monitoring / 'Plan B' policy should the Council be minded to consider such an approach within the plan when noting the various matters and issues cited in Section 3 of these representations.

SP10. Shropshire Economic Growth Strategy

- 8.20 Parts 1 to 3 of this policy say that Shropshire will promote its economic potential by, amongst other things, developing and diversifying its local economy, and delivering sustainable economic growth and investment at Key Centres, Strategic Settlements and Strategic Corridors. To this end, it is set out elsewhere in the plan that at the Key Centre of Shifnal, 39.0ha of land will be removed from the Green Belt and allocated for employment use. At RAF Cosford, the plan is seeking to release a further 220.9ha to be allocated as a Strategic Site for economic growth. Wallace fully commend this, given their location within the M54/A5 Strategic Corridor.
- 8.21 Part 5 goes on to say that the delivery of employment will be supported by, among other things, housing of the right type, quality and tenure and affordability in the right locations. Indeed, Shifnal will be within the key area of search for housing for the growing workforce arising in Shifnal and RAF Cosford, as well as elsewhere in the strategic corridor, and on this basis is suitable not only for the level of housing growth set out in the plan but arguably more.

9. DEVELOPMENT MANAGEMENT POLICIES

9.1 This part of the representations provide comment on some of the development management policies in the Regulation 18 Local Plan. In addition to those policies which are referred to in this section, Wallace retain the right to comment any other policies in the emerging plan in the future.

DP1. Residential Mix

9.2 Part 1 of the policy states that residential development will be expected to provide a mix of dwelling **sizes, types and tenures, in accordance with the Council's SHMA**. Wallace consider that this policy should offer flexibility and account for changing requirements throughout the plan period and localised and site specific evidence to support a departure from the district wide requirements set out in the SHMA. This flexibility is important since clearly any policy on residential housing mix must ensure that it does not frustrate delivery by being over prescriptive.

9.3 Part 5 of this policy requires developments of five or more new homes to provide at least 5% of the dwellings to be built to the M4(3) (wheelchair user dwellings) and a further 70% of the dwellings to be built to the M4(2) (accessible and adaptable dwellings). Part 6 of this policy requires developments of 50 dwellings or more to deliver a range of specialist housing to meet the diverse needs of older people and those with disabilities. Wallace support the provision and delivery of these types of homes, however the blanket approach of this policy may not be appropriate, so an element of flexibility should be incorporated. Furthermore, evidence still needs to be provided to justify the figures set out in this policy.

DP2. Self-Build and Custom-Build Housing

9.4 In terms of the requirement for self-build and custom-plots, Part 2 of the policy suggests that on sites of ten or more dwellings, 10% of the dwellings are encouraged to be made available as serviced plots for self-build and custom-build developers, where there is an identified need on the Self-Build Register. It is noted that the Self-Build Register identifies that the number of applications for self-build plots in the County is falling year-on-year with applications for just 62 self-build plots made between October 2018 and October 2019⁵.

9.5 At the outset, Wallace can confirm that they are supportive of providing self-build and custom-build housing and the contribution that this makes to the overall housing supply but have concerns in relation to the level of self-build and custom-build housing suggested and that the demand for such a significant number of serviced self and custom-built plots over the plan period is not yet fully evidenced. Furthermore, is 10% was to be applied to this Site it would equate to over 100 self-build plots and the distribution of these plots would need carefully consideration to prevent there being large areas of undeveloped land within the Site if there was insufficient demand.

⁵ <https://shropshire.gov.uk/self-build-homes/self-build-register/register-statistics/>

9.6 Wallace also have concerns with the wording of Part 2d of the policy, which required plots to be marketed, serviced, available for purchase and ready for development by a self or custom-Builder, and marketed for at least 36 months at a fair plot valuation and in accordance with a marketing strategy to be approved by Shropshire Council. For the marketing strategies to be effective it would be useful if the policy defined **or give further clarification as to what is meant by 'fair value'**, and further clarification as to how the serviced plots would be developed after the period of marketing. It is also noted that the suggested 36 months marketing period is significantly longer than similar policies in other Local Plans and not justified, and a 12 month period of marketing may be more appropriate instead.

DP3. Affordable Housing Provision

9.7 Wallace support the need to deliver affordable housing and fully recognise their obligations as site promoters to assist in meeting such needs, as set out in Part 1a of this policy, which requires 20% of homes to be affordable. Wallace are committed to delivering the required amount of affordable homes on the Site. Notwithstanding this, Part 2 of this policy is also welcomed, which allows for a reduced rate of affordable housing based on the viability of otherwise sustainable schemes where evidence is clearly presented and agreed by the Council, as this approach is endorsed by the NPPF.

9.8 Part 1d says that where affordable housing is to be secured on site, its tenure should comprise 70% social or affordable rent accommodation and 30% intermediate or other affordable housing, unless evidence of local need indicates otherwise. Wallace support the flexibility this part of the policy provides. However, **clarity is required on whether the "other affordable housing" includes First Homes for sale at a discount of least 30%, and Wallace respectfully request that this part of the policy be kept under review to ensure consistency with the Government's policy changes with regards to First Homes.**

DP9. Strategic Corridors

9.9 Part 1 of the policy sets the strategic approach to the delivery of significant development and **infrastructure investment within the 'Strategic Corridors' served by the principal rail network and strategic and principal road networks in Shropshire.** The supporting text at paragraph 4.91 identifies the strategic corridors including, amongst others, the M54/A5 Strategic Corridor with opportunities in and around Shifnal as a Key Centre and RAF Cosford as a significant location. Wallace fully support the acknowledgement of this Strategic Corridor and the opportunities arising in Shifnal and RAF Cosford as a result.

9.10 Part 3 of the policy goes on to say that development at the strategic corridors should be sequentially located, starting with the Principal and Key Centres on an allocated site firstly or a windfall site. Wallace are supportive of part of the policy and the acknowledgement of Key Centres being at the top of the hierarchy, but consider that safeguarded sites if included within the settlement boundary could also be included in the hierarchy, particularly if **there is a monitoring / 'Plan B' policy in the plan.**

DP10. Managing and Supporting Town Centres

9.11 Part 8 of the policy says:

"The provision of neighbourhood based local shopping and other community facilities will be supported where this will help consolidate and improve existing provision or will serve significant new residential developments in main towns identified in policies S1-S18, or the Strategic Sites and Strategic Settlements identified in Policies S19-S21."

9.12 Wallace support this part of the policy as it provides some support for local facilities to be delivered in order to support significant new residential developments. The Council may also wish to consider, **if a monitoring / 'Plan B' policy is included in the plan, referring to these** sites in this policy.

DP12. Minimising Carbon Emissions

9.13 Part 1c of this policy requires new residential development on sites of one or more dwellings to ensure that 10% of the predicted energy needs of the development be delivered from on-site renewable and low-carbon energy sources. Part 1d of this policy strongly encourages all proposals of 50 dwellings or more to achieve zero net-carbon emissions. Wallace support the need to minimise carbon emissions and commend the **Council's efforts towards creating a zero net-carbon emission society**. However, these are matters solely for Building Regulations. The Deregulation Act 2015 removed the provision set out in the Planning and Energy Act 2008 which allowed a local planning authority to include in their plans energy efficiency standards that exceeded the energy requirement of Building Regulations. PPG is also clear in that local planning authorities only have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard.

9.14 Part 2 of this policy states that all non-residential developments of 1,000sqm or more will achieve **BREEAM 'excellent' rating**, and whilst Wallace again believe that buildings should be well-designed, this is not a matter that should be included in the plan. The Written Ministerial Statement (March 2015) is clear in that local planning authorities should not set in their emerging Local Plans any requirements relating to the performance or construction of new dwellings.

DP13. The Natural Environment

9.15 Parts 1 and 2 are supported, which seek to protect designated sites and priority species and habitats.

9.16 Part 3 requires all development to deliver at least 10% net gain for biodiversity. The NPPF says that planning policies and decisions should minimise the impacts on and provide net gains for biodiversity (paragraph 170) and that in order to protect and enhance biodiversity and geodiversity, plans should identify and pursue opportunities for securing measurable net gains for biodiversity (paragraph 174). Whilst the NPPF does not refer specifically to a 10% net gain, the Environmental Bill is due to be enacted towards the end of year which will require developers to ensure habitats

for wildlife are enhanced with a 10% increase in habitat value for wildlife. On this basis, Wallace have no issue with Part 3 of the policy at present but suggest that the Council monitor progress of the Environmental Bill and any policy reforms and ensure that the policy reflects the latest guidance prior to examination.

- 9.17 Parts 4 to 7 seeks protection for the natural assets within the County, which included Local Wildlife Sites, Local Geological Sites, Local Nature Reserves and Local Green Spaces, and sets the hierarchy of avoidance, mitigation and compensation. These parts of the policy are fully supported.
- 9.18 Part 8 of the policy seeks to retain trees, woodland and hedgerows where possible and increase the extent and distribution of trees and hedgerows. The retention and planting of trees will assist **in delivering the Council's vision for the green infrastructure within the** County and Wallace take no issue with this part of the policy.

DP15. Green Infrastructure

- 9.19 Wallace support the aims of this policy which seeks to provide better green infrastructure and all new development to make a reasonable contribution wherever possible, including linking up to existing green infrastructure in the area. This also ties-in with other policy aims, including improvements in biodiversity, tackling climate change, protecting landscape, reducing recreational impact on internationally designated wildlife sites and ensuring a high-quality local environment and an enhanced quality of life.
- 9.20 In the context of this policy it is noted that the landscape strategy for this Site aims to maintain and enhance the existing green infrastructure network and provide a series of proposals for existing and new green infrastructure that respond to local landscape characteristics such as landform, field boundaries, tree belts etc.

DP16. Open Space

- 9.21 This policy outlines the standards expected in the creation of open space on new development. When read alongside policy *DP15. Green Infrastructure*, these policies provide a clear emphasis for using open space provision as a means of creating and improving green infrastructure links as a priority wherever possible, and this is commended.
- 9.22 In this regards it is worth reiterating that the Site will comply with this policy and provide:
- A linear green infrastructure corridor along Wesley Brook that will incorporate a new public park and active travel routes along the brook to the town, as endorsed by the Shifnal Neighbourhood Plan (December 2016).
 - Formal open spaces including play areas and sports provision; and,
 - Informal amenity and semi-natural green spaces.

DP17. Landscaping of New Development

- 9.23 This policy seeks to create and maintain an attractive and well-designed environment, and development proposals will be expected to provide landscaping on site, unless the Council agrees that off-site landscaping would be more appropriate. It goes on to list a number of criteria that landscape schemes should meet. Wallace take no issue within this policy and the criteria listed therein, **although asks that clarity is provided as to what 'trees within adoptable areas' means.**

DP18. Landscaping and Visual Amenity

- 9.24 This policy seeks to respect, safeguard, and wherever possible, restore or enhance landscape character and visual amenity in Shropshire and refers development proposals back to the LVSS for guidance.
- 9.25 Wallace take no issue with this or the policy and Pegasus Group have undertaken their own Preliminary Landscape and Visual Appraisal for the Site which finds that the proposed development complies with this policy and accommodates a sensitively designed residential scheme with only limited landscape and visual effects at a localised level and that such impacts can successfully be avoided or reduced through effective mitigation.

DP19. Pollution and Public Amenity

- 9.26 This policy seeks to safeguard environmental quality and public amenity; minimise pollution; mitigate adverse effects and maximise opportunities for improvements where practicable. Wallace support this policy, as the criteria listed therein are considered to generally reflect the aims of the NPPF to prevent development from contributing to, or being put at risk from, unacceptable levels of soil, air, light or noise pollution or land instability.

DP21. Water Efficiency

- 9.27 Part 1 of this policy expects new housing to meet the Building Regulations 110 litres/person/day standard for water. PGG recognises that all new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day), but where there is a clear and evidenced 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. On the basis that the evidence supporting this tighter controls is set out in the Shropshire Water Cycle Study (July 2020), Wallace take no issue with this part of the policy.
- 9.28 Part 2 of the policy says that **non-domestic buildings will be expected to reach BREEAM 'good' rating** for water efficiency as a minimum, unless it can be demonstrated that this would make the development unavailable. However, the Written Ministerial Statement (March 2015) is clear in that local planning authorities should not set in their emerging Local Plans any requirements relating to the performance or construction of new dwellings.

9.29 Wallace take no issue with Part 3 which expects major development schemes to provide a programme of water efficiency promotion and consumer education with the aim of bringing about behavioural change with regards to water use.

DP22. Flood Risk

9.30 This policy applies the sequential and exception test and seeks to ensure that the causes and impacts of flooding as well as residual flood risk, will be reduced through design measures, wherever possible. Wallace are supportive of this policy and consider that the criteria listed in it reflect the requirements of the NPPF and PPG on this matter and can confirm that the development of the Site will meet these objectives.

DP23. Sustainable Drainage Systems

9.31 This policy requires developments to integrate measures for sustainable water management to reduce flood risk, avoid adverse impacts on water quality and quantity within Shropshire, including groundwater resources, and provide opportunities to enhance biodiversity, health and recreation. It requires major development (as defined in the NPPF) to include sustainable urban drainage systems. Wallace are supportive of the policy and can confirm that the development of the Site will incorporate sustainable urban drainage systems.

DP24. Conserving and Enhancing the Historic Environment

9.32 Wallace fully support this policy which seeks to protect the heritage assets in the County. The heritage assessment that has been undertaken so far for the Wallace site and provided in Appendix 1 confirms there are no heritage constraints that would prevent the Site coming forward for housing.

DP25. Green Belt and Safeguarded Land

9.33 Part 1 of the policy refers to the Policies Map which identifies the extent of the Green Belt and safeguarded land for future development needs beyond the plan period. Table DP25.1 in the supporting text identifies the locations of Green Belt release and whether it is proposed to be allocated for housing or employment or safeguarded. For ease of reference the table is shown below.

Table 4: Table DP25.1: Green Belt Release by Location and Type (from Regulation 18 Local Plan)

Location	Housing (ha)	Mixed Use (ha)	Employment (ha)	Strategic Site (ha)	Safeguarded (ha)	Total (ha)
Albrighton	-	-	-	-	19.9	19.9
Alveley	1.4	2.4	-	-	3.6	7.4
RAF Cosford	-	-	-	220.9	-	220.9
Shifnal	-	-	39.0	-	92.8	131.9
Stanmore (Bridgnorth)	-	-	11.4	-	-	11.4
Total	1.4	2.4	50.4	220.9	116.3	391.4

9.34 Wallace **commend the Council’s decision to release land from the Green Belt**, particularly at Shifnal, but note that the Green Belt release does not include any housing allocations in Shifnal or the M54/A5 Strategic Corridor and there is a compelling case to allocate the Site for housing in the plan period rather than safeguard for the future. It is set out in detail in these representations the **justification for allocating the Site for development or at least providing a monitoring / ‘Plan B’** policy for safeguarded sites.

9.35 Part 2 to Part 7 of the policy set out when development in the Green Belt would be considered appropriate or not inappropriate. Having considered these parts of the policy Wallace does not take issue with them.

DP27. Infrastructure Provision

9.36 Wallace support Part 1 of the policy which effectively only allows development to come forward where existing capacity allows or where any shortfall can satisfactorily be addressed through reasonable contributions. As previously noted, Wallace would work with the Council on a timetable for infrastructure delivery emanating from the delivery of the Site and would be willing to consider how this could be embedded into an allocation policy should the Council decide there is justification and merit to allocate the Site now rather than safeguard for the future.

DP29. Communications and Transport

9.37 This policy seeks to promote and support improvements to the communications and transport infrastructure serving the County. Wallace are fully supportive of this policy as it is central to the delivery of sustainable economic growth and the creation of the sustainable pattern of development set out in policy *SP2. Strategic Approach*.

10. SHIFNAL PLACE PLAN AREA

10.1 This part of the representations comments on the policy for the Shifnal Place Plan Area, *S15.1 Development Strategy: Shifnal Town.*

S15.1. Development Strategy: Shifnal Town

10.2 Part 1 of this policy states:

"Shifnal will fulfil its role as a Key Centre and the largest settlement in the north of the Shropshire Green Belt. Shifnal will be the focus for investment, employment, housing and development on the M54/A5 Strategic Corridor through Shropshire with access to Junctions 4 and 3 with proximity to Wolverhampton and the i54 major investment site."

10.3 However, whilst this part of policy says that Shifnal will be the key focus for housing development this is only really true until circa 2025, as thereafter any new housing development will be restricted to a very small amount of windfall development. As such Wallace believe that Shifnal can deliver more housing in the plan period and is suitable to accommodate more growth than set out in the plan, especially given its position within the M54/A5 Strategic Corridor.

10.4 Part 2 of the policy refers to the Neighbourhood Plan for Shifnal, which covers the period 2014 to 2026 and says that policies and proposals in the Neighbourhood Plan that conform with the Local Plan will continue to apply. Similarly, Part 11 of the policy says that proposals should respond positively to the Neighbourhood Plan, as well as other community-led plans, community strategies, and masterplans adopted by Shropshire Council. Wallace support these parts of the policy.

10.5 Part 3 of the policy states:

"Shifnal is inset into the Green Belt and planned development will only occur within the development boundary shown on the Policies Map. Development in the Green Belt may be permitted in 'very special circumstances' in accordance with national and local Green Belt policies that specify the appropriate land uses and the acceptable circumstances for this development."

10.6 Wallace take no issue with this part of the policy although as set out in these representations it is recommended that safeguarded sites be included in the development boundary.

10.7 Part 4 of the policy says:

"Shifnal will have a key role in providing homes, jobs, services and facilities to the Place Plan area, other Green Belt communities and the M54/A5 Strategic Corridor. Over the Local Plan period, the town will deliver around 1,500 dwellings and make available around 41 hectares of employment land to provide choice and competition in the market. New housing and employment will make provision for the needs of the town and surrounding hinterland, including attracting inward investment and allowing existing businesses to expand."

- 10.8 Wallace has no particular issue with the wording of this policy *per se* but do consider that the residential guideline of 1,500 may be being unnecessarily constrained and Shifnal could be considered suitable for a higher level of housing growth. It is noted that by allocating this Site and including it within the settlement boundary the residential guidelines in the town would increase to around 2,765 homes. However, whilst this might seem like a significant increase only 1,495 homes would be from new allocations, including 1,265 at this Site and 230 from other housing allocations. Shifnal is suitable for this number of new homes from allocations, particularly with the necessary infrastructure in place to support it, which can be secured through reasonable s106/CIL contributions.
- 10.9 Part 5 of the policy says new residential development will primarily be delivered through the saved SAMDev allocations and the new residential allocations in Schedule S15.1(i) and shown on the Policies Map.
- 10.10 The SAMDev Plan residential allocations include:
- SHIF004a – Land south of Aston Road
 - SHIF004b – Land between Lawton Road and Stanton Road
 - SHIF006a – Land north of Wolverhampton Road
- 10.11 Appendix 5 of the plan shows that the SAMDev Plan allocations have already been completed or have planning permission.
- 10.12 The new residential allocations at Schedule S15.1(i) include:
- SHF013 – Land adjoining Meadow Drive, Shifnal (65 homes)
 - SHF015 & SHF029 – Land adjoining Beech House between A464 and Park Lane (65 homes)
 - SHF022 & SHF023 (part) – Land between Windmill View and The Monument on A464, Shifnal (100 homes)
- 10.13 The supporting text of the plan at paragraph 5.204 says that given the past rate of housing delivery in Shifnal, all the supply of housing land could be delivered in its entirety by 2025. Thus, most of the housing provision set out in Part 5 of the policy, could be completed by 2025 after which any new housing in Shifnal would be limited to windfall development in the development boundary. This is a risky strategy and could put pressure on land outside the settlement boundary.
- 10.14 Part 6 of the policy says that Shifnal will deliver a significant, new investment opportunity on the employment allocation in Schedule S15.1(ii) and shown on the Policies Map. Wallace fully support this part of the policy since Shifnal is ideally placed for economic and employment growth being within the M54/A5 Strategic Corridor and would benefit from improved self-containment of the working population.

10.15 Part 7 of the policy says that land beyond the development boundary that is not part of the Green Belt is safeguarded for Shifnal's future development needs, as set out in Schedule S15.1(iii) and on the Policies Map. The safeguarded land at Schedule S15.1(iii) includes:

- 4.5 hectares - Land adjoining junction of Stanton Road and Lamledge Lane
- 9.4 hectares – Land adjoining Shifnal Hillcrest School and Shifnal Industrial Estate
- 10.4 hectares – Land between Revells Rough, Lamledge Lane and the eastern rail line
- 9.6 hectares – Land between A464 (south) and Park Lane
- 46.1 hectares – Land between Park Lane and A4169 at Lodge Hill
- 12.8 hectares – Land between A4169 and the western railway line

10.16 The latter three sites comprise the Site. Wallace take no particular issue with the safeguarding of the Site but do consider that the settlement boundary could include safeguarded land, and there is a strong case to **include a robust monitoring / 'Plan B' policy**. Alternatively, the Site could be allocated instead as highlighted in Section 5 of these representations.

10.17 The benefits associated with the Site are set out at paragraph 5.214 of the plan, which states:

"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, leading to;*
- b. Significant range and choice of new housing to meet local needs;*
- c. Highway improvements at Five Ways and Innage Road, and*
- d. A future opportunity to connect the A4169 and the A464 through the railway embankment **creating a 'safety valve' for the capacity of the Five Ways junction;***
- e. Improved access to community facilities and commercial services in the town with the potential to offer further services including:*
 - i. Capacity of core services including schools, GP surgery and other health care;*
 - ii. Extending the retail offer to provide a choice and deflect trade within Shifnal away from Telford and other alternative locations; and*
 - iii. Providing vehicle services for fuel or vehicle charging to deflect trade within Shifnal from the motorway services and other alternative locations.*
- f. a significant net gain in Green Infrastructure and the management of flooding; and*
- g. improved access into the town, to recreational open space and to the countryside in the Green Belt to enhance its environmental quality and accessibility."*

10.18 Wallace commend the inclusion of these benefits in the plan and consider that they could come forward in the plan period.

10.19 Part 7 of the policy goes on to say that:

'Development of this [safeguarded] land during the Plan period will only be permitted in 'very special circumstances' to meet Shifnal's longer term development needs in accordance with national and local Green Belt policies.'

10.20 Part 8 of the policy says:

"To support Shifnal's role as a Key Centre and the importance of the town's distinctive retail offer and the need to sustain a vital and viable town centre, the town centre identified on the Policies Map is the preferred location for new or enhanced retail development. There is a presumption against out of centre retail development with the exception of the release of safeguarded land to the west and south of Shifnal in 'very special circumstances' to meet the longer term development needs of the town."

10.21 Since there is no national requirement to demonstrate very special circumstances for development **on safeguarded land a more robust approach may be to include a monitoring / 'Plan B' policy** for safeguarded land, as previously highlighted.

10.22 Wallace support the recognition that retail development at the Site may be suitable and indeed potential retail facilities at the Site will provide a choice and retain expenditure within the town. However, if **the Site was allocated or included in a monitoring / 'Plan B' policy, then retail development could be controlled through Policy DP10. Managing and Supporting Town Centres.**

10.23 Wallace support Part 9 of the policy which says that development in the town will have regard to **the town's natural and historic features**, heritage assets, green corridors and spaces; and, the improvement of environmental quality, including the protection and enhancement of the corridor of the Wesley Brook and the effective drainage of river and surface water through the town particularly from the discharge of flood waters.

10.24 Part 10 of the policy states that Shifnal will be a significant focus for the provision of infrastructure and services to meet the needs of the town and its wider catchment area, with current priorities set out in the Shifnal and Surrounding Area Place Plan including:

- Localised improvements to Haughton Lane and Haughton village;
- Improvements to pedestrian and cycle infrastructure to support sustainable travel;
- Improvements to the town centre including Bradford Street / Aston Street junction;
- Further improvements required by the proposed growth of Shifnal including:
 - Priorities afforded to through traffic and residential parking on Innage Road;
 - Capacity improvements to Five Ways roundabout; and,

- o Improvements to upgrade key routes and junctions serving the town.

10.25 Wallace support this part of the policy and consider that the Site could contribute to the implementation of this infrastructure through reasonable s106/CIL contributions arising from the proposed development, which given the scale of the Site would not be insignificant.

10.26 Part 11 of the policy states:

"Development proposals will demonstrate they have adequately assessed and mitigated their impacts with regard to co-ordinating infrastructure provision and the development of their proposals. Development proposals should address the infrastructure constraints and requirements identified in the Implementation Plan and Shifnal Place Plan and any site or settlement infrastructure modelling and/or assessments to positively contribute to local infrastructure improvements, including the provision of community benefits in accordance with Policy DP27."

10.27 Wallace fully support this part of the policy as it would be inappropriate for development to come forward without first demonstrating that the impacts can be mitigation and the necessary infrastructure can be provided to support it. Indeed, in this regard, any allocation could not come forward unless it complied with this part of the policy, including this Site if allocated.

11. SUMMARY

- 11.1 Pegasus Group are instructed by Wallace to make representations to the Regulation 18 Local Plan, pertaining the Site which extends around the south and west of Shifnal which is proposed to be released from the Green Belt and safeguarded for future housing needs.
- 11.2 The exceptional circumstances to remove the Site from the Green Belt include the potential to provide:
- Around 1,265 new homes which in turn will:
 - Increase expenditure that is directed to the town;
 - **Support investment in the town's services and facilities;**
 - Support the economic growth strategy for the town and M54/A5 Strategic Corridor; and,
 - Assist in addressing some of the unmet needs of the Black Country.
 - Policy compliant affordable homes;
 - Homes for the working age population, which together with the employment land proposed within the town, will help address the low-levels of self-containment;
 - Land for retail facilities to provide a choice and expenditure leakage out of the town;
 - Land for a primary school to improve capacity within town;
 - A link road from the A464 (south) to the A4169 helping ease capacity issues in the town;
 - The potential for a future link up to the A464 (west); and,
 - **Improved access and drop off for St Andrew's Primary School which will relieve traffic congestion on Park Lane.**
- 11.3 Wallace **fully support the Council's decision to remove the Site from the Green Belt.** Wallace also welcome the safeguarding of the Site within the Regulation 18 Local Plan.
- 11.4 As set out in these representations, if more land needs to be identified to achieve the housing requirement or a higher requirement resulting from the revised standard method, the Site represents a perfectly suitable and sustainable site to allocate now. Indeed, it:
- Is in the right place to strengthen the economic growth potential of Shifnal and the M54-A4 Strategic Corridor;
 - Can provide a thoroughly considered development in a highly sustainable location;
 - Can be delivered from when there is very limited housing development planned in Shifnal;
 - Can bring substantial and unique benefits to the town in the plan period; and,
 - Scores best of all the other safeguarded land in Shifnal in the Sustainability Appraisal.

- 11.5 As set out in these representations, the delivery of homes, employment land and infrastructure required to support the Site could be set out in a Site specific allocation policy that would ensure an appropriate masterplanning and phasing strategy was endorsed prior to an application being submitted and the commencement of development so as to not adversely impact on the local community and existing infrastructure in Shifnal. Wallace would be more than willing to discuss and consider such a policy should the Council consider there are sufficient exceptional circumstances to allocate the Site now.
- 11.6 In the event that the Council are minded to retain the safeguarded status of the Site within the plan, and not put it forward for an allocation now, **we respectfully request that the Council's policy** officers consider the following:
- Safeguard the Site but include it within the newly defined settlement boundary of Shifnal; and,
 - Include a monitoring policy in the plan that sets out what the Council will do in terms of reviewing / updating the Local Plan under certain circumstances such as:
 - The statutory five year trigger point for a Local Plan review; and/or,
 - The inability to demonstrate five years supply of housing land;
 - A relevant change / **increase in the Council's housing requirement**;
 - Any evidence that demonstrates other key allocate sites cannot be delivered coming to light;
 - Any other material consideration that would impact on housing requirements in Shifnal; and,
 - Include a hierarchy / 'Plan B' policy within the plan as part of policy *SP6. Managing Housing Development* (as per the West Lancashire Local Plan examples provided in Section 5 of these representations).
- 11.7 Overall, Wallace consider the Council have prepared a strong Regulation 18 Local Plan and support its content in respect of many of its policies, but they respectfully request that the Council consider the comments made in these representations.