

## Representation Form

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

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

### Part B: Representation

Name and Organisation:	Sansaw Estate
------------------------	---------------

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

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

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

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

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

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

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

#### Strategic Policy SP2 Strategic Approach

The Sansaw Estate notes the policy's aspiration to accommodate, "*investment and new development that contributes to meeting needs and making its settlements more sustainable*". However part 2 of the policy undermines its own aims to meet the county's needs because its proposals for only 1,400 dwellings per annum is significantly less than the latest official statistics' estimate of the number of new households in Shropshire over the plan period, which is for an average growth of 1,656 households per annum over 2016-2038. Policy SP2 will therefore constrain growth rather than meet Shropshire's housing needs and therefore fails the 'positively prepared' test of soundness.

The Office of National Statistics (ONS) latest household projections were published on 29th June 2020 and are reproduced in figure 1 overleaf<sup>1</sup>. They are based on 2018 data and are significantly higher than the 2014-based data used by the 'standard method'.

*Figure 1. ONS Household Projections for Shropshire*

	2014-based projection	2018-based projection
2016	123,886	135,452
2017	125,421	137,305
2018	126,633	138,998
2019	127,443	141,085
2020	128,686	142,954
2021	130,206	144,748
2022	131,432	146,680
2023	132,056	148,560
2024	133,357	150,419
2025	134,383	152,170
2026	135,511	153,863
2027	136,620	155,557
2028	137,727	157,211
2029	138,844	158,813
2030	139,903	160,361
2031	140,949	161,881
2032	141,944	163,378
2033	142,944	164,866
2034	143,925	166,306
2035	144,890	167,729
2036	145,844	169,145
2037	146,748	170,519
2038	147,635	171,876
<b>total increase 2016-2038</b>	<b>23,749</b>	<b>36,424</b>
<b>rate per annum (hholds/pa)</b>	<b>1,080</b>	<b>1,656</b>

The 2014-based projections estimate growth of 1,080 households per annum whereas the 2018-based projections estimate growth of 1,656 households per annum in Shropshire.

The 2018-based official household projections result in a much higher estimate of 171,876 households by the end of the Plan period compared to only 137,635 households in the earlier projections. They are so much higher than the 2014-based projections that exceptional circumstances exist to justify a departure from the normal, 2014-based 'standard method' of calculating housing requirements. Exceptional circumstances exist in Shropshire to justify the use of the more recent 2018-based

<sup>1</sup> Office of National Statistics 2018-based household projections, published 29<sup>th</sup> June 2020, table 406 <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

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	Part B Reference:

household projections, to avoid a very significant difference between the number of dwellings and the county's growing number of households.

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

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

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

To ensure the Plan passes the 'positively prepared' and 'effective' tests of soundness, the following modifications are necessary to sections 2 and 6 of policy SP2 respectively:

*"2. Over the plan period from 2016 to 2038, ~~around 30,800~~ **at least 36,432** new dwellings and around 300 hectares of employment land will be delivered. This equates to around ~~4,400~~ **1,656** dwellings and around 14ha of employment land per annum. This Local Plan ensures that sufficient land in the right locations is available to achieve these growth aspirations, however the availability of land will be kept under review to ensure a continuous supply of suitable sites is available."*

*"6. Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development **and visionary rural transformation** within Community Hubs, identified in Schedule SP2.2, which are considered significant rural service centres..."*

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

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Office Use Only	Part A Reference:
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No, I do not wish to participate in hearing session(s)

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

*(Please tick one box)*

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

The Sansaw Estate are an active landowner and developer in the Hadhall, Clive and Grinshill areas and will be able to contribute positively to discussions that relate to these locations and to the operation of whole Estate Plans. They wish to participate in all relevant hearing sessions.

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Signature: H. Howie

Date: 03/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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

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

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SP8"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |

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#### **Strategic Policy SP8 Managing Development in Community Hubs**

We support the statement in Policy SP8 that, "*Community Hubs are considered significant rural service centres and the focus for development within the rural area.*" However section 1f of the policy contradicts this by requiring that, "*The granting of permission would not result in the settlement's residential guideline being exceeded*". The ceiling on development set by section 1f renders the Policy unsound against the 'positively prepared', 'justified' and 'consistent with national policy' tests of soundness.

Section 1f effectively turns Community Hubs from sustainable settlements in which development is appropriate, into locations where development is refused if the residential guideline is exceeded. This contradicts the policy's earlier statement

that, "Community Hubs are considered significant rural service centres and the focus for development within the rural area." There is inadequate justification or evidence as to why successful and sustainable villages should tip from a positive approach to development to a negative approach, simply because they have exceeded an arbitrary guideline figure. To this extent the policy fails the 'justified' test of soundness.

Almost all the Community Hubs have a settlement residential guideline lower than the Office of National Statistic's latest projected household growth figures for Shropshire (2018-based figures, provided in more detail in our representations on policy SP2 Strategic Approach). The requirement in section 1f of Policy SP8 to keep development below the settlement guideline figure results in the policy failing the 'positively prepared' test of soundness as it does not seek to meet the growth needs of rural areas.

Section 1f of the policy makes the guideline a ceiling figure, running counter to the National Planning Policy Framework's consistent use of housing numbers as *minimums* rather than *maximums*. It is contrary to the Government's key objective of, "significantly boosting the supply of homes" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It therefore fails the 'consistent with national policy' test of soundness.

Furthermore, section 1f is an unnecessary repetition of section 3 of Policy SP7 (Managing Housing Development).

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To make the Plan sound, section 1f should be deleted from policy SP8 in its entirety as follows:

~~f. The granting of permission would not result in the settlement's residential guideline being exceeded, taking into consideration completions since the start of the plan period and outstanding commitments (including site allocations). If it does, regard will be given to policy requirements identified within Paragraph 3 of Policy SP6 and any other relevant policies of this Local Plan.~~

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

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

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

*(Please tick one box)*

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

The Sansaw Estate are an active landowner and developer in the Hadnall, Clive and Grinshill areas and will be able to contribute positively to discussions that relate to these locations and to the operation of whole Estate Plans. They wish to participate in all relevant hearing sessions.

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

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Signature:

H. Howie

Date:

03/02/2021

Office Use Only

Part A Reference:

Part B Reference:

## Representation Form

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- (Please tick one box)

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

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

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

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#### **Strategic Policy SP10 Managing Development in the Countryside**

#### **SP10 sections 2 & 3 on Economy & Community**

Overall, Sansaw Estate support the positive approach in sections 2 and 3 of Policy SP10 to economic and community development in the countryside. We welcome the policy's enablement of a wide range of uses that will strengthen rural sustainability. However section 3a of the policy restricts new economic development to "small-scale" and this fails the 'justified', 'effective' and 'consistent with national soundness' tests of soundness.

Section 6 of the National Planning Policy Framework seeks to support a prosperous rural economy. Paragraph 83 states:



*"Planning policies and decisions should enable:*

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship."*

There is no restriction in national policy that rural economic development must be limited to being small-scale. Introducing such a requirement in section 3a of Policy SP10 makes it contrary to national policy that supports sustainable growth "*of all types of business*".

Sections 3b and 3c of the policy do not impose a size restriction on existing businesses and land-based businesses and there is no justification for doing so for new businesses.

There is no need for the 'small-scale' restriction in order to protect the countryside given that the policy already requires that economic development must, "*maintain or enhance countryside vitality and character*".

#### **Section 4 Housing**

The Estate has a number of historic buildings in which it expects to invest in renovations over the plan period. Section 4d permits the sustainable re-use of buildings with heritage significance but is worded so tightly that it will render renovation unviable and impractical in most cases.

There is little point in investing in the future of a building if it cannot be brought up to modern standards and in most cases this does involve some alterations or extensions to the original building. This can be done very sympathetically to provide a successful mix of the original and the modern. Unfortunately the policy will be used to refuse schemes unless there is, "*minimal alteration, extension or rebuilding*", greatly limiting the flexibility that is necessary to make renovation schemes worthwhile.

The intention of section 4d is to achieve, "*The optimum viable and sustainable reuse of buildings with heritage significance*" but the restrictions in the policy render it ineffective and fail the 'effective' test of soundness.

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

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Office Use Only	Part A Reference:
	Part B Reference:

To ensure the Plan can pass the tests of soundness, it is necessary to modify sections 3a and 4d of the policy as follows:

*"3a. ~~Small-scale~~ ~~n~~New economic development diversifying the rural economy, including farm diversification schemes"*

*"4d. The optimum viable and sustainable reuse of buildings with heritage significance, particularly where this also secures retention of the building as a significant landscape feature and/or achieves environmental enhancement, and meets the criteria set out in Local Plan Policies SP5, SP11, DP12, DP17, DP23 and DP24. Where buildings are not of heritage significance, any proposal for reuse should evidence how the development will result in an enhancement of the immediate setting which is sympathetic to the local character and context and that the benefits of the development are not otherwise outweighed by other sustainability, Green Belt or Local Plan policy considerations. For all buildings, minimal ~~alteration, extension or~~ rebuilding should be required to achieve the development"*

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

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

*(Please tick one box)*

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Signature: H. Howie

Date: 03/02/2021

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Part A Reference:

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Name and Organisation:	Sansaw Estate
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- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

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

Paragraph:	<input type="text"/>	Policy:	S17.2	Site:	CLV012	Policies Map:	Clive
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- |  |      |                          |     |                                     |
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##### **Settlement Policy S17.2 Community Hubs in the Wem Place Plan Area - Clive**

Policy S17.2 identifies Clive as a Community Hub settlement that will have growth of around 30 dwellings, with around 20 dwellings to be delivered on allocations CLV012 and CLV018. These allocations fail the 'justified' and 'effective' tests of soundness.

Site CLV010 had been the preferred site in the November 2018 'Preferred Options' Plan but in 2020 the Council swapped this site for sites CLV012 and CLV018. The Council's reasoning for changing its preferred allocation is set out on page 220 of the Wem site assessments report in relation to site CLV010 as follows: "*Whilst this site was identified as a Preferred option in 2018, concerns have been raised about the sites proximity to services within the villages, taking into account the slightly uphill gradient from west to east, as well as concern that traffic will need to go through the village to access the A49. To this end, it is considered there are alternative sites on the east of the village that are more appropriate for allocation to meet the village's modest housing requirement.*"

With regard to traffic, the village sits mid-way between the A49 to the east and the A528 to the west. Concerns about construction traffic are misplaced, as a planning condition can be applied to require all deliveries to travel to and from the site from the A528 direction, thus entirely avoiding any construction traffic through the village.

The concern about the 'slightly uphill gradient' is disingenuous as the gradient of Station Road at this point is very slight indeed. Development of site CLV010 would create a pedestrian footway along this length of Station Road, to the benefit of existing homes on the opposite side of the road as well as to the new dwellings.

*Figure 1. Station Road with potential for footway on southern (right-hand) side*



The Sansaw Estate owns the intervening land between site CLV010 and the existing public right of way that connects the south of the village to the railway station and the school. A new footpath link will be created as part of the development of site CLV010 that will provide residents with a largely off-road route to the railway station to the west and the school and village facilities to the east as shown in figure 2.

Office Use Only	Part A Reference:
	Part B Reference:

In addition, the Sansaw Estate will provide a hard surface to improve the route between site CLV010 and the school.

*Fig 2. New footpath link (shown in red) proposed across Sansaw Estate land to connect site CLV010 to Field Drive to the east and the right of way to the south*



The Sansaw Estate has an excellent reputation for delivering housing and public open space in the local area. The Estate manages 150 hectares of woodland and extensive areas of grassland, including the Grinshill Local Nature Reserve over which it allows unfettered public access.

Clive CoE Primary School is physically constrained however the Sansaw Estate do own land and a derelict building known as 'Hilltop Cottages' adjoining the school, which would be made available as part of site CLV010's contribution to making Clive more sustainable. The school governors support the proposed transfer of the land and building and there is an outline agreement between the Sansaw Estate and the school that this will accompany the development of site CLV010 as part of its contribution to community infrastructure associated with development.

Sites CLV012 and CLV018 are further from the railway station and the village shop than site CLV010 and are unable to make the contributions to village infrastructure that site CLV010 can deliver. Their allocation fails the 'justified' test of soundness and in relation to improving the sustainability fo Clive, the proposed allocations also fail the 'effective' test of soundness.

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

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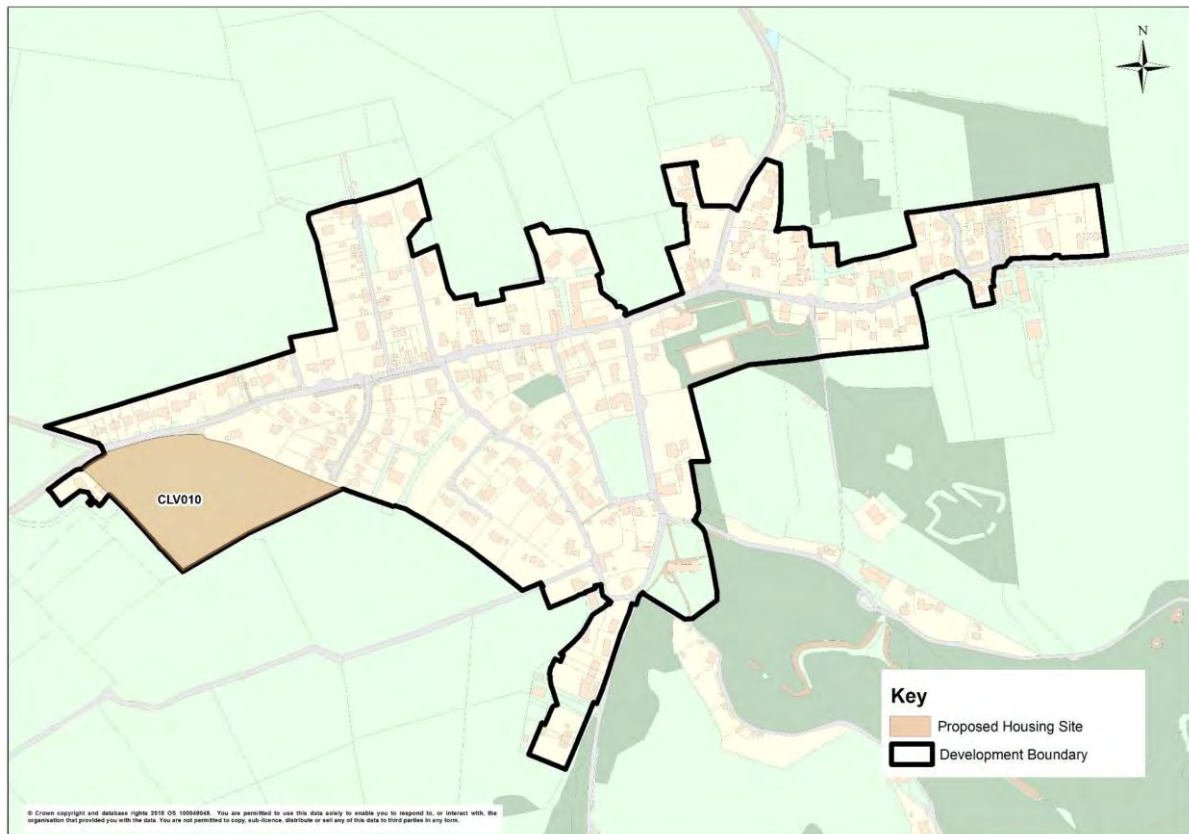
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To ensure the Plan can pass the 'justified' and 'effective' tests of soundness, the following modifications are necessary:

Site Allocation	Development Guidelines	Provision
<b>Clive Community Hub</b>		
<p><del>Land at Flemley Park Farm, High Street, Clive and adjacent to the Bungalow (CLV012 and CLV018)</del></p> <p><u>Land south of Station Road, Clive (CLV010)</u></p>	<p>An appropriate highway access will be provided <del>onto High Street, onto Station Road with accompanying pedestrian footway.</del></p> <p>Development will respect the existing linear built form and provide a low density scheme, and incorporate additional car parking and cycle storage facilities to reduce the level of on-street parking.</p> <p>Development will enhance pedestrian linkages between the site and the existing facilities on the High Street and with Clive Primary School <del>along Holly Close along the existing right of way.</del></p> <p>Existing trees, hedgerows and priority habitats will be retained and enhanced.</p> <p><u>Development will contribute to the extension of the school through the provision of the 'Hilltop Cottages' site adjoining the school.</u></p>	20 houses

Change to policies map as shown below:



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Signature: H. Howie on behalf of Sansaw Estate

Date: 03/02/2021

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### Part B: Representation

Name and Organisation:	Sansaw Estate
------------------------	---------------

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

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

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

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S17.2 Hadnall"/>	Site:	<input type="text" value="HDL012 HDL014"/>	Policies Map:	<input type="text" value="Hadnall"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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

(Please tick as appropriate).

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

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

##### **Settlement Policy S17.2 Community Hubs in the Wem Place Plan Area - Hadnall**

The Sansaw Estate strongly supports the designation of Hadnall as a Community Hub settlement in Policy S17.2 as vital to ensure the village's long-term future but considers that the housing guideline of around 125 dwellings fails the 'justified' and 'positively prepared' tests of soundness.

Paragraph 5.248 of the explanatory text notes that, "*due to its relatively close proximity, the village (also) has a strong relationship with Shrewsbury.*" This relationship makes Hadnall one of relatively few villages in Shropshire that has significant potential for rural growth both socially and economically.



Hadnall is located on the A49 corridor which is named as a strategic corridor in paragraph 3.28e of the Plan which notes, "*The strategic approach also responds directly to the Economic Growth Strategy for Shropshire (2017-2021) and specifically reflects the objective to prioritise investment in strategic locations and growth zones along strategic corridors utilising existing road and rail connections.*" However the settlement housing guideline for Hadnall fails to reflect this strategy.

Despite being located on a strategic corridor, Policy S17.2 gives Hadnall a residential development guideline of 125 dwellings, of which 73 dwellings (58%) are already committed. The Plan allocates one site for 40 dwellings at land south of Wedgefields Close (HDL006) and assumes windfall development of 12 dwellings over the remainder of the plan period to 2038. This equates to around 3 dwellings per annum over the 17 years 2021-2038, which is unjustifiably small for such a well located, sustainable village.

Our representations on Policy SP2 were that the housing requirement should at least match the latest official projections of household growth in Shropshire over 2016-2038. Hadnall is an ideal village to help meet the county's housing needs.

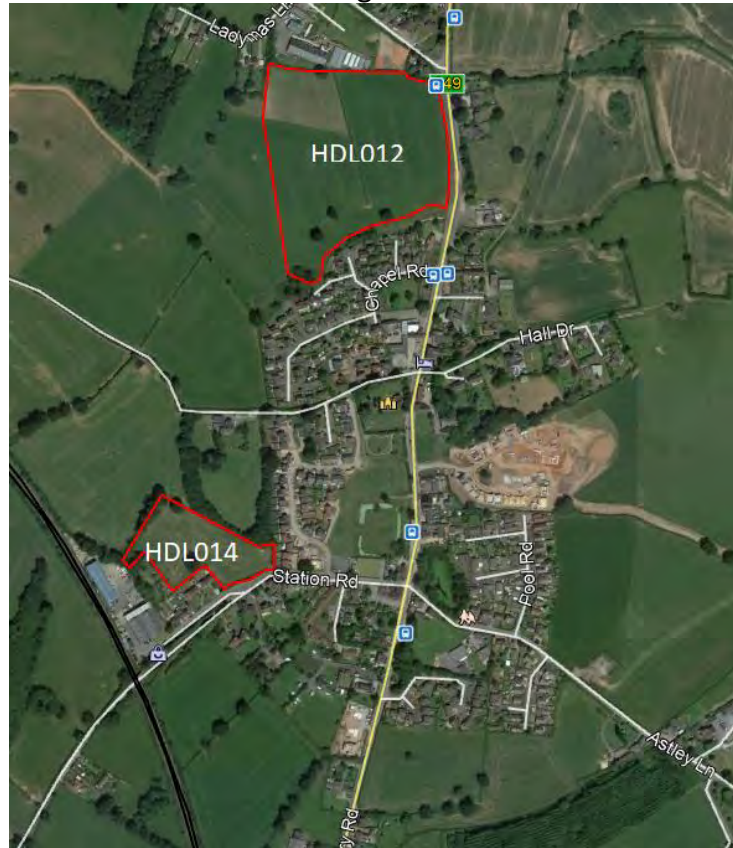
Previous experience shows that incremental growth of villages rarely delivers much more than housing. Single allocations fail to deliver significant changes in sustainability but simply perpetuate the status quo. It takes a longer term, strategic approach, to deliver transformational change. For generations, the Sansaw Estate has been taking a long-term approach and we believe the success of this is apparent in the fact that the Estate has developed a thriving Business Park and has a number of leading rural enterprises. The Sansaw Estate has a vision for the long-term future of Hadnall encompassing several plan periods, which is set out on pages 6 & 7 of its draft Estate Plan attached at **Appendix 1**.

The Plan ignores the potential to facilitate a renewal of the heart of the village and create a more vibrant village core centred on the community facilities of the village hall, car park, church, village shop and central area of public open space around Hadnall moat. The Plan fails to deliver significant improvements to the sustainability of the village and to this extent it is not 'positively prepared' or 'justified'.

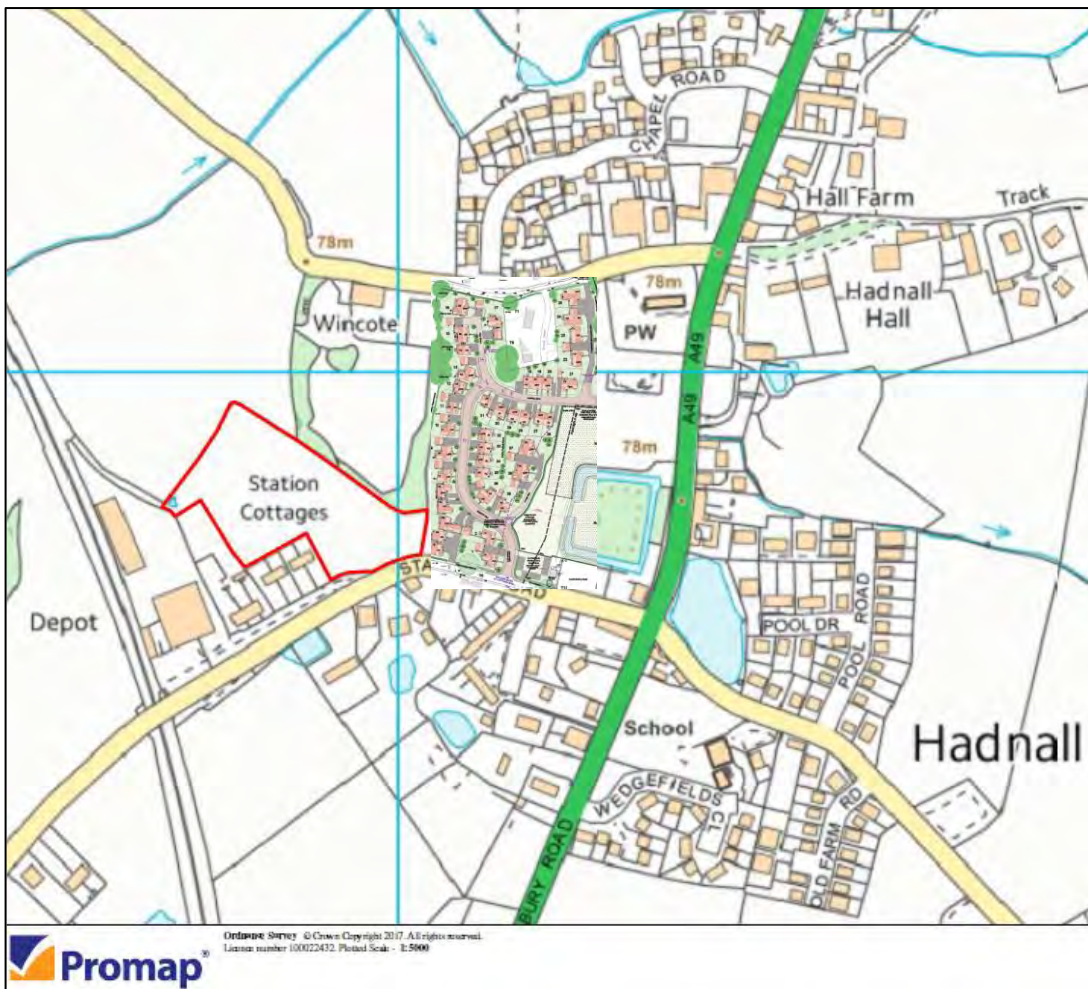
The Council's sustainability appraisal shows that site HDL012 (land west of the A49) scores 'fair' while site HDL014 (land north of Station Road) scores 'good'. Site HDL014 has a higher score than the allocated site HDL006 (land south of Wedgefields Close). The Council's site assessments show that site HDL014 has no major problems and was only discounted due to a preference for site HDL006. The Council's site assessment for HDL012 is out-of-date as the highway authority has since undertaken work to the A49 that resolves the drainage issue. There is no technical reason why site HDL012 cannot be allocated. Both sites HDL012 and HDL014 are more centrally located in the village than the allocated site HDL006 and can contribute to the sustainable growth of Hadnall as set out in the Estate's Vision attached in Appendix 1.

Office Use Only	Part A Reference:
	Part B Reference:

Aerial of Hadnall showing sites HDL012 and HDL014



Site HDL014 Land north of Station Road

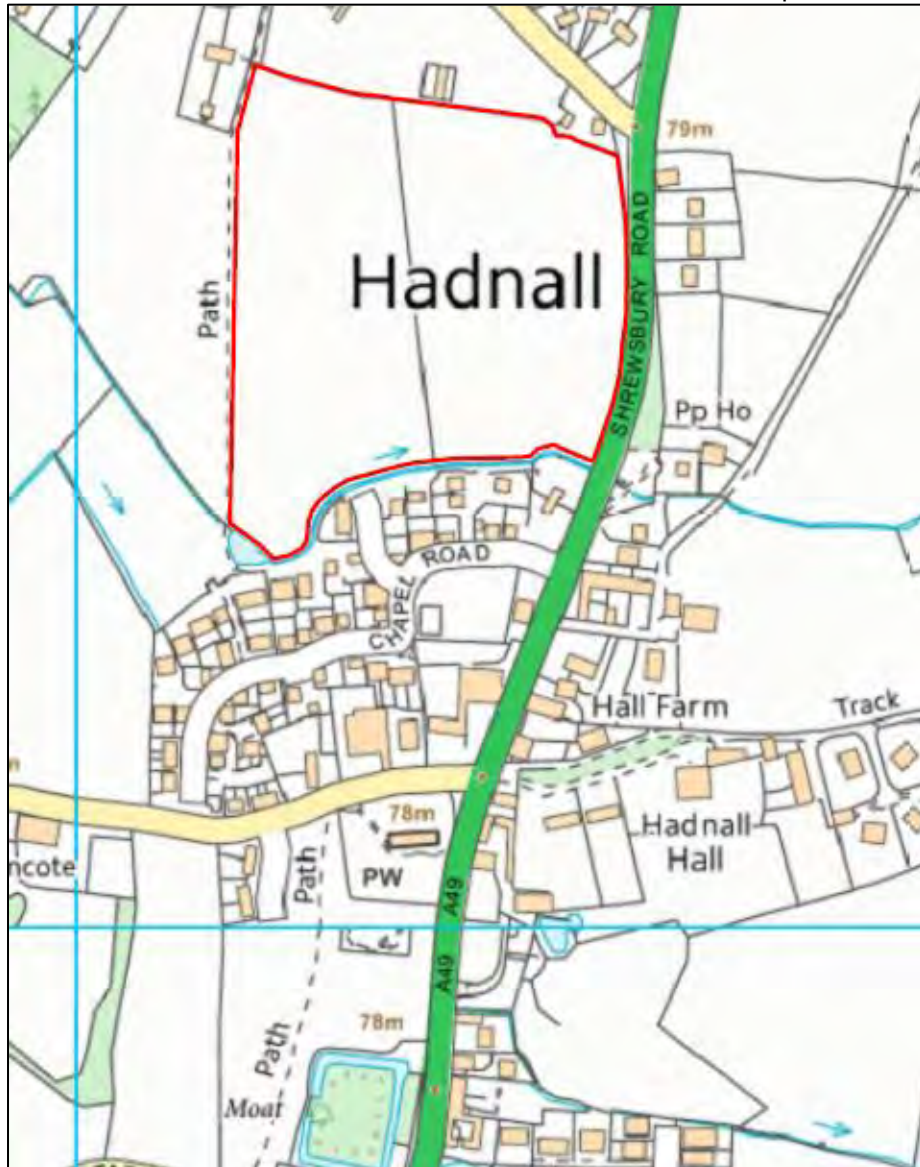


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Part A Reference:

Part B Reference:

Site HDL012 Land west of the A49 and north of Chapel Road



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

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

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

Office Use Only	Part A Reference:
	Part B Reference:

To ensure the Plan can pass the 'justified' and 'effective' tests of soundness, the following modifications are necessary:

### S17.2. Community Hubs: Wem Place Plan Area

1. Within the Wem Place Plan Area, a number of Community Hub settlements have been identified. These settlements and their residential development guidelines are listed below:

Community Hub Settlements	Residential Guideline
Clive	Around 30 dwellings
Hadnall	Around <del>125</del> <u>300</u> dwellings
Shawbury	Around 150 dwellings

#### Hadnall Community Hub

Land south of Wedgefields Close, Hadnall (HDL006)	The development will provide land for additional car parking for the school. An appropriate highway access will be provided from the A49. Any necessary highway improvements, including an appropriate extension of the 30mph speed zone, will be undertaken. The existing pedestrian footway on the eastern side of the A49 will be extended along the sites road frontage. Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise from Shrewsbury Road. The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.	40 dwellings
<u>Land north of Station Road (HDL014)</u>	<u>The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.</u>	<u>40 dwellings</u>
<u>Land west of A49 and north of Chapel Road (HDL012)</u>	<u>Pedestrian routes will be provided from Chapel Road to the employment premises on Ladymass Road.</u> <u>The site will incorporate appropriate sustainable drainage, informed by a sustainable drainage strategy. Any residual surface water flood risk will be managed by excluding development from the</u>	<u>150 dwellings</u>

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Part A Reference:

Part B Reference:

	<u>affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.</u>	
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(Please continue on a separate sheet if necessary)

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

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

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

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

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

(Please tick one box)

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

The Sansaw Estate are an active landowner and developer in the Hadnall, Clive and Grinshill areas and will be able to contribute positively to discussions that relate to these locations and to the operation of whole Estate Plans. They wish to participate in all relevant hearing sessions.

(Please continue on a separate sheet if necessary)

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

Signature: H. Howie on behalf of Sansaw Estate

Date: 03/02/2021

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Part A Reference:

Part B Reference:



# Sansaw Estate

## Enabling Sustainable Rural Futures





## A Living Working Countryside

Sansaw Estate is a dynamic family owned and operated rural business that combines a significant farming enterprise with the letting and development of farms, residential, commercial and leisure property.

The estate provides open market and affordable homes, hosts a range of businesses, and directly employs a team of 25 across its farm, property, and land management enterprises.

The estate has long-term perspective to asset management and has an impressive track record of re-investing capital receipts arising from development to create opportunities for business and employment which have delivered additional economic growth. Examples include:

- the conversion of the Stables at Sansaw Business Park and development of the award-winning Pavilions creating over 2,500 sq metres of high-quality, environmentally sustainable office space;
- the creation of a £3.5 million dairy business;
- the development of c. 90 new homes in Hadnall, over a 20 year period;
- the restoration and improvement of over 100 traditional rural houses and cottages including the management of 10 listed buildings;
- the restoration of the Hadnall Moat, working in partnership with Historic England and Shropshire Council; and
- the management of 150 hectares of woodland.

Sansaw Estate has a strong track record of delivery; it is a proven and reliable development partner.

# Our Contribution

1. Sansaw Business Park: comprising the Stables, converted historic estate buildings and The Pavilions, a RIBA award winning development of environmentally friendly buildings in a wooded setting. Currently hosting c. 14 businesses across c. 2,500 sq metres.
2. Sansaw Dairy: a dynamic modern dairy enterprise that produces over 7 million litres of milk each year from a grass-based herd.
3. Black Birches: a mixed-use workspace and leisure site hosting the Country Garden Plant Centre with onsite café and retail offer.
4. Hardwicke Farm; a former Victorian model farm currently hosting the estate yard and joinery enterprise.





# A Whole Estate Plan Led Approach

Sansaw Estate has an ambitious vision to enable sustainable rural futures for the people and places we can support and influence.

Our Whole Estate Plan will flesh out this vision, offering insight around the form, extent, value and stewardship of our natural capital, landscape character and built heritage, around our sustainable food & farming enterprise, the businesses we host and support, the homes we provide and the role we play in supporting the health, well-being and vitality of the communities of Hadnall, Clive, Grinsill, Yorton and their rural hinterland.

The Whole Estate Plan will demonstrate linkages between the continued investment in and conservation of the natural environment we care for, our farming and wider property business and the development and change needed to support our work.

The plan will give an insight into the potential we believe the estate has to bring forward sustainable development proposals associated with the re-use of heritage assets, with incremental village growth, new tourism and leisure enterprises, and our emerging thinking around the opportunity to create a new, purpose built crematorium and memorial garden in a beautiful natural setting.

It will provide detail around our emerging plans for the sensitive re-use of traditional model farm buildings at Hardwicke, Yorton and Hope Farm, for a continued evolution of the role of Black Birches and the ongoing stewardship of the Estate's heritage, community and natural assets.

We hope to bring the Whole Estate Plan forward during the early years of the newly adopted Local Plan, potentially leading the way in support of this new policy.



# Opportunities to Contribute to Shropshire's Zero Carbon Growth

Sansaw Dairy: continued investment in new facilities to work towards a best in class sustainable dairy enterprise to generate improvements including environmental enhancement, improved cow welfare and enhance milk quality.

Hardwicke Farm: sensitive re-development to breathe new life into this historic model farm site through the creation of modern workspace (B1), apartments and smaller residential units for mixed generational living.

Black Birches: a sensitive evolution of the site to incorporate a new crematorium and memorial garden in a beautiful natural setting.

Hadnall, Clive and Grinshill: enhancing vitality, generating funds for investment in community facilities and infrastructure, for reinvestment across the estate, and supporting thriving and vibrant villages through release of land to enable proportionate housing and employment growth.

Hope Farm, Yorton Farm and Yorton Villa Farm: sensitive re-use over time of the traditional buildings across these three farm sites as investment in modern farming infrastructure allows.



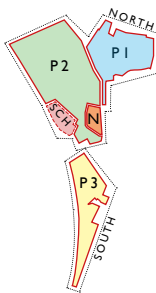
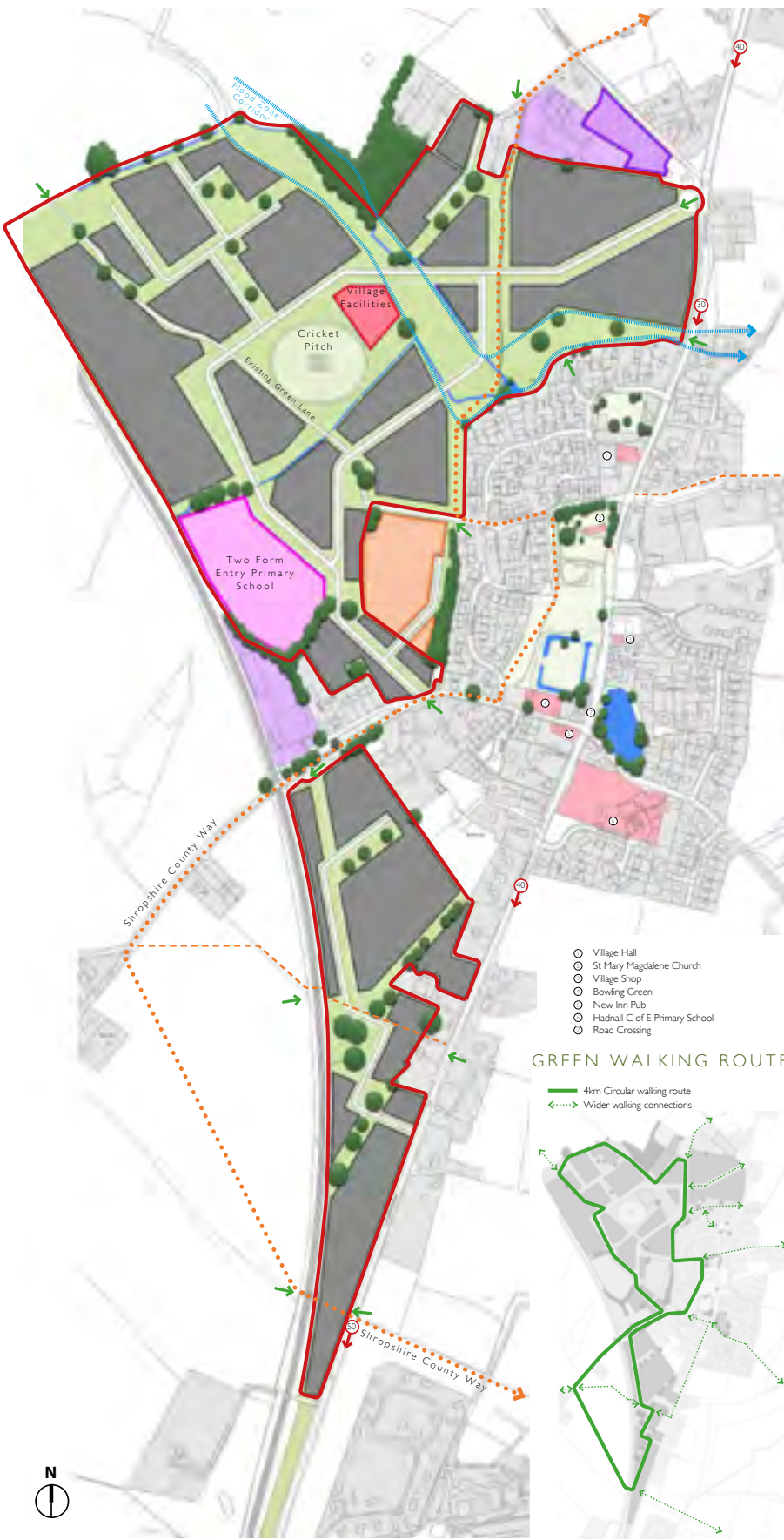
# An Exciting Vision For Hadnall

Hadnall is a good place to live and work. It has a strong functional relationship with Shrewsbury and has an important role to play in helping the Council to meet future housing needs. Just 5 miles from the counties' principal centre its combination of road, rail and bus ensure it can support the modern accessible rural lifestyles that more and more people aspire to.

But, at circa 350<sup>1</sup> households, Hadnall is entering a tricky phase. Big enough to continue to be allocated new homes but too small to sustain the improvement and growth in services that incremental growth will demand.

Hadnall could be a great place to live. We have set out our vision as to how this could be achieved through a long-term plan for transformational yet sustainable growth over time. We continue to back this plan and remain willing to make land available, both in the short and longer term, and to work with the community and the Council to create a viable vision for a vibrant future.





**AREAS** (approximate)

North land parcel approx 32.7ha  
House density: 25 p/ha to remain consistent with Hadnall Village

Phase 1:  
Residential: 5.1ha - approx 128 houses  
Public Open Space (POS): 2.5ha (Includes 1.6ha flood zone in POS)

Phase 2:  
Residential: 10ha - approx 250 houses  
Village Facilities: 0.4ha  
Public Open Space (POS): 5.6ha (Includes 0.9ha flood zone in POS)

School (SCH): 2ha

Neighbouring Land Potential (N): 1.7ha  
Residential: 1.2ha - approx 30 houses  
Public Open Space (POS): 0.3ha

South land parcel approx 8ha

Phase 3:  
Residential: 4.9ha - approx 122 houses  
Public Open Space (POS): 1.5ha

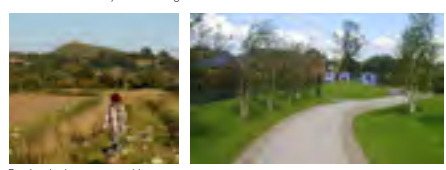
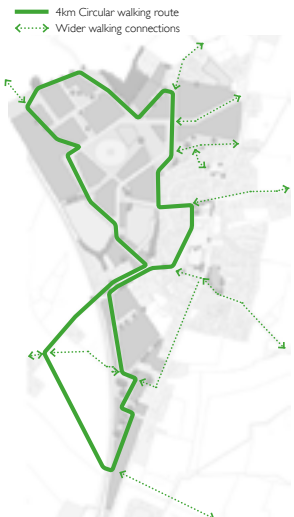
**Housing Numbers Summary**  
Phase 1: 117  
Phase 2: 250  
Phase 3: 122  
N: 30

Total 519  
(Phase 1, 2 and N = 397 houses)

- KEY**
- Existing Site
  - Public Right of Way
  - Shropshire County Way
  - Flood Zone
  - Trees
  - National Speed Limit
  - Employment Land
  - Neighbouring Land Potential
- Access and Circulation
- Potential and existing pedestrian access
- Proposed Use
- Housing
  - Public Open Space (POS) and Green corridors
  - Employment

- Village Hall
- St Mary Magdalene Church
- Village Shop
- Bowling Green
- New Inn Pub
- Hadnall C of E Primary School
- Road Crossing

**GREEN WALKING ROUTES**





For further information please visit [www.sansaw.co.uk](http://www.sansaw.co.uk)

Or contact

James Thompson  
Email: [james@sansaw.co.uk](mailto:james@sansaw.co.uk)  
Mobile: 07980 305815  
Office: 01939 211100



## Representation Form

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

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

### Part B: Representation

Name and Organisation:	Sansaw Estate
------------------------	---------------

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

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

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

Paragraph:	<input type="text"/>	Policy:	SP15	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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

*(Please tick as appropriate).*

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

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##### **Strategic Policy SP15 Whole Estate Plans**

The Sansaw Estate welcomes the Plan's use of Whole Estate Plans as a material consideration but is concerned that the policy's current wording fails the 'justified', 'effective' and 'consistent with national policy' tests of soundness.

Whole Estate Plans are hugely valuable in delivering balanced and sustainable land management and providing transparency and insight around estate's activities to the wider community. They can enable outcomes that deliver real value across multiple strategic objectives but which might otherwise not have been achievable if judged solely against the policy context of the Local Plan. We were delighted to see Shropshire Council reflect this approach in their Local Plan but deeply disappointed that the wording of Policy SP15 will render the policy ineffective.

The Sansaw Estate are developing a Whole Estate Plan and attach their overview document that sets the scene for the forthcoming Whole Estate Plan in **Appendix 1**.

A successful example of a planning policy cross-reference to Whole Estate Plans is the recently adopted South Downs Local Plan. As the extracts demonstrate, a short reference to Whole Estate Plans in a key policy is sufficient.

*Extracts from the South Downs Local Plan (July 2019)*

### **Strategic Policy SD25: Development Strategy**

3. In considering development proposals outside settlement boundaries within rural estates and large farms, positive regard will be had to the following:
- a) The development proposals are part of a Whole Estate Plan that has been endorsed by the National Park Authority; and
  - b) The development proposals deliver multiple benefits in line with the purposes and the special qualities of the National Park and in regard to ecosystem services.

### **WHOLE ESTATE PLANS AND LARGE FARM PLANS**

**7.15** Estates, institutions and farms across the National Park have an important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. Policy SD25 recognises that Whole Estate Plans may be able to demonstrate particular material considerations, relating to the purposes and special qualities of the National Park that justify development outside of settlement boundaries. The Authority will only give weight to such plans where they have been endorsed by the National Park Authority, in line with the *Whole Estate Plans Guidelines*<sup>71</sup>.

Policy SP15 specifies that Whole Estate Plans will only be endorsed and used by the Council as a material consideration where, *"The objectives, policies and land use proposals of the Whole Estate Plan complement and are consistent with the objectives and policies of the Local Plan."*

This requirement for consistency with the Plan's policies renders a Whole Estate Plan marginal in terms of added value in the planning process. It will result in far fewer coming forward as well as making Estate Plans of low value. The current wording renders the policy ineffective.

The root problem is that the policy is poorly justified. Explanatory paragraph 3.153 notes that Whole Estate Plans may add value to the planning process but do, *"not replace the primacy of the Local Plan in decision making."* While we do not disagree with this statement, it does not wholly capture the statutory position that decision-makers can and often do include considerations that are not consistent with the Local Plan and it is important to allow such flexibility.

As set out in paragraph 2 of the Framework, *"Planning law requires that planning applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise"*. The legislation allows for material considerations that are potentially not consistent with the Local Plan. It is not necessary for the Council to be blind to Estate Plans that are

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Part A Reference:

Part B Reference:

inconsistent with the Local Plan, as decision-makers are in any event permitted by planning law to take them into account as a 'material consideration'.

It is inevitable that the context and national policy situation will change over the Local Plan's lifespan. An Estate Plan that reflects such change might well not be, "*consistent with the objectives and policies of the Local Plan*" and would under policy SP15's current wording not be eligible to be endorsed by the Council.

The requirement for consistency with the Local Plan unnecessarily ties the Council's hands in making future decisions on Whole Estate Plans and renders the policy ineffective. It is contrary to paragraph 11a of the Framework which states, "*plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.*"

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

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

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To ensure the Plan can pass the 'justified', 'effective' and 'consistent with national policy' tests of soundness, the following modification is necessary:

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

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

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

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

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

Office Use Only	Part A Reference:
	Part B Reference:



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

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

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

*(Please tick one box)*

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

The Sansaw Estate are an active landowner and developer in the Hadnall, Clive and Grinshill areas and will be able to contribute positively to discussions that relate to these locations and to the operation of whole Estate Plans. They wish to participate in all relevant hearing sessions.

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Signature: H. Howie

Date: 03/02/2021

Office Use Only

Part A Reference:

Part B Reference: