

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:	C Sussums-Lewis, Carter Jonas LLP
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Q1. To which document does this representation relate?

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

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

Paragraph:	<input type="text" value="Place Plan"/>	Policy:	<input type="text" value="S14"/>	Site:	<input type="text" value="WHN024"/>	Policies Map:	<input type="text" value="S14"/>
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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 checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input checked="" type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input checked="" 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.

(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.

We do not consider any changes are necessary to the allocation of Site WHN024.

We support the allocation of Site WHN024 (Land off Donnett Close, Whittington) in Place Plan S14 for the development of 70 dwellings. The site is deliverable and achievable within the first five years of the Local Plan Review period.

(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:

(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:

C Sussums-Lewis

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

LAND ADJ TO DONNETT CLOSE, WHITTINGTON

Shropshire Local Plan Site Ref:	WHN024
Consultation:	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
Grid Ref:	SJ 32921 30942
Date:	September 2020
Site Owner:	R & J Harvey T & K Reeves

INTRODUCTION

Carter Jonas LLP have been instructed by the Site Owners to prepare and submit representations on their behalf in response to Regulation 18: Pre-Submission Draft of the Shropshire Local Plan. The Site (Ref: WHN024) lies to the south east of Whittington and is located between Whittington Cricket Ground and Donnett Close.

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1. REGULATION 18: PRE-SUBMISSION DRAFT OF THE SHROPSHIRE LOCAL PLAN 2016-2038

The Site is supported through the following principle Policies in the Pre-Submission Draft of the Shropshire Local Plan:

1.1. Settlement Policies

S14. Oswestry Place Plan Area

S14.2. Community Hubs: Oswestry Place Plan Area

1.2. Appendix 5: Residential Development Guidelines and Residential Supply

1.3. Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations

1.4. Appendix 0: Oswestry Place Plan Area Site Assessments

1.5. Strategic Policies:

SP2. Strategic Approach

SP7. Managing Development in Community Hubs

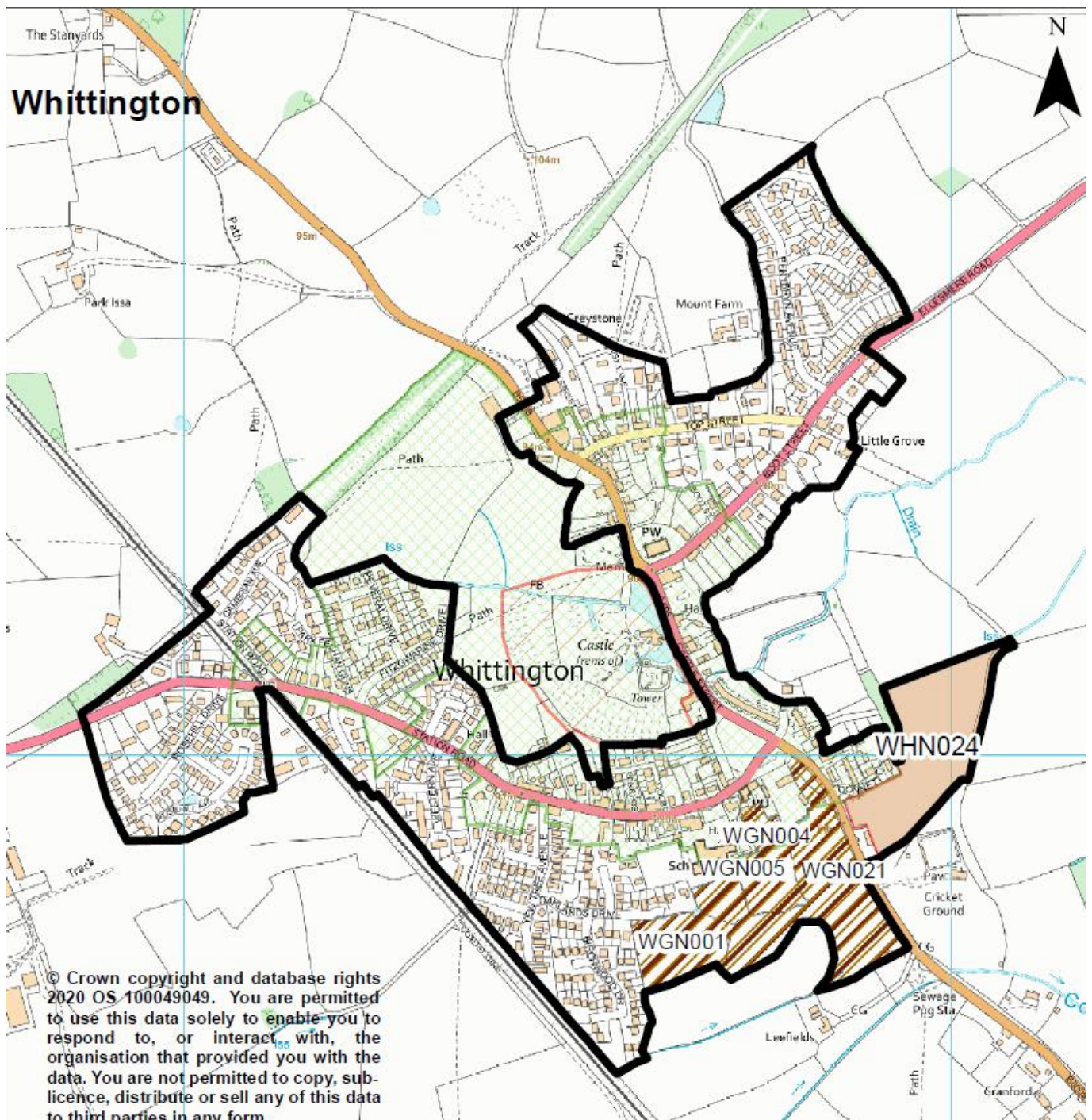
This report will provide further detail to the above Policies in the ensuing pages.

1.1. SETTLEMENT POLICIES

S14. OSWESTRY PLACE PLAN AREA

S14.2 COMMUNITY HUBS: OSWESTRY PLACE PLAN AREA

The Site is included within Regulation 18: Pre-Submission of the Shropshire Local Plan as an Allocation. The included site area amounts to circa 2.5ha.



EXTRACT OF REGULATION 18 POLICIES MAP – INSET 14 – OSWESTRY PLACE PLAN AREA

Within the Oswestry Place Plan Area, a number of Community Hub settlements have been identified. Whittington is included as one of these settlements and has a development guideline of 200 dwellings.

The Policy states that:

Within each Community Hub, new residential development will be delivered through any identified saved SAMDev residential allocations, any identified Local Plan residential allocations; appropriate small-scale windfall residential development within the settlements development boundary, as shown on the Policies Map, where it is consistent with Community Hub Policy SP7 and other relevant policies of this Local Plan; and appropriate cross-subsidy and

exception development where it is consistent with Community Hub Policy DP7 and other relevant policies of this Local Plan.

Within these Community Hubs, new employment development will be delivered through any identified saved SAMDev mixed use allocations; and appropriate small-scale windfall employment development within the settlements development boundary, as shown on the Policies Map, where it is consistent with Community Hub Policy SP7 and other relevant policies of this Local Plan. Saved SAMDev Plan site allocations within these Community Hubs are listed in Appendix 2 and identified on the Policies Map. Local Plan site allocations within these Community Hubs are identified in Schedule S14.2(i) and identified on the Policies Map. Development of site allocations should be in accordance with specified development guidelines and approximate site provision figures and all other relevant policies of this Local Plan.

Development proposals will be expected to positively respond to policies and guidelines within any relevant community-led plans and local needs. Mitigation measures will be required to remove any adverse effect from increased recreational pressure arising from development in Ruyton XI Towns, St Martins, West Felton and Whittington on the integrity of the Cole Mere Ramsar site in accordance with policies DP13, DP15 and DP16.

Whittington Community Hub

Site Allocation

Land off Donnett Close, Whittington (WHN024)

Development Guidelines

Appropriate access to be provided via the B5009.

An appropriate heritage assessment should be undertaken, and its conclusions implemented. High quality design and layout will be required, responding to the site's proximity to Whittington Conservation Area.

Development will fund a review and extension of 30mph speed limit and any necessary traffic calming and footways and pedestrian crossing facilities at the site frontage.

The design and layout of development and appropriate boundary treatments should mitigate noise from the road to the west of the site.

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.

Provision

70 Dwellings

It is noted in S14.2 that development of site allocations should be in accordance with specified development guidelines, including approximate site provision figures and all other relevant policies of the Local Plan.

The development guidelines provided within S14.2 stated that an appropriate access should be provided via the B5009. A Highways Report has been undertaken and the details of this are included within these Representations. The conclusion was that a satisfactory 'Traditional Estate Road' (in accordance with the Shropshire County Council 'Specification for Residential / Industrial Estate Roads') can be achieved from Station Road (B5009) directly into The Site with adequate visibility splay requirements, swept path and junction capacity.

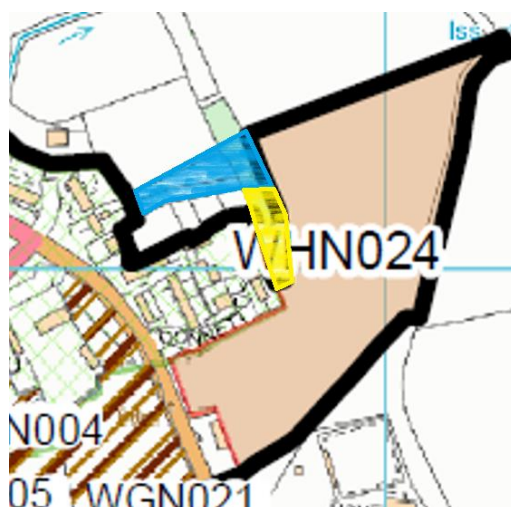
It was discussed with the Planning Officers at Shropshire Council that a Heritage Assessment would be undertaken at the planning application stage. This Statement would include a review of the existing built form within the settlement of Whittington including local vernacular styles and architectural merit which could be incorporated into the design of the proposed dwellings to ensure a high quality and legible development which reflects its proximity to the Whittington Conservation Area. As well as high quality design, the design and layout of The Site will allow for appropriate boundary treatments to mitigate any adverse noise impacts from Station Road. The boundary treatments will also provide for biodiversity enhancement through increasing suitable habitats for local wildlife.

Further discussions with the Planning Officers included the review of the existing 30mph speed limit to assess the possibility of extending its scope and introducing any necessary traffic calming measures together with any required footways and pedestrian crossing facilities at the site frontage. It was agreed that the review would be undertaken at the planning application stage as it was considered too premature to conduct the study at this stage.

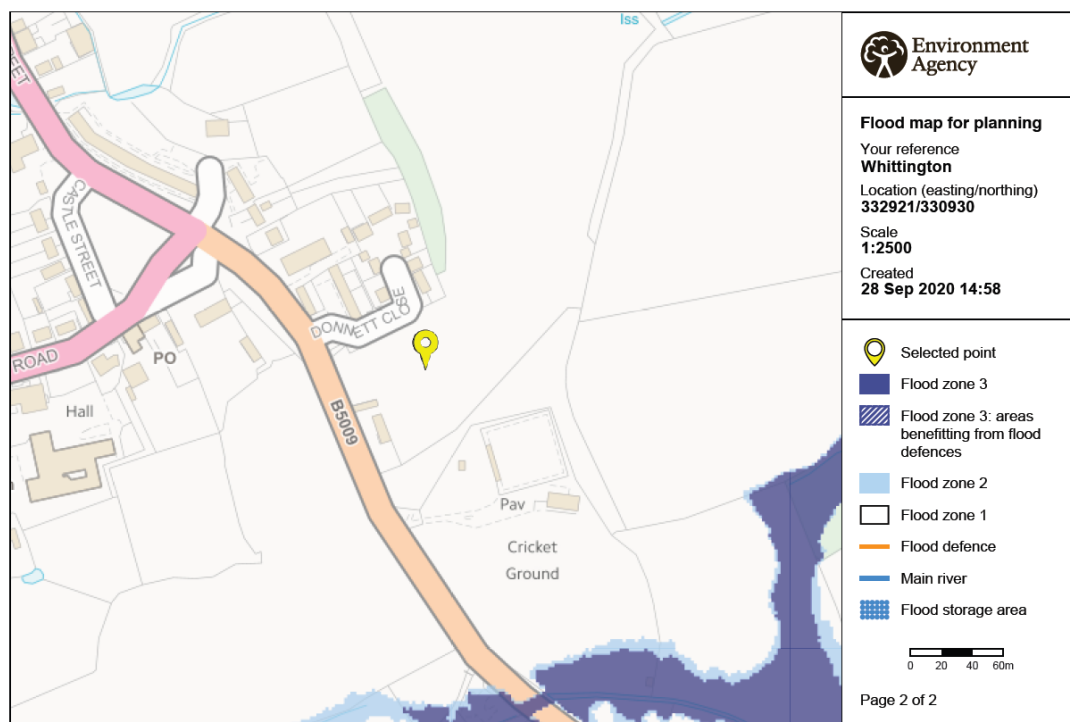
To improve connectivity and sustainability of The Site to the settlement of Whittington, a modest extension to the allocation was discussed which would allow for a direct pedestrian link into the heart of Whittington. This would allow for a greater level of connectivity to the centre of Whittington and therefore increase the sustainability of The Site. The feedback at the meeting was positive and as such the additional land has been included within these submissions for consideration.

The inclusion of this area would result in a modest increase to the allocated site area which is presently 2.5 Ha to 2.8 Ha.

Description	Colour on Plan	Approx. Area	Justification
Preferred Allocation	Peach	2.5 Ha	
Land to rear of cottages to include pedestrian link	Blue	0.2 Ha	This area would allow for a direct pedestrian link into the centre of Whittington which will improve connectivity and sustainability.
Additional Land	Yellow	0.1 Ha	This area can be incorporated into the scheme and utilised as the public open space area with the opportunity to provide some biodiversity enhancements. If this omitted from the site it will not be able to be accessed and therefore maintained.



As part of the planning application process a full drainage strategy will be provided which 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. The Site is within Flood Zone 1, an area with a low probability of flooding, as shown below:



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It is further considered that Site WHN024 can positively respond to any mitigation measures required to protect the integrity of the Cole Mere Ramsar site in accordance with policies DP13, DP15 and DP16.

1.2. APPENDIX 5: RESIDENTIAL DEVELOPMENT GUIDELINES AND RESIDENTIAL SUPPLY

Paragraph A5.1 states that Schedule A5(i) summarises the residential development guidelines for the Strategic Centre, Principal Centres and Key Centres. It also identifies the completions achieved in 2016/17, 2017/18 and 2018/19 and the various forms of commitments available to achieve the identified residential development guidelines.

Paragraph A5.2 states that the information will be reviewed annually through the Five Year Housing Land Supply Statement and the Authority Monitoring Report.

We agree with the Local Plan Allocation of Site WHN024 for 70 dwellings as detailed below:

Schedule A5(i): Residential Guidelines and Residential Supply within the Strategic Centre, Principal Centre and Key Centres							
Settlement	Type of Settlement	Residential Development Guideline	Total Residential Completions (2016/17, 2017/18 and 2018/19)	Total Residential Commitments			Windfall Allowance
				Sites with Planning Permission or Prior Approval (as at 31st March 2019)	Saved SAMDev Plan Allocations without Planning Permission (as at 31st March 2019)	Local Plan Allocations	
Whittington	Oswestry	200	23	6	86	70	15

1.3. APPENDIX 7: FORECAST OF DELIVERY TIMESCALES FOR LOCAL PLAN ALLOCATIONS

Schedule A7 sets out indicative timescales for the development of the Local Plan allocations. It states that *these forecasts are considered to represent cautious assumptions based on the best available information currently available. However, it is acknowledged that the delivery timescales for many of these allocations will change over the Local Plan period.* Paragraph A7.2 states that *the schedule is split into five-year time periods, with short-term representing the five-year period from 2020/21 to 2024/25, medium-term representing the five-year period from 2025/26-2029/30 and long-term representing the remaining period of the Local Plan from 2030/31-2037/38. A category for beyond the Local Plan period is also included, where development of the site is expected to continue beyond the current Local Plan period.*

Paragraph A7.3 goes on to state that *it is not considered necessary to seek to phase the delivery of these allocations, although development on the larger sites (and particularly those for a mix of uses) within the Strategic, Principal and Key Centres and the development of the Strategic Settlements will need to be undertaken in a coordinated manner to ensure that they deliver sustainable, comprehensive, high-quality and complementary development which meets local needs. On such sites masterplanning exercises will be necessary to manage their development, where this is the case this is specifically identified within the development guidelines for the site allocation.*

It is confirmed that Site WHN024 can be delivered within the Short Term and Medium Term timescale as defined in the plan below. A Viability Assessment was undertaken on The Site and it is considered that The Site could come forward within the ‘Short Term’ as there are no barriers to delivery.

Schedule A7: Forecast of Delivery Timescales for Local Plan Allocations										
Site Allocation Reference	Site Allocation Name	Settlement	Place Plan	Residential Guideline	Employment Guideline	Short-Term (2020/21-2024/25)	Medium-Term (2025/26-2029/30)	Long Term (2030/31-2034/35)	Long Term (2035/36-2037/38)	Beyond the Plan Period (2038+)
WHN024	Land off Donnett Close, Whittington	Whittington	Oswestry	70	N/A					

1.4. APPENDIX O: OSWESTRY PLACE PLAN AREA SITE ASSESSMENTS

To inform the identification of proposed site allocations within the Local Plan Review, Shropshire Council has undertaken a Site Assessment process. This site assessment process incorporates the assessment of sites undertaken within the Sustainability Appraisal of the Local Plan, recognising that the Sustainability Appraisal is an integral part of plan making, informing the development of vision, objectives and policies and site allocations.

The Site Assessments for Site WHN024 are included on the ensuing pages for reference. In response to the assessments the following comments are raised:

Sustainability Appraisal

Upon review it is noted that there are three minor discrepancies within the Sustainability Appraisal which we would welcome feedback on. Firstly, in Section 13, The Site is not within the Conservation Area of Whittington, although it has been marked as being so. Secondly, in Section 6, The Site is within 480m of ‘Three Trees’ bus stop which runs regular bus routes 70, 70A and 449 between Oswestry, Shrewsbury and Ellesmere. Finally, in Section 5, The Site is also within 480m of a regular mobile library stop at Whittington Castle.

Taking the above into consideration, the Sustainability Assessment could be increased by 3 points.

Stage 3 Site Assessment

The comments are welcomed from the various officers and departments and we have incorporated their views into the scheme.

In terms of ecology, I can confirm that relevant studies and reports will be undertaken to assess any potential impact from the development on wildlife and protected species including bats, GCNs, badgers, reptiles and nesting birds.

In terms of highways, we have noted above that discussions have taken place with the Planning Officers with regards reviewing of the existing 30mph speed limit to assess the possibility to extending its scope and introducing any necessary traffic calming measures together with any required footways and pedestrian crossing facilities at the site frontage. It was agreed that the review would be undertake at the planning application stage as it was considered too premature to conduct the study at this stage. The Planning Officers concurred with the recommendations of the Highways Report that an access direct from Station Road would be achievable and suitable.

Appropriate habitat mitigation and enhancement will be incorporated into the scheme. Mature trees and hedgerows will be retained and enhanced where possible and a Standard BS5837 Tree Survey, Arboricultural Impact Assessment and Tree Protection Plan will be undertaken as part of the planning application. The additional suggested parcel of land (coloured yellow on the plan) provides for an opportunity to enhance tree planting and create a natural green space as part of the open space requirements.

It has been previously noted within the representations that discussions have taken place with the Planning Officers who confirmed that a Heritage Assessment should be undertaken at the planning application stage. This Statement would include a review of the existing built form within the settlement of Whittington including local vernacular styles and architectural merits which could be incorporated into the design of the proposed houses to ensure a high quality and legible development which reflects its proximity to the Whittington Conservation Area.

Criteria	Criteria Description	Scoring Guide	Site Ref: WHN024
1	Site wholly or partly within one or more of the following (record all that apply):		
	Special Area of Conservation		0
	Ramsar Site		0
	National Nature Reserve	Yes = double minus score (-)	0
	Site of Special Scientific Interest		0
	Ancient Woodland	No = zero score (0)	0
	Wildlife Site		0
Local Nature Reserve	0		
2	Site boundary within buffer zone¹ of one or more (record all that apply):		
	1km of a Special Area of Conservation		0
	1km of a Ramsar Site		0
	500m of a National Nature Reserve	Yes = minus score (-)	0
	500m of a Site of Special Scientific Interest		0
	500m of Ancient woodland	No = zero score (0)	0
	250m of a Wildlife Site		0
100m of a Local Nature Reserve	0		
3	Tree Preservation Order (single or group) within or on site boundary	Yes = minus score (-) No = zero score (0)	0
4	Site contains one or more (or part) of the following² (record all that apply):		
	Children's playground		0
	Outdoor sports facility	Yes = minus score (-) No = zero score (0)	0
	Amenity green space		0
	Accessible natural green space (natural/semi-natural green space)		0
5	Site boundary within 480m³ of one or more of the following (record all that apply):		
	Primary School		+
	GP surgery		-
	Library(permanent or mobile library stop)		-
	Leisure centre	Yes = plus score (+) No = minus score (-)	-
	Children's playground		+
	Outdoor sports facility	+	
	Amenity green space	+	
Accessible natural green space (natural/semi-natural green space)		+	
6	Site boundary within 480m ³ of a public transport node with a regular service offered during peak travel times ⁴ :	Yes = plus score (+) No = minus score (-)	-
7	Site wholly or partly on grade 1 or 2 or 3 agricultural land (best & most versatile)	Yes = minus score (-) No = zero score (0)	-
8	All or part of the site within a Source Protection Zone (groundwater)	Yes = minus score (-) No = zero score (0)	-
9	All or part of the site is within Flood Zones 2 or 3	Yes = minus score (-) No = zero score (0)	0
10	Site wholly/partly within an Air Quality Management Area	Yes = minus score (-) No = zero score (0)	0
11	Site is wholly/partly classified as brownfield or is wholly/partly within an area with a previous industrial or potentially contaminative use	Yes = plus score (+) No = zero score (0)	0
12	Site would displace an existing waste management operation	Yes = minus score (-) No = zero score (0)	0
13	Site wholly/partly within/contains any of the following (record all that apply):		
	a World Heritage Site or its buffer zone		0
	a Scheduled Monument	Yes = double minus score (-)	0
	a Registered Battlefield		0
	a Registered Park or Garden	No = zero score (0)	0
	a Conservation Area		-
a Listed Building	0		
14	Site boundary within buffer zone⁵ of one or more (record all that apply):		
	300m of a World Heritage Site or its buffer zone		0
	300m of a Scheduled Monument		-
	300m of a Registered Battlefield	Yes = minus score (-) No = zero score (0)	0
	300m of a Registered Park or Garden		0
	300m of a Conservation Area		-
	300m of a Listed Building		-
15	Site is wholly/partly classified as very high landscape sensitivity for residential	Double minus score (-)	
	Site is wholly/partly classified as high landscape sensitivity for residential	Minus score (-)	
	Site is wholly/partly classified as medium low, medium, or medium high landscape sensitivity for residential	Zero score (0)	0
	Site is wholly classified as low landscape sensitivity for residential or site is inside the development boundary	Plus score (+)	
	Please note: where a site falls into more than one category, highest sensitivity category is recorded		
Overall Score			-6
Overall Sustainability Conclusion			Fair
Range is 5 to -11 Good is 5 to 0 Fair is -1 to -6 Poor is -7 to -11			

Site Assessment - Stage 2b

Site Reference:	WHN024
Site Address:	Land off Donnett Close, Whittington
Settlement:	Whittington
Site Size (Ha):	5.42
Indicative Capacity (Dwellings):	162
Type of Site:	Greenfield
If mixed, percentage brownfield:	N/A
General Description:	Site is located to the east of the village, mostly outside of the development boundary (with only around 2% within the boundary). Site is relatively large given the existing built form of the village, and is currently in agricultural use.
Surrounding Character:	The site lies north of the Whittington Cricket Club, with agricultural land to the east and the existing built form (mostly C3) to the west.
Suitability Information: (from SLAA)	Not Currently Suitable but Future Potential
Availability Information ¹ :	Currently Available
Achievability/Viability Information:	Residential development is generally considered achievable and viable unless there are site specific issues evident. To confirm this conclusion, a viability assessment will be undertaken to inform the Local Plan Review.
Conclusion:	Availability ¹ :
	Size ² :
	Strategic Suitability ³ :
Summary:	Considered within the next stage of the site assessment process due to conclusions reached regarding the sites availability, size and/or suitability.

^{1, 2 and 3} Further information provided within the Site Assessment Process Overview.

Site Assessment - Stage 3	
Site Reference:	WHN024
<i>Coal Authority Reference Area?</i>	No
<i>Mineral Safeguarding Area?</i>	No
<i>Wholly or Partly Grade 1, 2 and/or 3 Agricultural Land Quality:</i>	Yes
<i>Percentage of site in Flood Zone 3:</i>	0%
<i>Percentage of site in Flood Zone 2:</i>	0%
<i>Percentage of site in Flood Zone 1:</i>	100%
<i>Percentage of the site in the 30 year surface flood risk zone:</i>	2%
<i>Percentage of the site in the 100 year surface flood risk zone:</i>	2%
<i>Percentage of the site in the 1,000 year surface flood risk zone:</i>	6%
<i>Percentage of the site identified on the EA Historic Flood Map:</i>	0%
<i>Percentage of the site within 20m of an historic flood event:</i>	0%
<i>Percentage of the site within 20m of a detailed river network:</i>	0%
<i>All or part of the site within a Source Protection Zone:</i>	Yes
<i>Landscape Considerations: (from the LVSS)</i>	Medium
<i>Visual Impact Considerations: (from the LVSS)</i>	Medium
<i>Highway Comments - Direct Access to Highway Network?</i>	Y
<i>Highway Comments - If No Direct Access, Can One Reasonably Be Achieved? And How?</i>	Donnett Close and/or B5009
<i>Highway Comments - Existing Highway Suitable for Traffic Associated with the Development at the Access Point?</i>	Y
<i>Highway Comments - If Existing Highway at Access Point is Not Suitable, Can It Reasonably be Made So?</i>	Assumes the development will fund a new estate road access or use Donnett Close (subject to a review of this road given potential for this site to deliver 162 homes). Also fund a review and extension of 30mph speed limit and any necessary traffic calming and footways and pedestrian crossing facilities at the site frontage.
<i>Highway Comments - Could the Development Occur Without Off-Site Works?</i>	Y
<i>Highway Comments - Are Envisaged Off-Site Works Achievable?</i>	Site layout need to accommodate future link to WHN017.
<i>Highways Accessibility Rating (Out Of 24) (Based on Primary School, GP Surgery, Convenience Store & Public Transport Service):</i>	

<p><i>Ecology Comments</i> <i>Significant Constraints:</i></p>	<p>HRA will be required for recreational impacts in-combination on Cole Mere. More than the minimum 30m per bedroom (SAMDev Policy MD2) would be required to address recreation issues in the HRA which could reduce numbers of dwellings possible. See LPR HRA.</p> <p>Possible HRA required due to road emissions from increased traffic (in-combination) on White Mere and Crose Mere. See LPR HRA.</p> <p>May trigger Natural England's SSSI IRZ.</p> <p>If priority habitats are present then the site should not be developed. If priority habitats not present then the protection of the Env. Network and watercourse will greatly reduce the developable area.</p>
<p><i>Ecology Comments</i> <i>Other Constraints:</i></p>	<p>The site may contain priority habitats - botanical survey required. If priority habitats are present then the site should not be developed. The site is adjacent to Env. Network core and corridor and a watercourse.</p> <p>Requires botanical survey, Ecla and surveys for bats, GCNs (ponds within 250m/500m), badgers, reptiles and nesting birds.</p>
<p><i>Ecology Comments</i> <i>Management of Constraints:</i></p>	<p>If priority habitat, site should not be developed.</p> <p>If not priority habitat: protected and priority species and habitats mitigation and enhancement, retain and enhance mature trees/hedgerows/tree lines and protect adjacent priority habitats. Protect, enhance and restore Env. Network in accordance with CS17 Environmental Networks and MD12.</p>
<p><i>Ecology Comments</i> <i>Opportunities:</i></p>	<p>Habitat could potentially be restored as priority habitat.</p>
<p><i>Heritage Comments</i> <i>Significant Constraints:</i></p>	
<p><i>Heritage Comments</i> <i>Other Constraints:</i></p>	<p>Site located partially within (i.e. site access), and may effect setting, of the Whittington Conservation Area. No other known archaeological interest but large size of site suggests it may have some archaeological potential.</p>
<p><i>Heritage Comments</i> <i>Management of Constraints:</i></p>	<p>Heritage Assessment required with application (impact on setting of CA; archaeological DBA + field evaluation).</p>
<p><i>Heritage Comments</i> <i>Opportunities:</i></p>	<p>High quality of design necessary to mitigate any impacts.</p>
<p><i>Tree Comments</i> <i>Significant Constraints:</i></p>	
<p><i>Tree Comments</i> <i>Other Constraints:</i></p>	<p>Agricultural land with boundary and field trees and hedgerows.</p>
<p><i>Tree Comments</i> <i>Management of Constraints:</i></p>	<p>Standard BS5837 Tree Survey / Arb Impact Assessment and Tree Protection Plan.</p> <p>Development density and layout needs to be considered so that it allows room for retention of existing mature trees</p>
<p><i>Tree Comments</i> <i>Opportunities:</i></p>	<p>Tree planting opportunities across the site to ensure that development can meet tree cover targets in planning policy framework and help to improve urban forest resource within the settlement.</p>
<p><i>Public Protection Comments</i> <i>Significant Constraints:</i></p>	
<p><i>Public Protection Comments</i> <i>Other Constraints:</i></p>	<p>Road noise close to the southwest part of the site.</p>
<p><i>Public Protection Comments</i> <i>Management of Constraints:</i></p>	<p>Potential to mitigate noise through separation distances, orientation and room layout as well as glazing and boundary treatment.</p>
<p><i>Public Protection Comments</i> <i>Opportunities:</i></p>	

Conclusion - Stage 2a Sustainability Appraisal	Fair
Strategic Considerations:	<p>Site is located to the east of the village, mostly outside of the development boundary (with only around 2% within the boundary). It is assumed that any development will fund a new estate road access or use Donnett Close for access. Site located partially within (i.e. site access), and may effect setting of the Whittington Conservation Area and nearby Grade II Listed Building. No other known archaeological interest but large size of site suggests it may have some archaeological potential.</p>
Known Infrastructure Requirements to make Development Suitable in Planning Terms:	<p>Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.</p>
Known Infrastructure Opportunities:	<p>Habitat could potentially be restored as priority habitat. Potential to mitigate noise through separation distances, orientation and room layout as well as glazing and boundary treatment. Relevant supporting studies should be undertaken and their recommendations implemented. See comments from relevant service areas.</p>
Potential for Windfall?	No
Potential for Allocation?	Yes
Recommendation	Allocate
Reasoning	Any issues raised by consultees are manageable. Site is suitably located within proximity to Whittington's services and acts as a natural extension to the village.
If proposed for Allocation, Potential Capacity:	70
If proposed for Allocation Design Requirements:	<p>Appropriate access to be provided via the B5009. High quality design and layout required. Any habitats on the site should be retained. Development will fund a review and extension of 30mph speed limit and any necessary traffic calming and footways and pedestrian crossing facilities at the site frontage.</p>

1.5. STRATEGIC POLICIES:

SP2. STRATEGIC APPROACH

The policy states that over the plan period from 2016 to 2038, around 30,800 new dwellings and around 300 hectares of employment land will be delivered. This equates to around 1,400 dwellings and 15ha of employment land per annum. The Local Plan aims to ensure that sufficient land is available to achieve these growth aspirations, however the availability of land will be kept under review to ensure a continuous supply of suitable sites is available. Delivery of affordable housing remains a key priority in Shropshire, as such around 7,700 affordable dwellings (equating to around 25% of the total housing requirement) will be delivered during the plan period from 2016 to 2038.

New development will be focused in the urban areas specifically Shrewsbury, Principle and Key Centres and Strategic Settlements and Sites.

In recognition of 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 within Community Hubs, including **Whittington** (identified in Schedule SP2.2) which is considered as a significant rural service centres.

We support the classification of Whittington as a Community Hub in that it provides a rural service centre to the immediate residents and those in the outlying communities. Whittington has an abundance of facilities including a school, public houses, cricket ground, regular bus route, mobile library stop, convenience stores and a tourist attraction. It is essential that the village continues to thrive through managed growth of housing for all sectors of the community and beyond.

SP7. MANAGING DEVELOPMENT IN COMMUNITY HUBS

The Policy states that Community Hubs are considered significant rural service centres and the focus for development within the rural area. As such appropriate development will be permitted on allocated sites and other sustainable sites within the development boundary of Community Hubs, as identified on the Policies Map, where it complies with all the following considerations:

- a. It is of a scale, design and layout that is appropriate to the site and its surroundings, respects natural and heritage assets, safeguards residential amenity and is responsive to and in keeping with the character and identity of the settlement and its environs, consistent with relevant policies of this Local Plan.*
- b. The design and layout of development positively responds to our changing climate and maximises any opportunities to minimise carbon emissions and make efficient use of water, in accordance with relevant policies of this Local Plan.*
- c. It maintains the integrity of strategically important gaps between settlements.*
- d. There is sufficient infrastructure capacity to support the development, or any infrastructure capacity constraints can be addressed through the development, consistent with relevant policies of this Local Plan.*
- e. Any residential development provides an appropriate mix of dwelling types, tenure and affordability in accordance with relevant policies of this Local Plan.*
- f. 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.*
- g. Cumulatively, any employment development and other non-residential development, in combination with completions since the start of the plan period and any outstanding commitments (including site allocations), is considered appropriate and complements the size, character and identity of the settlement.*
- h. All necessary supporting studies in relation to site constraints, infrastructure and other development requirements specified by the policies in this Local Plan have been undertaken by a suitably qualified individual and the specified requirements can be provided and any identified adverse impacts satisfactorily mitigated through the development.*
- i. It positively responds to design criteria and policies identified within relevant Neighbourhood Plans and Community Led Plans.*

It is considered that Site WHN024 is capable of complying with Policy SP7 in that it will provide for a high quality legible development which will provide a range of house types and sizes whilst including the necessary affordable housing units and biodiversity enhancements.

2. VIABILITY

It is understood that the proposed policies and proposed site allocations within the ‘Regulation 18’: Pre-Submission Draft Shropshire Local Plan have been informed by a Whole Plan Viability Assessment that considered the costs of the various policies the Council is proposing and the impact of these on development viability. This process is a requirement of the 2019 National Planning Policy Framework (NPPF) and the associated updated (in September 2019) of the Planning Practice Guidance (PPG).

Shropshire Council have sought confirmation from Carter Jonas that Site WHN024 is deliverable in the context of the policies in the ‘Regulation 18’: Pre-Submission Draft Shropshire Local Plan. Paragraph 16 of the NPPF states “*plans should.... be prepared positively, in a way that is aspirational but deliverable...*”, whilst Paragraph 35 states “*Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:... Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground...*”.

As such only deliverable sites should be included within the Shropshire Local Plan and we can confirm that:

- 1 Site WHN024 is viable and deliverable having regard to the policy requirements identified within the ‘Regulation 18’: Pre-Submission Draft Shropshire Local Plan.
- 2 With regard to the proposed site allocation WHN024, the timescales for the delivery within Appendix 7 of the ‘Regulation 18’ Pre-Submission Draft of the Shropshire Local Plan is considered to be:
 - a. Correct;

3. HIGHWAYS REPORT

A technical highways note has been prepared to assess the access to The Site directly from Station Road in relation to the Shropshire Council document ‘Specification for Residential / Industrial Estate Roads’. The access was also reviewed based on the results of speed surveys undertaken on Station Road to inform vision splay requirements, swept path analysis, junction capacity tests and collision analysis.

The Shropshire County Council residential road design standards are set out in the ‘Specification for Residential / Industrial Estate Roads’ document, dated February 2000. The road types specified within the above document are detailed at **Table 1** below.

Road Type	Purpose / Number of Houses to Serve
Industrial Estate Road	An industrial estate
Residential Distributor Road	300 + dwellings.
Collector Road	Not specified – collects traffic from within small parts of residential areas and may take the form of a loop.
Traditional Estate Road	Maximum of 200 dwellings.
Access Road	Maximum of 50 dwellings.
Shared Surface Road	Maximum of 20 dwellings.
Mews Court	Maximum of 10 dwellings.

Table 1 - Specification for Residential / Industrial Estate Roads – Road Types

The site access will need to serve 70 dwellings and be able to accommodate future housing growth on the land to the rear. Based on **Table 1**, it has been assumed that the access should be judged against the design criteria for a 'Traditional Estate Road', details of which are provided at **Figure 3**.

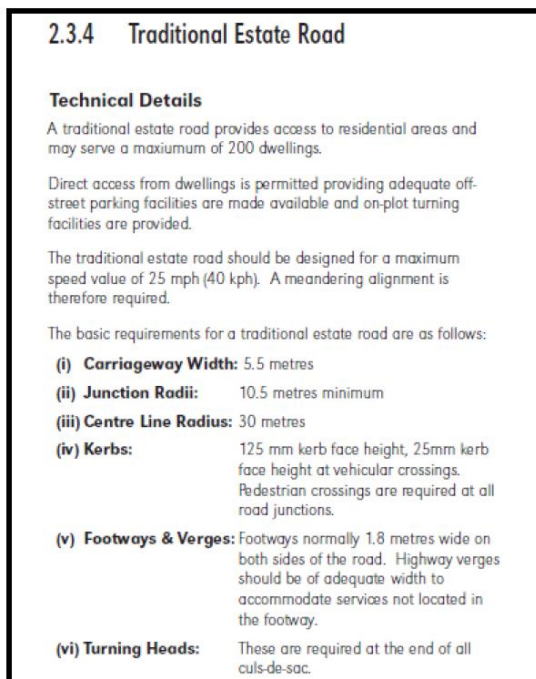


Figure 3 – Traditional Estate Road Source: Specification for Residential / Industrial Estate Roads

Geometry measurements have been undertaken at the proposed Station Road junction using CAD.

Manual for Streets (MfS) states in section 7.1 that “carriageway widths should be appropriate for the particular context and uses of the street.” It goes on to state how this is dependent on the volume of traffic, pedestrian activity, traffic composition, parking in the carriageway, the design speed, the curvature of the street and whether the road is single lane. Figure 7.1 taken for MfS illustrates what various carriageway widths can accommodate.

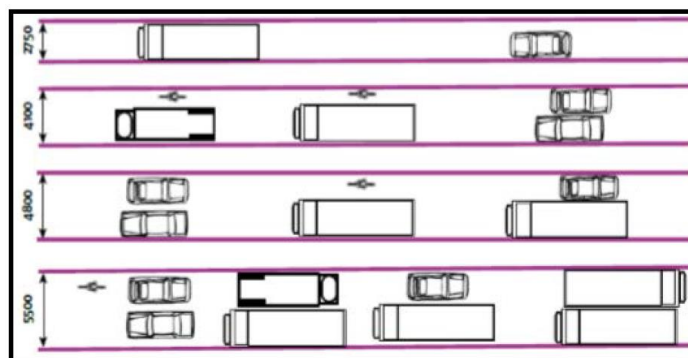


Figure 6 – Manual for Streets 2 Carriageway Width Diagram

Based on **Figure 6** above, at a width of 4.8m, a car and a lorry can pass in a straight line, and 5.5m is required for two lorries to pass. The 'Traditional Estate Road' width of 5.5m is based on two lorries being able to pass. MfS states that the ability for vehicles to pass is dependent on the curvature of the Street.

A new access to Station Road would be located c25m south of the existing Donnett Close access. This access arrangement is shown on the submitted highway layout plan. The proposed access junction has been designed in accordance with the Shropshire County Council residential road design standards for a 'Traditional Estate Roads' as detailed overleaf: -

- Carriageway Width = 5.5m.
- Junction Radii = 12m (in excess of the minimum of 10.5m).
- Centre Line Radius = Infinity (Straight Line).
- Footways = 1.8m.
- Verges = not present.
- Turning Head = Will be provided further into the site.

COMPLIANCE WITH DESIGN STANDARDS

The proposed Station Road junction conforms with the Shropshire County Council residential road design standards for a 'Traditional Estate Road' in terms of its footway widths, carriageway width, junction radii and centre line radius. Turning heads would be provided further into the site.

SPEED SURVEY

Speed surveys undertaken using automatic traffic counting (ATC) equipment have been undertaken on Station Road to inform the vision splay requirements of the existing Donnett Close junction and any potential new access.

To the south of Donnett Close the speed limit on Station Road is 40mph, while the section of Station Road where the Donnett Close access junction is located, and Station Road to the north, is subject to a speed limit of 30mph.

Speed surveys have been undertaken using automatic traffic counting (ATC) equipment at the following locations: -

- ATC 1: Station Road immediately north of the Donnett Close junction (within a 30mph speed limit).
- ATC 2: Station Road to the south of the Donnett Close junction (within a 40mph speed limit).

The locations of the ATC's are shown at **Figure 7** below, and are designed to capture the approach speeds to the site access to inform the vision splays.



Figure 7 – ATC Locations

The ATC surveys were carried out from Wednesday 18th to Tuesday 24th March 2020, inclusive. The results of the survey, including the 85th percentile speeds, are shown at **Table 2** below.

Location	Direction	Average Daily Vehicle Flow	Average Speed (mph)	85 th Percentile Speed (mph)
ATC 1	Northbound	1,740	30.8	35.9
	Southbound	1,638	30.7	39.4
ATC 2	Northbound	1,746	31.3	37.2
	Southbound	1,630	32.9	43.0

Table 2 – Speed Survey Results

Table 2 above shows that, in combination, both sets of northbound speeds are consistent with traffic travelling from a 40 mph to a 30 mph speed limit and both sets of southbound speeds are consistent with traffic travelling from a 30 mph to a 40 mph speed limit.

As detailed at Section 10.1.4 of Manual for Streets (MfS) 2 in relation to the design speed, “For existing streets, the 85th percentile wet-weather speed is used.” The weather during the survey period has been investigated using an online website (timeanddate.com) to determine if a wet weather speed adjustment is justifiable. As shown at Figure 8 and Figure 9 below, some light rain was experienced during the day on Wednesday 18th and the morning of Tuesday 19th, all other days during the survey period were dry. Based on the above, a wet weather adjustment of minus 4kph (-2.5 mph) has been made to the recorded 85th percentile speeds.

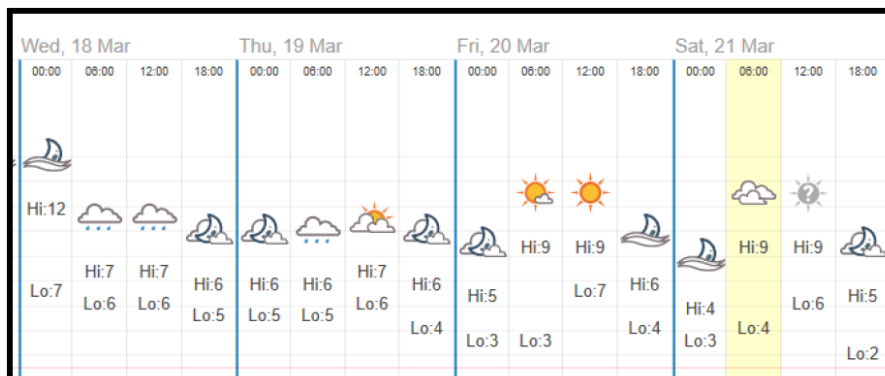


Figure 8 – Weather 18th to 21st March

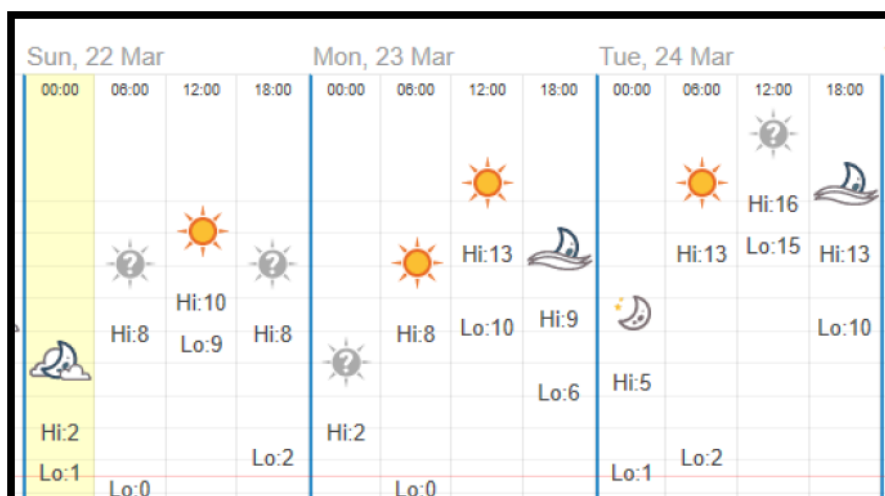


Figure 9 – Weather 22nd to 24th March

85th percentile wet weather design speeds are shown at **Table 3** below

Location	Direction	85 th Percentile Speed (mph)	85 th Percentile Wet Weather Speed (mph)
ATC 1			
	Southbound	39.4	36.9
ATC 2	Northbound	37.2	34.7

Table 3 – Speed Survey Results (Wet Weather Adjustment)

STOPPING SIGHT DISTANCES

Section 10.1 of MfS2 provides guidance on Stopping Sight Distances (SSD’s) for streets where 85th percentile speeds are up to 60 kph (37mph). MfS states that, “This will generally be achieved within 30mph limits and may be achieved in some 40mph limits.” As the recorded speeds are below 37mph, SSD’s have been calculated with reference to the formula set out at paragraph 10.1.7 of MfS2, using a 1.5s reaction time and a 0.45g deceleration rate. SSD’s have only been calculated on the approaches to the access, these being the southbound speed at ATC 1 and the northbound speed at ATC 2. Using the 85th percentile wet weather vehicle speeds, the resultant SSD’s are detailed at **Table 4** below.

Location	Direction	85 th Percentile Wet Weather Speed (mph)	SSD’s (m) (MfS2 – 1.5s, 0.45g)
ATC 1	Southbound	36.9	58.0
ATC 2	Northbound	34.7	52.9

Table 4 – SSD’s MfS2

Based on the above, the vision splay requirement for the proposed access onto Station Road (ATC 1 Southbound and ATC2 northbound) is 58.0m to the north and 52.9m to the south.

Vision splays in accordance with the above distances are achievable in both directions and this is shown on the Highways Plan.

SWEPT PATH ANALYSIS

The proposed access has been assessed for refuse vehicle manoeuvres, based on a refuse vehicle of 12m in length. The track plots showed that both options can accommodate a refuse which would be able to manoeuvre the new access, enabling service vehicles to arrive and depart in forward gear.

JUNCTION CAPACITY TESTS

Industry-standard junction capacity modelling software, which is the appropriate software to model the operation of the proposed junction, has been used to assess the development traffic effect on its capacity and operation. The PICADY9 module of the Junctions9 package is an industry standard computer package for modelling the operation of priority (give-way) junctions. PICADY uses the geometry of the junction combined with traffic flow information to predict capacity. The software provides a number of results in its output, the most meaningful of which is the Ratio of Flow to Capacity (RFC), where an RFC of 1.00 on any approach to the junction reflects a traffic demand equal to the theoretical capacity of that approach.

PICADY is typically operated using ‘One Hour’ mode which estimates the traffic profile for an hour-long period based a bell-shaped curve with a 15-minute ‘Warm Up’ period before, and a 15-minute ‘Cool Down’ period either side of the 60-minute peak-hour. This simulates the robust scenario of a peak within the peak hour.

The PICADY9 computer program has been used to assess the operation of the existing Donnett Close / Station Road Junction and this capacity assessment is also indicative of how the new junction would operate. The operation of the junction has been assessed for the 2030 base traffic ‘with’ the proposed development (Weekday AM / PM and Saturday Peaks), based on the existing junction geometry. Traffic flows on Station Road have been established using the ATC data presented at Section 5.3, and projected to 2030 using TEMPRO growth factors. Traffic flows for the Donnett Close and proposed residential dwellings have been established using TRICS, an online database of trip rates for various types of development. The results of the PICADY tests are set out at **Table 5** below.

Movement	AM Period			PM Period			SAT Period		
	Queue (pcu)	Delay (sec)	RFC	Queue (pcu)	Delay (sec)	RFC	Queue (pcu)	Delay (sec)	RFC
Donnett Close to Station Road South	0.0	5.92	0.01	0.0	5.80	0.01	0.0	5.59	0.01
Donnett Close to Station Road North	0.1	9.24	0.06	0.0	8.88	0.03	0.0	8.27	0.04
Station Road South to Station Road North and Donnett Close	0.0	5.18	0.01	0.0	5.23	0.01	0.0	5.24	0.01

Table 5 – PICADY Summary – Existing Donnett Close / Station Road Junction

The capacity modelling shows that the junction is predicated to operate within capacity with a maximum RFC of 0.06 in the AM peak period, which is only 6% of theoretical capacity. The modelling results above should be treated with caution as the surveyed traffic flows are likely to be slightly lower than typical traffic numbers. As the model shows the junction is operating at 6% of theoretical capacity, even with an increase in traffic the junction is still likely to operate within capacity. For simplicity, it has been assumed that a new junction would operate broadly the same as the existing Donnett Close junction.

COLLISION DATA

Collision data has been obtained for Station Road / Donnett Close area for the 5-year period of 2015 to 2019. A plan showing the details and location of the recorded personal injury collisions over this period is shown at **Figure 10** below.

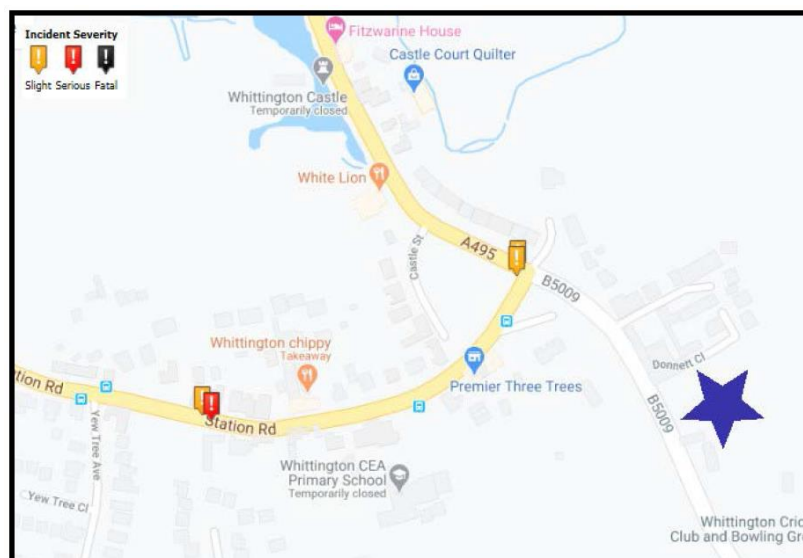


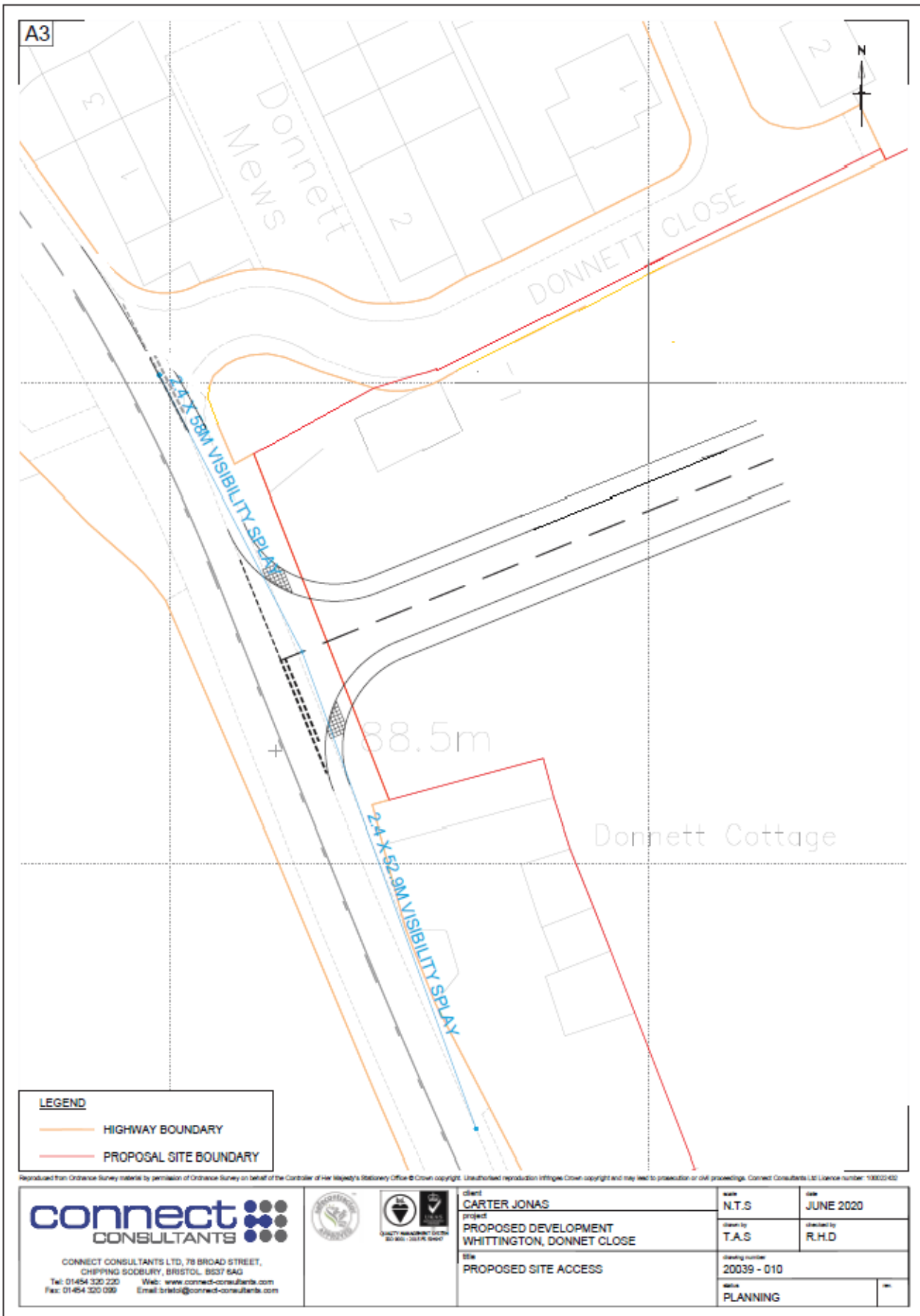
Figure 10 – Collision Study Area

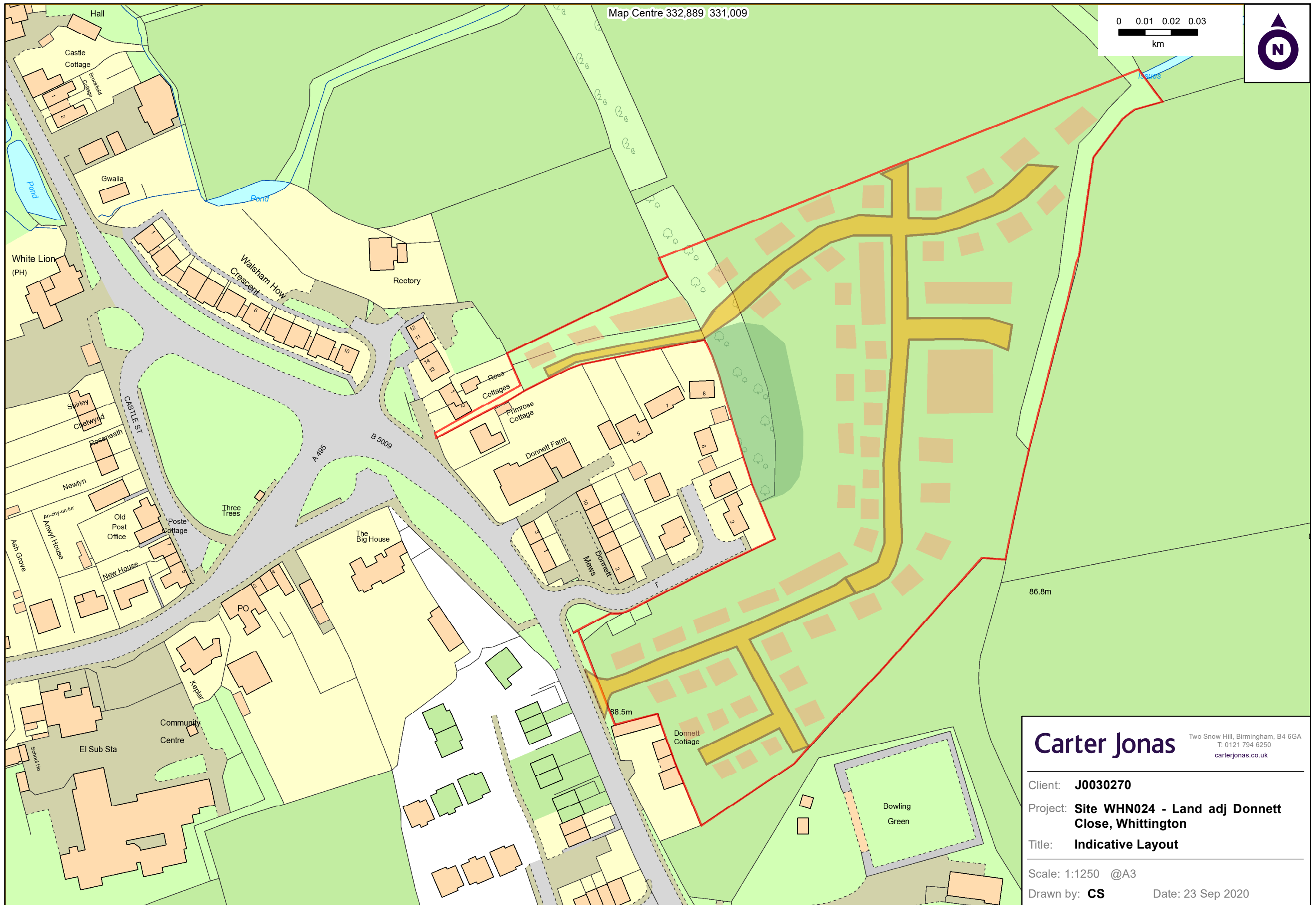
As shown above, no collisions have occurred over the last five years at the existing Donnett Close / Station Road junction or on Station Road at the new junction location. Two collisions, both classified as ‘slight’, have occurred at the A495 Station Road / A495 Castle Road / B5009 Station Road junction to the north of the proposal site. Two

collisions, one classified as 'slight' and one classified as 'serious' occurred on the A495 Station Road to the west of the site. No location within the study area had more than five collisions (i.e. one or more per year) and therefore the collision data has not been analysed in detail. On this basis, overall, no pattern of collisions has been identified which is attributable to a road layout deficiency, nor one which is likely to be materially worsened by the development proposals.

SUMMARY

Based on the above, the proposed Station Road access arrangement is suitable to serve the site, meaning it can be allocated with the knowledge that access issues would not prevent its delivery as a housing site.





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Client: **J0030270**
Project: **Site WHN024 - Land adj Donnett Close, Whittington**
Title: **Indicative Layout**

Scale: 1:1250 @A3
Drawn by: **CS** Date: 23 Sep 2020