

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:	Kathryn Ventham, Barton Willmore LLP on behalf of David Wilson Homes
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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: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant Yes: No:
- B. Sound Yes: No:
- C. Compliant with the Duty to Co-operate Yes: No:

(Please tick as appropriate).

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

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 see accompanying representation report submitted 26.02.21.

(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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Signature:

K. Ventham

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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Date: 26/02/2021

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Part B Reference:

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Paragraph:	<input type="text" value="2.27"/>	Policy:	<input type="text" value="Click or tap here to enter text."/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| 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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K. Ventham

Date:

26/02/2021

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Shropshire Local Plan Review – Regulation 19 Pre-Submission Consultation

Consultation Response

On Behalf of David Wilson Homes (Mercia)

February 2021

Shropshire Local Plan Review – Regulation 19 Pre-Submission Consultation

Consultation Response on behalf of David Wilson Homes (Mercia)

Project Ref:	27237	27237
Status:	Draft	Final
Issue/Rev:	P1a	P1b
Date:	February 2021	February 2021
Prepared by:	HM	HM
Checked by:	GJ	KV
Authorised by:	KV	KV

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Date: February 2021

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APPENDICES

Appendix 1: Vision Document

1.0 INTRODUCTION

- 1.1 We write on behalf of our Client, David Wilson Homes (Mercia), in respect of their land interests at Land at Haroldgate, Whitchurch ('the Site') which is being promoted for a sustainable, residential-led development to meet Shropshire's housing needs. These representations follow on from our previous representations to the Local Plan process, including Issues and Options (2017), Preferred Options (2017), 'Preferred Sites Consultation (2019), and Regulation 18 Pre-Submission Draft Consultation (2020). These representations identified the suitability and availability of the Site for residential development, including an indicative Vision Document. This Vision Document is provided again for completeness at **Appendix 1**.
- 1.2 David Wilson Homes is part of the Barratt Developments Group, contributing significantly to a total of over 17,000 new homes a year, and is currently active on around 150 sites across Britain. They have an excellent track record of bringing sites forward including residential developments of this size.
- 1.3 The current Development Plan in Shropshire is comprised of the Core Strategy (2011) and the Site Allocations and Management of Development (SAMDev) Plan (2015), which provides the framework for managing development in the County up to 2026. Upon adoption, the policies of the Shropshire Local Plan 2016 to 2038 will replace the policies of the Core Strategy and SAMDev Plan, except for the SAMDev site allocations which have yet to be delivered, which will be 'saved' and therefore continue to form part of the Development Plan.
- 1.4 The National Planning Policy Framework (NPPF) sets out the key framework for plan-making. Of particular relevance to these representations are the 'tests of soundness' for Local Plans (Paragraph 35). These are copied below for reference:

"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:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the areas objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.”*

- 1.5 The National Planning Practice Guidance (NPPG) provides further advice on plan making and how these tests can be met. It is noted that this current framework for the preparation and examination of Local Plans is subject to a future review, as detailed in the recent ‘Planning for the Future’ White Paper (August 2020) consultation.
- 1.6 Shropshire Council intends to submit the draft Shropshire Local Plan (herein referred to as the SLP) for examination in April 2021 and anticipates adoption in May 2022, subject to independent examination. It is therefore expected that the current NPPF and tests of soundness will still be applicable based upon this timetable. Our comments are therefore submitted with the current national policy framework considerations in mind.
- 1.7 A summary of the proposed development for the Site is provided for background information in Section 2 of this Report. We then provide comment on specific parts of the draft SLP and provide suggested changes, where they are considered to be necessary in order to make the Plan ‘sound’ as per the NPPF definition. The responses are set out in chronological order.

2.0 LAND AT HAROLDGATE, WHITCHURCH

- 2.1 Land at Haroldgate, Whitchurch lies approximately 1km to the north-west of the town of Whitchurch, which offers a range of shops and services, including doctors' surgeries, dentists, opticians and independent and high street retail offerings. It is therefore considered to represent a sustainable location for residential development.
- 2.2 The Site currently consists of agricultural fields and extends to 8.7 hectares. Existing residential development adjoins the site to the north, on allocated site WHIT046. The eastern, southern and western boundaries are defined by hedgerows and landscaping. Agricultural fields extend beyond the Site to the eastern, southern and western boundaries.
- 2.3 As per the current draft SLP, the Site is identified as residential site allocation Land North of Chester Road (WHT037 and WHT044), for 200 dwellings. As emphasised above, immediately to the north of the Site lies allocated site WHIT046, which has already been successfully delivered. This demonstrates the overall sustainable nature of this location. The allocation would serve to complement the development immediately adjacent to the Site, with two access points proposed: from Tarporley Road through the existing Mount Farm development and from Chester Road. The Site therefore offers a natural second phase to the site to the north, at an appropriate scale. It is considered that the Site could indicatively provide for 215 dwellings whilst also meeting the required open space / bio diversity mitigation, as confirmed in our representations to the 2019 Preferred Sites Consultation. It is therefore requested that the allocation is increased to 215 dwellings.
- 2.4 The Concept Plan provides an indicative vision and masterplan for the Site. The development would provide appropriate landscaping to retain and enhance existing site boundaries. It would ensure connectivity both within the Site and to its surrounds via sustainable transport means. Informal and formal open space is accommodated within the development, and sustainable drainage technologies would ensure the Site is not subject to flooding. The vision for the Site would assist Shropshire in sustainably meeting the housing needs of existing and future residents.

3.0 INTRODUCTION (CROSS BOUNDARY ISSUES AND DUTY TO COOPERATE - PARAGRAPH 2.27)

We consider that further information is required to ensure the draft SLP is sound in respect of the approach to cross boundary issues. This would ensure the draft SLP is positively prepared and consistent with national planning policy.

- 3.1 The Introduction provides an overview of the characteristics of Shropshire, the Local Plan framework and identifies some of the strategic cross boundary matters to be considered. It is noted that there is no reference to the advent of High Speed 2 (HS2) and opportunities in terms of job creation / increased population serving local facilities for northern Shropshire towns, including Whitchurch that it will create. We consider more recognition should be given to the positive knock-on effects of HS2. Paragraph 102(b) of the NPPF supports the need to consider the opportunities arising from new transport infrastructure: *'opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated'*.
- 3.2 Under 'Cross Boundary Issues and the Duty to Cooperate' it is stated that in Shropshire's case the County is adjoined by several Local Authority areas, and there are areas beyond this with a functional relationship, most notably the Black Country. Strategic planning matters need to be positively addressed with these authorities to meet the legal and soundness test of the Duty to Cooperate. At paragraph 2.27 the draft SLP identifies that *'positive conversations with relevant bodies have been ongoing over the course of the preparation of the Plan, and ahead of the submission of the Plan for Examination a full set of Statements of Common Ground will be made available'*.
- 3.3 In specific relation to housing issues, it is noted at paragraph 3.7 that 1,500 dwellings of the draft SLP housing requirement will go towards meeting the shortfall in housing supply within the Black Country. In relation to employment issues, at paragraph 3.8 the draft SLP now provides 30 hectares of employment land to help meet the Black Country needs, out of the total 300 hectares requirement for Shropshire. The positive approach of Shropshire to helping meet wider housing and employment market area needs is supported. Nevertheless, no further explanation appears to be provided within the draft SLP or supporting evidence base as to how these figures have been derived at this stage

(including within the published 'Correspondence with the Association of the Black Country Authorities').

- 3.4 The Council has not published a separate Duty to Cooperate Statement or any Statements of Common Ground to address strategic policy matters as required by the NPPF (paragraph 27) at this stage. The PPG 'Maintaining Effective Cooperation' section provides guidance on the format of these statements and states these should be maintained throughout the plan production process and made available on their website by the time the Council publish their draft Plan, *'in order to provide communities and other stakeholders with a transparent picture of how they have collaborated'* (Paragraph 020 ID: 61-020-20190315). Given that there are no accompanying Statements of Common Ground it is difficult for other stakeholders to ascertain the extent of agreement with other local authorities on strategic issues and assess the appropriateness of any agreements reached e.g. in relation to the Black Country shortfall contributions. Further information should be provided, and the figures should be kept under review in light of any further evidence from the Black Country Authorities, including progress on the Black Country Local Plan.
- 3.5 For instance, in relation to housing it is noted that the recent update to the standard methodology for calculating local housing needs increases the requirement for Wolverhampton City Council from 750 dwellings per annum under the previous standard method to 1,013 dwellings (as one of the 20 urban areas subject to the 35% uplift under the revised methodology.) Furthermore, the 35% urban lift has also been applied to Birmingham City Council's local housing needs. As the Black Country is part of the Greater Birmingham Housing Market Area, this is likely to result in further pressures upon the housing (and potentially employment) land supply within the Black Country and wider housing market area to which it is related. These updates to the standard methodology may therefore have implications for the level of shortfalls due to be accommodated by the draft SLP. However, the implications are difficult to assess without further detail on how the current contribution figures have been derived.

Recommended changes to Introduction (Cross Boundary Issues and Duty to Cooperate)

- 3.6 In order for the draft SLP to be positively prepared and consistent with national planning policy we suggest the following changes are necessary:
- The Council should update and publish a Duty to Cooperate Statement and accompanying Statements of Common Ground to demonstrate the extent of

agreement on strategic matters and provide information on how agreements on these matters have been reached, including the further detail on how the contribution towards Black Country unmet need have been derived.

- The housing needs shortfall contribution towards the Black Country in particular should be kept under review and considered in light of the most recent updates to the standard methodology for local housing needs which increases the minimum housing requirement for Wolverhampton City Council and therefore the Black Country local plan area overall. This should be reflected in the Statements of Common Ground required to support the draft SLP. The draft SLP should consider the addition of a mechanism within policy to commit to a review of the housing requirements in light of further unmet needs arising in the future.

4.0 DRAFT POLICY SP2 – STRATEGIC APPROACH

Whilst we are supportive of the principles of the strategic approach, we consider that a greater proportion of housing growth should be directed to the urban areas/locations (namely the strategic, principal and key centres) and that additional housing land supply should be identified. We consider that this would ensure the draft SLP is sound in terms of being positively prepared, justified, effective and consistent with national planning policy.

Strategic Approach and Housing Requirements

- 4.1 Draft Policy SP2 (Strategic Approach) identifies that over the plan period from 2016-2038 around 30,800 new dwellings and around 300 hectares of employment land will be delivered. This equates to around 1,400 dwellings and 15 hectares of employment land per annum. The plan will deliver around 7,700 affordable dwellings (equating to around 25% of the total housing requirement). To achieve a sustainable and appropriate pattern of development which also maximises investment opportunities, new development will be focused in the urban areas/locations identified in Schedule SP2.1, wherein Shrewsbury is identified as the only Strategic Centre and Whitchurch is identified as one of five Principal Centres. Specifically, ***'Principal and Key Centres will accommodate significant well-designed new housing and employment development, supported by necessary infrastructure. Growth within these diverse settlements will maintain and enhance their roles, support key services and facilities and maximise their economic potential.'***
- 4.2 Appropriate new development within 'Community Hubs', which are identified in Schedule SP2.2, which are considered significant rural service centres and to a lesser extent 'Community Clusters', identified in Schedule SP2.3 will complement development in the urban areas. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification.
- 4.3 Based upon the residential guideline figures provided within Appendix 5 of the draft SLP (and the supply from the wider rural area at note A5.5) around 31,112 dwellings are identified within the housing supply (with 30,912 dwellings to come forward during the plan period taking account of anticipated delivery at Clive Barracks). Analysis of these figures highlights that around 74% of the draft SLP housing requirement is directed to

the urban areas/locations (including the centres and strategic sites) and that around 26% is directed to the community hubs, clusters and wider rural area.

- 4.4 Within Draft Policy SP2 of the Plan, an urban focused strategy is proposed, directing the majority of new development towards the larger settlements with the greatest range of services, facilities and infrastructure. The justification for the strategy is based on the Shropshire Economic Development Needs Assessment (Interim Report) and the Economic Growth Strategy for Shropshire 2017-2021, which look to prioritise investment in strategic locations and growth zones along strategic corridors, making use of existing alternative transport connections. The areas considered to be the most sustainable and therefore appropriate for new development were considered as part of the Hierarchy of Settlements Assessment (2020). In order to assess settlement function, Shropshire Council utilised a four-stage assessment methodology. This included: Stage 1 - Identification of settlements, Stage 2 - Screening of settlements, Stage 3 - Assessment of screened-in settlements and Stage 4 - Categorisation of settlements. On the basis of its number and proximity of houses (Stage 1), population size and self-containment (Stage 2) and range of services and facilities, high speed broadband provision, employment opportunities and available public transport links (Stage 3), Whitchurch was categorised as a Principal Centre where a commensurate level of new development is to be directed (Stage 4). The categorisation of Whitchurch as a Principal Centre and the urban focused strategy set out within Draft Policy SP2 is supported. The draft SLP should however consider the potential for further development to be directed to the urban locations specified in Schedule SP2.1 (under the Strategic, Principal and Key Centres) with a lesser proportion being directed to the more rural settlements in Schedules SP2.2 and SP2.3.
- 4.5 There are a number of smaller Community Hubs which have significant development directed towards them. Examples Llanymynech which is expected to grow by 125 dwellings, of which 50 are new allocations (a 55% increase in terms of overall dwellings in the settlement, according to the 2020 Hierarchy of Settlements); and Hadnall (125 dwellings of which 40 are new allocations; totalling a 56% increase). This is compared to the Principal Centres of Whitchurch, which is expected to grow by 1600 dwellings, of which 450 are new allocations (a 35% increase in terms of overall dwellings in the settlement); and Market Drayton (1200 dwellings of which 450 are new allocations, totalling a 22% increase).
- 4.6 Whilst some development in the Community Hubs is necessary to support their long-term sustainability the scale of development should be proportionate to the size and sustainability of the settlement. We consider more sustainable growth would be achieved by directing more growth to the higher order settlements such as Whitchurch. This would

also mean that there was the opportunity for the housing land supply to be less dependent on smaller scale schemes as typically delivered within the lower order settlements. Whilst the NPPF (paragraph 68) recognises the importance of small-medium scale sites to housing delivery and requires Local Plans to identify at least 10% of their supply via sites under 1 hectare, the Council should be cautious in any over-reliance upon smaller scale schemes in particular given their generally higher rate of non-implementation (see further comments below regarding lapse rates).

- 4.7 As referenced above, the draft SLP already outlines how the strategic spatial approach responds directly to the objectives of the Economic Growth Strategy for Shropshire (2017-2021), by prioritising investment in strategic locations and growth zones. The corridor of 'North East Shropshire and the A41' covering Whitchurch and Market Drayton is specifically referenced, as are opportunities connected to the delivery of HS2 in the second half of the plan period. Additional housing development in these urban locations and centres would therefore assist to enhance the economic growth of the County in line with the NPPF (paragraph 80) which states ***'significant weight should be placed on the need to support economic growth and productivity'***.
- 4.8 Paragraph 35 (b) of the NPPF sets out that in order to be sound, a plan must be *"justified" – an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence.*" The Sustainability Appraisal (SA) of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan outlines the range of positive benefits for an urban focused strategy, in comparison to other alternative options which would involve greater growth in rural areas. The SA (page 73) notes that an urban focused strategy ***'is likely to have significant benefits for the following sustainability objectives: protecting and enhancing the range of plants and animals and the quality and extent of wildlife habitats in Shropshire; encouraging a strong and sustainable economy; supporting active and healthy communities; protecting and improving soil quality; conserving and enhancing water quality; reducing carbon dioxide emissions and conserving and enhancing landscape character and local distinctiveness.'*** This tested the scenario of around 75% of growth being directed towards the urban locations, which appears to be carried forward within the draft SLP (with around 74% of housing growth directed to urban locations, as detailed above).
- 4.9 In respect of draft SLP Policy SP2, the SA sets out the strategic approach and states it ***'is significantly positive towards encouraging a strong and sustainable economy, as well as providing a sufficient amount of good quality housing which meets the needs of all sections of society.'*** It identifies positive outcomes in relation to reducing carbon emissions, access to services, encouraging sustainable means

of transport, and supporting active and healthy communities. Whilst the assessment notes some potential negative effects in relation to soil quality (not fully established), landscape character and local distinctiveness, efficient use of natural resources and ecological value, this is mostly due to the use of greenfield land and does not take into account mitigation measures. This demonstrates that the urban focused strategy is the most justified and therefore sound approach undertaken to date, when compared with the other alternatives.

- 4.10 Whilst it is recognised that there are some potential adverse effects associated with a more urban focused strategy, in light of its overwhelming positive effects, the Council should direct a higher proportion of growth to these urban locations (namely the Strategic, Principal and Key Centres) whilst providing specific policy support for smaller scale affordable housing provision within the rural areas. The scenario of a higher level of growth within the urban areas (more than 75%) should also be tested in order to demonstrate that the strategic approach proposed is the most suitable / justified.
- 4.11 It is also noted that as part of the Preferred Spatial Strategy (2017) a slightly higher annual level of housing growth was tested via the SA and was considered to be justified (1,430 dwellings per annum versus the current draft SLP requirement of 1,400 dwellings per annum). It is not clear why this slightly higher level of annual growth is no longer proposed to be accommodated (particularly given it was considered justified previously via the SA and Preferred Spatial Strategy approach). In view of the need for further flexibility (see further commentary below) the Council should consider the need for the SA to test scenarios of higher levels of growth.
- 4.12 The draft SLP (paragraphs 3.5-3.7) outlines that Shropshire Council has undertaken an assessment of the Local Housing Need (LHN) using Government's Standard Methodology, which indicates a housing need of some 25,894 dwellings over the plan period from 2016 to 2038, as at April 2020. The Council proposes a housing requirement of around 30,800 dwellings over the plan period to ***'meet housing need and support the long-term sustainability of the County'***. The draft SLP also states that this housing requirement (approximately 19% above the minimum LHN figure) provides some flexibility to respond to changes to LHN over the plan period and an opportunity to:

- 'a. Respond positively to specific sustainable development opportunities;***
- b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;***

- c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;*
- d. Support the diversification our labour force; and*
- e. Support wider aspirations, including increased economic growth and productivity.'*

- 4.13 It is not clear from the Local Housing Needs Assessment (August 2020) how the uplift has been determined and whether this uplift of 4,906 dwellings has been determined by the housing land supply capacity i.e. the Assessment only provides the 25,894 dwellings figure and does not provide any commentary on the uplift (the draft SLP identifies that 1,500 dwellings are for the unmet needs of the Black Country). Related to this, it is not clear from the Local Housing Needs Assessment and the Economic Development Needs Assessment (updated December 2020) whether the housing requirements and the economic growth ambitions are fully aligned i.e. the Local Housing Need Assessment does not identify how much of the uplift over and above the minimum local housing need figure is required for economic growth. Equally, the Economic Development Needs Assessment (EDNA) tests the employment land requirements associated with the minimum local housing need and draft SLP proposed local housing need (alongside other scenarios, including job forecasts and past growth trends). The scenarios associated with the housing requirements suggest a lower employment land requirement than that within the draft SLP (132-142 hectares versus the 300 hectares identified within the draft SLP- see Table 8.17 of the EDNA). The evidence and draft SLP should therefore be clearer on the extent of alignment between the housing and economic growth requirements. Should there be a need for further housing growth to support the economic growth strategy fully we consider this would be best distributed in accordance with the urban focused strategy with additional growth at the strategic, principle and key centres.
- 4.14 The Strategic Housing Market Assessment (September 2020) refers to the Local Housing Needs Assessment for the analysis of the overall housing requirement and the former provides an assessment of the type of housing needs over the plan period, including affordable housing. At paragraphs 4.152-4.156 it identifies that the level of affordable housing need (some 17,574 dwellings over the plan period, equating to around 799 dwellings per annum) will not be met by the level of overall housing need (based on past trends of 21% of all housing being affordable). It notes the PPG (Paragraph 008 Reference ID: 67-008-20190722) which states that *"an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes."*
- 4.15 Whilst the SHMA states that the level of overall housing that would be required to meet affordable housing need is considered undeliverable (and we do not advocate meeting

affordable housing needs in full) there is an opportunity for the draft SLP to go further in meeting affordable housing needs via additional sustainable housing development as part of the urban focused strategy.

- 4.16 In relation to accommodating unmet needs the draft SLP should also have regard to the need for ongoing flexibility, particularly in terms of the increase in the Black Country housing requirements arising from the 35% urban uplift to the local housing need figure for Wolverhampton City Council (as outlined in our response to the 'Introduction - Cross Boundary and Duty to Cooperate'). The Council should consider the need to allocate additional housing in sustainable urban locations (e.g. through increased site capacity, where it can be accommodated) to provide this flexibility to ensure local and unmet housing needs in the current and beyond plan period are met in full (as per NPPF, paragraphs 59-60 and 67). This is particularly relevant as some of the proposed larger scale development site allocation delivery trajectories extend into the long term, and there is some reliance upon 'Safeguarded Land' removed from the Green Belt to meet needs beyond the plan period. Our comments in relation to these matters are outlined further under the relevant Policy SP11.

Housing Land Supply

- 4.17 From the figures provided within Appendix 5 of the draft SLP, around 31,112 dwellings are identified within the supply but with only 30,912 dwellings within the plan period taking into account the anticipated delivery from Clive Barracks (based upon the residential guidelines and supply from the wider rural area detailed at note A5.5). Against the 30,800 dwellings requirement set out in draft Policy SP2 there is therefore no flexibility in the housing land supply identified. This risks the draft SLP not being effective in terms of delivering the necessary housing over the plan period, particularly given issues in respect of lapse rates and windfall allowances (see further commentary below).
- 4.18 Recent Local Plan Examinations for the Guildford Local Plan and South Oxfordshire Local Plan have both provided for a greater degree of flexibility in their housing land supply. The Guildford Local Plan identifies the equivalent to a 36% headroom above its own housing requirements, which helps provide for the unmet needs of Woking, providing flexibility for slippage in the housing trajectory and addressing affordability issues. In the recent case of the South Oxfordshire Local Plan Review a headroom equivalent to 27% above the housing requirements was considered appropriate¹. This provided contingency

¹ The South Oxfordshire housing requirement totals 23,550 dwellings (consisting of 18,600 homes for South Oxfordshire's own needs and 4,950 homes for Oxford City) and is to provide enough housing land capacity for 29,893 homes

in the event of larger allocations being delayed in coming forward. The current draft SLP provides for no flexibility against the housing requirement of 30,800 dwellings. Whilst it is recognised that the 19% uplift against the minimum local housing need figure of 25,894 dwellings provides flexibility for some factors such as unmet housing needs and affordability, it is still below the levels of flexibility identified within these two recently examined (and adopted) Local Plans (36% for Guildford and 27% for South Oxfordshire).

- 4.19 Related to this issue of flexibility, it is not clear what lapse (or non-implementation) rate has been assumed in the housing trajectory overall for the plan period. Whilst the Councils' Five Year Supply Statement (2019) states that a 10% lapse rate has been assumed for deliverable sites, the Strategic Housing Land Availability Assessment (2018) does not make any reference to lapse rates. This should be clearly identified and evidenced as per the PPG (Paragraph 024 ID: 3-024-20190722) which states that an overall risk assessment should be made as to whether sites will come forward as anticipated. There is no up to date justification provided for the 10% lapse rate assumed in the Five Year Supply Statement i.e. local evidence of implementation rates in recent years (reference is made to the SAMDev Plan Inspectors Report from 2015).
- 4.20 The evidence for the windfall rates assumed for each settlement is also unclear. Whilst the Five Year Housing Supply Statement (2019) references the constant supply this has provided to Shropshire overall in recent years (sites of less than 5 dwellings) and the Strategic Housing Land Availability Assessment (SHLAA, 2018) provides a summary of recent rates across Shropshire but there is no apparent evidence of the settlement by settlement analysis that justifies the assumptions within Appendix 5 (in line with the NPPF, paragraph 70 and the PPG Paragraph 023 ID: 3-023-20190722). The degree of reliance upon windfall developments as part of the housing land supply should be reviewed with more detailed analysis in order to be justified (it currently constitutes 2,682 dwellings which represents around 11% of the housing land supply from April 2019 onwards, excluding completions up to that point). We consider more robust housing land supply would be secured via increased growth within the urban locations rather than a reliance upon windfalls ensuring an effective strategy for housing delivery.
- 4.21 Our comments in relation to the site-specific allocations at Whitchurch, including our Clients' Site specifically are detailed further under Draft Policy S18.

Recommended Changes to Draft Policy SP2 Strategic Approach

- 4.22 In order for the draft SLP to be positively prepared, justified, effective and consistent with national planning policy we suggest the following changes are necessary:

- The draft SLP should direct a higher proportion of new growth (particularly housing) towards the urban areas/locations reflecting the SA benefits of an urban focused approach demonstrated to date and providing further benefits to the economic strategy.
- In light of the overwhelming supportive evidence for an urban focused approach, the scenario of a higher level of growth within the urban areas (more than 75%) should be tested as part of the Sustainability Appraisal (SA) of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.
- The draft SLP and supporting evidence base should clearly demonstrate the degree of alignment between the high growth economic strategy employment land requirement and the housing requirement.
- As per our comments on the 'Introduction (Cross Boundary Issues and Duty to Cooperate)' further consideration should be given to the need for additional flexibility in the housing requirement and housing land supply to take account of the increased Black Country housing needs under the revised standard methodology.
- Further flexibility should be provided for in the housing land supply, in accordance with the approach taken in recent Local Plan examinations. This additional supply should be directed towards the urban areas/locations in accordance with the urban focused strategy.
- The flexibility of the housing land supply should be reviewed with respect to lapse rates and the windfall allowance assumed. Reliance upon windfalls as part of the housing land supply should be reduced via increased growth within urban locations.

5.0 DRAFT POLICY DP1 RESIDENTIAL MIX

Whilst we are supportive of the principle of the policy to address the specific local housing needs of Shropshire, we consider that in order for the policy to be sound further site and scheme flexibility should be provided as well as evidence for the standards. This would ensure the draft SLP is justified, effective and consistent with national planning policy.

- 5.1 This draft Policy sets out a series of requirements from residential development sites of varying scales (and tenure) including required dwelling size, type and tenure mix; meeting nationally described space standards; meeting M4(3) wheelchair user dwellings and M4(2) accessible and adaptable dwellings standards; and requiring specialist housing to meet the needs of older people and those with disability or special needs to be provided on site (on sites of 50 dwellings or more). The Council has produced a Strategic Housing Market Assessment (SHMA, September 2020) as part of the evidence for the policies (in accordance with the NPPF, paragraph 61).
- 5.2 The need for these standards to be fully evidenced is set in the NPPF (footnote 46) and the PPG (Housing: Optional Technical Standards section). For example, in relation to the nationally described space standards the PPG (Paragraph 020 Reference ID: 56-020-20150327) identifies that the evidence should consist of need (including what is currently being built in the area), viability and timing. In relation to accessibility optional technical standards the PPG (Paragraph 005 Reference ID: 56-005-20150327 to Paragraph 011 Reference ID: 56-011-20150327) sets out the necessary evidence to justify policies incorporating the standards, including detailed information on the accessibility and adaptability of the existing stock and the size, location, type and quality of dwellings needed.
- 5.3 The supporting text to draft Policy DP1 provides some commentary for the justification for the standards and references the SMHA evidence, however it is not clear from the analysis within the SHMA if all of the PPG relevant considerations have been taken fully into account in justifying the policy requirements. There does not appear to be any evidence justifying the inclusion of the nationally described space standards, which is required in order for the plan to be 'sound' by paragraph 35 of the NPPF.
- 5.4 The policy is also supported by a Viability Assessment (July 2020) in accordance with the NPPF (paragraph 34) and the PPG 'Viability'. However, it should be noted that this is primarily a typology-based approach and given the need for the viability assessment to be

kept under review there is still a need for site and scheme flexibility which is not reflected in the current policy wording. At Paragraph 8.10 of the Viability Assessment the assessment notes that *'the housing mixes are not sought rigidly across all sites, rather are used to inform the overall housing mix.'* In line with the NPPF (paragraph 57) the draft SLP Policy DP1 should provide for this flexibility in order to be consistent with national policy and therefore accord with paragraph 35 of the NPPF. The supporting Viability Study (Findings and Recommendations) also notes the challenging picture of viability across Shropshire and identifies the additional costs associated with these requirements which adds to these challenges.

Recommended changes to Draft Policy DP1 Residential Mix

5.5 In order for the draft SLP to be justified, effective and consistent with national planning policy we suggest the following changes are necessary:

- Additional policy wording should be incorporated to provide specific site and scheme flexibility.
- The requirements for optional technical standards should be fully justified by the evidence base having regard to the PPG criteria.

6.0 DRAFT POLICY DP2 SELF BUILD AND CUSTOM BUILD HOUSING

We are supportive of the principle of the policy to address the specific local housing needs of Shropshire, however we consider that in order for the policy to be sound it should be amended to remove the percentage requirement. This would ensure the draft SLP is justified, effective and consistent with national planning policy.

- 6.1 This draft Policy states that all sites of five or more dwellings in designated rural areas and ten or more dwellings elsewhere (or sites in excess of 0.5ha) are encouraged to make 10% of the dwellings available as serviced plots for Self-Build and Custom Build Housing. This is based on the SHMA which estimates around 2,400 applications will be made for inclusion on the Self-Build Register over the Local Plan period from 2016-2038 which equates to around 9% of the calculated local housing need.
- 6.2 We would challenge whether reliance on estimated demand via the Self Build Register is a suitable basis for a percentage-based policy. This is particularly relevant given that the criteria for expressing an interest on the Self Build Register is relatively limited i.e. whilst an individual may express an interest the degree to which it is a realistic ambition cannot be determined. As such, the draft Policy should continue to support self-build whilst referring to the most up to date Self Build Register for evidence of demand within a locality to inform any need to provide for plots on specific sites. The specific percentage of 10% should be removed.
- 6.3 There is not a necessity within National policy to include self and custom build thresholds, with the PPG (Paragraph 025 Reference ID: 57-025-201760728) setting out a number of ways in which Local Authorities can support self and custom build. As such the currently proposed SLP approach is unnecessary in the context of the tests of soundness set out within paragraph 35 of the NPPF which require plans to be consistent with national policy. It also places the burden of delivering self-build upon developers. Other mechanisms such as site-specific allocations or the use of publicly owned land could be more suitable and should be considered, rather than relying solely upon a percentage-based policy to be met, which may not be deliverable.
- 6.4 The potential for impacts upon the delivery timescales of developments as a result of a percentage requirement should be considered. For example, time is needed to sell individual self-build plots and this should be considered in terms of the effectiveness of the draft Policy. In order to avoid plots being left vacant in perpetuity and the impact on

housing land supply that this could have, we consider it essential that an additional clause is included within the Policy which states that a developer can build out the plots as market housing if there is no interest after 12 months of marketing.

Recommended changes to Draft Policy DP2 Self Build and Custom Build Housing

6.5 In order for the draft SLP to be justified, effective and consistent with national planning policy we suggest the following changes are necessary:

- Remove the specified percentage of 10% and continue to encourage the provision of self build housing where it is appropriate and viable, with reference to the most up to date evidence of need within the Self Build Register.
- Insert clause allowing the reversion of the self build plots to the site developer for market housing after 12 months of marketing for self build.

7.0 DRAFT POLICY DP3 AFFORDABLE HOUSING PROVISION

We support the approach of the policy, however we consider that the Council should ensure that all of the anticipated development costs associated with all the draft Policies of the SLP have been taken into account. This will ensure the draft SLP is justified, effective and consistent with national planning policy.

- 7.1 The draft Policy requires new residential development of five or more dwellings in designated rural areas and ten or more dwellings (or sites of 0.5ha or more) elsewhere to provide on-site affordable housing. For the northern area of the County this requirement is 10%, whilst for the southern area it is 20%. The draft Policy is supported by the SHMA and Viability Assessment.
- 7.2 In relation to viability, the Council should ensure that all of the anticipated development costs associated with all the draft Policies of the SLP have been fully taken into account, for example draft Policy DP1 Residential Mix and draft Policy DP12 Minimising Carbon Emissions (in line with the NPPF, paragraph 35 and the NPPG 'Viability' see Paragraph 001 Reference ID: 10-001-20190509 and Paragraph 002 Reference ID: 10-002-20190509). This should ensure that the delivery of affordable housing, as a key objective of the draft SLP, is not undermined. Whilst the Viability Assessment appears to reflect these considerations (in Chapter 8 and 12) it notes the need for the assessment to be kept under review, particularly in light of the COVID-19 pandemic and Brexit. It is recognised that viability is now to be considered 'up front' as part of the Local Plan process; nevertheless, as the Viability Assessment still represents primarily a typology-based approach, the Council's policies should continue to offer site and scheme specific flexibility (in line with the NPPF, paragraph 57).
- 7.3 As such, the reference within draft Policy DP3 to site specific viability assessments being taken into account in exceptional circumstances is considered to meet the tests of soundness in paragraph 35 of the NPPF, in that it is consistent with national policy. It is therefore supported.

8.0 DRAFT POLICY DP11 MINIMISING CARBON EMISSIONS

The principle of addressing climate change via the design of new dwellings is supported. In order for the policy to be sound however, it should be amended to align with the national timetable for improved building performance. This would ensure that the draft SLP meets the tests of soundness set out in paragraph 35 of the NPPF.

- 8.1 This draft Policy requires developments to address climate change primarily via design measures, including a number of requirements and standards which are 'encouraged.' All proposals of ten or more dwellings are to achieve a minimum 19% improvement in the energy performance and all proposals of one or more dwellings should provide a minimum of 10% of predicted energy needs from on-site renewable and low carbon sources. It is 'strongly encouraged' that all residential proposals (particularly those of fifty dwellings or more) achieve zero net-carbon emissions; maximise on-site district heating and cooling; and maximise opportunities to connect to wider heating and cooling networks.
- 8.2 The flexibility provided within the policy which relates to viability issues and higher standards being 'encouraged' as oppose to mandatory is supported. However, we still have concerns with the implications of the policy on the deliverability of developments. The supporting Viability Study (findings and recommendations) refers to the challenging picture of viability across Shropshire and recognises the additional costs associated with these requirements which adds to the challenges. This may give rise to the policy being unachievable.
- 8.3 We consider that the policy should align with the national timetable for the Future Homes Standards to provide consistency with national policy and regulations as well as providing for a more effective approach in terms of viability considerations. In relation to the 10% renewable or low carbon energy requirement, as well as further increasing costs, the policy is contradictory to the 'energy efficiency hierarchy' set out within the standards whereby energy efficiency measures are prioritised in the first instance.
- 8.4 The supporting text to the policy is not clear in terms of which evidence has informed the requirements, for example local evidence on the availability, feasibility and viability of district heating and cooling systems (as per the NPPF, paragraph 151). There are locational issues associated with some of these technologies which may mean they are not suitable across the County e.g. levels of heat demand. In the experience of our Client, district heating on lower density, low-rise housing schemes only becomes potentially viable for sites of around 800 dwellings or more. There are also several practical barriers to the

delivery of these schemes, including who owns and operates the system and customer take up. This should be recognised in the supporting text and policy, with further flexibility provided that states such technologies will only be encouraged where they are clearly viable options based on local evidence, in order to make the policy effective, justifiable and in line with national policy (in accordance with paragraph 35 of the NPPF).

Recommended changes to Draft Policy DP11 Minimising Carbon Emissions

8.5 In order for the draft SLP to be considered 'sound' we suggest the following changes are necessary:

- Remove current percentage requirements in relation to energy performance and renewable/low carbon energy supply and align the policy with emerging national Building Regulation as per the Future Homes Standard.

9.0 DRAFT POLICY DP12 THE NATURAL ENVIRONMENT

We consider that Point 3 of Policy DP12 should be amended to align with national requirements in order for the policy to be consistent with national planning policy.

- 9.1 Point 3 of the draft Policy states that all development is to deliver at least a 10% net gain for biodiversity. However, this 'requirement' goes beyond that currently set out in the NPPF which encourages developers to provide net gains (at paragraphs 170 and 175(d)). It is therefore considered to be contradictory to the tests of 'soundness' within paragraph 35 of the NPPF, as it is not in line with national policy.
- 9.2 Whilst the draft Environment Bill has proposed mandating gains of 10% for biodiversity it should be recognised that this remains subject to Parliamentary debate, processes and Royal Assent. It would be more appropriate to require a net gain and then allow any future legislation to deliver the specific figure.

Recommended changes to Draft Policy DP12 The Natural Environment

- 9.3 In order for the draft SLP to be consistent with national planning policy we suggest the following changes are necessary:
- Remove reference to the requirement for a 10% net gain and instead make reference to a requirement for net gain in accordance with the most up to date legislative requirements.

10.0 DRAFT POLICY S18 WHITCHURCH PLACE PLAN AREA

We are supportive of the residential allocations of Land North of Chester Road (WHT037 and WHT044) at Whitchurch. We would welcome the minor amendments detailed below, which would ensure that the draft SLP is justified, effective and consistent with national planning policy.

- 10.1 This draft Policy details the specific development requirements and locations for future development within the Whitchurch Place Area. At S18.1 Development Strategy it identifies that:
- Whitchurch will act as a Principal Centre and contribute towards strategic growth objectives in the north-east of the County. It will act as a focus for significant development, delivering around 1,600 dwellings and around 20 hectares of employment development. New housing and employment development will respond to local needs.
 - New residential development will primarily be delivered through the saved SAMDev residential allocations and Local Plan residential allocations. This will be complemented by appropriate windfall residential development within the Whitchurch development boundary shown on the Policies Map, where it is consistent with relevant policies of this Local Plan. It will also be complemented by appropriate cross-subsidy and exception development, where it is consistent with relevant policies of this Local Plan.
- 10.2 Under Schedule 18.1(i) the draft SLP allocations for Whitchurch Principal Centre are identified, alongside the Saved SAMDev allocations (in Appendix 2 of the draft SLP). Our Client's Site is identified as draft SLP residential allocation WHT037 and WHT044 for 200 dwellings. The site allocations process has been informed via the Sustainability Appraisal (with these Sites included in the Whitchurch Place Plan Area Site Assessments (December 2020)).
- 10.3 We support these allocations, and they represent a logical solution to meet housing need within the development boundary of Whitchurch. They are located in proximity to existing housing allocations and a recent residential development constructed by David Wilson Homes (14/01264/FUL). They form a comprehensive development in that they are in close proximity to existing transport networks, local facilities/services and an extension to an already established residential settlement. Our Vision Document further outlines the suitability of the Site and demonstrates how it can comprise a comprehensive development. David Wilson Homes have a strong track record of delivering homes in Whitchurch. The

first phase development was successfully delivered and provides confidence in David Wilson Homes' ability to deliver the remainder of the site in a timely manner making a strong, early contribution towards the Council's housing land supply position.

- 10.4 Whilst we support the allocation, we respectfully request an amendment to the overall capacity for the Site from 200 dwellings to 215 dwellings. Within the Sustainability Appraisal, Whitchurch is described as an accessible location, where growth is likely to minimise the need for additional car-based transport, whilst focusing development where there is existing access to health, leisure, recreational and cultural activities. The slight increase in site capacity would therefore be more appropriate to the strategic objectives for the town's growth when assessing the policy against the tests of soundness within the NPPF (paragraph 35), reflecting the ability of the Site to deliver new housing in a sustainable location and provide further flexibility within the development strategy for the Whitchurch Place Plan Area. Furthermore, the additional dwellings can be delivered whilst also securing a policy compliant level of open space on site. It would also bring the policy more in line with the NPPF in terms of the presumption in favour of sustainable development set out in paragraph 11.
- 10.5 At draft Policies S18.1, S18.2, S18.3 and Appendix 5 it is identified that there will be some reliance upon windfall developments within the Whitchurch Place Plan Area (at Whitchurch town, the Community Hub of Prees and Community Cluster of Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall). Within the Community Hub and Cluster in particular there is likely to be more reliance upon smaller scale schemes, which can generally have higher rates of non-implementation. By providing for a relatively minimal uplift in the housing capacity for WHT037 and WHT044 (less than 10%) the housing supply within the Whitchurch area would be more 'secured' and it would reduce some of the reliance upon the windfall supply (particularly from smaller scale sites). With regards to the implications for NPPF paragraph 35 and the tests of soundness, this would increase the effectiveness of the policy to deliver the levels of growth projected for Whitchurch, as well as the overall housing requirement for Shropshire. This marginal uplift is not considered to give rise to any sustainability implications (including infrastructure provision); it would serve to provide further housing within an already preferred, sustainable location.
- 10.6 At Schedule S18.1(i) the key Development Guidelines are provided for the development of the Site. The Development Guidelines state:
- *“Development to be delivered in a comprehensive manner in order to ensure sustainable development. The quality, design, mix and layout of housing provided on*

the site will be informed by site constraints and opportunities, identified local needs and relevant policies of this Local Plan.”

10.7 We query how this guideline, as currently worded, will provide sufficient clarity to developers when bringing the site forward. We find no assessment of different housing mix provisions on viability – a matter which has been a consistent theme in appeal decisions dealing with LPA attempts to impose a housing mix on market dwellings.

10.8 Furthermore, there is no reference to demand – which is a key component of housing provision. We highlight that David Wilson Homes have successfully delivered the first phase of the scheme, in which the mix, as put forward by David Wilson Homes in response to demand, was acceptable to the Council and has ensured provision of a mix of new homes in a well-designed new development.

- *“The site has potential for two vehicular access points; from Chester Road and Tarporley Road through the existing Mount Farm development. However, there will be no direct vehicular access connecting Chester Road and Tarporley Road, although pedestrian and cycle links through the site will be required.*
- *All necessary improvements to the highway network will be undertaken.*
- *Opportunities to encourage increased pedestrian and cycle access to, through and from the site into the town centre will be provided.*
- *Green infrastructure corridors with effective native planting will form an intrinsic component of this development.*
- *Mature trees, hedgerows and priority habitats will be retained, forming part of the green infrastructure network. Where appropriate it will also be enhanced and expanded to create a sustainable juxtaposition between the built and natural form.*
- *Acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise from nearby roads.*
- *The site will incorporate appropriate sustainable drainage, informed by a Sustainable Drainage Strategy in line with policy DP22. All surface water from the site will be managed effectively, with run-off restricted to greenfield rates. Any areas of flood risk will be excluded from development and will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.”*

10.9 The Development Guidelines are in line with the proposals submitted to date and are supported subject to the comments above (see Vision Document at **Appendix 1**). Our comments in relation to relevant draft SLP policies e.g. on residential mix are also applicable in this site-specific context. The detailed requirements for the site should be informed by additional site-specific evidence going forward as part of the planning application process.

Recommended changes to Draft Policy S18 Whitchurch Place Plan Area

10.10 In order for the draft SLP to be effective, justified and more consistent with national planning policy we suggest the following changes are necessary:

- The overall capacity of the Site be amended from 200 to 215 dwellings.
- Amendments to the wording of the first development guideline to provide further clarity on housing mix, with a reference included to demand; or alternatively deletion of the reference to 'identified local needs'.

11.0 CONCLUDING COMMENTS

- 11.1 Thank you for the opportunity to comment on the Shropshire Local Plan Review Pre-Submission Consultation. We have set out a number of recommended changes to the draft SLP related to the strategic approach, settlement and site-specific policies and other development management policies to ensure it complies with the NPPF and its tests of soundness (NPPF, Paragraph 35).
- 11.2 Whilst we are supportive of the Council going beyond the minimum local housing needs, the urban focused strategic approach and the desire to deliver a 'step change' in the economic growth of the County, we do have some concerns that the draft SLP, as drafted, will not deliver upon these requirements and ambitions. We consider that the existing approach and evidence justifies the need to consider the provision of additional housing growth in particular, with a greater emphasis upon delivering at the urban locations/areas as part of the preferred urban focused strategy.
- 11.3 Our Client's Site, Land at Haroldgate, can provide a logical / sustainable extension to the existing settlement of Whitchurch, in line with the urban focused strategy of the draft SLP. The site has been assessed and deemed to be suitable for allocation via the draft SLP evidence, including the Sustainability Appraisal and Strategic Housing Land Availability Assessment. The accompanying Vision Document demonstrates the opportunity for a comprehensive development that would serve to make use of and further enhance the sustainability of Whitchurch, delivering on the overall strategic objectives of the draft SLP and meeting local needs for housing and infrastructure.

APPENDIX 1



Land South of Haroldgate

W H I T C H U R C H

Promotional Document

June 2018

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Document Status	Final
Revision	C
Author	Various
Checked By	KV
Authorised By	KV
Issue Date	July 2018

**BARTON
WILLMORE**



DAVID WILSON HOMES

WHERE QUALITY LIVES

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1. Introduction

The Site presents an exceptional opportunity to meet the future housing needs of Shropshire. This Promotional Document demonstrates the case for allocating the Site for residential development during the emerging Plan period.

1.1 This Promotional Document has been prepared by Barton Willmore LLP on behalf of David Wilson Homes (Mercia) Ltd who have land interests to the south of Haroldgate, Whitchurch. The land interest which is the focus of this Promotional Document is illustrated in **Figures 1 and 2** and is referred to hereafter as 'the Site'.

1.2 This document also demonstrates how this development will sit alongside the recently consented scheme by David Wilson Homes (Mercia) Ltd presenting a comprehensive form of development along this entrance to the town.

1.3 Section 2 of this document sets out the context of the Site along with a brief planning history. Section 3 sets out the constraints and opportunities for the Site whilst Section 4 details a Facilities Plan (**Figure 4**). Section 5 details the development masterplan and proposed development capacity before drawing its conclusions at Section 6.





2. Site Context and History

This section describes the site location and context of the Site within Whitchurch. The Site is situated to the north-west of Whitchurch and is not subject to any landscape designations. It is considered to form a logical extension to the town.

The Site

2.1 The Site is situated to the north-west of Whitchurch. The Site currently comprises of agricultural fields and extends to 8.7 hectares.

2.2 To the northern boundary the Site is defined by an existing residential development on allocated site WHIT046 which is currently under construction and approximately 60% complete. The eastern, southern and western boundaries are defined by hedgerows and landscaping. Agricultural fields extend beyond the site to the eastern, southern and western boundaries.

2.3 The Site is located approximately 1km north-west of the town centre which offers a range of shops and services including various doctors' surgeries, dentists, opticians and independent and high street retail offerings. Whitchurch CE Infant and Nursery School is located within 1.55km of the Site with Whitchurch CE Junior School within 1.5km and Sir John Talbot Secondary School and Technology College within 2km of the Site. Employment opportunities are available on Waymills Industrial Estate to the south-east of Whitchurch.

Planning History

2.4 There is no relevant planning history in relation to the Site itself, although as stated above, site WHIT046 (also under the control of David Wilson) is currently under construction.

2.5 Shropshire is a predominantly rural county; the Core Strategy states that 94% of Shropshire is classed as rural and 6% urban. As such, it is logical to deduce that 6% of Shropshire constitutes the most sustainable areas and should be the focus of future development. In light of this, we contend, that

the preferred 'Urban Focus' strategy does not appear to be 'truly' urban and does not represent the most sustainable strategy, as the breakdown of distribution seeks to direct around 27.5% of development to the rural areas.

2.6 In accordance with the NPPF, we fully support planning policies and decisions which facilitate a prosperous rural economy; these policies should, however, ensure housing is located where it will enhance or maintain the vitality of rural communities. We agree that some future development is required in and should be directed to the rural areas within Shropshire, however, it is unclear why the Council's preferred distribution seeks to direct 27.5% of future development (7,875 dwellings) in the least sustainable areas, whilst, simultaneously directing only 24.5% to the Principal Centres.

2.7 We recommend a redistribution from

Rural Areas to the Principal Centres and Key Centres. It is recognised that this will result in Key Centres having a requirement which exceeds the housing requirements for Principal Centres, however, two things should be noted that, namely: (1) our proposed preferred distribution in Key Centres will be spread across 11 settlements and (2) the 11 Key Centres have a distinctly different role within the spatial strategy to the 5 Principal Centres.

2.8 Considering the above, the rationale for the preferred quantum of development in Shropshire's rural areas does not appear to reflect the most sustainable option. We contend that a truly 'urban focus' and sustainable strategy would ensure that housing is directed to the most suitable and sustainable places; there should be a redistribution where the Key Centres are required to take a percentage of the future development proposed from the Rural Areas.

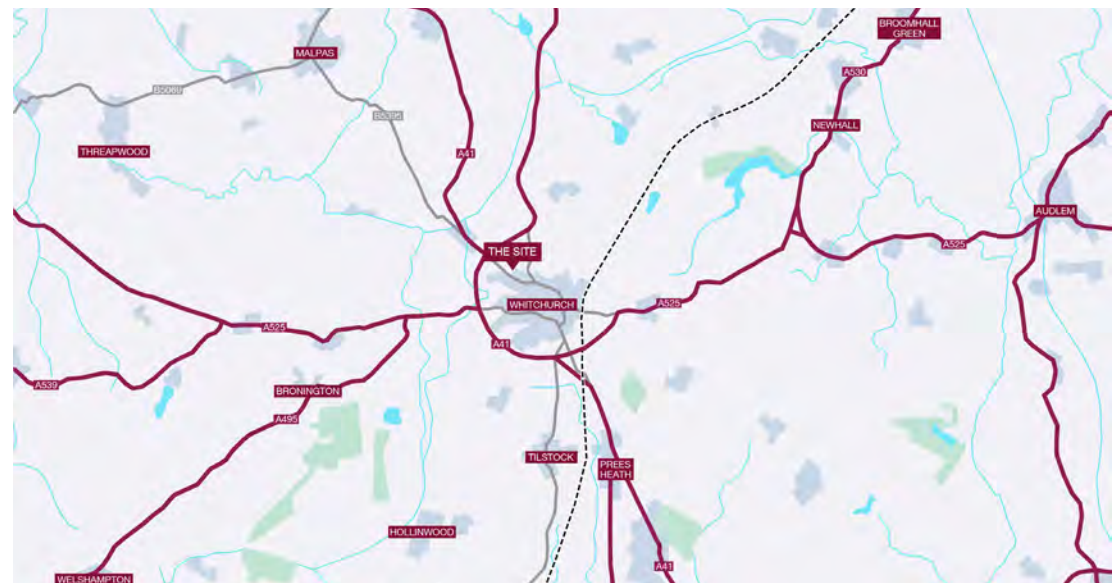


Figure 1: Wider Location Plan

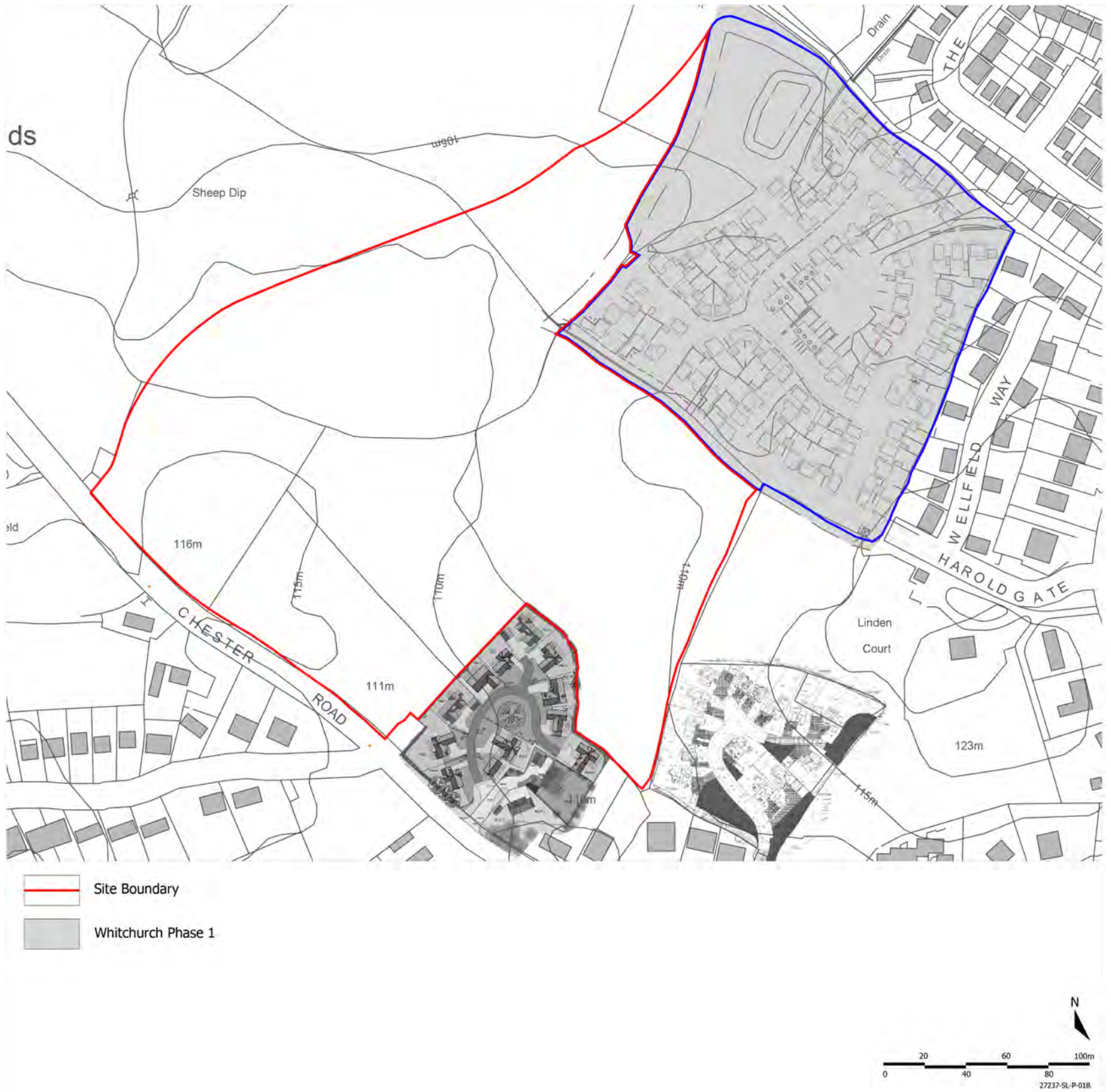


Figure 2: Site Location Plan

3. Constraints and Opportunities

This section provides a review of the constraints and opportunities identified in bringing the Site forward for residential development. A number of constraints and opportunities have been identified and these have been incorporated into the development of the Masterplan.

3.1 A number of key constraints and opportunities have been identified. These are outlined as follows:

Constraints:

- Careful consideration into the use of sustainable urban drainage technologies to ensure that the Site is capable of drainage and not at risk to flooding;
- Loss of agricultural land, however this is not identified to be of Best and Most Versatile Land (BMVL);
- Careful consideration to existing tree and vegetation belts to minimise loss.

Opportunities:

- Opportunity to deliver a site to meet the future housing needs of Shropshire;
- Opportunity to deliver a landscape led scheme with significant landscape buffers to key site boundaries;
- Opportunity to deliver a scheme for both market and affordable dwellings to meet the needs of existing and future residents of the town;
- Opportunity to offer pedestrian and vehicular linkages into the adjoining consented site on behalf of David Wilson Homes;
- Opportunity to provide areas of informal and formal open space within the development;

3.2 A constraints and opportunities plan is identified at [Figure 3](#).



Whitchurch Town Centre



4. Local Facilities

This section provides a review of existing local facilities and movement patterns which has been undertaken to assess how the Site relates in terms of distance and accessibility. The Site occupies a sustainable location and is considered to present a great opportunity to deliver a high quality sustainable housing development that will sensitively contribute towards the identified future housing needs of Shropshire.

4.1 To ensure the proposed development would fulfil the criteria of sustainable development, an assessment of local facilities and movement patterns has been undertaken and is set out below and shown in [Figure 4](#).

Retail

4.2 Whitchurch town centre is located approximately 1km (direct line) to the south-east. It offers a range of independent shops and other services and facilities including banks, takeaways, pubs, wine bars, garage and a betting shop.

4.3 Whitchurch Town also provides a range of offerings in terms of convenience shopping. Sainsbury's, Tesco's, Lidl and Iceland are all located within the town. It also provides host to a number of high street outlets such as Argos and Homebase.

4.4 Shrewsbury, as the sub-regional centre of Shropshire, is located approximately 29km to the south where higher order services, facilities and comparison shopping are on offer including large department stores and high street shops.

Health and Community Facilities

4.5 Whitchurch Community Hospital is situated on Claypit Street approximately 1km (direct line) to the east of the Site. The hospital provides in-patient services for local patients with 32 beds for rehabilitation and palliative care.

4.6 There are four local doctors surgeries within Whitchurch which serve the town as follows:

- Bridgewater Family Medical Practice located on Bridgewater Street 1.3km (direct line) from the Site;
- Dodington Surgery located on Dodington 1.4km (direct line) from the Site;
- Richmond Surgery located on Station Road 1.5km (direct line) from the Site; and
- Claypit Street Medical Practice situated within the Community Hospital.

4.7 There are three dental practices which serve the town as follows:

- Whitchurch Dental Studio located on Brownlow Street 1.2km (direct line) from the Site;
- Green End Dental Practice located on Green End 1.1km (direct line) from the Site; and
- Spa Dental also located on Green End.

4.8 Two independent opticians operate within Whitchurch. Whitchurch Library is situated within the Civic Centre located on the High Street 0.9km (direct line) from the Site.

Education

4.9 Whitchurch CE Infant and Nursery School is located off Station Road approximately 1.55km (direct line) to the south-east of the Site. Whitchurch CE Junior School is located off Salisbury Road approximately 1.5km (direct line) to the south-east of the Site. The White House School is an independent primary school located off Heath Road approximately 2.2km (direct line) to the south of the Site.

4.10 Sir John Talbot's School and Sir John Talbot's Technology College are located off Prees Road and Tilstock Road respectively approximately 2km (direct line) to the south of the Site.

4.11 Whitchurch has a number of pre-school and playgroups which are either independent or comprise part of the primary school network.



Recreation and Leisure

4.12 Whitchurch has two areas of large formal open space; Jubilee Park located to the south of the Site and Whitchurch Waterways Country Park also to the south of the Site.

4.13 Whitchurch Sport and Leisure Centre offers a fitness suite within Sir John Talbot's School which offers a range of classes and clubs utilising the sports facilities within the school with the classes taking place outside of school hours.

Employment

4.14 Waymills Industrial Estate is a multi-let industrial estate situated to the south-east of Whitchurch approximately 2km (direct line) from the Site. It comprises of a number of companies including Landia UK; Dairy Spares; Needham Inks; UK Nutrition; and Grocontinental.

4.15 Whitchurch Business Park is situated immediately adjacent to Waymills Industrial Estate and comprises of Renault Minute and Springcare Limited.

4.16 The town centre and local services offer a range of other potential employment opportunities within the town.

Public Transport

4.17 Whitchurch is well served by bus and rail services, supporting its status as a sustainable settlement. Within Whitchurch town centre (approximately 1km from the Site) bus services provide access to Chester in the north on a regular frequency.

4.18 Whitchurch railway station is located approximately 1.7km (direct line) to the south-east of the Site. Situated on the Shrewsbury to Crewe line it also offers connections to Manchester Piccadilly; Bridgend; Swansea and Carmarthen.

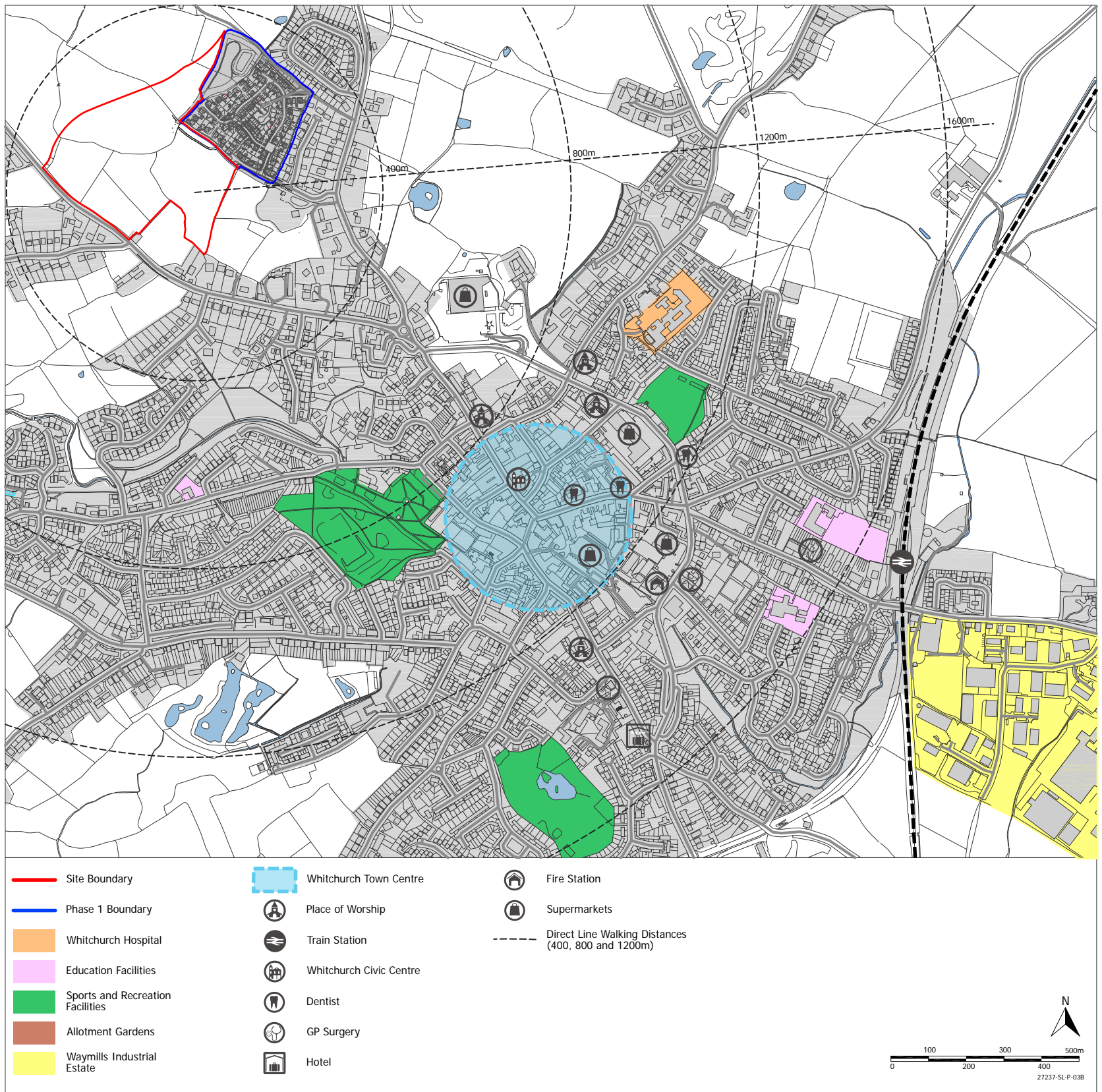


Figure 4: Facilities Plan

5. Masterplan and Proposals

This section provides a review of the framework masterplan which has emerged following the site assessment and analysis work undertaken. It demonstrates that the Site is capable of sustainably delivering up to 190 dwellings to include both market and affordable housing, as well as being a landscape led development scheme.

5.1 Taking all of the assessment and analysis work, along with the constraints and opportunities, interpretation of the Local Plan policy requirements, a framework masterplan has emerged for the Site. Table 1 and Figure 5 provide an indication of the proposed distribution of land uses and how they are broken down.

5.2 The predominant land use will be residential with proposed public open space and sustainable urban drainage technologies to be provided within the Site.

5.3 The masterplan at Figure 5 includes the following features:

- Appropriate landscaping to retain and enhance existing site boundaries;
- Access point through the existing consented development on WHIT046 to the north for David Wilson Homes;
- Additional access point from Chester Road to the south to improve connectivity;
- Provision for up to 190 dwellings to include for 10% affordable housing;
- Provision of formal and informal open space within the development;
- Provision of sustainable drainage technologies to ensure the site is not subject to flooding.

5.4 The density for the Site is set at 28 dwellings per hectare based on the framework of delivery 190 dwellings on 6.6 hectares.

Table 1: Land Use Schedule

Area	Ha	Ac
Potential Development Area Including Infrastructure	6.60	16.31
Potential Open Space Including SUDS	2.10	5.18
Total	8.70	21.49

Table 2: Accommodation Schedule

No. of beds	No. of units
2	12
3	61
4	117
Total	190

5.5 The indicative accommodation schedule (Table 2) demonstrates the level of housing mix which could be provided on the Site to help meet the needs of the Council for both market housing and affordable housing. This however is provided for illustrative purposes only and is an example of just one way in which the Site could be developed.

5.6 The development has a distinctive urban form and structure strongly influenced by the surrounding development and public open space.

5.7 The main access will be taken from the existing consented development to the north, ensuring a safe and accessible site for all modes of transport. A secondary main access point will be taken from Chester Road to the south to improve connectivity. The layout proposes a main street with smaller roads and lanes branching off to create variation and assist in reducing vehicle speeds throughout the development.



Figure 5: Concept Plan

6. Conclusions

This section sets out the conclusions drawn together as a result of the details contained within this Promotional Document. The Site has excellent links to the local area and is in an inherently sustainable location with access to local services, facilities and public transport. The Site is both available, achievable and deliverable now.

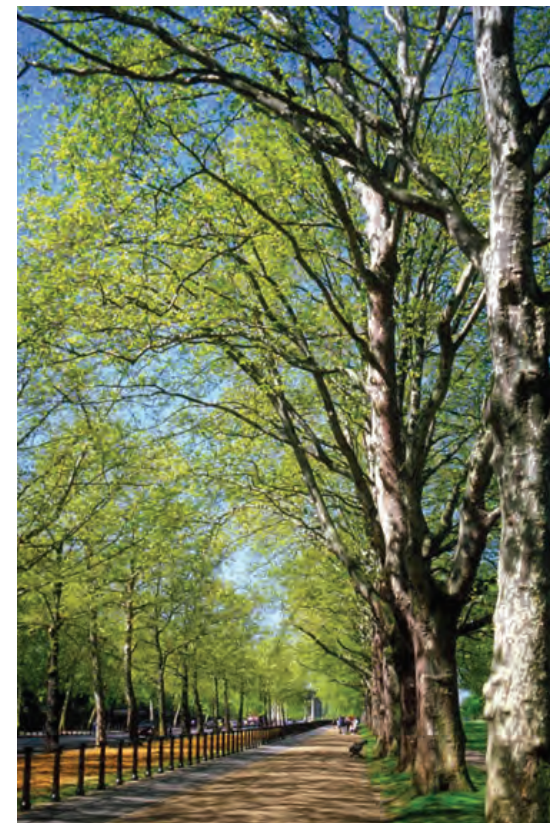
6.1 This Promotional Document demonstrates that the development of the Site to the south of Haroldgate, Whitchurch will assist Shropshire in sustainably meeting the housing needs of existing and future residents as the area continues to grow.

6.2 The Site has excellent links to the local area and is in an inherently sustainable location with access to employment, retail, education and public transport within 2km of the Site.

6.3 The Site would contribute to the delivery of additional public open space complemented by significant landscape buffers along key site boundaries.

6.4 In summary, the Site represents a highly sustainable and deliverable opportunity for a residential development of up to 190 dwellings which is both available and deliverable







DAVID WILSON HOMES

WHERE QUALITY LIVES