Shropshire Local Plan Review – Regulation 19 Pre-Submission Consultation

Consultation Response

On Behalf of Bloor Homes

February 2021

BARTON WILLMORE

Shropshire Local Plan Review – Regulation 19 Pre-Submission Consultation

Consultation Response on behalf of Bloor Homes

Project Ref:	30918	30918
Status:	Draft	Final
Issue/Rev:	P1	P1a
Date:	10th February 2021	25th February 2021
Prepared by:	SJ	JE
Checked by:	JE	MXS
Authorised by:	MXS	MXS

Ref: 30918/A5/P1a/SJ/JE/MXS/bc

Date: February 2021

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore LLP stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

		Page
1.0	Introduction	1
2.0	Land at Nobold, Site Proposals and Concept Plan	3
3.0	Introduction (Cross Boundary Issues and Duty to Cooperate)	5
4.0	Draft Policy SP2	8
5.0	Draft Policy SP7	16
6.0	Draft Policy SP 11	17
7.0	Draft Policy SP12, SP13 and SP14	19
8.0	Draft Policy DP1	20
9.0	Draft Policy DP2	22
10.0	Draft Policy DP11	24
11.0	Draft Policy DP12	26
12.0	Draft Policy S16	27
13.0	Draft Policy S19 and S20	32
14.0	Summary	34

APPENDICES

Appendix 1: Concept Plan Option 1 (Drawing 9300 Rev E)

Appendix 2: Concept Plan Option 2 (Drawing 9300 Rev E)

1.0 INTRODUCTION

1.1 We write on behalf of our Client, Bloor Homes, in respect of their land interests at Land at Nobold, Shrewsbury ('the Site') which is being promoted for a sustainable, residential-led development to meet local housing needs. These representations follow on from our recent response to the Regulation 18 Pre-Submission Draft Shropshire Local Plan in September 2020. These representations identified the suitability and availability of the Site for residential development, including two indicative Concept Plan Options. These Concept Plans are provided again for completeness at Appendices 1 and 2.

1.2 Bloor Homes is the UK's largest privately owned housebuilder, delivering approximately 4,200 dwellings per annum with an annual turnover in excess of £1bn. The Company operates from 8 regional offices, with the West Midlands office based in Tamworth delivering in excess of 550 dwellings each year.

1.3 As a business, Bloor focus heavily on the delivery of strategic development land, with over 60% of its units being delivered from its strategic land holdings. It has an excellent track record of bringing forward strategic land including major urban extensions with significant infrastructure packages alongside.

1.4 It is noted that the current Development Plan in Shropshire consists of the Core Strategy (2011) and the Site Allocations and Management of Development (SAMDev) Plan (2015), which provide a framework for managing development in the County up to 2026. Upon adoption, the policies of the Shropshire Local Plan 2016 to 2038 (SLP) 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.

1.5 The National Planning Policy Framework (NPPF) sets out the key framework for plan-making including the 'tests of soundness' for Local Plans (Paragraph 35). 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 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 brief overview of the proposals for the Site are provide for context in Section 2 of this Report. We then respond in chronological order to specific elements of the draft SLP and provide a series of suggested changes as relevant.

2.0 LAND AT NOBOLD, SHREWSBURY

2.1 Land at Nobold, Shrewsbury lies to the south west of the town of Shrewsbury in close proximity to the existing suburban neighbourhoods of Radbrook and Meole Brace, representing a sustainable location for residential development with access to a range of existing services and facilities.

2.2 Two development options have been prepared for the Site, these are shown in Appendices 1 and 2. Option 1 provides the opportunity for a sustainable urban extension of approximately 138 hectares with residential development to the north of the A5 and employment development to the south (indicated by the red line area on the accompanying Concept Plan). Option 2 provides the opportunity for a sustainable urban extension of approximately 93 hectares with residential development to the north of the A5. Both development options are capable of catering for a range of infrastructure needs including a primary school, local centre, green infrastructure and highways infrastructure. Land adjacent to the Site in separate ownership (to the west fronting Hanwood Road and to the east fronting Longden Road) is also considered as part of the comprehensive masterplans (shown outside of the red line area on the accompanying Concept Plans).

2.3 As per the current draft SLP, the Site lies outside the designated development boundary for Shrewsbury and is not currently designated or allocated for any land use. The Site represents largely undeveloped agricultural land with some agricultural and residential buildings in situ at Day House, Nobold (which is excluded from the proposed development area). Option 1 (shown in Appendix 1) is bounded by Hanwood Road (A488) to the north-west and crosses the A5 to the south. The most southern boundary of the Site is partly defined by the railway line. Option 2 (shown in Appendix 2) is bounded by Hanwood Road (A488) to the north and the A5 to the south.

2.4 In close proximity to the north of the Site lies the proposed draft SLP mixed use allocation for Land between Mytton Oak Road and Hanwood Road, Shrewsbury (SHR060, SHR158 & SHR161) for 1,500 dwellings, 5ha of employment land (minimum) and a local centre, including potential education and medical facilities. There are also a number of Saved SAMDev Plan sites taken forward by the draft SLP in close proximity to the Site, including SHREW212 for 175 dwellings and SHREW019, 094, 030/R and 210/09 for a total of 550 dwellings. These existing SAMDev allocations and the proposed draft SLP allocations demonstrate the overall sustainable nature of this location to the south-west of Shrewsbury.

2.5 Development of Land at Nobold would serve to complement these proposed developments, maximising the opportunity provided by the existing sustainable location. Option 1 could indicatively provide for the following (within the red line area shown in Appendix 1):

- 1,750 dwellings (based upon a net developable area of 50 hectares at 35 dwellings per hectare) to the north of the A5
- 18 hectares of employment land to the south of the A5
- A 2FE primary school
- Local centre
- A variety of open space

2.6 Option 2 could indicatively provide for the following (within the red line area shown in Appendix 2):

- 1,750 dwellings (based upon a net developable area of 50 hectares at 35 dwellings per hectare)
- A 2FE primary school
- Local centre
- A variety of open space

2.7 The Concept Plans provide an indicative vision and masterplan for the Site. The development would retain existing and incorporate further green infrastructure provision. Both options would ensure connectivity both within the Site and to its surrounds via sustainable transport means. This would make use of and enhance existing connections within the area (such as Public Rights of Way and access to the National Cycle Route). The vision for the Site would help deliver on the objectives of the Shrewsbury Big Town Plan, particularly in relation to improvements for 'movement' and the green infrastructure network.

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 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".

3.2 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').

3.3 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.

3.4 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)

3.5 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. Specifically, Shrewsbury will 'bloom', fulfilling its role as a strategic centre and acting as a focus for well-designed new housing and employment development, supported by new retail and leisure opportunities in the town alongside necessary infrastructure provision.

4.2 Development in the urban areas will be complemented by appropriate new development within 'Community Hubs', identified in Schedule SP2.2, which are considered significant rural service centres and to a lesser extent 'Community Clusters', identified in Schedule SP2.3. Outside these settlements, new development in the wider rural area will consist of affordable housing where there is evidenced local needs.

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, with around 28% directed to Shrewsbury) and that around 26% is directed to the community hubs, clusters and wider rural area. Around a third of the employment land requirement of 300 hectares is to be provided in the strategic centre of Shrewsbury (100 hectares). Based on the

employment land supply of 414 hectares identified within Appendix 6, around 87% is due to come forward within the urban areas/locations (including the centres and strategic sites, including 27% at Shrewsbury) with around 13% directed to the community hubs, clusters and wider rural area.

4.4 We support the principle of Draft Policy SP2 identifying Shrewsbury as the main strategic centre for the plan area to where a commensurate level of new development is to be directed. The status of other urban centres, such as the Principal Centres and Key Centres, is also supported as part of a sustainable development strategy for Shropshire overall. 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 include Burford, which is expected to grow by 190 dwellings, of which 140 are new allocations and 46 are windfalls (a 37% increase in terms of overall dwellings in the settlement, according to the 2020 Hierarchy of Settlements Assessment); Llanymynech (125 dwellings of which 50 are new allocations; totalling a 55% increase); and Hadnall (125 dwellings of which 40 are new allocations; totalling a 56% increase). 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. The approach needs to be more robustly justified, with reference to the scale of each settlement and its level of services and facilities as well as accessibility to higher order settlements. We consider more sustainable growth would be achieved by directing more growth to the higher order settlements such as Shrewsbury. As per our comments below under SP16 further information on the housing trajectories for the draft SLP site allocations should also be provided to justify the anticipated timescales for delivery e.g. we would note that in relation to site allocation BUR004 at Burford (for 100 dwellings) there does not appear to have been any active promotion of the site to date.

4.6 By directing more growth to the higher order settlements there is the opportunity for the housing land supply to be less reliant upon 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 there

generally higher rate of non-implementation (see further comments below regarding lapse rates).

4.7 Paragraph 3.28 of the draft SLP already outlines how that the strategic spatial approach responds directly to the Economic Growth Strategy for Shropshire (2017-2021) reflecting the objective to prioritise investment in strategic locations and growth zones along strategic corridors, which includes the corridors of the 'Eastern Belt M54/A5, A41/A464 and A4169/A458/A454' including opportunities around Shrewsbury and 'Central Shropshire' (focused primarily on opportunities in Shrewsbury as the Strategic Centre) and other corridors related to the Principal and Key Centres. Further growth (housing and employment) focused on these urban locations and centres would therefore serve to boost 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 The Sustainability Appraisal (SA) outlines the range of positive benefits for an urban focused strategy, particularly in comparison to other strategy options which would involve greater growth in the rural areas. With regard to an urban focused strategy, Page 76 of the SA states:

> **"**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**".**

4.9 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).

4.10 The SA of the draft SLP Policy SP2 sets out the strategic approach and states:

> **"**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**".**

4.11 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.

4.12 Whilst it is recognised that there are some potential adverse effects arising from a more urban focused strategy, in light of its overwhelming positive effects, the Council should consider directing 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%) does not appear to have been tested within the SA to date. 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 considered 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 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.

4.13 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**".**

4.14 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.

4.15 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."*

4.16 Whilst the SHMA states that the level of overall housing that would be required to meet affordable housing need is considered undeliverable, 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.

4.17 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' section). The Council should consider the need for

additional residential and mixed-use allocations in sustainable urban locations 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

4.18 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).

4.19 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 appropriate[1]. This provided contingency in the event of larger allocations being delayed in coming forward. The current draft SLP provides for a 19% uplift against the minimum local housing need figure of 25,894 dwellings, it is considered that this level of contingency is not large enough to provide sufficient flexibility for the deliver of larger allocations being delayed. As such, a larger headroom should be provided to ensure there is enough contingency over the Plan period.

4.20 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

[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

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).

4.21 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 additional allocations rather than a reliance upon windfalls ensuring an effective strategy for housing delivery.

4.22 Our comments in relation to the development suitability of the south-west area of Shrewsbury, including our Clients' Site specifically, are outlined further under Policy S16 Shrewsbury Place Plan Area. We also provide comments in respect of the approach to Green Belt land as part of the strategic approach under draft Policy SP11.

Recommended Changes to Draft Policy SP2 Strategic Approach

4.23 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.
- 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 the securing of additional allocations as part of the urban focused strategy.

5.0 DRAFT POLICY SP7 MANAGING HOUSING DEVELOPMENT

5.1 We support the monitoring-led approach of this policy which states:

> **"Additional market housing development outside the settlement** development boundaries shown on the Policies Map will be strictly controlled in line with Policy SP10 and will only be considered potentially acceptable where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan period, or where there are specific **considerations set out in the Settlement Policies."**

5.2 However, as per our response to draft Policy SP2, we consider sufficient housing land supply and flexibility should be identified and prioritised.

6.0 DRAFT POLICY SP11 GREEN BELT AND SAFEGUARDED LAND AND TABLE SP11.1

We consider that further consideration should be given to site options for non-Green Belt development under draft Policy SP11 to ensure that the SLP is justified and consistent with national planning policy.

6.1 This draft Policy identifies areas that are to be removed from the Green Belt and it identifies areas of 'safeguarded land' for future development (subject to a further Local Plan Review, in line with the NPPF, paragraph 139).

6.2 Given that safeguarded land can only be released for development following a further Local Plan review that proposes the development, the Council should consider the need for further flexibility beyond the plan period via the identification of sites which could come forward in a more timely manner to respond to future market circumstances.

6.3 The NPPF (paragraphs 136-137) requires the Council to fully demonstrate 'exceptional circumstances' exist to justify amendments to the Green Belt. As such the draft SLP is supported by an 'Exceptional Circumstances Statement' (August 2020). This has utilised the Green Belt Assessment (Part 1, 2017) and Green Belt Review (Part 2, 2018) alongside other pieces of evidence to inform its conclusions.

6.4 In relation to the proposals for Green Belt amendments (particularly those at Shifnal where over 90 hectares of safeguarded land is identified for potential housing and employment development) the Exceptional Circumstances Statement provides a summary for each settlement on how the provisions of the NPPF (paragraphs 136-137) are met. This includes an assessment of all other 'reasonable options' to the release of Green Belt land. It is queried if the release of Green Belt land is fully justified in this context. For instance, in relation to Shifnal, the Exceptional Circumstances Statement (paragraphs 8.73-8.81) notes that there are potential alternative non-Green Belt options at other urban locations along the strategic growth corridor, including Shrewsbury, which could mean that in the balance a case for exceptional circumstances is not fully justified.

Recommended changes to Draft Policy SP11 Green Belt and Safeguarded Land

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

6.6 The case for exceptional circumstances should be fully justified as per the NPPF. The Council should consider the appropriateness of alternative non-Green Belt housing land supply options for beyond the plan period within the context of its urban focused strategy and taking account of the non-Green Belt land opportunities at the strategic centre of Shrewsbury.

7.0 DRAFT POLICY SP12 SHROPSHIRE ECONOMIC GROWTH, SP13 DELIVERING SUSTAINABLE ECONOMIC GROWTH AND ENTERPRISE AND DRAFT POLICY SP14 STRATEGIC CORRIDORS

The urban focused approach to the spatial strategy for economic growth is supported, with the Strategic, Principal and Key Centres being a focus for growth. The aim to provide for a high economic growth strategy via around 300 hectares of employment land over the Plan period is also supported.

7.1 Paragraphs 3.117-3.118 and 3.121 refer to the desire for a 'step change' in Shropshire's economic productivity which will be delivered via investment opportunities in the identified strategic corridors as identified in draft Policy SP14. This includes the:

> "Eastern Belt M54/A5, A41/A464 and A4169/A458/A454, supporting **Shropshire's motorway, road and rail links to the West** Midlands region and the role of the West Midlands Combined **Authority' including opportunities around Shrewsbury and 'Central** Shropshire supporting the primary location for growth in the County situated around the hub of the road and rail networks and **focused on opportunities in and around Shrewsbury…".**

7.2 Our Clients' site within the Strategic Centre of Shrewsbury benefits from a close location to the A5 and therefore is ideally located for a range of employment uses in conjunction with residential development at the site. It has the potential to create a high number of jobs for the local population and support the economic growth strategy, being located within the strategic corridors and strategic centre. Whilst we support the ambitions for economic growth, as per our response to draft Policy SP2 the objective to deliver a step change in economic productivity should be maximised by reflecting the opportunities for a greater proportion of growth to the urban locations and Shrewsbury as the Strategic Centre. The identification of additional housing growth within these locations should be supported by corresponding employment growth, recognising opportunities for mixed-use allocations at sites such as Land at Nobold.

8.0 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.

8.1 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).

8.2 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.

8.3 Whilst the supporting text to draft Policy DP1 provides some commentary on the justification for the standards and references the SHMA evidence, it is not clear from the analysis within the SHMA if all of the PPG relevant considerations have been fully taken into account in justifying the policy requirements. There does not appear to be any evidence justifying the nationally described space standards.

8.4 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 a 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. 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

8.5 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.
- If no evidence having regard to the PPG criteria can be provided to justify the requirements for optional technical standards, this part of the policy should be deleted.

9.0 DRAFT POLICY DP2 SELF BUILD AND CUSTOM BUILD HOUSING

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 it should be amended to remove the percentage requirement. This would ensure the draft SLP is justified, effective and consistent with national planning policy.

9.1 This draft Policy states that all sites of 5 or more dwellings in designated rural areas and 10 or more dwellings elsewhere (or sites 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 evidence from the SHMA which calculates around 2,400 applications will be made for inclusion on the Self-Build Register over the Local Plan period which equates to around 9% of the calculated local housing need.

9.2 It is queried if reliance on estimated demand via the Self Build Register is an appropriate basis for a percentage-based policy. This is particularly relevant given that the criteria for expressing an interest on the Self Build Register are relatively limited i.e. whilst an individual may express an interest the degree to which it is a realistic ambition cannot be determined. It is considered that the draft Policy should continue to encourage self-build but remove the specified percentage of 10% of plots. It should instead refer to the most up to date Self Build Register for evidence of demand within a locality to inform any need to provide for such plots on specific sites. The PPG (Paragraph 025 Reference ID: 57-025-201760728) sets out a number of ways in which Local Authorities can support self and custom build. Whilst Local Plan policies should be supportive, there is no necessity to include a specific threshold as currently proposed and the draft SLP approach places the burden of delivering self-build upon developers. The draft SLP should therefore consider and make reference to the use of other mechanisms such as site-specific allocations or the use pf publicly owned land, rather than relying solely upon a percentage-based policy to be met by developers.

9.3 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. We consider that an additional clause should be included within the Policy which states that a developer should be able to build out the plots as market/affordable housing if there is no interest after 12 months of marketing.

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

9.4 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.

10.0 DRAFT POLICY DP11 MINIMISING CARBON EMISSIONS

Whilst the principle of addressing climate change via the design of new dwellings is supported, we consider that in order for the policy to be sound it should be amended to align with the national timetable for enhanced building performance. This would ensure the draft SLP is justified, effective and consistent with national planning policy.

10.1 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 10 or more dwellings are to achieve a minimum 19% improvement in the energy performance and all proposals of 1 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 50 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. Some flexibility is provided in the case of viability issues resulting the requirement being unachievable, which is supported.

10.2 Whilst we support the flexibility provided within the policy related to viability issues and higher standards being 'encouraged', we still have concerns with the implications of the policy requirements. The supporting Viability Study (Findings and Recommendations) notes the challenging picture of viability across Shropshire and identifies the additional costs associated with these requirements which adds to these challenges. This may give rise to the policy requirements being unachievable due to viability and therefore undeliverable. 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, the policy is contradictory to the 'energy efficiency hierarchy' whereby energy efficiency measures are prioritised in the first instance and it will further increase costs.

10.3 It is not clear from the supporting text what evidence has informed all of these requirements e.g. 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.

Recommended changes to Draft Policy DP11 Minimising Carbon Emissions

10.4 In order for the draft SLP to be justified, effective and consistent with national planning policy 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.

11.0 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.

11.1 Point 3 of the draft Policy states that all development is to deliver at least a 10% net gain for biodiversity. This 'requirement' goes beyond the NPPF which at paragraphs 170 and 175(d) encourages developers to provide net gains. 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 then allow any future legislation to deliver the specific figure.

Recommended changes to Draft Policy DP12 The Natural Environment

11.2 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.

12.0 DRAFT POLICY S16 SHREWSBURY PLACE PLAN AREA

Whilst we are supportive of the urban focused strategy which directs the highest proportion of growth towards Shrewsbury, we consider that the level of growth identified and its apportionment between the main town and the wider rural area of Shrewsbury Place Plan Area should be amended to be considered sound. We consider additional growth should be directed towards the town of Shrewsbury. This would ensure that the draft SLP is justified, effective and consistent with national planning policy.

12.1 This draft Policy details the specific development requirements and locations for future development within the Shrewsbury Place Area. At S16.1 Development Strategy it identifies:

- Shrewsbury is the Strategic Centre of Shropshire and the primary focus for new development in the County. Recognising this role, between 2016 and 2038, around 8,625 dwellings will be delivered and around 100 hectares of employment land will be made available for development, to provide choice and competition in the market.
- A comprehensive and co-ordinated approach will be pursued to the planning and development of Shrewsbury. This approach is consistent with the Shrewsbury 'Big Town Plan'.
- New residential development will primarily be delivered through a combination of the saved SAMDev residential and mixed-use allocations and the Local Plan residential and mixed-use allocations. This will be complemented by significant residential and mixed-use development opportunities within the Shrewsbury development boundary, where it is consistent with the relevant policies of this Local Plan.
- New employment development will primarily be delivered through a combination of the saved SAMDev mixed-use and employment allocations and Local Plan mixed-use and employment allocations. Opportunities to enhance existing high-quality employment facilities will be supported.

12.2 Under Schedule 16.1(i and ii) the draft SLP allocations for Shrewsbury town are identified, alongside the Saved SAMDev allocations (in Appendix 2 of the draft SLP). Within this there are a number of larger urban extensions identified including:

- Land between Mytton Oak Road and Hanwood Road, Shrewsbury (draft SLP allocation SHR060, SHR158 & SHR161) which is identified as appropriate for 1,500 dwellings, a

minimum of 5ha of new employment land, a local centre with potential new education and medical facilities, and extensive green infrastructure provision.

- Shrewsbury South Sustainable Urban Extension (Saved SAMDEV allocation) which is identified as appropriate for 950 dwellings, local centre and employment land.

12.3 The NPPF (paragraph 72) sets out that the supply of a large number of new homes can often be best achieved through planning for large scale development, however there are a number of key considerations including a realistic assessment of likely rates of delivery which takes into account lead in times. In line with the NPPF (paragraph 73) the Council sets out high-level anticipated delivery trajectories for the draft SLP allocations (provided in five-year tranches- Appendix 7). It is noted that there are no up to date trajectories provided for the Saved SAMDev allocations; they should be provided to reflect the most up to date position for these Saved allocations which are a key part of the housing delivery strategy.

12.4 The delivery trajectory for the draft SLP housing allocation at Land between Mytton Oak Road and Hanwood Road (SHR060, 158 & 181) shows that it is anticipated to be delivered throughout the plan period and potentially extend beyond this. It is also noted that another larger scale allocation at Ellesmere Road (SHR173) for 450 dwellings will only commence when the North Western Relief Road to be provided is operational. The site delivery trajectories are not detailed (i.e. year by year) and the Council should be clear on the assumptions that have been made to inform the high level delivery trajectories for these sites (there does not appear to be any detailed commentary within the draft SLP or supporting evidence base). In accordance with the PPG (Paragraph 022 Reference ID: 3-022-20190722) information on a sites' suitability, availability and achievability can be used to assess likely timescales as well as indicative lead-in times and build out rates, with the advice of developers and local agents being important in this regard. The Council should be confident on the delivery trajectory and the need to factor in any further flexibility to ensure the housing requirements of Shrewsbury are met within the plan period at this sustainable location within the town. For instance, we would note that in relation to Land between Mytton Oak Road and Hanwood Road, where delivery is assumed in the short term, parts of the site do not appear to have been marketed to date and there is no option agreement or developer in place at present.

12.5 Within the Shrewsbury Place Plan Area, a number of Community Hub settlements have been identified. Under S16.2 the residential guidelines for these settlements are provided, totalling around 1,280 dwellings. Under Schedule S16.2(i) a number of allocations are identified consisting of small-medium scale sites. At Appendix 5 it appears there is a greater degree of reliance upon smaller scale and windfall developments (sites of less than

five dwellings) to deliver some of the residential guidelines in the Community Hubs e.g. at Dorrington, almost 50% of the 150 dwelling guideline for the settlement is to be delivered via windfalls (71 dwellings). The Council should consider the potential to provide a more sustainable and secure strategy focused upon the town of Shrewsbury, as per our comments to draft Policy SP2. The risks to the delivery of smaller scale sites should be factored into the Council's housing trajectory and considered in its approach to the distribution of housing growth within the Shrewsbury Place Plan Area e.g. lapse rates, which can generally be higher for smaller scale schemes. Further development focused at Shrewsbury Strategic Centre would align with the provisions of the draft Policy S16.1 Point 10 which seeks to ensure that the town will be the *'major focus for the provision of infrastructure and services to meet the needs of the town and its wider catchment area…'*. It would also serve to deliver on the ambitions of the Big Town Plan.

12.6 Land at Nobold (the Site) has been assessed within the Strategic Housing Land Availability Assessment (SHLAA, 2018) under a number of separate parcels and site references. All of these parcels are categorised as 'Rejected' in terms of further consideration for residential development or allocations at this time. The principal reason for this 'rejection' related to 'suitability' appears to be in terms of the policy considerations i.e. that the parcels lie outside the development boundary of Shrewsbury and are not directly adjacent to existing build development. However, it is recognised in the supporting assessment text to one of the parcels (SHR187) that it:

> **"**may have long term potential as part of a strategic release in this location, subject to appropriate changes to policies affecting this location; and suitable management of the physical, heritage and environmental constraints present (informed by input from relevant service areas and infrastructure providers) and the outcome of a visual impact and landscape sensitivity assessment**".**

12.7 The Sustainability Appraisal Appendix Site Assessments for Shrewsbury assesses the majority of the site under reference SHR225 with the eastern parcel assessed at SHR027. The Stage 2a Sustainability Appraisal assessment matrix for SHR225 demonstrates the absence of any major negative effects (and suitability constraints). There are some minor negative effects noted in respect of proximity to Local Wildlife Sites, Tree Preservation Orders, Listed Buildings, location on Grade 1, 2 or 3 agricultural land and accessibility to some key services. The site scores 'Fair' overall in relation to residential development ('Poor' for employment). Under the 'Reasoning' for the Stage 3 assessment where a decision is made to allocate or not, the commentary notes that a key factor in dismissing the site for allocation at this stage is the lack of a need to grow the town beyond the A5 by-pass at this stage and that with regards to the land to the north of the A5 the existing and proposed allocations within this area also provide for sufficient new development;

there is no requirement to release the site at this time. It suggests that the preferred site allocations to the north of the site *'are considered to offer greater potential benefits to the town and can support the objectives of the Big Town Plan and to achieve a comprehensively planned development'.*

12.8 The site is therefore not dismissed on any significant grounds related to suitability, availability or achievability. Although the commentary notes the development beyond the boundary of the A5, the railway line to the south also provides a boundary for development shown in Option 1 (Appendix 1) and appropriate design and landscaping measures can create new boundaries. In addition, Option 2 (I) only provides development to the north of the A5. Whilst the Council consider other nearby sites provide preferred site allocations, as demonstrated by the submitted Concept Plans and promotion of the site by Bloor Homes, this site is clearly able to deliver on the Council ambitions in terms of benefit to the town, taking into account the Big Town Plan and the ability to deliver a comprehensive planned development. It is noted that the supporting assessment commentary for the Stage 3 process refers to considerations for the individual parcels making up this large site, rather than assessing the overall site as a whole as a comprehensive development; we consider the site should be assessed as a whole in order to inform conclusions related to matters such as highways comments.

12.9 Whilst site SHR027 is assessed as 'Poor' within the Stage 2a Sustainability Appraisal, this is largely as a result of minor negative effects related to accessibility to key services. Only one major negative effect is identified in relation to an on-site listed building. Under the 'Reasoning' for the Stage 3 assessment the commentary notes that *'the site has potential to be part of a frontage into a much larger strategic allocation between the Hanwood Road and Longden Road'.* However, it is considered there is no requirement to release the land at this time due to the preferred site allocations to the north (and in isolation the site is divorced from the main town). Again, the site is not dismissed on any significant grounds related to suitability, availability or achievability (when considered as part of a wider development area).

12.10 In light of this commentary and the Site's proximity to existing draft SLP allocations, it is clear that there is potential for further consideration of strategic land release within the south west area of the town as a sustainable location. It is apparent that significant flood risk to east, centre and north west of town constraints further opportunities in those locations. Combined with existing allocations that have already been proposed around the town edges, the area to the south west represents the next logical area to examine further.

Recommended changes to Draft Policy SP16 Shrewsbury Place Plan Area

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

- A higher proportion of the overall levels of growth, particularly housing, should be directed towards the urban locations/areas as per our comments in response to draft Policy SP2, including Shrewsbury as the Strategic Centre for Shropshire
- Within the Shrewsbury Place Plan Area a higher proportion of housing growth should be directed to the Strategic Centre of Shrewsbury versus the Community Hubs and Clusters.
- The site (Land at Nobold) should be considered for allocation as a sustainable urban extension to Shrewsbury town, providing for additional sustainable growth in line with an urban focused strategy that directs further development towards the strategic centre.
- The site should also be considered as a reserve site for the Plan or a direction for growth in Shrewsbury in the longer term.
- Further information should be provided on the housing trajectories for the identified housing land supply, consisting of the draft SLP allocations and SAMDev Plan saved allocations.

13.0 DRAFT POLICY S19 STRATEGIC SETTLEMENT: CLIVE BARRACKS AND DRAFT POLICY S20 STRATEGIC SETTLEMENT IRONBRIDGE POWER STATION

We consider that in order for the policies to be considered sound further evidence should be provided. This would ensure the draft SLP is fully justified.

13.1 The Strategic Settlements of Clive Barracks (draft Policy S19) for 750 dwellings and Former Ironbridge Power Station (draft Policy S20) for 1,000 dwellings are identified as a part of the housing delivery strategy. Appendix 7 highlights the anticipated high level delivery trajectory for these sites, with Clive Barracks extending beyond the plan period (delivering only 550 dwellings in the plan period) and the Former Ironbridge Power Station being at least long term too (up to end of the plan period). There does not appear to be any information within the draft SLP or supporting evidence base on how the trajectory has been derived and no updates provided from the previous Shropshire Council 'Strategic Sites Consultation' (2019) on how the necessary assessment work for these strategic settlements has progressed.

13.2 In accordance with the PPG (Paragraph 022 Reference ID: 3-022-20190722) information on a sites' suitability, availability and achievability can be used to assess likely timescales as well as indicative lead-in times and build out rates, with the advice of developers and local agents being important in this regard. As per our comments under draft Policy S16, the Council should clearly set out the detailed anticipated delivery trajectories for these sites and be transparent on the assumptions applied in order to ensure any risks to delivery of housing at these sites within (and beyond) the plan period are fully taken into account. These assumptions should reflect the site-specific existing characteristics affecting the development of these strategic settlement sites and future requirements (such as their existing/previous use and brownfield status and infrastructure requirements) to enable their effective delivery. If the risk assessment demonstrates that such sites are likely to be longer term and further beyond the plan period than anticipated, the Council should consider the need to identify further flexibility within the housing land supply by directing additional allocations to the urban locations as per the urban focused spatial strategy for development (draft Policy SP2). Clive Barracks may be better suited to a strategic employment allocation given its location adjacent to the A41, which the plan recognises is an important strategic corridor thereby providing greater alignment with Policy SP12.

Recommended changes to Draft Policy SP19 Strategic Settlement: Clive Barracks and Draft Policy SP20 Strategic Settlement: Ironbridge Power Station

13.3 In order for the draft SLP to be justified we suggest the following changes are necessary:

- Further detail to be provided to support the housing trajectory identified, taking into account the site specific risks and constraints to delivery.

14.0 SUMMARY

14.1 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.

14.2 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 have a number of concerns that the draft SLP at present 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.

14.3 Our Client's Site, Land at Nobold, can provide a sustainable urban extension to Shrewsbury town, in line with the urban focused strategy of the draft SLP. The site has been the subject of assessment via the draft SLP evidence, including the Sustainability Appraisal and Strategic Housing Land Availability Assessment. The accompanying Concept Plans demonstrate the opportunity for a comprehensive development that would serve to make use of and further enhance the sustainability of the south-west area of Shrewsbury, delivering on the objectives of the Shrewsbury Big Town Plan and meeting local needs for housing, employment and infrastructure.

14.4 If you require any further information or wish to discuss these representations in greater detail, please contact Jessica Evans or Mark Sitch on 0121 711 5151.

APPENDIX 1

CONCEPT PLAN OPTION 1 (DRAWING 9300 REV E)

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-

N

LEGEND

- Site Boundary
- Additional Comprehensive Masterplan Area
- Residential
- Primary Movement Route
- Secondary Movement Route
- Proposed Vehicular Access Point
- Existing PRoW and Access
- Existing Access Track
- Access to National Cycle Route
- Employment
- Primary School
- Local Centre
- Mixed Use
- Open Space
- Focal Space
- Green Corridor - Ped/Cycle Movement Conduit
- Existing Green Infrastructure and Planting
- Proposed Green Infrastructure and Planting
- Proposed Junction Removal

NOTE: This plan is in draft form and is subject to detailed technical surveys and input

Project
Land at Nobold
Shrewsbury

Drawing Title
Concept Plan
Option 1

Date	Scale	Drawn by	Check by
22.02.21	1:5000@A2	CDB	JdH

Project No	Drawing No	Revision
30918	9300	E

DRAFT

BARTON WILLMORE

Town Planning • Master Planning & Urban Design • Architecture • Landscape Planning & Design • Infrastructure & Environmental Planning • Heritage • Graphic Communication • Communications & Engagement • Development Economics

bartonwillmore.co.uk

Offices at Birmingham Bristol Cambridge Cardiff Ebbsfleet Edinburgh Glasgow Leeds London Manchester Newcastle Reading Southampton

Reproduced from the Ordnance Survey Map with the permission of the Controller of HMSO. Crown Copyright Reserved. Licence No. 100019279.

J:\30000\30918 - Land At Nobold, Shrewsbury\A4 - Drawings & Registers\Masterplanning\30918 9300 Concept Plan Rev E 220221.dwg - A2 (Option 1)

APPENDIX 2

CONCEPT PLAN OPTION 2 (DRAWING 9300 REV E)

The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-

N

LEGEND

- Site Boundary
- Additional Comprehensive Masterplan Area
- Residential
- Primary Movement Route
- Secondary Movement Route
- Proposed Vehicular Access Point
- Existing PRoW and Access
- Existing Access Track
- Access to National Cycle Route
- Primary School
- Local Centre
- Mixed Use
- Open Space
- Focal Space
- Green Corridor - Ped/Cycle Movement Conduit
- Existing Green Infrastructure and Planting
- Proposed Green Infrastructure and Planting

NOTE: This plan is in draft form and is subject to detailed technical surveys and input

Project
Land at Nobold
Shrewsbury

Drawing Title
Concept Plan
Option 2

Date	Scale	Drawn by	Check by
24.02.21	1:5000@A2	CDB	JdH

Project No	Drawing No	Revision
30918	9300	E

DRAFT

BARTON WILLMORE

Town Planning • Master Planning & Urban Design • Architecture • Landscape Planning & Design • Infrastructure & Environmental Planning • Heritage • Graphic Communication • Communications & Engagement • Development Economics

bartonwillmore.co.uk

Offices at Birmingham Bristol Cambridge Cardiff Ebbsfleet Edinburgh Glasgow Leeds London Manchester Newcastle Reading Southampton

Reproduced from the Ordnance Survey Map with the permission of the Controller of HMSO. Crown Copyright Reserved. Licence No. 100019279.

J:\30000\30918 - Land At Nobold, Shrewsbury\A4 - Drawings & Registers\Masterplanning\30918 9300 Concept Plan Rev E.dwg - A2 (Option 2)