



Our Ref: P585/JP
 Date: 23rd February 2021

Shropshire Council
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BY EMAIL: Planningpolicy@Shropshire.gov.uk

Dear Sirs/Madam

Re: The Regulation 19: Pre-Submission Draft of the Shropshire Local Plan Response by Telereal Trillium

We are instructed by Telereal Trillium ('TT') to submit representations to the Pre-Submission Draft of the Shropshire Local Plan and welcome the opportunity to do so at this time. TT have previously submitted representations to the Preferred Scale and Distribution of Development consultation in relation to its land interests at Whitehall, Monkmoor Road, Shrewsbury which it considers is suitable for residential development and should be allocated accordingly, thereby providing certainty for the delivery of new housing in Shrewsbury and reducing the reliance on windfalls having to come forward to meet the Council's housing needs over the Plan Period.

We are, therefore, generally supportive of the overall spatial strategy for development that seeks to direct major new housing development to the town of Shrewsbury, although our objection to the Plan as outlined above is twofold in that it places an over reliance on windfalls forming part of its housing supply and the omission of the land at Whitehall, Monkmoor Road, Shrewsbury as a proposed housing allocation in the Plan undermines the delivery of housing to meet the housing requirement.

Policy SP2. Strategic Approach

Policy SP2 sets out the Council's strategic approach to new development across the County over the Plan Period confirming that 30,800 dwellings and 300 hectares of employment land will be delivered. TT do not object in principle to the proposed housing requirement of 30,800 dwellings. It has been derived having regard to the standard method as required by the Framework, which provides a starting point for determining the minimum housing need for an area. The minimum housing need for Shropshire using the current standard method is 25,894 dwellings. The Council have then made an upward adjustment to the housing requirement of approximately 13% or an additional 3,406 dwellings to meet the Council's needs. In addition, 1,500 dwellings are to be made available to meet the needs of the Black Country.

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TT do not have any specific objection to the overall housing requirement that is proposed and note that other representors will likely present a stronger view on whether this is sufficient or not. Clearly, if the housing requirement were to increase then TT would welcome this outcome. However, as it stands, TT welcome the inclusion of a modest upward adjustment to the housing requirement, although our concerns relate to the components of the housing supply, how these have been derived and how ultimately they will be delivered.

Spatial Strategy for Development

Policy SP2 sets out the spatial strategy for development with the focus for new development being in and around Shrewsbury as the main strategic centre in the County. With TT's land interests at Mookmoor Road, Shrewsbury in mind we support the Council's objective of directing new housing development to the main urban area in the County as it is already well served by existing shops, services, supporting infrastructure and availability of public transport. This accords with paragraph 103 of the NPPF which states that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."

Policy S16. Shrewsbury Place Plan Area

Policy S16 confirms the position of Shrewsbury as the strategic centre and, therefore, the main focus for new development in the County. It identifies a requirement for 8,625 dwellings to be delivered in the town over the period 2016 and 2038. In order to deliver this housing, a number of allocations are identified, which when taken into account with sites that have already been completed, sites with planning permission and allocations in the SAMDEV that are carried over these account for 8,120 of the total dwellings planned for the town over the Period up to 2038. Taking into account commitments and allocations this leaves a shortfall of 505 dwellings against what is needed and which the Council have identified are expected to come forward as windfalls.

We have previously commented on this matter, expressing our concern about relying on windfalls to come forward when there are available suitable sites in the SLAA and Site Assessment paper that have not been allocated. The land at Whitehall, Monkmoor Road is one such site that is included in the SLAA and which is considered suitable for development and would make a contribution to meeting the housing needs of the town and wider District.

It is our view that suitable and sustainable sites that meet the both the objectives of the Framework and now published Big Town Plan should be allocated, including land at Whitehall, Monkmoor Road which is owned by TT and is identified as a suitable site in the Site Assessment paper. In doing so, it would reduce the windfall allowance and increase certainty over delivery of sufficient houses to meet the need identified in the town and towards meeting needs across the County. Furthermore, by relying on windfalls to deliver the housing needs of the District, this can result in uncertainty and a lack of clarity about how and where they are to be delivered. In turn this has a knock-on effect to planning for the location of jobs, services and the infrastructure that are required to support the growing population and which are key objectives to be delivered through the Plan. By not actively planning for growth by making allocations for development this could have the unintended consequence of undermining growth and the achievement of sustainable development, something which we are sure the Council is keen to avoid, particularly in a post Covid world where recovery and growth will be key.

Whilst the Framework at paragraph 70 states that windfalls can be allowed for as part of the anticipated supply where there is compelling evidence that they will provide a reliable source of supply, paragraph 67 states that “planning policies should identify a sufficient supply and mix of sites” and that plans should identify “specific, deliverable sites for years one to five of the plan period” and “specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan”. In this instance the evidence in the SLAA and Site Assessment paper is such that it is possible to identify additional suitable housing sites and so this should be included in planning policy.

The Plan led system is such that it encourages Plan makers to make positive allocations for future development in order to meet the development needs of an area over the Plan Period. It seems perverse that when the Council’s own evidence confirms that a site is suitable for development that it is not allocated with the Council choosing to rely on windfalls instead. We do not consider that this is sound approach in that it is not an effective approach and could undermine achieving the delivery of sufficient housing in the town as a result. Furthermore, it is not considered justified when the alternative option is to make further allocations which are considered suitable and deliverable and would achieve the desired outcome.

In order to address our concern, we suggest that the land at Mookmoor Road, Shrewsbury is allocated for residential development for 80 dwellings which would reduce the windfall allowance for Shrewsbury Town and thereby provide greater certainty that the housing needs of the town were going to be met.

Omission Site

In light of our comments to Policy S16 we object to the omission of the land at Mookmoor Road, Shrewsbury as a housing allocation in the Plan. The site is previously developed land within the urban area and is therefore considered an ideal site to be allocated for residential development. The site is given a ‘Good’ rating in the Sustainability Appraisal and is identified a suitable housing site in the Site Assessment paper. It is still the case that the site is expected to become vacant in the near future, with the existing occupier choosing to vacate the site.

In redeveloping the site, a number of potential benefits of a residential scheme on this site have also identified, including better amenity for the surrounding residential occupiers; the opportunity to enhance the setting of adjoining Listed Buildings; and securing the occupation of redundant and vacant Listed Buildings within the site. As, such we can see no reason not to allocate the site with a view to delivery in years 6-10.

In terms of suitability and sustainability the site is located in a predominantly residential area and it is not an employment location. There is a primary school within 800 metres of the site and it is only a short walk to the Town Centre, where there are a range of shops, services and facilities present, which would benefit from increased pedestrian footfall, thereby improving the balance of uses and reducing movement. Furthermore, there are bus stops on Monkmoor Road at the front of the site where service number 1 operated by Arrivabus runs from.

The site is, therefore, located in a sustainable location that is highly accessible to shops, services and employment opportunities. It is served by public transport that provides a reasonable alternative to travelling by the private car. Furthermore, redevelopment of the site will not only deliver new market and affordable housing but it will also generate benefits to

existing heritage assets. As such, we conclude that the site is suitable for residential development and is promoted by a developer who wishes to see it reused for such a use.

In light of the site's omission from the Plan we consider it is unsound on the basis that the Plan will not be effective in meeting its housing needs over the Plan Period and that by allocated additional housing sites greater certainty will be provided that the housing requirement will be met.

We trust that you take our comments into consideration and we confirm that it will be our attention to participate the Examination Hearing Sessions in due course. Should you require any clarification on any of the above points please do not hesitate to contact me.

Yours sincerely

SAM SILCOCKS

Director

Sam.silcocks@harrislamb.com

Tel: 0121 455 9455

cc James Bradbury – Telereal Trillium
Duncan Brisbane – Telereal Trillium

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:	Sam Silcocks – Harris Lamb on behalf of Telereal Trillium
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Q1. To which document does this representation relate?

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

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

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

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

(Please tick as appropriate).

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

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

Please see attached letter

(Please continue on a separate sheet if necessary)

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

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

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(Please continue on a separate sheet if necessary)

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

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

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

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

(Please tick one box)

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

As an objector and promotor of omissions from the Plan we would welcome the opportunity to present orally the merits of the case for the inclusion of our sites in the Plan

(Please continue on a separate sheet if necessary)

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

Signature:	Sam Silcocks	Date:	23/02/2021
Office Use Only		Part A Reference:	
		Part B Reference:	

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

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

Paragraph:	<input type="text"/>	Policy:	<input type="text"/>	Site:	Omission site – Moonmoor Road	Policies Map:	<input type="text"/>
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	Part B Reference:



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