

**Our ref: JBB7634.C7575**

321 Bradford Street  
Birmingham, West Midlands  
B5 6ET  
T +44 121 622 8520

Date: 26 February 2021

Dear Sir / Madam

## **Representations on Pre-Submission version of the Shropshire Local Plan (Regulation 19)**

Thank you for the opportunity to comment on the latest stage in the partial review of the Shropshire Local Plan. These representations set out here are submitted on behalf of Jennings Estates Ltd, a land promoter operating in Shropshire and the surrounding areas, who has a land interest on part of the Shrewsbury West Sustainable Urban Extension (SWSUE) site.

The purpose of the representations is to address issues on the deliverability of part of the site (referred to as parcel 'R2), in order to support the continued allocation of the SWSUE in the Pre-Submission version of the Local Plan, in line with local and national policy. In summary, Mosaic Estates contend that the land parcel meets the test of deliverability as defined in the National Planning Policy Framework (NPPF) and Planning Guidance (PPG).

Consequently, the representations set out here are submitted in response to Policy S16 of the Pre-Submission Version of the Shropshire Local Plan, which deals with the proposed site allocations identified at Shrewsbury.

### **Background and Policy Context**

The land parcel in question was included as part of the Shrewsbury West SUE, which was originally identified in the Shropshire Core Strategy in March 2011. The extract below shows the designation taken from the Key diagram (in cross-hatching).

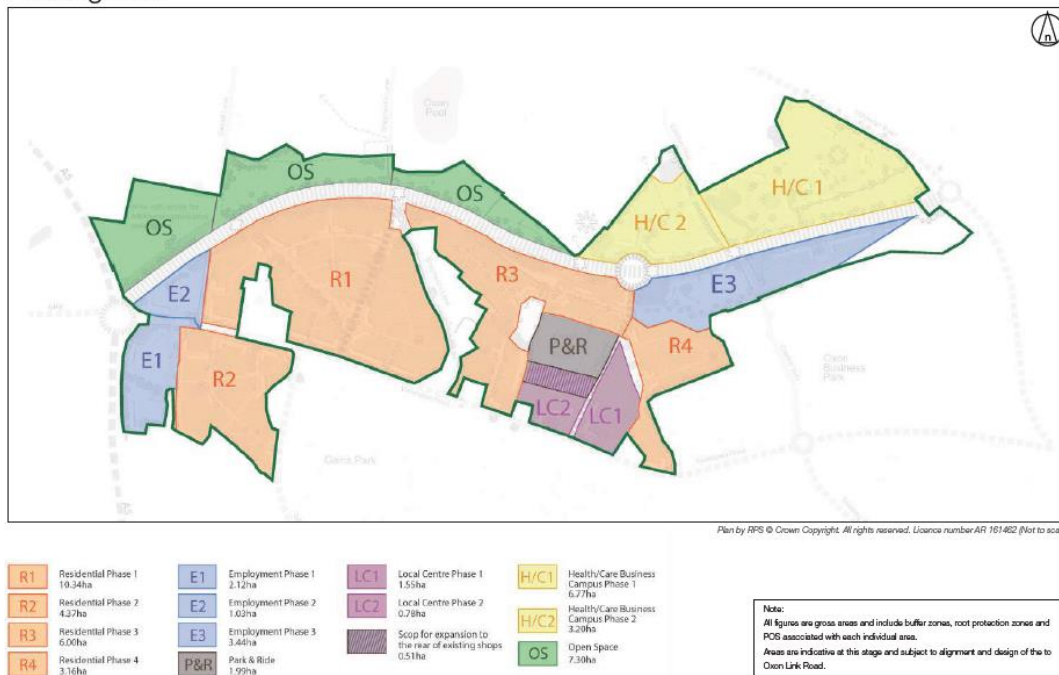
Figure 1 – Shropshire Core Strategy (2011) Key Diagram – extract showing Shrewsbury West SUE



Following this, a masterplan was adopted by Shropshire Council in 2014, which identified a defined boundary for the site as well as the design principles that would guide development on the SUE. The masterplan also included a phasing plan for the SWSUE, which specified the mix and location of uses on the site and which defined the individual sub-parcels of land that formed the overall SUE. The image below shown the distribution of uses across the site and identifies the location of each sub-parcel, including parcel 'R2' (located in the south western part of the site).

Figure 2 – Shrewsbury West SUE Masterplan 2014 Phasing Plan

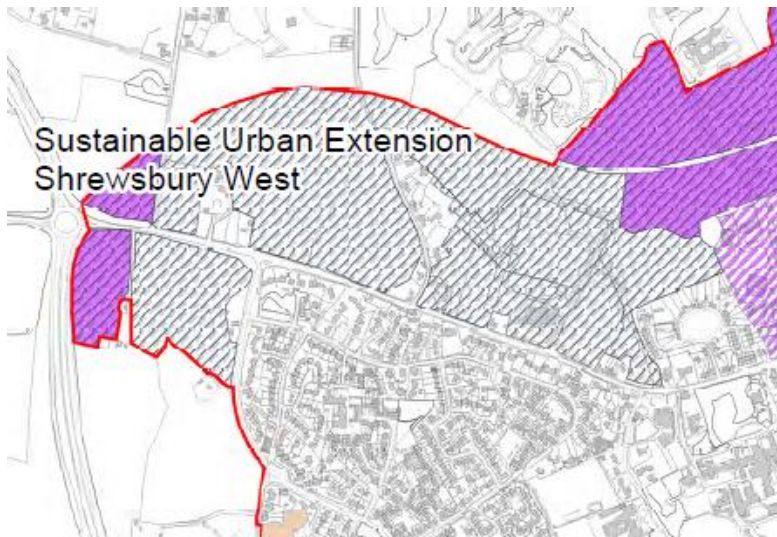
Phasing Plan



**Our ref: JBB7634.C7575**

The SWSUE was subsequently adopted into the Site Allocation and Development Management DPD (SAMDev) in December 2015. The SWSUE as whole was allocated for 750 dwellings, and this included land parcel R2, as illustrated below on the extract taken from the SAMDev Inset Map for Shrewsbury. As can be seen, parcel R2 is identified for residential development in the SAMDev plan

*Figure 3 – Shropshire SAMDev Adopted Policies Map (Shrewsbury Town - S16 Inset 1)*



RPS notes that the Pre-Submission Version of the Shropshire Local Plan document proposes to 'save' and roll forward a number of allocated sites identified in the SAMDev document, including the SWSUE. It is clear from the summary of the policy context outline above that there is a clear and consistent policy support for the continued allocation of the SWSUE in the Shropshire Local Plan. RPS therefore supports the approach to rolling forward the SWSUE into the Local Plan.

### **National Policy on Deliverability**

The NPPF states that plans should be prepared positively in a way that is aspirational but deliverable (paragraph 16b refers). This is to ensure that plans are effective over the plan period and thus can be deemed soundly-based.

In preparing the plan, policies identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability, and that plans should identify a supply and deliverable and developable land to be brought forward over the plan period (paragraph 67a refers). The NPPF Glossary defines 'deliverable' as meaning:

**Our ref: JBB7634.C7575**

*“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years... In particular...where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years..“*

And defines ‘developable’ as meaning;

*“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”*

National policy therefore applies three ‘tests’ to the assessment of deliverability; these are Availability, Suitability and Achievability of sites. More details on how these factors should be applied to individual sites and broad locations is set out in Planning Practice Guidance on the subject. RSP has considered the guidance in the context of land parcel R2, and is set out below.

**Applying the Test of Deliverability - Land Parcel R2**

Suitability

The PPG defines ‘suitability’ in terms of whether the site would provide an appropriate location for development. Notably, sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability (Paragraph: 018 Reference ID: 3-018-20190722 Revision date: 22 07 2019.)

In response, it is clear that land Parcel R2 forms part of a long-standing strategic allocation that is critical to delivering the housing requirement for Shrewsbury. RPS contends there are no policy or technical constraints that are likely to impact on the delivery of the site in the short-term. For example, a suitable access to/from the sites can be achieved off Gains Park Way without causing any severe adverse impact on highway safety. RPS is also not aware of any change in circumstances that warrant reconsideration of the land parcel’s suitability for residential development since the site was originally allocated in the development plan.

**Our ref: JBB7634.C7575**

In light of this, RPS contends that the land parcel R2 remains a suitable site for its intended purpose.

Availability

The PPG defines 'availability' in terms of there being confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available (Paragraph: 019 Reference ID: 3-019-20190722 Revision date: 22 07 2019).

In response, RPS contend that there are no such impediments that prevent the site from coming forward for development. In this regard, parcel R2 is in the control of a highly respected land promoter who intends to sell the site to a house builder in due course and at the earliest opportunity.

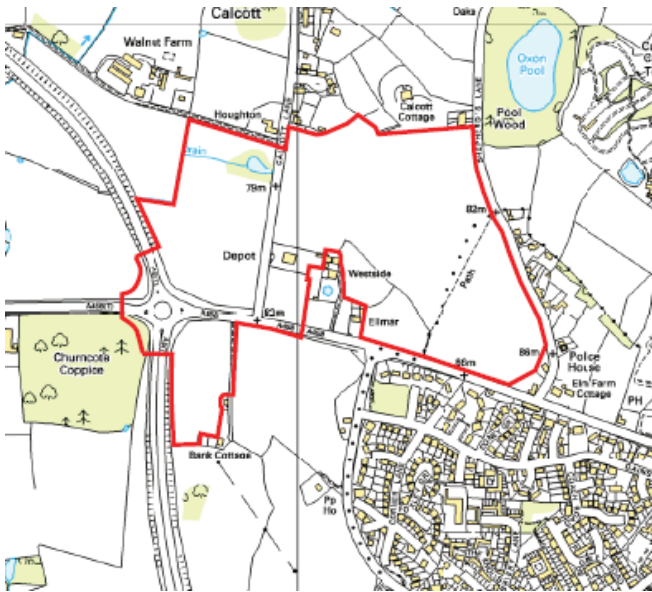
In light of this, RPS contends that the land parcel R2 is availability for the intended purpose of residential development.

Achievability

The PPG defines 'achievability' in terms of the reasonable prospects that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period (Paragraph: 020 Reference ID: 3-020-20190722 Revision date: 22 07 2019).

In response, RPS contends that there is clear market demand for residential development in this location. For example, land adjacent to parcel R2 forming part of the wider SWSUE allocation (comprising parcels E1, E2 and R1 as shown in Figure 2 above) was the subject of an outline planning application (14/00246/OUT) submitted by David Wilson Homes and Jennings Estates Ltd, which was granted consent on the 13th September 2019 for 296 dwellings. The plan below shows the location of the applications site. The land comprising parcel R2 is located adjacent to the southern boundary of the site.

Figure 4 – Location plan of application 14/00246/OUT (Land at Welshpool Road, Shrewsbury)



Subsequent to this, a reserved matters consent (20/00307/REM) was granted on 24<sup>th</sup> January 2020 for the full 296 dwellings approved under the original outline consent.

In light of this, RPS contend that there is clear market support for the delivery of the SWSUE and that parcel R2 would form a logical next phase of development of the SWSUE as a follow-on to the parcels already consented that would assist in delivering the residual housing required at the SWSUE.

Based on the foregoing analysis, RPS contend that parcel R2 meets the tests of deliverability as defined in national policy and guidance.

### Housing Trajectory

RPS notes that Policy S16 identifies around 8,625 dwellings to be delivered at Shrewsbury between 2016 and 2038 and that Shrewsbury is the Strategic Centre for Shropshire and the primary focus for new development in the County. RPS further notes that of the 8,625 dwellings to be delivered at Shrewsbury, 798 dwellings remain outstanding at the SUEs, including the residual 750 dwellings not yet approved at SWSUE (this being 454 dwellings). The residential guidelines for Shrewsbury (set out at Appendix 5, Schedule 5i of the Pre-Submission Local Plan) anticipates that all the remaining supply from the SUEs will be delivered within the plan period (by 2038). Furthermore, RPS notes that the Council expects 167 dwellings to be brought forward on the SWSUE allocation by 2024/25, as stated in the Shropshire Five Year Housing Land Supply Statement

**Our ref: JBB7634.C7575**

published 16th March 2020 (Appendix E to the report refers). Based on progress being made on bringing forward the SWSUE as outline in these representations, RPS is also broadly supportive of this assessment and is also broadly supportive of the expected trajectory at the SWSUE.

**Concluding remarks**

RPS has reviewed the policies and proposals related to the Shrewsbury West SUE (SWSUE) and is broadly supportive of the overall approach. In light of the progress being made in bringing forward the SWSUE, RPS broadly agrees that it is entirely appropriate to roll forward this allocation into the new Local Plan.

Furthermore, RPS contends that parcel R2, which forms part of SWSUE meets the tests of deliverability outlined in national policy and would represent a logical next phase in the delivery of the allocation and there is no evidence to suggest that this parcel is not capable of being delivered during the plan period.

RPS therefore recommends that the Shrewsbury West SUE, including parcel R2, is taken forward for adoption following the examination of the Local Plan.

Yours sincerely,

for RPS Consulting Services Ltd



**Darren Oakley**

Principal Planning Officer

[darren.oakley@rpsgroup.com](mailto:darren.oakley@rpsgroup.com)