Shropshire Council Regulation 19: Pre-submission Draft of the Local Plan 2016 to 2038 (December 2020)

Representations on behalf of Miller Homes in respect of land to the south of Shifnal

February 2021

Turley

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1. Introduction

1.1 These representations are submitted in response to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan and are made on behalf of Miller Homes (Miller) in the context of 12.7ha of land that Miller control to the south of Shifnal (the site). The site has been identified by Shropshire Council as 'Safeguarded Land for development beyond 2038'.

1.2 The site has the capacity to deliver a high quality scheme of between 175 and 200 new homes; is owned by a single landowner; and, is under the sole control of Miller.

1.3 The representations are structured as follows:

- **Section 2:** Provides a summary of the site and its surroundings, and demonstrates the sustainable residential development opportunity at Shifnal.
- **Section 3:** Summarises Miller's engagement with the Local Plan Review process to date.
- **Section 4:** Provides an overview of the technical survey reports to support the consideration of the site.
- **Section 5:** Provides our response to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan.
- **Section 6:** Provides a conclusion to these representations.

Miller Homes

1.4 Miller Homes are a national house builder with experience of delivering high quality housing sites throughout the UK. Miller delivered 3,498 new homes in 2019 (3,170 homes in 2018 and 2,775 homes in 2017). Miller have a wealth of experience and are a reputable house builder with a clear emphasis on build quality, customer care, and health and safety. They build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.

1.5 The strategic division of Miller have a great deal of experience and resource to enable the effective and proactive promotion of sites through the development plan process and planning applications.

1.6 With their consultant team, Miller will continue to work closely with Shropshire Council, statutory consultees and other stakeholders through the development plan process, and as "deliverers" will ensure careful attention is given to quality and creation of place.

2. The Site and the Opportunity

Site and surroundings

2.1 The site lies to the south of Shifnal and comprises two grass fields which are intermittently used for sheep grazing. The site is enclosed by hedgerows and vegetation and contains three mature oak trees.

2.2 The A464 Wolverhampton Road forms the site's north eastern boundary, beyond which are further agricultural fields and a large fishing pond. There are a number of trees along the north-west boundary, beyond which is a large residential property known as Beech House. To the south-west is The Terrace, a Grade II listed residential dwelling. Park Lane, the north to south route into Shifnal, forms the sites western boundary. The whole site falls under Green Belt designation.

2.3 The site is located within close proximity of a range of local services and facilities including a Primary School and local shops and conveniences, with Shifnal's local centre beyond that. St. Andrew's Church of England Primary School on Park Lane is less than 1 km walking distance from the site. Within Shifnal's local centre are a wide range of local services and facilities which include several convenience stores, a medical practice, public houses, a place of worship and a lower school / academy. Shifnal Train Station, which provides hourly trains to Birmingham and Shrewsbury, is also located within the local centre and is within cycling distance of the site.

2.4 There is no formal vehicle access to the site, although access for farm vehicles can be gained via a gate on Wolverhampton Road. A farm access track also leads north-west from Upton Lane and Upton Farm to the site. There are no existing Public Rights of Way across the site.

2.5 The site is well served by the strategic and local road network and would be accessed off the A464 Wolverhampton Road and Park Lane.

2.6 The site is currently not subject to any overriding environmental or physical designations or constraints that would prevent the site from delivering residential development. The Environment Agency's Flood Map for Planning demonstrates that the majority of the site falls within Flood Zone 1, where there is less than 0.1 per cent (1 in 1000) chance of flooding occurring each year.

2.7 Further details are provided within the Vision Framework, that has previously been shared with the Council, and which is provided again within **Appendix 1** for ease of reference.

The Opportunity

2.8 Miller's site has the potential to deliver between 175 and 200 new homes (market and affordable) in a location identified by the Council as being suitable for residential development. The Vision Framework demonstrates that Miller have a clear understanding of the opportunities and constraints to the development of the site and demonstrates how the site could be delivered. This understanding is founded upon the

studies and research undertaken as part of the technical assessments that have fed into the preparation of the Vision.

2.9 The Vision Framework presents a thorough understanding of the site and how it will contribute to a sense of place in this part of Shifnal. The site also has the potential to assist in contributing towards the delivery of wider growth within this part of the County.

2.10 The site is owned by one landowner and under the sole control of Miller. The delivery of the site is not reliant on any third party land for highways, ecology, landscape or drainage mitigation.

3. Engagement with Local Plan Review

3.1 Miller are committed to helping the Council meet their identified housing needs and delivering homes in a sustainable location. Miller have previously submitted representations to the Shropshire Local Plan Review in response to the following consultation stages:

- Shropshire Local Plan Review – Consultation on Preferred Scale and Distribution of Development (October 2017);
- Strategic Land Availability Assessment (March 2018);
- Shropshire Local Plan Review Consultation on Preferred Strategic Sites (September 2019); and
- Shropshire District Council's Local Plan Review: Consultation on Pre-submission Draft (Regulation 18) (September 2020).

3.2 Miller have remained consistent in their approach to each of the above consultations and made recommendations that would make the plan pass the soundness at each stage of consultation.

3.3 Alongside commenting on the Local Plan itself, Miller have also submitted representations to the Council's emerging draft Local Plan Delivery and Viability Study (March 2020).

3.4 Following engagement with the above consultations, representatives from Miller and Turley have met with the Council to discuss their preferred approach to delivering new homes at Shifnal. These discussions have focussed on the need for, and scope of, supporting technical evidence, and the potential form of any future scheme. It is anticipated that these discussions will be ongoing as the Local Plan progresses to adoption.

3.5 Furthermore, and following on from discussions with Shropshire Council, Miller have met with representatives from Wallace Land who control land to the south west of Shifnal (Consultation Document References: P16a, SHF017 South, SHF017 North and P17a) and have committed to the preparation of a holistic masterplan for delivering development to the south and west of Shifnal.

3.6 The Vision Framework and Illustrative Masterplan, enclosed as part of **Appendix 1**, also demonstrate how wider consideration has been given to land to the west of Shifnal which is being promoted separately by Wallace Land. The Illustrative Masterplan has been designed to provide opportunities for the comprehensive delivery of residential development to the south and west of Shifnal. Notwithstanding this, there is sufficient flexibility within the design and access opportunities for Miller's site to be delivered independently.

4. Technical Reports to Support Consideration of the Site

4.1 As confirmed within the Pre-submission Draft Local Plan, Shifnal is considered a sustainable location for residential growth. More specifically, the Miller site 'Land between A464 (south) and Park Lane' is in the right location for this growth in the context of the existing settlement.

4.2 To support the consideration of the site by Shropshire Council, a number of technical reports have been commissioned by Miller to inform a masterplanning exercise that demonstrates one way in which the site could come forward.

Technical Survey Reports

4.3 In support of the promotion of the site, a Vision Framework has been prepared and has been submitted in support of previous representations. This document brings together the range of technical evidence that has been prepared by specialist consultants on behalf of Miller. The following technical survey reports have been prepared:

- Landscape Visual Assessment;
- Transport Note;
- Flood Risk Assessment;
- Preliminary Ecological Appraisal; and
- Initial Heritage Assessment.

4.4 The Vision Framework, which brings together the above technical documents into a single document, demonstrates that the site has capacity to deliver between 175 and 200 homes (market and affordable) together with public open space in a highly sustainable location to the south of Shifnal.

4.5 The Vision Framework and Illustrative Masterplan also demonstrate how wider consideration has been given to land to the west of Shifnal which is being promoted separately by Wallace Land. The Illustrative Masterplan has been designed to provide opportunities for the comprehensive delivery of residential development to the south and west of Shifnal. Notwithstanding this, there is sufficient flexibility within the design and access opportunities for Miller's site to be delivered independently.

4.6 On behalf of our Client, we have reviewed representations made by others in respect of the proposed allocation to date. This review has identified that there has been, in some cases, a misrepresentation of the evidence base that has been presented for a number of sites, including the Miller site. We have therefore prepared a document titled 'Consideration of Site against Technical Evidence'; in which appropriate clarification is provided within this report to assist the Council in responding to comments that have been received. The Consideration of Site against Technical

Evidence report includes the Vision Framework and all technical survey reports within its appendices and is enclosed at **Appendix 1** of these representations.

5. Representations

5.1 The following section sets out Miller's representations against a number of policies within the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan. These representations, whilst focussing on the specific policies, have the following overriding themes:

- Shifnal is an inherently sustainable location which we consider should receive a higher level of housing growth within the plan period, and that the safeguarded sites identified around Shifnal, should not be safeguarded but allocated for delivery within the plan period ; and

- If the sites in Shifnal are to remain safeguarded, there should be a mechanism built in to the plan for safeguarded sites to come forward during the plan period should the need arise.

SP1. The Shropshire Test

5.2 As set out above, and acknowledged within the Pre-submission Draft Plan, Shifnal is an inherently sustainable location which we consider should receive a higher level of housing growth within the plan period. Furthermore, we consider that the safeguarded sites identified around Shifnal, should not be safeguarded but allocated for delivery within the plan period.

5.3 The site being promoted by Miller aligns with each of the guiding principles as set out within 'The Shropshire Test'. The below provides our response against each of the guiding principles:

SP1. The Shropshire Test			Our Response
1.	Development will contribute to meeting local needs and making its settlements more sustainable, providing the right mix of new housing, employment and other types of development which:	a. Supports the health, well-being and safety of communities;	The site is in a sustainable location for residential development, immediately adjacent to a vibrant and highly sustainable settlement and in close proximity to existing community facilities and services, which are easily accessible by foot.
		b. Supports cohesive communities;	The site is capable of delivering a mix of open market and affordable housing reflective of current and future demographic and market trends and the needs of different groups in the community. The new development would provide policy compliant levels affordable homes and a range of dwelling sizes.

		Furthermore, the site is located close to existing residential development, which provides an opportunity for new and existing communities to become fully integrated with one another.
	c. Addresses and mitigates the impacts of climate change;	The Flood Risk Assessment and Surface water drainage strategy identify that the site would provide sufficient attenuation to address the impact of Climate Change.
	d. Conserves and enhances the high-quality natural environment and provides opportunities for green and blue networks;	New residential development will provide a strong landscape framework comprising new areas of open space for formal and informal play and recreation for use by new and existing residents.
	e. Raises design standards and enhances the area's character and historic environment;	Design details will seek to reflect the local vernacular.
	f. Makes efficient use of land; and	The site is capable of delivering circa 175- 200 homes at a density of between 35-40 dph, assisting in the delivery of new market and affordable housing that is capable of addressing local need in terms of type and tenure. The land can be brought forward for development in the short-medium term to make an important contribution towards the housing needs of the town and wider County.
	g. Provides sufficient infrastructure, services, facilities, and where necessary provides opportunities	As set out in section 3 of these representations, the Vision Framework demonstrates that Miller have a clear understanding of the opportunities and constraints to the development of

	for their enhancement.	the site. The Vision Framework demonstrates how the site could deliver sufficient infrastructure, services, and facilities and where necessary provides opportunities for their enhancement – specifically ecological and biodiversity enhancements.
2. In addition, and where appropriate, proposals should seek to reflect relevant considerations of Shropshire Council's other strategies, including its Community Led Plans, Local Economic Growth Strategies (including the Shrewsbury Big Town Plan), the Local Transport Plan, and the Public Health Strategy.		The proposed development will provide a boost to the local economy, ensuring that the vitality of Shifnal and its community is enhanced. The development of the site for new housing will attract new households to the area with additional expenditure in the local economy that will stimulate additional demand in new and existing shops/services.

SP2. Strategic Approach

5.4 Miller support the Council's ambitions that Shropshire will flourish over the Plan period, accommodating investment and new development that contributes to meeting needs and making the districts settlements more sustainable. The technical survey reports (enclosed at **Appendix 1**) demonstrate how their site can help achieve these ambitions.

5.5 Miller instructed Turley to prepare an 'Update to the Technical Review of Sustainable Growth Plans for Shifnal' in response to the regulation 18 consultation. A copy of this is enclosed at **Appendix 2**. The purpose of the report was to provide a technical review of the proposed level of growth in Shifnal, in the context of local and wider housing needs and its ability to sustainably accommodate growth. The conclusions of this report have been set out below in our response to policy SP2 'Strategic Approach'.

Housing Requirement

5.6 Miller recognise the sustained ambitions of the Council to respond positively in providing for housing to meet local needs, with the Pre-submission Draft Plan continuing to provide for 1,400 homes per year (30,800 homes between 2016 and 2038) thus exceeding the current outcome of the standard method (1,149dpa) as of early 2021.

5.7 The NPPF and PPG strongly support the position taken by authorities such as Shropshire to identify a housing requirement which is higher than that implied as a 'minimum' level through the standard method. This particularly recognises economic ambitions relating to the M54 growth corridor with a clear commitment across a range of strategies to ensure that this investment is successful, with the outlined aspiration

representing a significant potential growth in employment opportunities across the corridor. Furthermore planning for a higher level of provision is necessary to respond to the pressing need to deliver much needed affordable homes to address the consequences of historic under-provision.

5.8 Whilst the proposed housing requirement is higher than the outcome of the current standard method, up-to-date demographic projections suggest higher levels of need are likely to arise where recent growth is sustained.

5.9 Planning for higher levels of housing need is also considered prudent in the context of the significant housing need pressures identified in the Greater Birmingham/ Black Country HMA, with which both Shropshire as a whole and Shifnal are identified as having strong functional housing market relationships. There is little evidence to date that the full scale of need associated with either a minimum level, or indeed those associated with delivering the HMA's economic growth ambitions, will be accommodated in the current generation of Local Plans. The introduction of the 35% uplift to be applied to 20 urban centres, announced as part of the December 2020 updates to the Standard Method, will add further pressures to the Greater Birmingham / Black Country HMA which results in a 14% increase in housing requirement across the HMA – with Birmingham and Wolverhampton having the uplift applied to their local housing need. The result will be a continued displacement of housing demand pressures, which will in turn place greater pressure on local housing markets in Shropshire, as well as other areas, where connections are strongest. The opportunity exists for the Council to take an even more positive approach in providing for these needs again with reference to the unique position it has in joining housing markets through the M54 Corridor.

5.10 The 'Update to the Technical Review of Sustainable Growth Plans for Shifnal' report also provides strong evidence-based support for the proposed policy approach of allocating and safeguarding land for housing growth in Shifnal. However, the analysis identifies that the Pre-submission Draft Plan should incorporate greater flexibility to support land coming forward in the plan period where justified. We note the reference to the fact that the *"availability of land will be kept under review to ensure a continuous supply of suitable sites is available".* However, there is no mechanism in place to determine how such reviews would impact upon the policies within the Local Plan or how safeguarded sites would be considered within the plan period should the need arise. Such a mechanism would make the Pre-submission Draft Plan more robust and help ensure that the Council are able to meet their ambitions.

Affordable Housing

5.11 Policy SP2 confirms the intention to provide for around 7,700 affordable homes during the plan period, or 350 homes per year. As the Pre-submission Draft Plan acknowledges, the Council's evidence base confirms the full need is considerably higher, calculating an estimated need to provide 799 affordable homes a year over the plan period. This level of need represents some 57% of the overall proposed affordable housing requirement and would require a significant increase from recent levels of delivery.

5.12 The last published Annual Monitoring Report confirms that in the last seven years the highest annual level achieved has been 441 (2016/17) with the average in the last seven years being only 244 affordable homes per annum. Evidently planning for a level of housing growth above the current proposed requirement would further support the delivery of additional affordable housing and mitigate a risk that the aspired boost in provision is not achieved.

Sustainable and Appropriate Pattern of Development

5.13 Schedule SP2.1 identifies Shifnal as a 'Key Centre' which, together with other settlements considered as 'Principal Centres' and 'Key Centres', will accommodate significant well-designed new housing and employment development'.

5.14 In support of the partial review of the Shropshire Development Plan, in 2017 the Council produced a Hierarchy of Settlements document which has subsequently been updated in 2020 by the Council to inform the Pre-submission Draft Plan. These studies outline the provision of social infrastructure in Shropshire's settlements, namely the range of services and facilities within each settlement that support those living and working within it and its surrounding hinterland. It is stated that the hierarchy is used to inform decisions on a settlement's potential to accommodate new development.

5.15 Shifnal scores 97 points in accordance with this methodology out of a maximum possible of 116, ranking the town in 10th place in the Shropshire settlement hierarchy, and as the 4th highest-scoring 'Key Centre', and therefore one with significant provision of social infrastructure.

5.16 In the context of the social infrastructure already within the town, the 2020 Sustainability Appraisal report (published in December 2020) affirms that Shifnal is a sustainable settlement and that a level of development in line with that proposed within the Pre-submission Draft Local Plan would mean that:

"This level of growth will strongly contribute to the evidenced housing need for Shropshire in the Plan period. It is likely to provide a variety of locations and a good level of affordable houses in Shifnal, thereby helping meet the needs of priority households. Existing businesses are likely to be maintained and supported and opportunities to create more or higher value jobs provided. The level of existing public transport infrastructure in Shifnal is likely to be maintained or increased and there may be provide opportunities to co-ordinate new development with future provision. Shifnal is an accessible location and this level of growth is likely to minimise the need for additional car-based transport whilst focussing development where there is good existing access to health, leisure, recreational and cultural activities. The provision of, and access to, services such as schools, doctor's surgeries and shops is likely to be maintained or enhanced. Similarly, opportunities to increase the provision or connectivity of services such as broadband or renewable energy are likely to increase in the medium to long term"

5.17 This aligns with the Shifnal Neighbourhood Plan's objectives around the provision of health and leisure facilities, with 'Policy HL1 New Medical Facility, Land at Corner of Haughton Road/Newport Road' emphasising the importance of delivering a new medical facility as part of the residential outline application at Haughton Road.

Similarly, the Neighbourhood Plan highlights that new leisure and recreation provision should be delivered alongside sustainable residential development.

5.18 A further point of note is that the Sustainability Appraisal specifically references that Shifnal's provision of public transport infrastructure is also likely to be maintained or increased with opportunities to co-ordinate new development with future provision.

5.19 Shifnal is well-connected to its wider economic area and is a location that exhibits demand for further residential development, with this expressly recognised within the Pre-submission Draft Plan. The analysis presented in the 'Update to the Technical Review of Sustainable Growth Plans for Shifnal' report has served to additionally demonstrate that the town does already itself accommodate significant levels of economic activity and employment, alongside a good level of social infrastructure provision.

5.20 The Council's evidence indicates that the provision of new homes and employment space will serve to support existing businesses and public services in Shifnal, delivering benefits for current and future residents and ensuring the resilience of this part of its employment base.

5.21 The proposed allocation of a large employment site in Shifnal is strongly supported as a means of sustainably accommodating inward investment and enabling local business to grow building on the advantages of the M54 corridor. This will, it is agreed, offer the opportunity to create a more sustainable balance between housing and employment in Shifnal over the plan period. However, it is important to recognise that there is a realistic prospect that where the provision of housing is curtailed on the basis of the proposed requirement for the town, this is likely to occur in parallel to a period in which new employment would be starting to be delivered on the proposed employment allocation to the east of Shifnal (SHF018b and SHF018d). Where some level of displacement of people living in Shifnal and working elsewhere to living and working in Shifnal could occur, the enhancement in the provision of rail transport services alongside other factors is likely to make it challenging to realise this quickly.

5.22 Where the creation of jobs will elevate demand for housing locally this suggests that to realise the benefits in full associated with its location on the M54 corridor the Pre-submission Draft Plan should recognise the need for greater flexibility in the advancement of safeguarded land within the plan period.

SP3. Climate Change

5.23 Miller supports the Council's overall goal of making Shropshire Council net greenhouse neutral by 2030, as set out in the Climate Change Strategy Framework. We consider that more growth at Shifnal will assist the Council in their endeavours to transition to a zero carbon economy, and would avoid the need for development to be brought forward in less sustainable locations elsewhere in the District.

5.24 Miller consider that the site is located in a highly sustainable location and benefits from good access to existing public transport with the opportunity for everyday activities to be made by use of existing active transport opportunities, thereby assisting in reducing carbon emissions. Indeed Shropshire Council's 'Hierarchy of Settlements' paper (2018),

confirms that Shifnal is one of the most sustainable 'Key Centres' within the district, scoring highly for the provision of existing local services and facilities, local transport, amenity spaces, local employment and schools. This therefore provides a strong evidence base for bringing forward residential development in this location.

5.25 As set out in the supporting technical survey reports submitted with these representations (**Appendix 1**) a number of measures have already been incorporated into the Illustrative Masterplan, these include:

- **Reducing carbon emissions through a number of means:** A new footpath is proposed to the west of the proposed site access along the southern side of the A464 to enhance pedestrian and cycle connectivity into Shifnal Village Centre. The nearest bus stops are located on Victoria Road within the centre of Shifnal approximately 1.2 km north-west of the site. However, as part of the consent for the 175 residential homes and doctors surgery at land to the north of A464 (PA: BR/APP/OUT/08/0869), bus services 113/114 and 323 are to be re-routed through this development which is located approximately 400m west of the site. These buses provide a frequent service to the surrounding areas including Telford, Bridgenorth and Market Drayton. Shifnal Railway Station is located approximately 1.1 km to the north-west of the site which provides direct links to Telford, Shrewsbury, Wolverhampton and Birmingham, where additional rail opportunities are available to the wider areas of the country.

- **Mitigating and adapting to the impacts of climate change:** Whilst the exact form of Surface Water Management Strategy will need to be confirmed in due course further to detailed site investigations, the proposed development has been designed to provide suitable space for Sustainable Urban Drainage infrastructure which can be incorporated into the wider open space network / strategy on site. The Illustrative Masterplan also identifies a substantial amount of open space available within the development for the enhancement of existing ecological features with the potential to deliver a net biodiversity gain across the site.

5.26 The 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020. The Future Buildings Standard consultation (January 2021), which relates to non-domestic buildings and existing dwellings, provided an update on the implementation of the changes to Part L, Part 6 and Part F of the Buildings Regulations will now come into force in 2021.Therefore, Building Regulations will require Miller to build more resilient homes to assist the Council in achieving their targets.

5.27 On this basis, more growth at Shifnal will assist the Council in their endeavours to transition to a zero carbon economy, and would avoid the need for development to be brought forward in less sustainable locations elsewhere in the District. Miller have provided a strong evidence base for bringing forward highly sustainable residential development at this site.

SP4. Sustainable Development

5.28 Policy SP4. 'Sustainable Development' duplicates the National Planning Policy Framework and reiterates the principles set out within Section 38 (6) of the Planning and Compulsory Purchase Act 2004.

5.29 Planning practice guidance states: *"Paragraph 11 of the National Planning Policy Framework indicates that Local Plans should reflect the presumption in favour of sustainable development. This should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally. However, there is no need for a plan to directly replicate the wording in paragraph 11 in a policy."* (Paragraph: 036 Reference ID: 61-036-20190723)

5.30 It is considered that policy SP4 would be more effective if further details were provided relating to how the presumption will be applied locally.

SP5. High-quality Design

5.31 Miller have an extensive track record of delivering sites with High-quality design and will be able to meet these policy aspirations. The Vision Framework and Illustrative Masterplan also demonstrate how wider design consideration has been given to land to the west of Shifnal, which is being promoted by Wallace Land and also a safeguarded site, to ensure cohesiveness between the developments.

SP7. Managing Housing Development

5.32 Whilst the policy notes that "*there will be positive consideration of other sustainable housing development where this does not conflict with the Policies in the Local Plan*" there is no reference to the potential of safeguarded sites.

5.33 Point 4 of the policy highlights that sites beyond the settlement boundary "*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*". The Council have identified safeguarded sites to be delivered beyond the plan period (after 2038) – it would be sensible for the safeguarded sites to be considered in the first instance. It is therefore considered that a robust mechanism should be built into this policy to allow the safeguarded sites to be bought forward at an earlier date if certain criterion is met.

5.34 As set out above, Shifnal is one of the most sustainable 'Key Centres' within the district, scoring highly for the provision of existing local services and facilities, local transport, amenity spaces, local employment and schools.

5.35 Miller's site has the potential to deliver between 175 and 200 new homes (market and affordable) in a location identified by the Council as being suitable for residential development. The Vision Framework, included as part of **Appendix 1**, demonstrates that Miller have a clear understanding of the opportunities and constraints to the development of the site and demonstrates how the site could be delivered. This

understanding is founded upon the studies and research undertaken as part of the technical assessments that have fed into the preparation of the Vision.

5.36 Whilst we state that more growth should be directed to Shifnal within the plan period the Local Plan Review would be more robust if a mechanism was built into this policy to allow safeguarded sites to be released at an earlier point (before 2038) should the need arise. The technical evidence, which support these representations, confirms that this site can be delivered within the early stages of the plan period.

SP11. Green Belt and Safeguarded Land

5.37 Miller welcomes the fact that this policy has been 'upgraded' to a strategic policy within the Local Plan Review.

5.38 Whilst the policy title makes reference to Safeguarded Land, the only text relating to safeguarded land within the policy states: *"Safeguarded land, being land removed from the Green Belt for future development needs beyond the current Local Plan period, is shown on the Policies Map"*.

5.39 As currently drafted, Miller contend that the approach to safeguarded sites is not consistent with national policy, specifically in relation to paragraph 120 of the NPPF which states that planning policies need to reflect changes in the demand for land. There is an opportunity to make this policy more robust by including a mechanism for when the safeguarded land could come forward within the plan period. Such an amendment would also assist the Plan in passing the soundness test (NPPF paragraph 35).

5.40 Exceptional Circumstances for the removal of Miller's site from the Green Belt to be safeguarded for future development, have been fully evidenced and justified through Shropshire's evidence base (Green Belt Release Exceptional Circumstances Statement, December 2020), in line with paragraph 136 of the NPPF. Through the process of allocating Miller's site as safeguarded land, the Council have demonstrated that they have fully examined all other reasonable options for meeting their identified need for development. Through this evidence base, it has been shown that Miller's site is suitable to come forward for development within the plan period as an allocation rather than a safeguarded site. However if the site is to remain a safeguarded site, it is important that the Pre-submission Draft Plan has sufficient triggers to allow Miller's site to come forward within the plan period, if required.

5.41 It would also be beneficial to allocate site reference numbers to each of the safeguarded sites so that the Policies Map can be cross referenced at the appropriate points within the Local Plan Review.

SP14. Strategic Corridors

5.42 Miller welcomes the fact that this policy has been 'upgraded' to a strategic policy within the Local Plan Review.

5.43 Miller support the purpose of this policy to enable Shropshire to respond positively to demand from new businesses attracted into the District as inward investment and note

that the Council recognise that such inward investment needs to be supported by the delivery of new housing.

5.44 As set out above, the proposed allocation of a large employment site in Shifnal is strongly supported as a means of sustainably accommodating inward investment and enabling local business to grow, building on the advantages of the M54 corridor. This will offer the opportunity to create a more sustainable balance between housing and employment in Shifnal over the plan period. However, it is important to recognise that there is a realistic prospect that where the provision of housing is curtailed on the basis of the proposed requirement for the town, this is likely to occur in parallel to a period in which new employment would be starting to be delivered on the allocation. Where some level of displacement of people living in Shifnal and working elsewhere to living and working in Shifnal could occur, the enhancement in the provision of rail transport services alongside other factors is likely to make it challenging to realise this quickly. Where the creation of jobs will elevate demand for housing locally, this suggests that to realise the benefits in full associated with its location on the M54 corridor, the Pre-submission Draft Plan should recognise the need for greater flexibility in the advancement of safeguarded land within the plan period.

5.45 Shifnal's location on the M54/A5 East growth corridor, and the strong connectivity benefits this creates, form an important context for understanding both current demand pressures but also the extent to which these are likely to continue to increase where the corridor's investment is realised. At a local level, there has evidently been success in recent years in elevating the regularity of rail services to Shifnal. This has reinforced its connectivity into the corridor and specifically the national rail infrastructure which itself will continue to be enhanced through the delivery of HS2. This investment in improvements to rail connectivity has also responded to Shifnal's own growth. This again forms important context to its ongoing credentials for accommodating sustainable growth.

5.46 Miller's site, by being identified as safeguarded land, is a suitable location for a sustainable residential development that can assist with accommodating the sustainable growth of Shifnal as part of a Strategic Corridor. The site has the potential to deliver between 175 and 200 new homes (market and affordable). The site is in a sustainable location for residential development, immediately adjacent to a vibrant and highly sustainable settlement and in close proximity to existing community facilities and services, which are easily accessible by foot. The Vision Framework, included as part of **Appendix 1**, demonstrates that Miller have a clear understanding of the opportunities and constraints to the development of the site and demonstrates how the site could be delivered.

DP1. Residential Mix

5.47 It is recognised that policy DP1 states at point 1 that *"Residential development will be expected to provide a mix of dwelling sizes, types and tenures in order to meet the identified needs of local communities, including families with children, older people, people wishing to build their own homes and people with disabilities and special needs, in accordance with Shropshire Council's Strategic Housing Market Assessment"* the

following points (2 to 6) each state that new development "will" meet the requirements set out in policy rather than being "expected".

5.48 The policy should acknowledge that the final mix of any development will be subject to further negotiation between the applicant and the District Council during the planning application stage. This approach is justified in that demography and market signals will change over the plan period to 2038. Detailed prescription should be avoided in order to not undermine market demand and financial viability, which can put delivery at great risk. Such factors are will ensure the Pre-submission Draft Local Plan responds to paragraph 122b of the NPPF.

DP2. Self-build and Custom-build Housing

5.49 It is noted that residential developments of 10 or more homes are encouraged to make 10% of the new homes available as serviced plots for self-build and custom-build developers, where there is an identified need. However, we consider that a key consideration is whether providing such homes in large scale new build developments is meeting the needs and aspirations of those people who have registered for a self-build / custom-build home. To avoid self-build and custom-build plots being left undeveloped a mechanism should be built in to enable the plots to be delivered by the developer if a self-build and custom-build developer is not found after a certain period.

5.50 Phasing and legal agreements will have to ensure that the provision of 10% of all homes on a development for self-build / custom-build homes would not have an impact on the delivery and occupation of the wider development. This should be a requirement of any policy to ensure that overall housing need for the District can still be met, most likely through the ability of major housebuilders such as Miller to deliver at scale.

DP3. Affordable Housing Provision

5.51 Miller acknowledge paragraph 20 of the NPPF which states that strategic policies should make provision for housing, including affordable housing.

5.52 The Vision Framework submitted alongside these representations; demonstrates that affordable housing can be delivered onsite. However, the terminology used at point b of policy DP3 states *"Ensuring that only in exceptional circumstances will either an off-site provision or a financial contribution in lieu of on-site provision be supported on major housing development"* and is not in accordance with paragraph 62 of the NPPF.

5.53 Paragraph 62 of the NPPF states that affordable housing can be provided off-site or an appropriate financial contribution paid in-lieu if it can be robustly justified. The NPPF does not specify any such definition of "*exceptional circumstances*" for off-site provision or an appropriate financial contribution in lieu. This terminology should be removed from the policy text contained within the Pre-submission Draft Plan.

DP11. Minimising Carbon Emissions

5.54 As set out above, the 2019 Spring Statement included a commitment that by 2025 the Government will introduce a Future Homes Standard for new build homes to be future-

proofed with low carbon heating and 'world-leading levels of energy efficiency'. The Consultation document (October 2019) highlighted that changes to Part L, Part 6 and Part F of the Building Regulations are anticipated to come into force by mid/late 2020. The Future Buildings Standard consultation (January 2021), which relates to non-domestic buildings and existing dwellings, provided an update on the implementation of the changes to Part L, Part 6 and Part F of the Buildings Regulations will now come into force in 2021.Therefore, Building Regulations will require Miller to build more resilient homes to assist the Council in achieving their targets.

5.55 We consider that Policy DP11 is not required due to the fact that the Council's ambitions to minimise Carbon Emissions are set out in policy SP3. 'Climate Change' and any new homes will have to be in compliance with the proposed changes to Building Regulations. This policy should therefore be deleted.

DP28. Communications and Transport

5.56 This policy recognises that the following objectives will be achieved by delivering a sustainable pattern of growth and development, investing in the necessary communications and transport infrastructure and services, providing remote access to services and employment and making available accessible, safe, reliable, low carbon transport modes and active travel choices:

- *"Shropshire will continue be an attractive place to live and work by improving its communications and transport networks and supporting the infrastructure and services to widen travel and transport choices, to improve connectivity and accessibility, to reduce car dependency and manage the impacts of transport movements on communities and our environment."*

- *"Responding positively to changes in our climate will require access to better communications infrastructure and more sustainable travel options offering choices about the need to travel and the best transport modes. This will help to manage the environmental impacts of travel on climate change, air quality, network noise and public health contributing to the sustainability of communities and protecting our environment."*

5.57 Miller's site meets each of the requirements of this policy. As set out above, Shifnal is an inherently sustainable location which we consider should receive a higher level of housing growth within the plan period, and that the safeguarded sites identified around Shifnal, should not be safeguarded but allocated for delivery within the plan period.

5.58 Miller consider that the site is located in a highly sustainable location and benefits from good access to existing public transport with the opportunity for everyday activities to be made by use of existing active transport opportunities, thereby assisting in reducing carbon emissions. Indeed Shropshire Council's 'Hierarchy of Settlements' paper (2018), confirms that Shifnal is one of the most sustainable 'Key Centres' within the district, scoring highly for the provision of existing local services and facilities, local transport, amenity spaces, local employment and schools. This therefore provides a strong evidence base for bringing forward residential development in this location.

S15. Shifnal Place Plan Area

5.59 As set out in our response to strategic policies SP1 and SP2, Shifnal is one of the most sustainable settlements within the district and further residential development within Shifnal can support the Council's aspirations for the Growth Corridors. Miller contends that their site can be delivered during the plan period and that the site comprehensively aligns with the aspirations of the Pre-submission Draft Local Plan.

5.60 There are opportunities within this policy and others in the plan, to include a mechanism for when the safeguarded land could come forward within the plan period.

5.61 It would also be beneficial to allocate site reference numbers to each of the safeguarded sites identified with the Pre-submission Draft Local Plan so that the Policies Map can be cross referenced at the appropriate points within the Local Plan Review.

5.62 Miller's site has the potential to deliver between 175 and 200 new homes in a location identified by the Council as being suitable for residential development. The Vision Framework, enclosed as part of **Appendix 1**, demonstrates that Miller have a clear understanding of the opportunities and constraints to the development of the site and demonstrates how the site could be delivered. This understanding is founded upon the studies and research undertaken as part of the technical assessments.

5.63 The site is owned by one landowner and under the sole control of Miller. The delivery of the site is not reliant on any third party land for highways, ecology, landscape or drainage mitigation. On this basis, Miller's site should be identified as an allocation for residential development to be delivered within the plan period.

6. Conclusion

6.1 Miller welcomes the opportunity to engage with the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan and their representations have the following overriding themes:

- The District can accommodate a greater level of growth;
- Shifnal is an inherently sustainable location which we consider should receive a higher level of housing growth within the plan period, and that the safeguarded sites identified around Shifnal, should not be safeguarded but allocated for delivery within the plan period; and
- If the site is to remain a safeguarded site for delivery beyond the plan period, Miller contend that the current approach to safeguarded sites is not consistent with national policy, specifically in relation to paragraph 120 of the NPPF which states that planning policies need to reflect changes in the demand for land. There is an opportunity to make the Pre-submission Draft Local Plan more robust by including a mechanism for when the safeguarded land could come forward within the plan period. Such an amendment would also assist the Plan in passing the soundness test (NPPF paragraph 35).

6.2 Miller's site has the potential to deliver between 175 and 200 new homes in a location identified by the Council as being suitable for residential development. The Vision Framework demonstrates that Miller have a clear understanding of the opportunities and constraints to the development of the site and demonstrates how the site could be delivered. This understanding is founded upon the studies and research undertaken as part of the technical assessments.

6.3 The Vision Framework presents a thorough understanding of the site and how it will contribute to a sense of place in this part of Shifnal. The site also has the potential to assist in contributing towards the delivery of wider growth within this part of the County.

6.4 The site is owned by one landowner and under the sole control of Miller. The delivery of the site is not reliant on any third party land for highways, ecology, landscape or drainage mitigation.

6.5 We trust that the information provided with these representations will be considered and we welcome the opportunity to promote Miller Homes' site to the south of Shifnal through the Local Plan Review process.

Appendix 1: Consideration of Site against Technical Evidence report

Appendix 2: Update to the Technical Review of Sustainable Growth Plans for Shifnal

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