



For Shropshire
Council use

Respondent
no:

Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan

**Pre-Submission Draft (Final Plan)
17 March 2014 – 28 April 2014**

Representations Form

Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:

www.shropshire.gov.uk/samdev

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at www.shropshire.gov.uk/samdev.

Your details: Who is making this representation?

Name:	Mrs Samantha Ryan
Organisation (if applicable):	Turley
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Email:	Sam.ryan@turley.co.uk
Telephone:	0161 233 7676

If you are acting as an Agent, please use the following box to tell us who you are acting for:

Name:	
Organisation (if applicable):	The Stanley Beckett Partnership
Address:	
Email:	
Telephone:	

Your Representations

Please note, you must use a separate form for each representation you wish to make.

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Paragraph 1.2 / 2.3

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Object	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

Positively prepared	
Justified	
Effective	
Consistent with National Policy	

In the box below please specify your reason for supporting or objecting.

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

The Shropshire Core Strategy was adopted in February 2011 and provides the strategic planning policy framework for the County. This includes setting both the overall housing requirement (through policy CS1) and at a sub-area level (through policies CS2, CS3 and CS4).

The recognition in these paragraphs of this position is therefore welcomed and is important in providing the basis for the quantum of housing to be provided through housing allocations.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

None

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.

☐

No, I wish to pursue my representations through this written representation.

☒

If you wish to attend the examination, please explain why you think this is necessary in the box below:

n/a

Do you wish to be notified of any of the following? *Please tick all that apply. We will contact you using the details you have given above.*

When the SAMDev Plan has been submitted for examination	X
When the Inspector's Report is published	X
When the SAMDev Plan is adopted	X

Please return this form by 5pm on Monday 28 April 2014

You can e-mail it to:

Planning.policy@shropshire.gov.uk

Or return it to: Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Please note, we will acknowledge receipt of representations made by e-mail.

Data Protection Act 1998 and Freedom of Information Act 2000

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Your Representations

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(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy MD1

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Object	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

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Justified	
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As set out in the representations made in respect of paragraphs 1.2 / 2.3 of the SAMDev DPD, the housing requirement for the County is established through the Core Strategy and it is wholly appropriate to plan positively to ensure that the SAMDev delivers the requirement.

It is therefore entirely appropriate that Policy MD1 should make reference to this important policy context.

Similarly, reference to the settlement hierarchy, which the Core Strategy establishes as a concentration of development in Shrewsbury and market towns, with Whitchurch having a pre-eminent role within the north-eastern part of the County is

also supported. It is also appropriate that Policy MD1 refers to Core Strategy policy CS3, the explanatory text for which is clear that Whitchurch will accommodate over 1,000 dwellings (the highest band of housing growth in the table) is supported.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

None

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.

☐

No, I wish to pursue my representations through this written representation.

☒

If you wish to attend the examination, please explain why you think this is necessary in the box below:

n/a

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Your Representations

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In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy MD3

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Object	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

Positively prepared	X
Justified	
Effective	
Consistent with National Policy	X

In the box below please specify your reason for supporting or objecting.

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

The Policy provides, inter alia, the basis for determining applications for housing development. It refers to the settlement housing guideline as a significant policy consideration and states that where development would result in this figure being exceeded applications will be assessed against a range of specified criteria. They include the degree by which the requirement will be exceeded.

It is not accurate to call the figures a guideline, as (subject to being set at an appropriate level – see separate representations on Policy S18) they represent the housing requirement identified following an objective assessment of Shropshire's needs. Treating the figure as a guideline fails to give due weight to the importance of the housing requirement in delivering the sustainable housing growth across the

County and would be contrary to the Vision and Objectives of the Core Strategy.

Further it is considered that this policy is not positively prepared as it would likely constrain housing rather than to 'boost significantly', as required by the National Planning Policy Framework. The policy, as currently drafted, will lead to uncertainty as it fails to provide any guidance through the explanatory text, as to what would be an acceptable level of excess.

The requirement to provide evidence of community support for proposals is a further constraint on housing development. The policy is silent as to how this is to be demonstrated but more importantly, it elevates the weight given to the views of the community. Imposing such a requirement will enable communities to prevent development regardless of the need and will lead to limited potential for additional housing sites to come forward. This is a further example of the policy not being positively prepared and contrary to the emphasis placed on delivering housing by national planning policy.

The Policy goes on to suggest that development which is in accordance with the criteria relating to applications for housing sites beyond the settlement boundary may be acceptable but only where a settlement housing guideline is unlikely to be met by the end of the plan period. Given that the plan period runs to 2026, it restricts the ability for such sites to come forward within the earlier years of the plan period despite any need which may exist and the importance of meeting that need. Again, this demonstrates a negative approach to housing growth.

The explanatory text, at para. 4.20, misrepresents national planning policy suggesting that the only circumstances in which housing development beyond settlement boundaries may take place under is where there is an absence of a five-year supply. Whilst an absence of a five-year supply lends greater weight to such proposals, development may also proceed where it has been demonstrated that the planning balance weighs in favour of granting planning permission.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

Amend the policy to take a more positive approach to housing development, making clear the importance of providing the housing needed by the County and setting criteria which positively promotes rather than prevent housing development.

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Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.

☒

No, I wish to pursue my representations through this written representation.

☐

If you wish to attend the examination, please explain why you think this is necessary in the box below:

To present further evidence as to how the policy should be amended to achieve the positive approach to housing growth required by national policy and the Core Strategy.

Do you wish to be notified of any of the following? *Please tick all that apply. We will contact you using the details you have given above.*

When the SAMDev Plan has been submitted for examination	X
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Your Representations

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(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy S18

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Object	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

Positively prepared	X
Justified	X
Effective	X
Consistent with National Policy	X

In the box below please specify your reason for supporting or objecting.

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See separate sheet

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

An increase in the housing requirement for Whitchurch to ensure consistency with the approach sought by the Core Strategy and to ensure that sufficient provision for new housing development is made to deliver the Vision and Objectives of the Core Strategy.

Some of the additional growth can be accommodated on land at Wrexham Road which is a natural extension to the settlement and is free from technical constraints and represents a developable, sustainable urban extension which will make a valuable contribution to meeting Whitchurch's housing need (including affordable housing). The site should be identified as a housing allocation.

Omit / reduce the Oaklands Road and Tilstock Road allocations in the absence of evidence to substantiate their status as proposed housing allocations.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.

☒

No, I wish to pursue my representations through this written representation.

☐

If you wish to attend the examination, please explain why you think this is necessary in the box below:

To present further evidence on the Whitchurch housing requirement, the suitability of the land at Wrexham Road as a housing allocation which contributes to meeting the requirement and the issues with the other proposed allocations.

Do you wish to be notified of any of the following? *Please tick all that apply. We will contact you using the details you have given above.*

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Reason for supporting or objecting:

A. Whitchurch Housing Requirement

We have consistently advocated a higher housing requirement for Whitchurch than that proposed in preceding versions of the SAMDev document. Whilst the principle of the higher requirement proposed at the Revised Preferred Options stage (increased from 1,000 to 1,200 dwellings) is supported, the proposed increase is not considered to be sufficient to meet the objectively assessed needs of Whitchurch.

The starting point for consideration of its housing requirement is the adopted Core Strategy, as acknowledged elsewhere within the SAMDev DPD. It requires that the **majority** of the housing (which Core Strategy Policy CS1 confirms as being between 5,500 and 6,050 dwellings) in NE Shropshire is accommodated in Whitchurch and Market Drayton with some accommodated in Wem and the remainder in the rural area. There is therefore a clear policy direction for Whitchurch to accommodate substantial development and make a significant contribution to housing requirement not only for NE Shropshire, but also to the overall requirement for the County.

The SAMDev makes provision for just 1,200 dwellings within Whitchurch, with the same amount in Market Drayton, and equates to a delivery rate below historic rates achieved in the town, despite the clear government imperative to boost housing delivery. This is a substantial reduction from the 1,800 – 2,000 proposed by the Council at Issues and Options stage and, the combined figures for these two settlements do not represent the level of housing envisaged for the North East Shropshire area. Indeed, the combined total for the settlements and rural area in this part of the County is c.3,400 and is between just 56% and 62% of the range required by the Core Strategy.

The range previously proposed for Whitchurch was determined by the Council's own evidence base which identified that it was the only settlement in North East Shropshire capable of accommodating a substantial level of housing growth. The figure now proposed is of significant concern and has apparently been reduced in light of objections from third parties and the Town Council rather than an evidence-based approach which seeks to plan positively to accommodate sufficient housing provision.

By failing to make suitable provision housing the SAMDev will prejudice the ability of Shropshire to meet the objectives and priorities contained within the Core Strategy which are unequivocal about the role of Whitchurch in supporting growth and contributing to achieving a sustainable pattern of development.

In order to address this deficiency provision must be made for a greater number of dwellings in Whitchurch as it is the largest and most sustainable settlement in NE Shropshire reflecting the requirement of the Core Strategy. It has a pre-eminent role in the North-East Shropshire sub-area and should receive a substantial amount of development.

Windfall Housing Allowance

The need for further sites to be allocated is particularly acute given the inclusion of a windfall allowance which represents around 14% of the overall housing requirement. The Framework enables LPAs to include an allowance for windfall sites within the 5

year housing land supply where there is **compelling evidence**¹. However, it does not make provision for such sites within development plans. Even if a windfall allowance was permissible, the LPA has not provided any evidence in the draft plan to support the allowance; as a consequence the SAMDev is clearly contrary to the Framework and exacerbates the likelihood that the plan will not deliver the level of housing required by the Core Strategy, thus failing to meet the objectively assessed housing needs of the County.

Further, the potential housing sites identified through the SHLAA are all outside the settlement boundary of Whitchurch, with the exception of part of the Alport Road allocation and some small sites. Relying on windfall sites outside the settlement boundary would potentially conflict with Policy MD3 as currently drafted.

Conclusion on the Housing Requirement

The current approach of the SAMDev is demonstrably contrary to the requirements of the Framework. It is not positively prepared, failing to include sufficient sustainable and suitable sites for housing to enable it to meet its identified needs with sufficient flexibility to respond to future changes, and relying on a substantial and unjustified windfall allowance, thereby prejudicing implementation of the Core Strategy and its ability to achieve its objectives. No evidence has been provided as to why the approach, which is also inconsistent with that of the adopted Core Strategy represents an appropriate strategy, and as such it is not justified. On this basis the SAMDev does not comply with national planning policy and it is expected that it would be found to be unsound if it were subject to examination.

It is of interest to note that Shropshire has recently published its latest housing land supply position statement. It demonstrates a shortfall (4.95 years), with c. 25% of the supply composed of proposed allocations. There is no evidence to suggest that a detailed assessment of the deliverability of the proposed allocations has taken place. The fact that allocations from the now superseded North-East Shropshire Local Plan have not been implemented in full provides a cautionary note that such sites are not guaranteed to be deliverable. This underlines the need to take positive action identifying additional sites and to bringing forward early development to address any shortfall as required by para. 47 of the Framework.

B. Omission of Land at Wrexham Road

Commentary on the land at Wrexham Road within the SAMDev Revised Preferred Options document confirms that one of the main reasons for its omission is the views expressed by local residents and the Town Council rather than an objective assessment of its merits; this is a misinterpretation of the concept of 'Localism'.

It is necessary to give weight to the assessment of the site undertaken by the Council as part of its evidence base. This confirms that the site has clearly established boundaries and a high capacity for housing due to its low landscape sensitivity; further technical information prepared by the site owner confirms the absence of any ecological, flood-risk, drainage or highway constraints.

The potential highway impact previously cited by the Council as a reason for removing / not allocating the site has already been assessed in the Transport

¹ National Planning Policy Framework paragraph 48

Assessment submitted with our representations at Preferred Options stage representations. That fully assessed the potential impact and confirmed that the highway network has sufficient capacity to accommodate development without adverse highway impact. Contrary to the commentary of the SAMDev Revised Preferred Options, the assessment also considered the issue of on-street parking along Wrexham Road in relation to its impact on traffic flow. It concluded that a negligible impact would result but nonetheless proposed a scheme which would result in improvements to traffic flow along Wrexham Road and which would provide added local benefit by calming traffic speeds.

This is consistent with the conclusions of the North Shropshire Local Plan Inspector who previously considered the site as a potential allocation. In considering highway impact he found *'no indication that Wrexham Road would not cope with additional traffic'* [Inspector's Report para. 13.131]

The site has previously been shown, through preparation of a development framework and assessment of the site and its context, to be a natural extension to the settlement with permanent and defensible boundaries, a position also recognised in the Council's Whitchurch Housing Sites Assessment document. It is well served by public transport and offers the potential for an increased population to support enhanced public transport services. It is already close to a number of local services and highway improvements to increase accessibility by pedestrians and cyclists will further improve the ability of future residents to use non-car modes of transport. It is free from technical constraints and represents a developable, sustainable urban extension which will make a valuable contribution to meeting Whitchurch's housing need (including affordable housing) which can be phased over the plan period as appropriate.

Part 5 of the Policy alludes to exceptional sites focussed on suitable land adjoining the development boundary, including land within the A41 by-pass to the west of the town. The land at Wrexham Road clearly fits this description and demonstrates that the Council envisages it as a potentially suitable housing site. It is considered that there is a compelling case for the site to be allocated, but if the site is not allocated to meet the development needs and strategic housing requirement set out in the adopted Core Strategy (see representations to policies MD1 and MD3). In the event that the site is not allocated, the SAMDev should take a more positive approach than currently provided by this part of the policy and identify it as a reserve housing site.

C. Assessment of Other Proposed Allocations

Oaklands Farm

This site forms part of a wider site assessed in The Stanley Beckett Partnership's representations submitted in December 2011. It was concluded that the development of the site would be visually prominent due to its position beyond the natural settlement boundary formed by the railway line and the absence of a strong defensible boundary. On this basis the site is not considered to be a suitable housing allocation.

Tilstock Road

This site has previously been rejected as a suitable housing site by the Council in its SHLAA; in assessing the site it concluded that there were significant access constraints; despite those comments, the draft Plan now proposes a significant increase in the housing numbers (from 300 to 500). Not only is this action contrary to the Council's own evidence base it also raises the prospect of an unacceptable highway impact. [We note that the Council suggests that highway constraints can be addressed through highway improvements, underlining the principle stated above that the Wrexham Road highway improvement scheme, is an appropriate response to any perceived impact on that route].

The Tilstock Road site presently forms an attractive approach to the southern edge of the town, as assessed in the Council's Landscape Assessment. It is understood that c.10 ha of the site is now proposed for housing, equating to an overall density of 50 dwellings per hectare. This is more characteristic of a tightly grained brownfield site in an urban area rather than a site on the edge of a settlement which adjoins open land uses and an area of open countryside. Such a dense development is likely to be detrimental to the character of this part of the town and presents a very real risk of a harmful visual impact.

A number of potential benefits of the development have previously been referenced by the Council in its Housing Sites Assessment document. However, it acknowledges that the delivery of new cricket, football and education facilities are dependent on external funding, rather than being funded by the delivery of housing. Clearly there is no guarantee that these facilities will be provided and as such limited weight should be placed on their delivery as a benefit that would support the development of this site.

In the absence of evidence to support the site as a proposed allocation it should either be omitted or reduced in scale.

Conclusion on Other Proposed Sites

The implications of the issues associated with the proposed sites is that there is a serious risk that the proposed housing requirement will not be met or it is proposed to be met on sites in a form which would result in detrimental environmental and / or technical impacts.

The need to allocate other and/or alternative sites, such as the land at Wrexham Road, which are demonstrated to perform well as potential housing sites and would not result in harmful impacts is reinforced.