
Emerging Local Plan Representation – Site Allocations and Management of Development (SAMDev) – Pre-Submission Draft Consultation

Prepared for Ms A G Mayall

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LDF Representation SAMDev Revised Preferred Options

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1. Introduction

The following representation is submitted on behalf of Ms A G Mayall in support of the identification of Harmer Hill as a community cluster/hub and the allocation of “Land to the East of Shotton Lane” (Appendix A) for development. This document sets out our comments regarding the emerging Shropshire Local Plan Site Allocations and Management of Development (SAMDev) Pre-Submission Draft Plan (March 2014).

This report should be read in conjunction with our previous representations submitted in 2012 and 2013 (commenting on the emerging SAMDev documents).

The report firstly provides an update on Harmer Hill’s established housing need which is required to be delivered in accordance with Paragraph 14 of the National Planning Policy Framework (NPPF).

The report then assesses how and where growth should be delivered, in particular around Myddle and Harmer Hill.

The results of this assessment are then concluded and a series of recommendations are set out to ensure that the SAMDev is found sound at Examination (Paragraph 182 of the NPPF).

2. SAMDev Pre-Submission Draft – Harmer Hill

2.1 Housing Need

This section sets out housing need, we consider, that Harmer Hill needs to deliver more houses than currently planned and consider that there is capacity to acceptably accommodate further growth around the settlement boundary.

Policy CS1 of the adopted Shropshire Core Strategy (2011) stipulates the need to deliver between 5,500 and 6,050 dwellings up to 2026 within the North East Shropshire Spatial Zone. However, at present, only a total of 3,465 dwellings are proposed for delivery in this Spatial Zone. This figure takes into account proposed dwellings identified for delivery within the area's 'Market Towns' and 'Key Centres' (Whitchurch, Market Drayton and Wem), 'Community Hubs' (of which there are eight identified) and also 'Community Clusters' (of which there are six identified). Therefore, at present, the identified number of dwellings to be delivered within North East Shropshire does not meet the housing needs of the area identified in the Core Strategy.

This leaves between 2,035 and 2,585 dwellings to be delivered in accordance with the adopted Core Strategy but which are not identified for delivery within the SAMDev Pre-Submission Draft. This is particularly pertinent since the SAMDev policies MD7a and MD7b contain a strong resistance to new build dwellings proposed within the Open Countryside, only allowing for conversion schemes and rural worker dwellings.

Therefore, to ensure that the SAMDev meets the Core Strategy policies, additional housing growth (between 2,035 and 2,585 new dwellings) needs to be identified within North East Shropshire.

To help deliver the shortfall, additional sites should be identified within the Spatial Zone. A strategy to achieve this would be to deliver additional site allocations within identified Hubs, Clusters, Market Towns or Key Centres.

2.2 Spatial Distribution

We have assessed where this additional growth should be met. We consider that the degree of growth already focused towards Wem (500) has probably been maximised and, arguably, should actually be less than that proposed. This is on the basis of community comments from last year's Revised Preferred Options Consultation (SAMDev Plan Publication March 2014: Consultation Statement). These highlight some proposed site allocations within Wem which are still subject to a notable degree of objection from the local community. Site Wem003a (Land Off Pym's Road) is proposed to deliver 100 dwellings and this is despite "many respondents, including the Town Council, remain concerned about the additional burden which they consider even this level of development (100 dwellings) will place on local services and facilities". Also, whilst the number of dwellings proposed at Wem012 (Land at Tilley) is reduced from 30 to 10 dwellings "the majority, including the Town Council, do not support the proposed reduction in the size of the proposed allocation for this site since the site is considered inappropriate for any scale of development due, principally, to flooding, traffic and sewerage issues". On this basis, we consider further growth focussed towards Wem would, most probably, meet strong resistance from the local community.

Turning to Whitchurch, the Authority proposed to allocate Land at Oaklands Farm (Whit051) for 60 dwellings and we note that the majority of responses to this site from last year's consultation did not

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support the proposed allocation. Of those objecting, specific reasons included concern about the use of this greenfield site ahead of other brownfield options in the town and that this particular site did not benefit from a northern defensible boundary. There was also concern about the impact this site may have on additional commuting through the town towards Chester and Manchester. On this basis, it is considered a likely scenario that putting forward additional growth at Whitchurch could meet resistance from the local community on the basis that the local community appear to have strong views about choosing brownfield sites, before greenfield sites and the impact on highways congestion. These concerns could be the same for other sites put forward if additional growth was focussed towards Whitchurch.

We therefore consider that the additional growth identified above should be shared equally between Market Drayton, Community Hubs and Community Clusters within the area.

We have undertaken an exercise to help identify how the additional growth should be apportioned, working on the basis of delivering a shortfall of the lesser value of 2,035. We firstly consider that Market Drayton could potentially have capacity to deliver a further 200 dwellings through site allocations. Accordingly, we consider that (on the basis of size and sustainability), around 70% of the remaining deficit (1,835 dwellings) could be sustainably apportioned between the community hubs which would mean that around 160 extra dwellings would need to be identified within the eight Community Hubs. We consider it is reasonable to apportion around 30% of the remaining deficit (1,835 dwellings) between the eight Community Clusters, considering their identification for further development, but not as much as the hubs when roughly dividing this total (550 dwellings) this would mean that around 91 new dwellings need to be identified within the six community clusters.

2.3 Housing Strategy – Myddle and Harmer Hill Community Cluster

This section considers sites around Myddle and Harmer Hill to draw conclusions on where further growth should be identified.

The Authority proposes to deliver approximately 50 dwellings within Myddle and Harmer Hill over the plan period and, as 33 dwellings are already “committed”, this would allow for a further 20 dwellings.

We are also aware that planning permission has very recently been granted for six dwellings on Land Adjacent to Orchard House (13/04939/OUT), thus bringing the level of “commitments” up to 39 dwellings.

However, as highlighted within our consultation response last year, a proportion of these identified dwellings were granted consent back in 2010/early 2011 and have therefore now expired, requiring fresh planning applications to be submitted (a total of seven dwellings). On this basis, we consider that only 32 dwellings can be confirmed as firm commitments meeting the dwelling target, still leaving 18 dwellings to be identified within the cluster to, at the very least, meet the Parish Council’s growth target.

The Pre-Submission Draft states that “no specific site allocations are proposed in the cluster settlements and development should take the form of individual groups of housing as infill development within the development boundaries of both settlements”. We wish to re-highlight to the Authority the need to be certain that around 20 dwellings can realistically be delivered in this way and from our review last year of potential infill sites within the cluster we concluded that the capacity for

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further infill development is very questionable and around a figure of five dwellings is probably a more realistic figure to propose for delivery through infill/windfall development (i.e. bringing the level of housing we accept as arguably deliverable to 23 dwellings).

We consider it is important to highlight that whilst the consultation responses gained last year state that the majority support this proposed target of 50 dwellings, “some respondents consider this to be too low citing the fact that responses to recent community led plans show that there is a level of community support for over 50 dwellings and for development around the edge and beyond the current development boundary”. This indicates support within the community for further growth within Myddle and Harmer Hill.

Also, whilst the Parish Council opposed the development of the Land Adjacent to Orchard house within their consultation response, they stated that “the Parish Council would like to underline that it is not unreasonably opposed to development per se, it can demonstrate that it is well on its way to meeting its target of 53 houses but is increasingly conscious of the need to leave scope for further balanced development later in the period. To this end, we would underline that any development must also show real community benefit and/or need”.

This section shows that new housing sites need to be identified within Harmer Hill/Myddle to even be able to meet the current identified level of growth.

This indicates that further land identified for proposed allocation within the SAMDev has the potential to gain some level of support and it appears that the Parish Council are not adverse to additional future development within the cluster where real community benefits are provided.

3. Harmer Hill – Proposed Sites

The Authority have still not yet undertaken an assessment of potential development sites around Harmer Hill or Myddle (they are not included within the 2014 SHLAA). We still consider it is unacceptable for the Authority to not consider the future scenario that development will need to be delivered outside these existing settlement boundaries. If the identified level of housing is not delivered by infill, windfall or current commitments within the settlements (as demonstrated above to be very likely), the Authority have no alternative strategy to deliver the required housing growth which could result in the SAMDev being found unsound on the basis that the plan will not be deliverable (i.e. effective as considered against reasonable alternatives) nor based on a strategy which meets development requirements.

4. Conclusion

Overall, the above demonstrates that, at the very least, 27 dwellings still need to be identified to be delivered with Harmer Hill and Myddle to meet the Parish Council's growth aspirations (53 dwellings). We have also demonstrated that a much higher degree of growth needs to be identified within the cluster of Harmer Hill and Myddle to meet the wider housing needs of the North East Shropshire Spatial Zone (at least approximately 91 new dwellings).

Accordingly, to help the Authority meet its housing needs, we continue to put forward a site directly adjacent to Harmer Hill which is acceptable for development as it presents a logical extension to the settlement. It relates well to existing amenities within the area, it is not subject to any particular biodiversity or land quality designations and highways access is thought to be achievable. Importantly, the site could also be delivered as a mixed use scheme which incorporates elements of community development in line with the Parish Council's aspirations (as indicated in Section 2). A full reasoning for the site's acceptability for development is set out in Appendix B and vision for how the site could be developed in Appendix C. We wish to invite comment from the Parish Council on the vision.

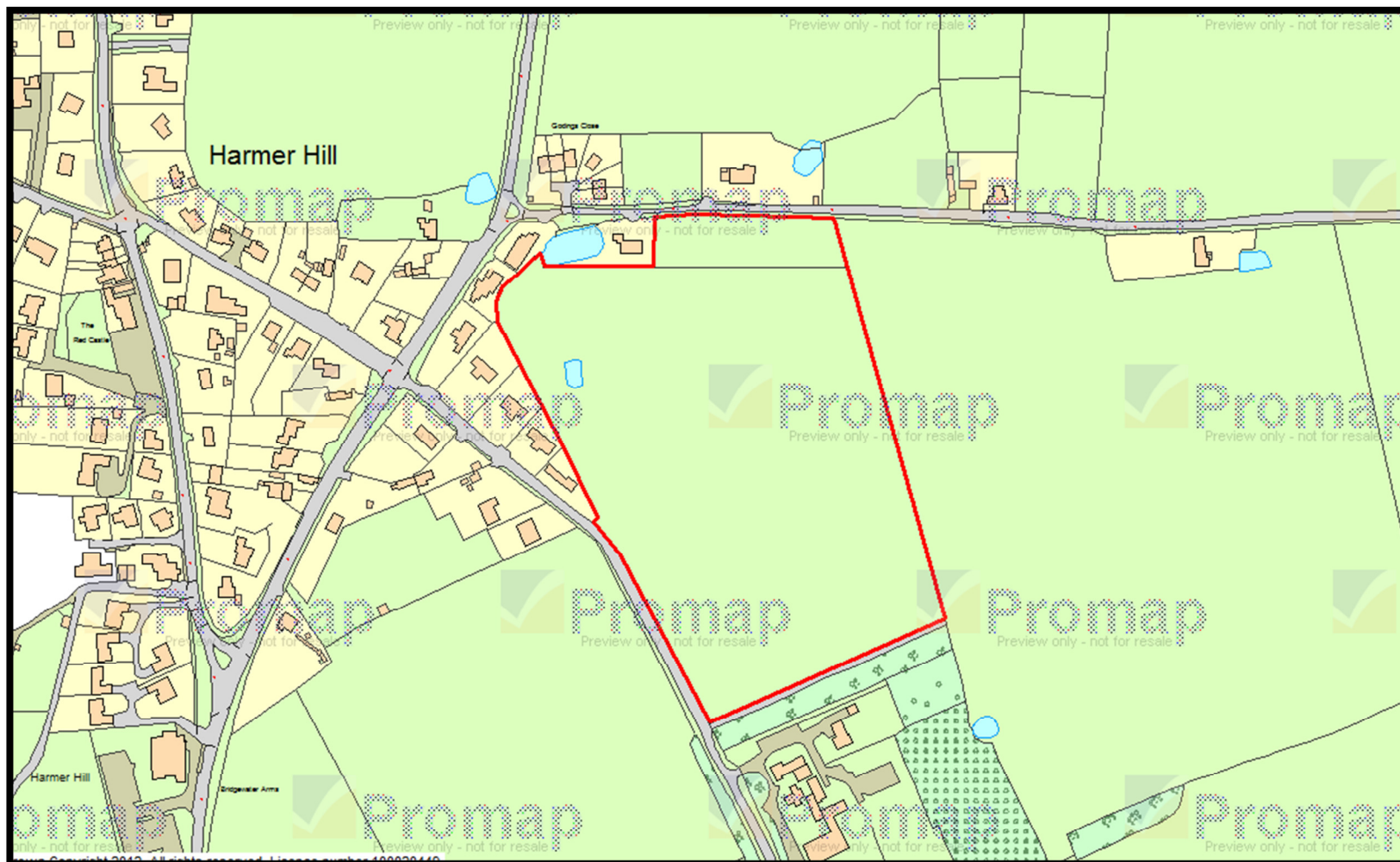
Overall, if the Authority do not change the current proposals for the Harmer Hill and Myddle cluster, we believe there is a considerable risk of the SAMDev being found "unsound" at Examination. This is on the basis (in accordance with the NPPF) that it will not be:

- (a) positively prepared (i.e. it will not be based on a strategy which seeks to meet objectively assessed development requirements);
- (b) effective (i.e. it will not be deliverable over its plan period); and
- (c) justified (i.e. the most appropriate strategy based on reasonable evidence).

Accordingly, we trust that these comments will be taken on board and the Pre-Submission Draft SAMDev amended before formal submission for Examination.

APPENDIX A

LAND AT HARMER HILL



APPENDIX B

Land to the east of Shotton Lane

Description

The site lies east of Shotton Lane and south of Godings Lane, comprising a greenfield parcel of land. Whilst the northern section directly abutting Godings Lane is recreation land the remainder is a surplus field with no specified purpose.

The site visually slots into the heart of Harmer Hill and is only 330 metres from the Bridgewater Arms and Premier Inn, and 220 metres from the Red Castle. There is also a bus stop 220 metres from the site which provides regular and direct services to Ellesmere and Shrewsbury. Therefore in terms of accessibility to local services and public transport this site is a wholly sustainable location for new housing. The site would provide a link between Harmer Hill and the residential development at Shotton Hall.

It is considered that suitable highways access from the site could be used from Shotton Lane or possibly Godings Lane.

The current owner of the proposed site recognised some time ago that there was a lack of amenity in the village of Harmer Hill for young people. She therefore made the land to the north of the site adjacent to Godings Lane available as a recreational area. This area is not well used and this raises the possibility to improve the amenity as part of any potential development.

Planning Policy Assessment – National Planning Policy Framework

This section considers the site identified above against the newly adopted National Planning Policy Framework.

The NPPF requires Local Authorities to “positively seek opportunities to meet the development needs of their area”.

At the heart of The NPPF is “the presumption in favour of sustainable development” (Paragraph 7) and in compliance we set out how the sites comply with each sustainability “pillar” below;

- i) **A social role;** Potential housing development at the proposed site will contribute towards the local housing supply, and help balance its population. Considering the site will directly adjoin the existing village, resultant development will be highly accessible to and from all local facilities and amenities. The site will overall deliver a sensible degree of growth which compliments and adds to the vitality and vibrancy of the existing community.
- ii) **An economic role;** The site will allow for a mix of uses including live/work developments which allow for sustainable work patterns, as well as supporting its local services, thus contributing towards a strong rural economy at Harmer Hill.
- iii) **An environmental role;** The site presents the opportunity to achieve a carbon zero development which is built to the highest standards of sustainability, with dwellings reaching Code for Sustainable Homes Level 6 (i.e. zero – carbon) and any employment spaces attaining the highest BREEAM standard. Through sympathetic and high quality design, development at the site will compliment and protect the natural environment, seamlessly integrating into the village.

Housing

The NPPF specifically commands Local Authorities to ensure that new developments “respond to local character and history and reflect the identity of local surroundings” (Paragraph 58).

As a solution, “Land to the east of Shotton Lane” could deliver circa 30 dwellings which are within walking distance from all village amenities, and spatially connect into and “round off” the village boundary in line with the NPPF (Paragraph 58 and 52).

In full compliance with Paragraph 47, we can confirm that development at the site can be achieved within the next 5 years as its deliverability is not hindered by complications such as land ownership issues, remediation/site clearance exercises, or highway infrastructure requirements etc.

It is also important to note that the NPPF not only requires Authorities to achieve a 5 year housing land supply, but now also demands an “additional buffer of 5%”. As the Core Strategy was adopted prior to the NPPF, we anticipate that the Authority have not built in this “buffer supply”. This consideration adds more justification as to why the site should be allocated within the SAMDev for it to be found sound at Examination (i.e. to meet housing need).

The NPPF recognises that the “supply of new homes can sometimes be best achieved through planning for larger scale development such as extensions to existing villages” (Paragraph 52). We consider that the site represent logical extensions to Harmer Hill as it directly adjoin the existing built boundary.

Desktop Physical Constraints Assessment

This section, considers the proposed site against the following criteria; landscape and visual impact, Local Plan designation, access, recreational/community value, other environmental considerations and availability.

Landscape and Visual Impact

The proposed site would naturally link into built development at Harmer Hill, essentially rounding off its edges. The site is visually enclosed along all its boundaries by mature trees and hedgerows. It is also envisaged that mitigation planting and sensitive design can dissolve any perceived harmful impact.

Local Plan Designation

Under the saved policies within the Local Plan the site is within the open countryside but adjacent to the existing village. Importantly the site is not included within the Green Belt.

Whilst part of the site is a designated recreation area, it is envisaged that this space can be retained and reconfigured through the comprehensive development of the site.

Access

Access can be taken from Shotton Lane or possibly Godings Lane. Given that access to this site would be from smaller B roads it is considered to be considerably safer than access for other sites off the A528 which is a notoriously fast road, posing risks for highway safety and accidents.

Other Environmental Considerations

The site is not within an identified Flood Risk area and being greenfield in nature is unlikely to have any contamination or remediation limitations. Furthermore, the site is not constrained by trees or ponds etc.

Availability

We can confirm that the site is currently available for development.

The above assessment confirms that no development constraints are thought to be present at the site.

APPENDIX C

Vision

Our vision is to allow for Harmer Hill's natural extension at the eastern extent of the village. By allowing for managed housing growth at this side of the village, development would naturally reflect and balance the settlements character and built form. In terms of tangible benefits to the community, the sites' development would help rebalance the population, support the rural economy and local services and provide the opportunity for the settlement to become a flagship pioneering eco-village

The site "land east of Shotton Lane" provides the opportunity to deliver a sustainable and integrated mix of zero carbon dwellings, outdoor recreation space and allotments.

Meeting local resident's aspirations for the area, the scheme would include a mix of affordable housing, open market dwellings and bungalows and a range of 1 – 4 bedroom properties. By achieving a mix of tenure and sizes, this would help improve the sustainability of the settlement and provide housing which is naturally affordable for young people to be able to access the local housing market. A scheme could also incorporate a level of community infrastructure to benefit the wider village.

Collectively an "eco" quarter of the village could be created which cohesively ties in with the existing village. It would deliver a new 21st Century development which shows of its eco credentials, paves the way forward for sustainable rural living, unites the community and creates a unique sense of space.