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

Prepared for The Trustees of Ellesmere Estate

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1. Introduction

This report is further to previous representations submitted on behalf of The Trustees of Ellesmere Estate in support of the identification of Cockshutt as a settlement where future growth should be delivered and the allocation of sites around the settlement for residential development (referred to as 'Land to the South West of Cockshutt' (Site CO002A) and 'Land to the South East of Cockshutt' (Site B), 'Land to the North of Cockshutt' (Site C) and 'Land to the North East of Crosemere Road' (Site D)).

This document sets out our comments regarding the Emerging Shropshire Local Plan Site Allocations and Management of Development (SAMDev) Pre-Submission Draft (March 2014).

We firstly provide a statement on Cockshutt'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 where growth should be delivered around Cockshutt focusing on the Authority's current proposed sites and considering the remaining sites above.

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

2. SAMDev Pre-Submission Draft – Cockshutt

2.1 Housing Need

This section sets out housing need and proposed delivery within Cockshutt.

We consider that Cockshutt needs to deliver more houses than currently planned and deem that there is further capacity to acceptably accommodate additional growth around the settlement boundary than currently planned.

Policy CS1 of the adopted Core Strategy (2011) stipulates the need to deliver between 5,775 and 6,325 new dwellings within the North West Shropshire Spatial Zone.

However, at present, a total of 4,393 dwellings are proposed for delivery in the North West Shropshire Spatial Zone. This figure takes into account proposed dwellings identified for delivery in the area's Market Town and Key Centres (Oswestry and Ellesmere), Community Hubs (of which there are eight identified) and also Community Clusters (of which there are nine identified). Whilst

this level of identified growth is an increase from last year's SAMDev Revised Preferred Options Consultation (July 2013), it does not go far enough to achieve the housing needs for North West Shropshire identified in the Core Strategy.

This leaves between 1,382 and 1,932 dwellings to be delivered in accordance with the adopted Core Strategy and 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 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 1,382 and 1,932 new dwellings) needs to be identified within North West Shropshire.

To help deliver this shortfall, additional sites should be identified within North West Shropshire and a strategy to achieve this would be to deliver additional site allocations within identified Hubs, Clusters, Market Towns or Key Centres.

We have assessed where this additional growth should be met. We consider that the degree of growth already focused towards Ellesmere (800 dwellings) and Oswestry (2,600 dwellings) has been maximised. In addition, considering the relative size and environmental constraints (for example, flood risk), it is unlikely that they have capacity to accommodate further growth. The approach should, therefore, be to share the deficit of dwellings (between 1,382 and 1,932) amongst the new SAMDev area's Hubs and Clusters. For the purposes of defining how much growth should be directed to the Hubs and Clusters we have first identified a mid-range of dwellings of 1,657 required for delivery (halfway between 1,382 and 1,932 dwellings). Dividing this required number between the Hubs and Clusters results in delivery of 97 dwellings per Hub and Cluster. However, due to the sustainability and size of the identified Hubs, a high proportion of this surplus number of dwellings should be identified within these identified settlements.

We consider that the hub of Cockshutt should accommodate a proportion of the required 1,657 dwellings (more than 97 dwellings). We assess below where additional growth within this Hub is best achieved.

2.2 Community Hub – Cockshutt

This section examines where the identified and surplus growth should be focused in and around Cockshutt. The beginning part of this section specifically reviews the Authority's current proposed allocation sites which remain unchanged since last year's SAMDev Revised Preferred Options Consultation (2013). The second part of this section then provides a consideration of other sites around Cockshutt and their acceptability for development.

3. Cockshutt – Proposed Allocation Sites

Reflecting last year's SAMDev Consultation, the Authority are still proposing to allocate five sites on the western side of Cockshutt for residential development. These comprise:

- Land to the West of Cockshutt (CO002A and CO002B) – proposed to deliver five dwellings each.
- Land at Cockshutt House Farm (CO005) and Land South of Kenwick Road (CO023) – proposed to deliver five dwellings between the two sites.
- Land South of Chapel House Farm (CO018) – proposed to deliver five dwellings.

3.1 Land to the West of Cockshutt

We continue to support these sites for residential allocation on the basis that:

- they score positively for access to a primary school, public transport, amenity green space and children's play area;
- highways access can be easily achieved (we trust that access for CO002A is deemed acceptable by the Authority from either the A528 or from The Parklands);
- they are relatively flat with some undulation to aid natural drainage;
- landscape impact is considered to be minimal since there are existing clear boundaries to the site (for example, a sandstone wall at the public house car park boundary and mature tall hedgerows);
- they meet the Parish Council's aspirations for new development to be located to the west of the A528 (Shrewsbury Road);
- the sites are not adjacent to, or within, a buffer zone of a designated site;
- no watercourse flooding has been recorded and no flood events have been reported by members of the public. Neither of the sites are within Flood Zones 3a or 3b.
- no part of the sites are susceptible to surface water flooding; and
- the sites have been generally supported throughout the SAMDev Consultation process which has been conducted over the last few years.

(Source: SAMDev Plan Pre-Submission Draft Cockshutt Housing Site Assessments, 2014).

However, we do maintain that additional growth can be achieved on site CO002A (over five dwellings). The reasoning for limiting development to five dwellings is a Parish Council aspiration for all developments and we also note the Parish Council's requirement to protect Jubilee Field and the playing field. We can confirm that a larger area around CO002A could be developed whilst still protecting the playing fields and we highlight that the majority of comments received about development in the village stated that CO002A/B should be allocated for 10-15 houses. Therefore, to achieve this aspiration, at the very least five additional dwellings need to be incorporated into the site allocations at CO002A and CO002B or on one of the sites. On the basis that CO002A is closer to existing amenities and facilities in the village, this would be the logical site. *(Source: Pre-Submission Draft March 2014 Consultation Statement).*

3.2 Land at Cockshutt House Farm and Land South of Kenwick Road

As expressed within previous consultation responses, we do not expressly object to these proposed allocations, considering that these sites are adjacent to the settlement boundary and are free from physical constraints or designations.

However, we note that the two sites are together allocated to deliver five homes (i.e. across the two sites). We are uncertain as to whether these two sites are within separate or the same ownership. Under the former scenario, the deliverability of five dwellings across the two sites could become questionable as an acceptable agreement between the two landowners would first be required for which there is no certainty that this will be achieved. Indeed, if site CO023 did not come forward for development then the five dwellings might not be achievable at CO005 since it is relatively small (0.2 hectares).

We also feel it prudent to highlight that these sites scored “negatively for access to four key amenities and facilities within the village” (*Source: SAMDev Plan Pre-Submission Draft Cockshutt Housing Site Assessment*). On this basis, we consider that, for sustainability reasons, development proposed on these sites would be better focused to a larger area around and including site CO002A, which is the closest site to existing amenities within village. Moreover, the “south west boundary of site CO023 is not defined and there is open countryside beyond” (*SAMDev Plan Pre-Submission Draft Cockshutt Housing Site Assessment*). By having undefined boundaries, this could logically lead to the site’s future expansion which the Authority may find difficult to resist on the basis that further development would then link into the existing village.

Overall, we consider that there are more preferable sites for development located closer to existing amenities within Cockshutt.

3.3 Land South of Chapel House Farm

We maintain that we do not object to this site’s allocation overall, considering its location adjacent to the existing settlement boundary. However, we do have some concerns regarding this site.

Within last year’s consultation response (to the Revised Preferred Options), we noted that consultation responses to this site highlighted concerns such as highways and pedestrian safety at the access point onto the A528, as well as a lack of continuous pavement to the village centre. We highlighted that these concerns do not appear to have been sufficiently addressed by the Authority and, likewise, this year, these concerns remain apparent. The March 2014 Consultation Statement notes that “the Parish Council would like extra information regarding highway and pedestrian safety” and “a similar issue regarding a lack of a continuous pavement to the village centre” was raised.

We also wish to re-highlight that this site “scored negatively for access to a primary school, public transport and a children’s play area” (*Pre-Submission Draft Cockshutt Housing Site Assessment*). This result is not surprising considering the site’s location at the very south of the settlement and on this basis, from a sustainability perspective, that the proposed development of five houses on this site would be better relocated for delivery further north (for example, around site CO002A which is closest to existing amenities and facilities).

3.4 Other Sites

Upon reviewing the Site Assessment Interactive Map (which shows SAMDev sites considered for allocation), we were disappointed to see that some of the sites we have previously put forward for allocation within consultation responses have not been expressly reviewed by the Authority (i.e. sites C and D in Appendix A).

We consider that if the Authority had reviewed these sites, they would have been considered acceptable for residential development, considering their location adjacent to the existing settlement boundaries of Cockshutt and being free from environmental constraints. We consider that site

CO002D is particularly acceptable for residential development on the basis that it links into the heart of Cockshutt and is a suitable walking distance from the settlement's main amenities and facilities.

Whilst we acknowledge the Parish Council's aspirations for new development within the village to be kept to the west of Cockshutt, it is important that new development is equally balanced around the village to help minimise landscape impact from the west and to make sure that potential highway congestion is minimised. Spatially, development at site D (Appendix A) would be in a more sustainable location than site CO018, considering its closer proximity to existing services and amenities.

The Authority states that, beyond the proposed site allocations, a further 30 dwellings will be delivered through infilling, conversions and small groups (up to five dwellings) on suitable sites within the development boundary identified on the Policies Map.

We support the inclusion of part of site D (see Appendix A) and part of site CO002A (Appendix A) (adjacent to The Leaking Tap public house) within the development boundary. These sites are acceptable for development on the basis that they are included within the existing built line of Cockshutt, are considered to have acceptable highways access and have potential to deliver a small group of dwellings which contribute to the sustainability of Cockshutt.

3.5 Conclusion

Whilst we do not expressly object to the housing allocations proposed within Cockshutt, site CO002A is clearly the most sustainable on the basis that it is closest to existing amenities and facilities around Cockshutt. There are, therefore, advantages to relocating some of the growth identified further south of the village to a larger CO002A site. These include the ability to deliver a larger strategic site which is underpinned by new community infrastructure, increased assurance of housing delivery (as the housing strategy for Cockshutt would be reliant on single and not multiple ownership) and the capacity to deliver a wholly inclusive scheme of mixed tenure so a range of people (i.e. age group) can live within the same site side-by-side. In terms of delivering the remainder of Cockshutt's housing strategy, we support the Authority's inclusion of parts of site D and CO002A (Appendix A) within the development boundary (i.e. sites where future housing would be deemed acceptable in principle). These sites will realistically contribute to the area's housing needs at small sustainable sites.

We do, however, request that the Authority formally assesses sites B, C and D (within Appendix A). If this exercise is not undertaken, there is a real risk that the SAMDev will be found unsound at Examination on the basis that it will not be justified (i.e. the most appropriate strategy based on reasonable alternatives) (Paragraph 182 of the NPPF).

4. Conclusion of Housing Need and Site Acceptability

We have highlighted that an additional number of houses (approximately 1,657) needs to be identified within North West Shropshire to deliver the proposed level of housing stated within the Core Strategy. Whilst the level of additional growth that Oswestry and Ellesmere could deliver is restricted, the Hubs and Clusters within North West Shropshire in principle have more capacity to deliver this surplus. Therefore, dividing the surplus of 1,657 dwellings evenly between the eight Hubs and nine Clusters results in the need deliver 97 dwellings per Hub and Cluster. We consider that, due to their size and sustainability (in terms of facilities and amenities), this number should be higher for the Hubs in comparison to the smaller Clusters.

In terms of identifying acceptable sites within the hub settlement of Cockshutt, the Authority needs to select those sites which are closest to existing facilities and amenities within Cockshutt and only then consider other sites which relate well (spatially) to the existing settlement boundary. On this basis, we support the proposed allocation of site CO002A, as this is the closest site to existing amenities and facilities. Whilst we do not have major objections towards the other proposed allocations within Cockshutt, it would be more sustainable and potentially more deliverable to redirect some or all of the identified growth to site CO002a. There are also other sites highlighted in Appendix A which are as sustainable, as those being preferred by the Authority and, together with the identified sites, these should be allocated to meet North West Shropshire's housing needs.

Fundamentally, if additional sites are not identified the SAMDev will be found unsound at Examination on the basis that it does not meet objectively assessed development requirements (i.e. positively prepared), it is not the most appropriate strategy when considered against reasonable alternatives (i.e. justified) and not deliverable (i.e. effective) (required by Paragraph 182 of the NPPF).

Within Appendix B we have set out a vision of how sites CO002A, B, C and D could come forward in terms of housing delivery which highlights that sites A to D present scope to deliver a sustainable and integrated mix of zero carbon dwellings, live/work business space, a multi-purpose community building and outdoor recreation space.

Accordingly, we trust that the Authority will take this representation into account and amend the Pre-Submission Draft before formally submitting for Examination.



APPENDIX B

Vision

This section proposed four sites which should be allocated for development on the basis of the report's conclusions (i.e. to meet North West Shropshire's housing needs) (Appendix A) and the sites deliverability being within single ownership.

Site A

Part of site A is already identified for housing, however we consider a larger area should be included within the allocation. This could either connect the identified sites CO002a and CO002b to deliver a well thought through scheme (instead of piecemeal development) or alternatively a third site could be identified in accordance with the SAMDev Preferred Options, 2012. A larger/additional site could be identified for development whilst protecting the playing fields from development.

Site B, C and D

All sites connect into built development at Cockshutt, none are located within the Green Belt and have hold any recreational/community value. We consider that acceptable access can be achieved for all sites and can confirm that all are available for development within the short term.

Despite these sites advantages they do not appear to have been formally considered by the Authority which is surprising and indicates that a rigorous process of site identification for allocation has not been followed.

Overall sites A-D presents scope to deliver a sustainable and integrated mix of zero carbon dwellings, live/work business space, a multi-purpose community building and outdoor recreation space.