



# Appendix B.8. Shropshire Council- Local Plan Review- Preferred Sites Consultation

Ellesmere

Shropshire Council

28 May 2019



### Notice

This document and its contents have been prepared and are intended solely as information for Shropshire Council and use in relation to analysing and summarize the consultation responses from the recent Preferred Sites Consultation and to provide a number of key deliverables to support the Council in moving forward the review of the Local Plan.

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This document has 12 pages including the cover.

#### **Document history**

Revision	Purpose description	Origin- ated	Checked	Reviewed	Authorised	Date
Rev 1.0	Draft Ellesmere	NC	BN	VD	VD	25/04/2019
Rev 1.0	Final Ellesmere	NC	BN	VD	VD	28/05/2019

#### **Client signoff**

Client	Shropshire Council	
Project	Appendix B.8. Consultation	Shropshire Council- Local Plan Review- Preferred Sites
Job number	5188227	
Client signature / date		



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### Introduction

Following approval from Cabinet on the Shropshire Council Preferred Sites Consultation, consultation documents for this third stage of the Local Plan Review were published on 29th November 2018 and the consultation ran till the 9th February 2019.

This stage of consultation sought views from all parties on the Preferred Sites Consultation in Shropshire for the period 2016-36.

Specifically, the consultation sought views of all parties with an interest in the preferred development strategy and sites in these identified locations, so that relevant views and evidence can be taken into account in deciding the best way forward. The Consultation Document:

- Outlines a housing policy direction to improve the delivery of local housing needs;
- Establishes development guidelines and development boundaries for Shrewsbury, Principal and Key Centres and each proposed Community Hub;
- Sets out the preferred sites to deliver the preferred scale and distribution of housing and employment growth during the period to 2036;

The responses will be used to inform the preparation of the further development of the Local Plan Review. This document summarises the key issues raised by respondents to the consultation in Ellesmere.



### 1. Overview

This report provides a summary of the consultation comments in response to the Ellesmere Place Plan Areaspecific questions posed as part of the Shropshire Local Plan Review Preferred Sites Consultation.

The following sections set out the analysis of the qualitative comments from the consultation. Question 3 and 4 sought views on the delivery of local housing need, question 5 and 6 sought views on windfall development. The key issues and concerns raised in response to these questions by consultees that responded to Ellesmere-specific questions are summarised in Sections 2 and 3.

There were four questions specifically relating to the Ellesmere Place Plan Area, the responses to these questions are summarised in Section 4. Section 5 summarises the other comments raised by consultees that responded to Ellesmere-specific questions.

A total of 59 consultees responded to these questions.

The quantitative assessment of the comments is set out in Appendix A.

### 2. Delivering Local Housing Need

#### 2.1. Question 3

Question 3 sought views on whether Shropshire should introduce a cross subsidy exception site policy allowing an element of open market housing to 'cross subsidise' affordable housing on the same site which would otherwise be unviable.

Of the responses received to this question from respondents interested in the Ellesmere Place Plan Area, the majority supported a cross-subsidy exception site policy, with the most common reason being that it would encourage the provision of affordable housing in rural locations. Other respondents supported the policy because it would encourage a greater mix of dwelling and tenure types. One respondent, representing a housebuilder, suggested the need for a greater provision of owner-occupied affordable housing defined as housing sold at 20% lower than market value. Two responses from a planning consultant representing two different clients supported the policy but doubted whether exception sites could contribute to strategic housing need. The same respondents also suggested a similar policy for custom and self-build housing.

Few responses were received from respondents who disagreed with the Council's exception site policy. A response from Hordley Parish Council supported the principle of the policy but expressed concern that, in practice it would encourage inappropriate development that would be approved on appeal. The respondents who checked 'didn't know / no opinion' did not provide any comments.

#### 2.2. Question 4

Question 4 sought views on whether respondents preferred (subject to viability assessment) if the development mix should be assessed on a site by site basis; or a set development mix, which would be geographically defined and subject to the findings of a viability assessment undertaken as part of the Local Plan Review, should be utilised.

The majority of responses received to this question from respondents interested in the Ellesmere Place Plan Area supported a site by site assessment with nearly all comments referring to the flexibility this approach would bring; accounting for geographic variations and 'one-off' site costs.

Some respondents supported a set development mix, of which, two respondents from the same organisation favoured the simplicity, transparency and certainty of this approach. Both respondents suggested a development mix with three areas, 10%,15% 20% – the highest open market being the 10% area to reflect the three areas of affordable housing.



### 3. Windfall Development

#### 3.1. Question 5

Question 5 sought views on whether respondents thought it was appropriate for some settlements to include a windfall allowance to help deliver their housing guidelines.

The responses to this question from respondents interested in the Ellesmere Place Plan Area demonstrated an even mix of support and objection. Only one respondent who supported the inclusion of the windfall allowance provided a comment. While they supported the proposal, they requested a geographical definition of the distance windfall sites can be from the development boundary; expressed concern with the feasibility of achieving windfall delivery rates from the 80's and 90's and queried the deliverability of windfall allowances without compelling evidence from the Council in reference to NPPF paragraph 70.

The respondents who disagreed with the inclusion of windfall allowances in housing guidelines cited the lack of remaining windfall sites in Ellesmere and opposed using windfall numbers to artificially inflate the 5 Year Housing supply when they are unlikely to comply with the NPPF delivery test requirements.

#### 3.2. Question 6

Question 6 sought views on whether respondents thought it was appropriate for some settlements to include a windfall allowance to help deliver their employment guidelines.

Almost half of the responses to this question from respondents interested in the Ellesmere Place Plan Area supported a windfall allowance; although, no specific comments were provided. One respondent who disagreed with the proposal stated that employment land requires forward planning and infrastructure to enable development, allocating sites provides more certainty to landowners to invest.

### 4. Ellesmere Place Plan Area

#### 4.1. Question 20 (a)

Question 20 (a) sought views on whether respondents agreed with the preferred housing and employment guidelines for Ellesmere. The majority of respondents did not know or had no opinion.

A range of comments were received from those who disagreed. Two respondents questioned the viability of previously allocated sites such as the proposed Marina South of Canal Way due to flood risk concerns and offered alternative sites they consider to be more suitable. One respondent stated that they believed that housing targets were above need and should be reduced by 10%, but that employment levels were correct.

Other respondents wanted higher housing guidelines with 160 dwellings (net) being the minimum figure due to Ellesmere being the 8<sup>th</sup> most sustainable settlement in Shropshire, and argued that the assessed levels of market housing demand were underestimated. Alternative housing guidelines were proposed including 850 dwellings (gross) accounting for a 50 dwelling windfall allowance comprised of infills and conversions. One respondent proposed a guideline figure of 1000 dwellings (gross) based on 109 households seeking affordable housing in Ellesmere and a 10% affordable housing target. No comments were received from those who agreed with the proposed guideline and no one commented on the proposed employment guideline.

### 4.2. Question 20 (b)

Question 20 (b) sought views on whether respondents agreed with the proposed development boundary for Ellesmere. The majority of respondents did not know or had no opinion.

Several respondents indicated that Ellesmere's development boundary should be redrawn to include current developments under construction and additional sites suggested by respondents. Several plans with redrawn boundaries were submitted to accompany this. None of the comments suggested that the development boundary should be tightened but one respondent considered development boundaries outdated and responsible for suppressing housing supply. Other responses suggested that development was too concentrated in one location putting too much pressure on infrastructure. Respondents supporting the development boundary did not provide any comment. One respondent suggested greater consideration of superficial deposits, sandstone resources and groundwater issues in the allocation of sites (including for a cemetery).



#### 4.3. Question 20 (c)

Question 20 (c) sought views on whether the respondents agreed with the preferred housing allocation ELL005 in Ellesmere. The majority of respondents did not know or had no opinion, but few comments were provided. One response questioned whether potential surface water run-off into Newnes Brook had been considered, suggesting de-culverting.

Several respondents disagreed with the preferred site allocation for various reasons. One respondent stated that the site should preserve land for the adjacent Lakelands Academy to expand.

Three respondents expressed concern that both proposed site allocations were directed in the south western corner of the town and this would limit choice in the housing market. Two of these respondents also wanted to see more small sites allocated for development because this would encourage competition in the housing market and they were deemed more deliverable than ELL005. Technical issues with the site allocations were also identified, in particular visual sensitivity to the Shropshire Union Canal. Both respondents provided details of alternative sites.

One respondent suggested use of the site for the pursuit of measurable net gains for biodiversity.

#### 4.4. Question 20 (d)

Question 20 (d) sought views on whether the respondents agreed with the preferred housing allocation ELL008 in Ellesmere. The majority of the respondents indicated they did not have an opinion or did not know. Of those that expressed an opinion other than that they did not know, the majority supported the proposal. The comments received for this question were identical to 20 (c). Respondents asked for more small sites to be allocated as they were deemed more deliverable than ELL008. Concerns were also raised that ELL008 concentrated development in the south western corner of Ellesmere at the expense of choice in the housing market. The same technical issues to ELL005 were also cited.

One respondent suggested use of the site for the pursuit of measurable net gains for biodiversity.

### 5. Further Information

#### 5.1. Question 63

Question 63 sought views on whether respondents thought any additional 'Community Clusters' to those identified within the Preferred Sites Consultation should be formed or any of the existing 'Community Clusters' should be removed.

The majority of respondents to this question, who were intertesed in the Ellesmere Place Plan Area, identified several Community Clusters to be added whereas no respondents suggested any Community Clusters to be removed. Several respondents did not want any Community Clusters to be added and re-emphasised support for the proposed designations in the consultation document.

In terms of additional Community Clusters, Cockshutt was identified most frequently by respondents. A response from Cockshutt Parish Council indicated that they are considering 'opting-in' subject to more detail. A survey was attached to one consultation response, indicating the support of local residents for further development.

One response highlighted a recent development which took ten years to complete and has detracted from the village's character. To avoid a similar situation, respondents suggested they would like more focused development through Community Cluster designation rather than relying on exception sites.

A response was submitted disagreeing with the village survey and calls for Cockshutt to become a Community Cluster. Others suggested Community Clusters included Welshhampton, Tetchill and Gladlas.

Three respondents who supported additional Community Clusters without mentioning specific places, expressed the viewpoint that the Community Clusters should be identified by Shropshire Council Officers rather than by Parish Councils. The response suggested that optional Community Cluster designation has restricted potential development opportunities in South Shropshire.

Dudleston Heath and Elson received three responses supporting their inclusion as Community Clusters and two responses stating that Dudleston Heath should be a Community Hub with one response asking for Elson to be separated.



#### 5.2. Question 64

Question 64 sought any other views. A number of respondents to this question, who were interested in the the Ellesmere Place Plan Area, took this opportunity to provide further justification for their previous responses in the questionnaire. Where suitable, responses to this question have been consolidated into other questions.

The Cockshutt village survey, provided by Cockshutt cum-Petton Parish Council indicates that the majority of their survey respondents will be sympathetic to another 10 dwellings over 9 years through infills and conversions.

One respondent questioned why Ellesmere had no Community Hub and only two Community Clusters. They also expressed concern with the lack of phasing for 160 dwellings and the risk of potentially disorderly and illogical development.

The collection of evidence to inform the consultation was also criticised, the scoring of Cockhsutt, Welshhampton, Dudleston Heath in the 2017 Hierarchy of Settlements document published by Shropshire Council was challenged by several respondents.

Respondents from the Ellesmere Place Plan Area also suggested numerous alternative sites across the place plan area including:

- CCT010 mixed use residential development and highway works in Cockshutt;
- CCT020 land adjoining Crosemere Hall for residential development. The respondent is willing to provide technical information in support of the site;
- DHG012 site for residential development in Dudleston Heath;
- ELL004 68 dwelling development at Teal Drive, previously dismissed at appeal;
- ELL007 1 hectare of residential development and 2 hectares of open space adjacent to the respondent's consented scheme;
- ELS001 Land adjoining Mayfield, Elson as a sustainable location for housing growth;
- ELS026 large residential development with an indicative capacity of 364 dwellings at Land off Elson Road. Technical information (Drainage Assessment, Highways Access Assessment, Great Crested Newt Survey, TPO, Ecological Assessment and Arboricultural Report) has been provided;
- TET002, land at Winston farm in Tetchill for residential development. The respondent is willing to provide technical information in support of the site;
- TET003 land at Winston farm in Tetchill for residential development. The respondent is willing to provide technical information in support of the site;
- A Location plan for a residential development on Eastwick Road in Gadlas. The respondent can ensure a safe and satisfactory means of access;
- Land at Greenhill Bank, modest residential development with draft access and environmental arrangements. The respondent has also provided a suggested development boundary incorporating Greenhill Bank.

One respondent also commented that boundary reviews should be properly consulted with the relevant stakeholders and the right processes but did not provide further information.

## Appendices



### Appendix A. Quantitative Analysis

This appendix details the responses provided to the multiple choice questions posed for the Ellesmere Place Plan Area.

#### A.1. Question 3

Question 3 sought views on whether Shropshire Council should introduce a cross-subsidy exception site policy, allowing an element of open market housing to support the delivery of affordable housing? Of the unique respondents to this question, who were interested in the Ellesmere Place Plan Area and completed this question:

- 69.5% agreed with the introduction of a cross-subsidy exception policy.
- 17.5% disagreed with the introduction of a cross-subsidy exception policy.
- 13% responded don't know/ no opinion on the introduction of a cross-subsidy exception site policy.

#### A.2. Question 4

Question 4 sought views on whether respondents preferred (subject to viability assessment):

The development mix to be assessed on a site by site basis, or; a set development mix which would be geographically defined and subject to the findings of a viability assessment undertaken as part of the Local Plan Review. Of the unique respondents to this question, who were interested in the Ellesmere Place Plan Area, and completed this question:

- 81% preferred a development mix to be assessed on a site by site basis.
- 19% preferred a set development mix.

#### A.3. Question 5

Question 5 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their housing guidelines. Of the unique respondents to this question, who were interested in the Ellesmere Place Plan Area, and completed this question:

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- 39% agreed that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline;
- 35% did not agree that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline; and
- 26% don't know/ no opinion that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline.

#### A.4. Question 6

Question 6 sought views on whether respondents thought that it was appropriate for some settlements to include a windfall allowance to help deliver their employment guidelines. Of the unique respondents to this question, who were interested in the Ellesmere Place Plan Area, and completed this question:

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- 45% agreed that it is appropriate for some settlements to include a windfall allowance to help deliver their employment guideline;
- 30% did not agree that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline; and
- 25% don't know/ no opinion that it is appropriate for some settlements to include a windfall allowance to help deliver their housing guideline.



### A.5. Question 20 (a)

Question 20 (a) asked respondents if they agreed with the preferred housing and employment guidelines for Ellesmere. Of the unique respondents that completed this question:

- 11% agreed with the preferred housing and employment guideline for Ellesmere;
- 24% disagreed with the preferred housing and employment guideline for Ellesmere; and
- 64% responded don't know/ no opinion towards the preferred housing and employment guideline for Ellesmere.

#### A.6. Question 20 (b)

Question 20 (b) asked respondents if they agreed with the proposed development boundary for Ellesmere. Of the unique respondents that completed this question:

- 12% agreed with the proposed development boundary for Ellesmere;
- 21% disagreed with the proposed development boundary for Ellesmere; and
- 67% responded don't know/ no opinion towards the proposed development boundary for Ellesmere.

#### A.7. Question 20 (c)

Question 20 (c) asked respondents if they agreed with the preferred housing allocation ELL005 in Ellesmere. Of the unique respondents that completed this question:

- 22% agreed with preferred housing allocation ELL005;
- 12% disagreed with preferred housing allocation ELL005; and
- 66% responded don't know/ no opinion towards the preferred housing allocation ELL005.

#### A.8. Question 20 (d)

Question 20 (d) asked respondents if they agreed with the preferred housing allocation ELL008 in Ellesmere. Of the unique respondents that completed this question:

- 24% agreed with preferred housing allocation ELL008;
- 7% disagreed with preferred housing allocation ELL008; and
- 68% responded don't know/ no opinion towards the preferred housing allocation ELL008.

#### A.9. Question 63

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Question 63 sought views on whether respondents thought any additional 'Community Clusters' to those identified in within the Preferred Sites Consultation Document should be formed, or any of the existing 'Community Clusters' identified within the Preferred Sites Consultation Document should be removed. Of the unique respondents to this question, who were interested in the Ellesmere Place Plan Area and completed this question:

- 67% agreed that additional Community Clusters should be added;
- 0% agreed that additional Community Clusters should be removed;
- 19% disagreed that additional Community Clusters should be added or removed; and
- 14% responded don't know/ no opinion.



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