

# Shropshire Local Plan Examination

## Stage 1 Matters, Issues and Questions.

### MATTER 3 STATEMENT.

On behalf of Barwood Development Securities Limited.

Date: May 2022 | Pegasus Ref: P18-2665

LPA Ref: A0608-Barwood Land

Author: A Gill

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Representor unique Part A Ref *	A0608-Barwood Land
Matter	3
Relevant questions nos	1, 3, 4 and 9

# Introduction

Pegasus Group is instructed by Barwood Development Securities Ltd (Barwood Land) to respond to the **Shropshire Local Plan Examination: Stage 1 Matters, Issues and Questions** produced by the Inspectors appointed to hold an independent examination of the Shropshire Local Plan ('the Plan').

This Statement relates to 'Matter 3 – Development Strategy (Policies SP1–SP15)' which broadly concerns strategic policies, in respect to Barwood Land's land interest at Land West of Ellesmere Road, Shrewsbury, which is the Site Allocation SHR173 for 450 dwellings. It is understood that this Stage 1 Hearing covers legal and strategic issues, with detailed issues concerning individual proposed site allocations being considered at the Stage 2 Hearings.

## **Matter 3 – Development Strategy (Policies SP1-SP15)**

### **Q1. How do the strategic policies in the Local Plan accord with paragraphs 20–23 of the Framework?**

The proposed Plan period of 2016–2038 is supported, as it covers the minimum 15 year period required by National Planning Policy Framework (NPPF) paragraph 22.

The draft Shropshire Local Plan’s strategic policies set out the overall strategy for the spatial pattern and scale of development across Shropshire during the Plan period. This allows for sufficient land to come forward to address objectively assessed needs over the Plan period, identifying sustainable locations through a settlement hierarchy and the provision of key infrastructure to support development. This reinforces the presumption in favour of sustainable development, with growth directed to the Strategic Centre i.e. Shrewsbury.

The strategic policies of the Plan are considered to accord with paragraphs 20–23 of the NPPF.

### **Q3. What is the basis for the overall spatial strategy and broad distribution of growth set out in Policy SP2? What options were considered and why was this chosen?**

The NPPF at paragraph 11 a) states that plans should promote a sustainable pattern of development in their area, including meeting development needs, aligning growth and infrastructure, and improving the environment including mitigating climate change; with paragraph 31 requiring the preparation and review of policies to be underpinned by relevant and up-to-date evidence.

The draft Local Plan as submitted, has a Spatial Strategy which seeks to focus development across identified urban areas, with Shrewsbury being the main focus as a strategic centre and principal settlement, as set out in the Settlement Hierarchy Schedule SP2.1: Urban Locations in the draft Local Plan. This hierarchy was underpinned as part of the evidence base document EVO60: Hierarchy of Settlements (August 2020), which informed decisions on a settlement's potential to accommodate new development, to support the local plan review, through a four-stage assessment methodology comprising 'identification', 'screening' 'assessment' and 'categorisation'.

The GC4i – Housing Topic Paper (February 2022) recognises that the core principle of the spatial distribution of development (including residential) was to employ an 'urban focus' with the majority of residential development directed toward urban areas. This approach is complimented by 'Community Hubs and Community Clusters' to ensure the long-term sustainability of rural communities.

The SDO06.01 – Sustainability Appraisal and Site Assessment Environmental Report (December 2020) of the Regulation 19 Pre-Submission Draft thoroughly considered the strategic distribution of growth in Shropshire. Three options were considered, being:

Option A: 'Rural Rebalance' – This option is most closely aligned with actual levels of housing delivery seen over the previous 10 years and represents the aspiration for 'rural rebalance' as advocated in the Core Strategy and SAMDev.

Option B: 'Urban Focus' – This option provides a greater focus for growth around Shrewsbury and the market towns and key centres, with around 75% of growth to these areas. Whilst the rural area would continue to accommodate some growth, this would be at a level below current policy and past trends.

Option C: 'Balanced Growth' – This option effectively provides a middle ground between Options A and B, balancing needs and opportunities across the urban and rural areas. This option would accommodate more growth in Shrewsbury and less in the rural areas but would maintain a similar rate of growth in the market towns and key centres.

Option B, the urban focused approach, with Shrewsbury being the top of the hierarchy, was determined the most sustainable option in the Sustainability Appraisal. As stated at page 92, this approach is likely to maintain and support existing businesses, provide a good choice of housing in terms of location and affordability, and is also likely to minimise harm to rural landscapes.

The distribution of development proposed in the emerging Local Plan, focusing development in urban areas including Shrewsbury, positively responds to the Plan's evidence base, consultation responses that informed the draft Plan, the requirements of

the NPPF and the principles of sustainable development that includes providing connectivity to services and facilities by sustainable means.

The distribution of development was identified through an iterative approach, informed by careful consideration of evidence, technical assessments and consultation and is considered appropriate for the Local Plan as drafted. This methodology and plan making approach to selecting appropriate site allocation is supported.

#### **Q4. Should Policy SP2 define the scale of development expected in the various urban locations and rural settlements?**

Paragraph 11 b) of the NPPF states that strategic policies should provide for objectively assessed needs for housing and other uses, with paragraph 23 stating that strategic policies should provide a clear strategy for bringing sufficient land forward to address objectively assessed needs.

Draft Policy SP2 states that around 30,800 new dwellings are required over the Plan period, equating to around 1,400 dwellings per annum, with Schedule SP2.1: Urban Locations identifying Shrewsbury as the principal settlement where development will be focussed as the most sustainable location. However, the scale of development is not defined for the various urban locations and rural settlements, within this Policy.

The SD006.01 – Sustainability Appraisal and Site Assessment Environmental Report (December 2020) considered the different options for the strategic distribution of growth, with the urban focused option being the most sustainable, with around 30% of development being directed to Shrewsbury Strategic Centre.

The GC4i – Housing Topic Paper (February 2022) at Figure 3: Distribution of Residential Development Across Shropshire highlights the residential development guidelines for the settlements across Shropshire, with 8,625 dwellings identified for Shrewsbury Strategic Centre. This supports the emerging Local Plan and Sustainability Appraisal by being urban focused.

Therefore, it is supported that the scale of development expected in urban locations and rural settlements is defined within this background evidence paper. This will provide assurance that the necessary number of dwellings has been appropriately considered and will be delivered in the most appropriate areas and in sustainable locations. The documents identified above, taken comprehensively, provides a clear strategy underpinned by a sound evidence base will be adhered to, in order to be found sound and comply with the NPPF.

**Q9. Is Policy SP3 justified, effective and consistent with national planning policy and Planning Practice Guidance (PPG)?**

Pegasus Group previously submitted alternative wording for Parts 1g and 2a of the policy, as they make reference to promoting fabric energy efficiency, and integrating renewable and low carbon energy systems.

Such requirements should not undermine the deliverability of the Plan, as stated at paragraph 34 of the NPPF. Parts 1g and 2a should neither duplicate nor supersede other legislative requirements, but instead defer to the latest building regulations, and not undermine the Government's intention to set energy efficiency standards through building regulations via the 2021 Part L Interim Uplift (effective from June 2022), and the 2025 Future Homes Standard which will provide electric vehicle charging points and water efficiency standards under Parts S and G of building regulations respectively.

Building regulations already consider the energy efficiency of buildings and this policy, as worded, adds no material value and is therefore superfluous to sound Policy wording. Any requirement that goes beyond building regulations should be on a needs only basis, informed by detailed evidence. This policy should therefore be amended to read:

*"1. Reducing carbon emissions through a number of means, including:*

*g. Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings, in line with the current Building Regulations."*

*"2. Integrating or supporting both on-and off-site delivery of renewable and low carbon energy, including by:*

*a. Integrating renewable and low carbon energy system into all residential developments of one or more dwellings in line with the current Building Regulations."*

The encouragement of development to offset its carbon emissions through investment in carbon capture and storage (informed by the EVO19.01 – Shropshire Climate Change Strategy) should be clarified as being encouraged as an optional approach and not a policy requirement.

This draft policy should be amended to reflect the above changes to be consistent with national policy and the National Planning Policy Guidance (NPPG) in order to be found sound.

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Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

**Birmingham (City)**

39 Bennetts Hill, Birmingham, B2 5SN

T 0121 308 9570

Birmingham@pegasusgroup.co.uk

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