

ID 10

SHROPSHIRE LOCAL PLAN EXAMINATION

Representor unique Part A Ref *	A0614 – Redrow
Matter	3
Relevant questions nos	9 & 15

Stage 1 Hearing Statement

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

Shropshire Local Plan Examination

Matter 3 Hearing Statement on behalf of Redrow (ID: A0614)

Issue - Development Strategy (Policies SP1 - SP15)

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

- 1.1 Redrow generally supports the basis of section 1 of Policy SP3 in regard to reducing carbon emissions.
- 1.2 However, they do have some concerns about how Section 2a of the policy is applied through policy DP11. Whilst renewable and low carbon energy systems are supported, the technologies required should be appropriate to Shropshire and proportionate to the subject proposals. Policy DP11 acknowledges the need to integrate renewable and low carbon energy systems into all residential developments, whilst also seeking to maximise the use of district heating and cooling systems on relatively modest sites.
- 1.3 Policy DP11, which is referenced in Section 2a of Policy SP3, expands on this by stating that 10% of the predicted energy needs of a development should come from renewable and low carbon energy systems on-site; with it also requiring a minimum 19% improvement in the energy performance requirement of the 2013 Part L Building Regulations. Both of these requirements have been tested through the Delivery and Viability Study prepared on behalf of Shropshire Council. The results illustrate that a significant proportion of delivery in the south of the county may not be viable. This is expanded upon in the Matter 8 Statement.
- 1.4 Paragraph 4.108 of the Pre-Submission Draft of the Shropshire Local Plan (PDSLPL) describes the five stages of the energy hierarchy and confirms that energy options should be pursued in the following order:
 - Reduce the need for energy;
 - Use energy more efficiently;
 - Use renewable energy;
 - Use low carbon sources; and
 - Use conventional energy
- 1.5 Shropshire Council is correct to identify the energy hierarchy but then appear to circumnavigate it by jumping straight to a requirement for renewable and low carbon sources on-site. The primary aim should be to reduce energy use, and therefore carbon emissions. It should not matter if that can be achieved through a fabric first approach. A more sophisticated methodology is needed than is currently being suggested.
- 1.6 Appropriate comments on Policies DP11 and DP12 will be made at Stage 2 of the Hearings.

15. Is the Community Hub and Community Cluster approach to development set out in Policies SP8 and SP9 justified and effective and consistent with national planning policy? Do these policies duplicate parts of other policies?

- 1.7 Policy SP8 is titled 'Managing Development in Community Hubs', and highlights that the settlements are significant service centres, where appropriate development will be permitted on allocated sites within the development boundary. Redrow supports the acknowledgement that Community Hubs are significant centres and the inclusion of site allocations for development within the PDSLP.
- 1.8 Paragraph 3.59 of the PDSLP confirms that in order to recognise the diversity of the settlements each Community Hub has been provided with an identified residential development guideline. The text highlights that the figure has been informed by consideration of the characteristics of each Community Hub and aims to provide greater certainty to local communities and the development industry.
- 1.9 The SAMDev was adopted in December 2015 and specifically identified Bayston Hill as a Community Hub with a Development Guideline of only 50-60 dwellings for a twenty year plan period (2006-2026). At the time Shropshire Council considered that this could be achieved through infill development and without identifying any specific allocations. This level of housing delivery has failed to sustain the delivery of much needed affordable housing within Bayston Hill, and the approach has had similar impacts in other Community Hubs.
- 1.10 The PDSLP has identified a residential guideline for Bayston Hill of 200 dwellings which is to be met principally by two allocations. Redrow supports the higher level of development directed to sustainable Community Hubs and the acknowledgment that site allocations provide certainty for all parties.
- 1.11 The Council's Hierarchy of Settlements paper (August 2020) reviews all settlements within the county and establishes a settlement hierarchy based upon the sustainability of all settlements. As part of this assessment, settlements are assessed for their provision of primary and secondary services, transport and employment opportunities.
- 1.12 In this assessment Bayston Hill clearly emerges as a highly sustainable settlement and is acknowledged to have good access to services. Overall, the Hierarchy of Settlements study scores Bayston Hill 80 out of a possible 116 total points for sustainability.
- 1.13 Redrow supports the identification of development guidelines for named Community Hubs. The housing figures clearly seek to acknowledge the sustainability of Community Hubs, as well as the requirement to meet the needs of small settlements for new housing and sustain the existing services.

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