



SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0522-Berwick Estate
Matter	Matter 3 – Development Strategy
Relevant questions nos	1, 3, 4, 5, 7, 20

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Matter 3 – Development Strategy

Question 1 – How do the strategic policies in the Local Plan accord with paragraphs 20-23 of the Framework?

- 1.1 NPPF para.20 identifies the scope and coverage for strategic policies in setting out an overall strategy for the pattern, scale, design quality, and making sufficient provision for a range of policy themes. NPPF para.21 identifies that strategic policies should be explicit and limited to those necessary to address strategic priorities of the area and provide a clear starting point for any non-strategic policies that are needed. NPPF para.22 requires strategic policies to look ahead over a minimum of 15 years, including to anticipate long-term requirements and opportunities, such as those arising from major infrastructure improvements. Paragraph 23 of the Framework expects strategic policies to provide a clear strategy for bringing sufficient land forwards at a sufficient rate to meet objectively assessed needs.
- 1.2 Strategic Policies in the Local Plan (LP) SP1-SP17 cover a range of topics outlined in NPPF para.20 including the overarching guiding principles for development, housing, economic growth, environment and climate change, and waste and minerals. The notable omission from the strategic policies in this respect is a policy that sets out the transport infrastructure priorities for the LP. Whilst policies SP1 and SP2 both mention the provision of supporting infrastructure there is no definitive list or single policy setting out the strategic transport requirements that are required for the plan to be delivered. The lack of a strategic policy dealing with transport infrastructure priorities means there is a failure of the plan to anticipate or respond to long-term opportunities that may arise from major improvements in infrastructure. Similarly the plan does not include a vision looking beyond a 15 year timescale despite some of the identified timescales for delivery of major sites and infrastructure projects which are likely to go beyond the plan period, as set out in previous representations.
- 1.3 Representations made at the Reg.19 stage identify the deliverability issues in respect of the proposed site SHR173 as a result of its reliance on the up-front delivery of the Shrewsbury North West Relief Road (NWRR). A modification was suggested, namely the allocation of land at the Berwick Estate, in order to meet the identified shortfall in housing land available to come forward within the plan period. Identifying the NWRR as an item of infrastructure is a matter for a strategic policy, and in accordance with the NPPF the Local Plan should also consider additional development opportunities arising from this including the land at the Berwick Estate.

Question 3 – 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?

- 1.4 Representations made to the Regulation 18 and 19 consultation stages confirm the overall support for the 'urban focussed' spatial strategy and distribution of growth. Shrewsbury is the highest ranking settlement in Shropshire in terms of access to facilities, employment and infrastructure. The strategy is justified in recognising Shrewsbury as the strategic centre of Shropshire and being the focus of new development. Notwithstanding this, there is scope and an identified need for additional development to be allocated at Shrewsbury as a result of issues raised in these representations.
- 1.5 The plan considered a continuation of the Core Strategy's rural focussed spatial strategy however this approach was not reflective of the overarching aims and objectives of the Local Plan, in particular through the increased focus on promoting sustainable patterns of development as the County moves towards a zero carbon economy.

Question 4 – Should Policy SP2 define the scale of development expected in the various urban locations and rural settlements?

- 1.6 The intention of Policy SP2 is to set out the overarching strategic approach to development across Shropshire, with the urban areas the focus of this in accordance with the hierarchy of urban locations set out in schedule SP2.1. The policy should identify the amount of development intended for each of the named settlements and each category of 'Urban Location' as a whole. This would accord with NPPF paragraphs 20-21 which are clear on the intention for strategic policies to provide a basis for non-strategic policies, such as by indicating a high-level scale of expected growth to then be met through non-strategic allocations. Furthermore it will aid decision

making and monitoring of the plan's effectiveness going forward by including clear and measurable targets. Furthermore, any such definition of the scale of development should be reflective of the identified 'urban focussed' strategy and therefore recognise Shrewsbury's role as the main settlement with an appropriate amount of development to ensure housing needs can be met in full within the plan period.

Question 5 – The spatial strategy in the Core Strategy has a rural focus, while the submitted Local Plan's spatial strategy is urban focussed. The latter holds a list of 'saved sites' in appendix 2 which the Council intends to rely upon to meet the new spatial strategy and development requirements. Do the 'saved sites' accord with the spatial distribution of the submitted Local Plan? What will be the policy basis for these 'saved sites'? By relying upon such an approach, is the Local Plan positively prepared, justified, effective and consistent with national policy?

1.7 The distribution of saved sites in relation to the draft spatial strategy is represented below:

Saved Sites and Spatial Strategy			
Settlement	No. Units	% saved allocated sites	% of draft plan housing requirement
Strategic Centre	798	22%	2.5%
Principal Centre	1687	46.55%	5.48%
Key Centre	738	20.35%	2.4%
Community Hub	341	9.4%	1.1%
Community Cluster	0	0	0
Rural Area	62	1.7%	1.7%

1.8 Paragraph 23 of the NPPF requires the Council to allocate sites to meet the strategic priorities of the area. The proposed 'saved sites' are disproportionately located at Principal and Key Centres, failing to reflect draft policy SP2 which prioritises an urban focus starting with the Strategic Centre of Shrewsbury.

1.9 Paragraph 31 of the NPPF requires all policies to be underpinned by relevant and up-to-date evidence. The evidence and policy basis for the allocation of 'saved sites' in the SAMDev Plan (2015) lies in the Core Strategy (2011). It is unclear at this stage whether an examination of the saved sites is anticipated. Any failure to consider these sites in light of current evidence and spatial strategy, current national policy and guidance, and other relevant local circumstances would be a matter of soundness for the Local Plan. Through modifications the plan should look to ensure a more appropriate proportion of development being focussed firstly at Shrewsbury, and then other urban locations, in accordance with the spatial strategy.

Question 7 – What proportion of housing supply comes from the 'saved sites'?

1.10 The saved site allocations total 3626 units, representing 11.8% of the total identified supply over the plan period. As of the 2020 Five Year Housing Land Supply Statement (draft plan version) 988 units are identified from saved sites, representing 9.65% of the five-year supply.

1.11 This is a significant contribution to Shropshire's housing land supply. Should the Council decide to utilise 'saved site' allocations in the draft plan, they should be subject to full scrutiny to determine their suitability, availability, and achievability as per Paragraph 68 of the National Planning Policy Framework (2021) to ensure, that as a minimum, the housing requirement can be met within the plan period. Modifications to the plan will be required should any saved sites be found to be undeliverable. In this scenario it will be necessary to make additional land allocations to ensure that the housing requirement can be met as a minimum and therefore make the plan sound in this respect.

Question 20 – What is the national planning policy basis for Whole Estate Plans (Policy SP15)? What will be the process for endorsement and what will be their purpose? Should SP15 be a non-strategic policy?

- 1.12 Whole Estate Plans (WEPs) are non-statutory plans and would therefore need to follow Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which set out the requirements for producing supplementary planning documents (SPDs). This is the process by which the Council should look to endorse WEPs.
- 1.13 Planning Practice Guidance sets out that SPDs should build upon Local Plans and provide more detailed advice or guidance in relation to existing adopted policies. These documents are non-statutory and therefore cannot introduce new development plan policies, they are however treated as material considerations in decision-making.
- 1.14 SPDs are used widely by local authorities and often include areas-based policies such as framework masterplans, or in this case, Whole Estate Plans which can set out an agreed vision or strategy for the development and evolution of a landed estate. There is at least one other example of a policy basis for Whole Estate Plans being included as a part of a strategic policy in a development plan. Strategic Policy SD25 'Development Strategy' of the South Downs Local Plan (adopted 2019) and its explanatory text set out guidelines for the endorsement of WEPs and large farm plans. In this case WEPs were noted for their important role to play in landscape conservation, the rural economy and rural ecosystem services.
- 1.15 WEPs are therefore capable and should be considered as strategic policy matters as part of the strategic approach to development. Having regards to NPPF para.20 they are relevant to directing growth and change including matters such as housing, rural business and tourism, environmental conservation and land management. In the case of the Berwick Estate the potential level of growth and development, including the delivery of the NWRR and other promoted development as part of a wider long-term vision for the Estate is considered to be of strategic importance to the Local Plan.