

Shropshire Local Plan Examination

Regulation 19 Consultation on additional Documents informing Shropshire Local Plan

On behalf of Barwood Development Securities Limited.

Date: June 2024 | Pegasus Ref: P18-2665

LPA Ref: A0608-Barwood Land

Author: S Butterfield

Local Plan Examination	A0608-Barwood Land
Representor unique Part A Ref *	
Documents	GC25, GC44, GC45 and GC46



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1 – ISSUE	11/06/2024	SB	-	FINAL

Contents.

1. Introduction.....	3
2. GC44: Shropshire Local Plan Updated Additional Sustainability Appraisal Report (April 2024).....	4
3. GC45: Updated Housing and Employment Topic Paper (April 2024)	5

1. Introduction

- 1.1. Pegasus Group is instructed by Barwood Development Securities Ltd (Barwood Land) to respond to the Shropshire Council consultation on specific documents which form part of the emerging Shropshire Local Plan.
- 1.2. Following the Stage 1 Hearings on the emerging Local Plan, the Inspectors appointed to conduct the independent examination requested some additional evidence to support the draft Local Plan.
- 1.3. That additional evidence and work comprises the following documents (with Examination reference numbers):
 - GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.
 - GC44: Shropshire Local Plan Updated Additional Sustainability Appraisal Report (April 2024)
 - GC45: Updated Housing and Employment Topic Paper (April 2024)
 - GC46: Updated Green Belt Topic Paper (April 2024)
- 1.4. These representations make comment on Documents GC44, being the additional Sustainability Appraisal (SA) Report and GC45: Updated Housing and Employment Topic Paper. Relevant representations to each document are set out in the following chapters.

2. GC44: Shropshire Local Plan Updated Additional Sustainability Appraisal Report (April 2024)

- 2.1. The SD006.01 – 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:
- 2.2. 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.
- 2.3. 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.
- 2.4. 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.
- 2.5. Option B, the urban focused approach, with Shrewsbury being the top of the hierarchy, was determined the most sustainable option in the Sustainability Appraisal. The SA work identified that 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 additional SA work undertaken specifically focuses on the proposed Plan contribution toward any Black Country unmet need within Shropshire based on the three options for growth previously considered, and the potential environmental impacts of delivering a 1,500 dwelling contribution toward that unmet need within Shropshire are considered.
- 2.6. This approach is supported, it addresses the Inspectors' requirements to consider the potential environmental impacts of contributing toward the Black Country's unmet need and ensures that all relevant options and distribution of housing land with and without a contribution to the Black Country's unmet need, have been considered as set out at paragraphs 4.1 and 6.8 of the additional SA work. The Inspectors had already concluded that the general approach to meeting some unmet need in the Black Country was broadly supported, but that the environmental impacts of such delivery need to be considered.
- 2.7. The SA additional work confirms that the chosen Growth Option B remains appropriate for development both to meet Shropshire's need and to meet unmet needs in the Black Country, and that it will in particular result in a strong positive effect on the delivery of quality housing to meet the needs of all sections of society.
- 2.8. The additional SA work is therefore considered appropriate to provide robust evidence that informs the Local Plan strategy.

3. GC45: Updated Housing and Employment Topic Paper (April 2024)

- 3.1. 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.
- 3.2. Following the additional SA work and the proposed delivery of 1,500 homes to meet the Black Country's unmet need, as well as delivery of homes to meet Shropshire's identified need, para 2.9 of the Updated Topic Paper identifies that Shropshire Council need to deliver 31,300 dwellings between 2016 and 2038, an average of 1,423 dwellings per year. In addition, 1,500 homes will be delivered to meet the Black Country unmet need.
- 3.3. This is an increase in the proposed dwellings set out in the Draft Local Plan Policy SP2 as submitted to Examination, but the Council have not proposed any change to the overall Spatial Strategy as set out in the draft Local Plan with Shrewsbury, as the principal settlement being where development will be focussed as the most sustainable location.
- 3.4. The Topic Paper goes on to identify at paras 2.17 – 2.18 they have sufficient land supply to deliver over 34,000 dwellings, which exceeds the identified requirement including a circa 10% flexibility buffer.
- 3.5. Page 56 onward of the Topic Paper goes on to identify potential windfall sites or opportunities that would arise in the identified settlements, and also considers past windfall delivery. This work is supported and provides evidence supporting the Council's preferred option.
- 3.6. Main Modifications to the Plan would be required to include the amended housing requirements, and the distribution of development with additional windfall allowances in settlements (draft Policies SP2, S.16 and S20). Whilst we would reserve the right to comment on the specific wording of such changes in principle these modifications would be sound based on the evidence base which informs the identified amendments.
- 3.7. Barwood Land's land interests on land west of Ellesmere Road could ensure that the Local Plan delivers housing from early in the plan period. The land, proposed allocation SHR173 for up to 450 dwellings plus a local centre and strategic infrastructure is subject to a current outline planning application that is currently before the Local Planning Authority (ref: 22/O1432/OUT).
- 3.8. The Council's proposed trajectory identifies that the Site could deliver 190 dwellings by 2033 (base date of April 2023), with the remainder delivered post 2033, once the North West Relief Road is delivered. This position is generally supported and based upon the current planning application and issue of a positive decision, it is considered that the Site could begin to deliver dwellings by 2026, early in the Plan period, to ensure the delivery of housing as early as possible to meet the Local Plan strategy and sustainable development. Subject to further highways modelling, we believe that the entire site, not just phase 1, could be delivered in full prior to the North West Relief Road being fully operational.

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

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



All paper sources from sustainably managed forests

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office: Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT
We are ISO certified 9001, 14001, 45001



Pegasus_Group



pegasusgroup



Pegasus_Group

PEGASUSGROUP.CO.UK