



REPRESENTATION

in respect of
Land off Woodhill Road, Highley (HNN019)
Shropshire EiP Topic Papers Consultation

on behalf of
Stonebond Ltd

11 June 2024

Client Reference: 00027f-P

Last User: SG

QMS

DATE 05/04/2024|11/06/2024 10:57:40

FILE LOCATION [https://rcaregeneration.sharepoint.com/sites/intranet/rcashare/Shared%20Documents/Jobs/S%20-%20U/Stonebond%20Properties%20Ltd%20\(RCA927\)/Land%20off%20Woodhill%20Road,%20Highl](https://rcaregeneration.sharepoint.com/sites/intranet/rcashare/Shared%20Documents/Jobs/S%20-%20U/Stonebond%20Properties%20Ltd%20(RCA927)/Land%20off%20Woodhill%20Road,%20Highl)

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CHECKED BY SG/Stonebond

VERSION ISSUED TO

Client

LPA

Other

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Submission

Client



CONTENTS

1. INTRODUCTION	4
2. UPDATED HOUSING AND EMPLOYMENT TOPIC PAPER	5
3. UPDATED ADDITIONAL SUSTAINABILITY APPRAISAL	8
4. CONCLUSIONS	10

1. INTRODUCTION

- 1.1. This representation is made by RCA Regeneration Ltd on behalf of Stonebond who are promoting the site known as Land off Woodhill Road, Highley (SLAA Ref HNN019). The site is not proposed for allocation in the submission plan.
- 1.2. On the 3rd September 2021, the draft Shropshire Local Plan was submitted for examination. Stage 1 Hearings were held in July 2022 and January 2023.
- 1.3. On 15th February 2023, the examining Inspectors issued their Interim Findings (reference number ID28) and supplemented this with further correspondence related to their Interim Findings on the 4th October 2023 (reference number ID36) and 16th January 2024 (reference number ID37).
- 1.4. In responding to the Interim Findings and subsequent correspondence, the Council has prepared additional documentation relating to a range of issues.
- 1.5. To inform the ongoing examination, the examining Inspectors have requested that Shropshire Council undertake a public consultation on the following documents:
 - GC25: The newly proposed draft policy on Housing Provision for Older People and those with Disabilities and Special Needs and its explanation.
 - Updated Additional Sustainability Appraisal of the Draft Shropshire Local Plan Report.
 - Updated Housing and Employment Topic Paper.
 - Updated Green Belt Topic Paper.
- 1.6. The Planning Practice Guidance (PPG) and SEA Directive¹ requires a clear and transparent process of identifying, describing and evaluating reasonable alternatives in both policy and site allocation terms. There is often a direct conflict between the imperative to deliver new homes and enough jobs to support the local economy, whilst continuing to offer sufficient protection to the environment. There is also a soundness and legal compliance element to the preparation and production of SA documents and as such we have considered these as part of our submission.
- 1.7. This representation responds more specifically to the Updated Additional Sustainability Appraisal and the Updated Housing and Employment Topic Paper where it is relevant to Stonebond, the site they are promoting at Woodhill Road and Highley more generally, where the site is located.
- 1.8. These views are without prejudice to future submissions or hearing statements, which may be made in advance of the next stages of the Examination in Public.

¹ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

2. UPDATED HOUSING AND EMPLOYMENT TOPIC PAPER

- 2.1. Firstly, we welcome the further consideration of additional housing being added to the emerging Local Plan and the potential for further housing allocations to meet that need.
- 2.2. Further housing need of 1,500 homes and 30ha employment land has necessitated the requirement of further allocations or additional provision to be made some other way.
- 2.3. We note that for this purpose, locations for additional growth have been identified in a number of higher tier Place Plan areas in the Borough including Bridgnorth, Shrewsbury, Broseley, Albrighton and Highley.
- 2.4. A further site assessment process was undertaken as a targeted update to the Stage 2A site assessments, followed by a filter process (Stage 2B) and final stage (3).
- 2.5. We note that from the Reg 18 Plan (September 2020), Highley was identified as a potential location for around 250 dwellings but has so far only been subject to an allocation for 122 dwellings (approx.) based on the approximate yield from both the Land East of Bridgnorth Road (Ref HNN014) affordable housing scheme and the proposed allocation at Oak Street for 100 dwellings (Ref HNN016).
- 2.6. We firmly consider that there is scope to allocate more homes to Highley and that there has been very little scrutiny of the real potential of the settlement to provide more growth.
- 2.7. The site (Ref HNN019) we promote on behalf of Stonebond was put forward for consideration in the SLAA as well as the Reg 18 and Reg 19 stages of the emerging plan. The site was considered to have 'long term potential' and was not immediately ruled out.
- 2.8. However, it has been constrained by being part of a land parcel in the Landscape and Visual Sensitivity Study (EV071) (LVSS) undertaken by Gillespies which has, in our view, not been calibrated to facilitate development, nor have the land parcels within it been sufficiently small to allow a more granular, objective assessment.
- 2.9. The site we are promoting is not only not as sensitive as claimed for the wider land parcel assessed in the LVSS, but had it been assessed as a stand alone parcel, it would have been clear that it is significantly less sensitive than much of the rest of the parcel. Being flanked by modern housing development it does not contribute to the landscape character in the same way as the rest of the wider land parcel (Ref 14-HGH-C) that it forms part of, for the purposes of the LVSS assessment. The wider parcel extends some distance to the west, so it is not surprising that some of the conclusions reached by the LVSS consultants were that the harm to the landscape had the potential to be moderate to high.
- 2.10. The site is situated between two post-war housing developments to the north at Dhustone View (off Bridgnorth Road) as well as Netherfield to the south and would sit between them effectively filling the gap between the two developments. Development on the site would also be set at a level below that at Dhustone View and would therefore be read against the backdrop of a considerable amount of existing residential built form, which is continuous along the eastern side of Woodhill Road (the B4555).
- 2.11. The following Google Streetview extracts show the glimpsed views into the site with the distant Netherfield housing development to the south and Dhustone View development to the right in the foreground. The housing along Woodhill Road is shown to the left of the picture:



Figure 1 Glimpsed view into the site from the north looking south

2.12. The following indicative plan shows the site within the context provided by the existing built form surrounding it:



- 2.13. We consider that there has been a seriously missed opportunity to re-visit the potential of Highley to deliver more housing, and specifically this site. There has been little consideration of the existing settlement pattern. Indeed, the LVSS states that 'development is not considered appropriate on higher land where it forms part of skyline' but it appears that it was acceptable for exactly this to happen on proposed allocation HNN016 which is in a prominent location on land with expansive medium and long-range views to the east and north.
- 2.14. Given how influential the LVSS has clearly been on the development strategy, it is disappointing to see that this inconsistent and overly generalised approach as resulted in what we consider to be a plan that does not maximise the opportunities available and particularly not in Highley.

3. UPDATED ADDITIONAL SUSTAINABILITY APPRAISAL

- 3.1. Para 8.58 of the SA Update initially set out a wider series of options to deliver the higher level of housing growth required, as concluded through the EiP process and these were as follows:
- a. The buffer of the housing land supply is reduced.
 - b. The density of proposed site allocations is increased
 - c. Settlement guidelines and windfall allowances in one or more settlements could be increased
 - d. One or more of the proposed site allocations could be expanded to increase its capacity
 - e. One or more additional site allocations could be proposed
 - f. A combination of the above
- 3.2. We also note at para 8.64 as the options are assessed that:
- 3.3. *'Due to the scale of development, it is likely that larger amounts of greenfield land would need to be released in this option compared to the baseline and options for lower levels of growth, there may also be a negative effect on the range of plants and animals and quality and extent of wildlife habitats, particularly in the medium to long term. However, this level of growth allows for more larger sites to come forward, a master-planning approach to larger sites may provide opportunities for biodiversity gains to offset such losses and provide opportunities for the creation of relatively large areas of new habitats. The specific site allocations are assessed separately within the SA process.'*
- 3.4. We do not agree with this statement. Given the mandatory requirement for 10% biodiversity net gain (BNG) across all sites (with a very small number of minor development exceptions) and the continuing protection for established sites where biodiversity and habitats have been identified, we do not see how the Council could any longer assume that greenfield development will be any more harmful than an intensification of development at established sites or increasing the capacity of brownfield sites.
- 3.5. We note that the Council consider uplift Option 3b should form the basis for the proposed housing requirement within the draft Shropshire Local Plan. We have no reason to disagree with this – being 31,300 dwellings from 2016-2038 and an annual average requirement of 1,423 dwellings.
- 3.6. The SA proposes 4 options to facilitate this, set out in the SA (page 161 onwards) that the Council have assessed as mechanisms to deliver the additional housing:
- Option 1: Increasing Settlement Guidelines and Windfall Allowances
- Option 2: Densification of Proposed Site Allocations
- Option 3: Increasing Site Allocations
- Option 4: A Combination of Two or More of the Other Options
- 3.7. Clearly, it is Stonebond's preference that Option 3 is followed through the addition of new allocations in sustainable locations, given the availability and deliverability of their own site in Highley.
- 3.8. On page 181 in the table assessing Option 3, we would make two points.

- 3.9. Firstly, we consider that increasing new site allocations should have been assessed as a stand-alone option, versus adding to existing proposed site allocations.
- 3.10. The two development strategies are very different and should be assessed as such. Under Option 3, it states that adding to existing strategic allocations would *'likely have a positive impact on the encouragement of a strong and sustainable economy throughout Shropshire. However, the extent of this impact would largely be dependent on the location of any extensions to existing proposed allocations/new proposed allocations.'* There is no such commentary for stand-alone new allocations at all which is, in our view, erroneous.
- 3.11. Secondly, the other difficulty we have with the assessment of Option 3 is that there appears to be no acknowledgement that larger strategic sites take longer to deliver, have more upfront infrastructure investment requirements and a longer lead-in time with phased delivery often through multiple developers. There is no acknowledgement of this in the SA document at all.
- 3.12. We would also dispute the weighting given to car-based travel as being a negative factor considering the move to electric vehicles – together with the lack of acknowledgement that Shropshire is a sparsely populated rural borough, which necessitates more private transport being used.
- 3.13. There are also clearly many unknowns in the assessment which is understandable, because it is not assessing specific sites or specific geographical locations, which, for the reasons already given is a mistake.
- 3.14. We do not understand how, in Table 10.5, page 194 how the option of increasing settlement guidelines and increasing windfall allowances would automatically be the 'least-worst' option in impacts on most of the sustainability objectives, given that such windfalls may not trigger biodiversity net gains (BNG) because the development is too small: small-scale self-build and custom build development of no more than 9 dwellings and on a site which has an area no larger than 0.5 hectares is exempt from BNG. It is this sort of scale of development that is likely to fall within the 'windfall' category. So we consider the SA to have drawn incorrect conclusions on potential cumulative impacts on Sustainability Objectives 1, 2, 3, 7, 9, and 11.
- 3.15. We therefore do not agree that Option 1: increasing settlement guidelines and windfall allowances represents the most sustainable of the reasonable options for accommodating the uplift to the proposed housing requirement.
- 3.16. We consider the Council should look again at how this assessment has been carried out for the reasons we have given.
- 3.17. At para 12.30, we note the conclusion that the Place Plan Areas (which includes Highley) have been identified as sustainable locations for new housing, as the range of factors considered indicate they have the strongest functional relationship to the Black Country. Such areas would therefore be best able to promote sustainable patterns of development and would also be most likely to meet the needs of the relevant Black Country households. We agree with this point.
- 3.18. At 12.45, it states that *'..it was not considered necessary or appropriate to undertake a further call for sites or to seek to identify further sites for consideration within the site assessment process'*, which may be fair, but we are concerned that the sites in the SLAA (such as the site we are promoting HNN019) have not been revisited properly for the purposes of identifying new potential housing allocations. The site received a 'fair' and 'fair' assessment in Table 12.1, and outperformed or was equal to the sites listed as Proposed Housing Allocations in Table 12.4.

4. CONCLUSIONS

- 4.1. Overall, we are disappointed that the council have missed an opportunity to make new allocations in sustainable locations. We have concerns that the chosen option will not result in real delivery happening in a timely manner. Given the delay to the emerging plan, delivery has become an even more critical factor.
- 4.2. We disagree with the conclusions of the LVSS where it relates to parcel 14-HGH-C and believe it should have been properly revisited for specific sites where new allocations were being considered.
- 4.3. We disagree with the SA where there seemed to be no acknowledgement of the impacts of the new mandatory 10% BNG requirements, nor the growing use of electric cars which will clearly have an impact on overall conclusions about whether a site is sustainable.
- 4.4. Stonebond are grateful for the opportunity to provide further representations at this stage and would welcome the opportunity to be involved in the next stage of the hearings.

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