



**MUCH WENLOCK NEIGHBOURHOOD
PLAN
REPRESENTATIONS ON BEHALF OF
WENLOCK ESTATES**

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QUALITY MANAGEMENT

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1 INTRODUCTION

- 1.1 RPS Planning & Development (RPS) is retained by Wenlock Estates to represent their interests in land east of Bridgnorth Road in which they have entered into an Option agreement with Persimmon Homes to seek planning permission for housing development. Wenlock Estates have other interests in land at Much Wenlock which are also addressed in this submission.
- 1.2 Persimmon developed the existing Hunters Gate development, adjoining the land east of Bridgnorth Road, which has been well received locally in respect of its sympathetic approach to new housing design in the town.
- 1.3 This submission has been prepared to respond to the material which is being presented to drop in sessions in Much Wenlock on 12 January 2013 on which comments have been invited up until midnight on 15 January 2013. An extension of time for this submission has been agreed up to 16 January 2013 with the Steering Group.
- 1.4 This submission focuses on the Housing Objectives, Policies and Proposals, while also reviewing other complementary aspects of the plan.

2 REPRESENTATIONS

- 2.1 The document is split into 9 objective areas including Housing as the first for which separate scenarios are presented. This section is structured to deal with each of the Objectives where they relate to Wenlock Estates' interests. A commentary is also provided in respect of the 19 sites listed and assessed in the documentation.

Objective 1: Housing and Development Scenarios 1, 2a and 2b

- 2.2 It is noted that this Objective is presented through three scenarios rather than a suite of policies.
- 2.3 Wenlock Estates and RPS reject Scenario 1 on the grounds that it will not deliver new homes for Much Wenlock to meet the needs of newly formed households and those seeking a larger family home whose existing accommodation does not best meet their needs. A strategy based on purely windfall developments is considered to be flawed. There is no guarantee that sites will continue to come forward at a suitable rate and in a form which meets the full range of demand, type, quality and location. Small scale schemes do not provide the affordable housing needed on site and there is no guarantee that new affordable housing will be delivered when it is needed through ad hoc planning obligations for off-site contributions.
- 2.4 The suggestion that affordable housing exception sites can be identified through targeting is not a realistic approach for Much Wenlock. The land ownership is well understood and the targeting of unsustainable sites for potential affordable exception sites is not appropriate and is unsound. The plan must be deliverable.
- 2.5 Under Scenario 1 it will be appropriate to allow infilling and suitable redevelopment schemes to come forward. However, this is entirely compatible with the allocation and release of land east of Bridgnorth Road as contemplated in Scenarios 2a and 2b and the combined approach would result in between 200 and 250 homes being delivered in Much Wenlock over the 20 year period of the Plan which is entirely consistent with the adopted Shropshire Core Strategy. The assertion that this combination of housing under Scenarios 1 and 2 (a or b) could 'begin to damage local amenity' is not evidence-based and should be withdrawn. The existence of the Shropshire Community Infrastructure Levy (CIL) with its 'local capture' provisions will allow the community to provide extensive improvements to local amenities and potential new amenities to the benefit of the area in conjunction with the planned level of development under Scenario 2.
- 2.6 A strategy based on Scenario 2 is strongly supported and endorsed. RPS has presented Scenario 2a consistently through the process on behalf of Persimmon and Wenlock Estates and continues to commend this to the local community. The site has capacity for about 85 to 90 dwellings of which, subject to Shropshire Council's affordable housing policy application, some 15 to 20 dwellings might be in affordable tenures. It should be noted that in 2013, the Council is continuing to seek 13% of new homes as affordable on housing schemes which would equate to about 12 affordable homes in a 90 dwellings scheme, whereas 15 out of 85 would equate to 17.5% and 20 out of 90 would represent a proportion of over 22% being affordable housing.
- 2.7 If a much larger area for play were to be required, as suggested under Scenario 2b, RPS and Persimmon consider there would be potential for other adjoining land south of the town to be used as an alternative to reducing the developable area of the 3.88ha site. It is noted that the

Neighbourhood Plan Steering Group has advanced Scenario 2b without seeking the endorsement of Persimmon which has a controlling interest in the land or Wenlock Estates as landowner albeit there have been constructive discussions between the Steering Group and Wenlock Estates.

- 2.8 In respect of site access, Persimmon's masterplan indicates a new roundabout could be provided at the site frontage which would have the effect of calming traffic speeds on the southern approach to the town close to the primary school. It is noted that the Scenario 2b generated by the Steering Group has not identified this as a requirement. Clearly, if this is not required and is not seen as a desirable benefit locally, Persimmon can be expected to revert to a priority access junction arrangement.
- 2.9 The Community Infrastructure Levy (CIL) implications of the Scenario 2a and 2b proposals are helpfully recorded. These figures do not take account of two factors which will affect the final figures, namely Shropshire Council takes 5% of the payment for administration before the available funds are identified and the Government is also proposing that local Town and Parish Councils will get a meaningful cut (say 10%, but still to be determined) before the Shropshire element is identified and split 90:10 in favour of the locality. In practice this means that the local capture would be 10% plus 90% of 85% (76.5%), i.e. 86.5% of the total CIL.
- 2.10 Clearly, the CIL level would be higher if less affordable housing were provided as under current Shropshire Council policy and the final figure would go up or down depending on the actual floorspace of the market dwellings. The Scenario 2a advantages are clear in respect of the higher CIL that would be available locally which would be some £30,000 than under Scenario 2b.
- 2.11 The affordable housing size thresholds should be open for discussion between the Registered Providers and the developer to ensure the accommodation meets the target need and is economically justifiable and viable and therefore ultimately sustainable as a tenure.
- 2.12 The reference to a new footpath and additional recreational space may be compatible with Scenario 2a as well as Scenario 2b for which discussion is invited between the Steering Group and Persimmon/Wenlock Estates/RPS.
- 2.13 As also stated below under other objectives, Wenlock Estates is aware that Persimmon and RPS would be willing to discuss the terms of a development brief and/or design brief for the site with representatives of the local community.
- 2.14 Other housing opportunities on Wenlock Estates land at the town are addressed individually below in this section.

Main Issues

- 2.15 The wide range of benefits from this site should greatly outweigh potential concerns over the scale of development given the absence of suitable alternative sites at a smaller scale elsewhere. The proposal is entirely acceptable.
- 2.16 It is considered that 90 dwellings would be a suitable maximum site capacity on a minimum residential area of some 3.7ha. Additional open space provision, if shown to be required could be accommodated on adjoining land owned by Wenlock Estates also under Persimmon's control.

- 2.17 The market housing mix, subject to Shropshire Council affordable housing policy, should be some 70 to 75 market dwellings and 12 to 20 affordable dwellings.
- 2.18 The site should provide a range of 2, 3 and 4 bedroom houses. It is not proposed that bungalows/single storey dwellings would be provided on this site with the possible exception of a small number of flats over garages.
- 2.19 Wenlock Estates concurs with Persimmon that the preferred style of housing would be similar to Hunters Gate as this is well related to the locality and has been well received locally.
- 2.20 RPS will welcome responses from the community on whether the proposed roundabout is seen as an important feature and benefit.
- 2.21 The development should start in 2014/15 and be naturally phased by the housing market to minimise local disruption and for efficient use of resources and labour. It is understood that Persimmon envisages the development would be completed in 4 to 5 years overall.
- 2.22 The flood alleviation measures outlined will provide considerable benefits locally and reduce flooding risk for existing properties. Persimmon/Wenlock Estates/RPS propose to liaise with Shropshire Council and their consultants Mouchel to agree the details of the most appropriate scheme.

Objective 2: The economy and jobs

- 2.23 The proposed policies are broadly supported as a sustainable approach to the area. The proposals at Stretton Road should reflect the potential of the area having regard to the flood alleviation proposals and need not be restricted to the temporary car park land.

Objective 3: Reducing flood risk

- 2.24 RPS requires seeing the proposed map showing 'flood sensitive areas in Much Wenlock as referred to in Policy 3.1 before being able to comment fully. The appropriate principle should be that no development should cause additional flooding risk or prejudice the delivery of the planned Integrated Urban Drainage Management Scheme (IUDMS). It has been recognised by Shropshire Council that appropriate development of the housing site east of Bridgnorth Road can result in improvements for flooding risk management. It is understood that these improvements are not dependent upon the completion of the IUDMS.
- 2.25 The proposal to restrict predicted water discharge to no more than 80 litres of water per person per day is noted. However, Wenlock Estates understands that Persimmon proposes to conform to current national standards including the prevailing Building Regulation standards.

Objective 4: Traffic management and accessibility

- 2.26 The proposed policies for 2 car parking spaces per new dwelling and permeable driveways are noted.

Objective 5: Community well-being

- 2.27 The policy of seeking to retain local facilities and services is noted. It is also noted that no need for specific new facilities has been identified in the draft Plan with the exception of improved public toilet provision.

Objective 6: Good quality design

- 2.28 The recognition of the Much Wenlock ‘bowl’ in the setting of the town is supported (Policy 6.1 refers). Land east of Bridgnorth Road lies at the base of the bowl and can be designed to form an attractive new edge to the south of the town.
- 2.29 It is noted there is reference to the Much Wenlock Design Statement in Policy 6.2. For this to gain the status of a development plan through this proposed policy there should be the opportunity to comment on the Design Statement as part of the consultation, scrutiny and adoption process associated with the Neighbourhood Plan.
- 2.30 Wenlock Estates understands that RPS and Persimmon will be pleased to engage with the Neighbourhood Plan Forum in respect of a design brief for the land east of Bridgnorth Road (Policy 6.3 refers).

Objective 7: Green and open spaces

- 2.31 The reference to the shortfall in recreational open space in the south of the town is noted. There is a lack of explanation in the Plan under Policy 7.1 as to how the plan proposes to address this shortfall. One option is clearly to consider the potential for recreational open space in conjunction with housing development east of Bridgnorth Road in the south of the town.
- 2.32 It is noted there is reference to the Shropshire Playing Fields Association (SPFA) guidance on garden provision in Policy 7.4. For this to gain the status of a development plan through this proposed policy there should be the opportunity to comment on SPFA guidance as part of the consultation, scrutiny and adoption process associated with the Neighbourhood Plan. In principle it is agreed that gardens should be broadly in scale with the size of the property.

Objective 8: The local landscape and wildlife

- 2.33 The proposed policies are broadly supported.

Objective 9: Sustainability and climate change

- 2.34 RPS notes the proposal to achieve Level 4 of the Code for Sustainable Homes for all new housing developments. However, again, Wenlock Estates understands that Persimmon proposes to conform to current National standards on sustainable construction which is the nationally accepted approach to such matters.

Steering Group’s Assessment of Potential Development Sites

- 2.35 Wenlock Estates has no further comments on Sites A, B, D, E, F, I, J, K, L, M, N, Q, R and S.
- 2.36 Site C is considered to be the most sustainable development opportunity to meet the need for new homes at Much Wenlock in the plan period. The size of the site should not be a reason for excluding its allocation and its serious consideration by the Steering Group is strongly welcomed.
- 2.37 The Core Strategy proposes up to 500 new homes at Much Wenlock town between 2006 and 2026. Whilst RPS accepts that the delivery of 500 new homes would be at too great a scale for the town over a 20 year period, equally it would not be appropriate to limit new development to

infilling and very small groups of new homes as this would not be of a scale and nature to provide the necessary range of new homes to allow newly formed households and more established households meet their aspirations for homes locally in the plan period.

- 2.38 Site C can be readily developed in a way that is entirely in character for the town, building on the very good quality design approach which was delivered through the adjoining Hunters Gate development, built by Persimmon Homes and photographs of which have featured extensively in the Neighbourhood Plan documentation.
- 2.39 Sites D and P in combination represent the most suitable location for employment use at the town, building on the existing WEN2 proposal in the adopted Bridgnorth District Local Plan. Accesses have been constructed for the temporary car park (Site P) and a new permanent full standard access with good visibility at Site D. A comprehensive approach to this area has been discussed with Shropshire Council's economic development team.
- 2.40 RPS contends that Site G should also be allocated for housing development in the Plan, noting the Steering Group saw merit in the land providing new homes. The need for careful design including the access to development is recognised. There are opportunities to improve forward visibility at the site frontage.
- 2.41 Site H has been suggested by Wenlock Estates for meeting understood community needs in the town. The existing GP Surgery is not considered adequate and a new location should be provided through the Neighbourhood Plan in proximity to the town centre with adequate car parking and access. Site H is entirely suitable. Access can be provided off Bridgnorth Road with good visibility. There can be no case to argue on concerns over congestion as there is no constraint over the capacity of Bridgnorth Road in this location. The impact of a new surgery building or other community facility on the landscape can readily be managed through appropriate design. It is envisaged that new buildings would be located north of Dark Lane opposite the Filling Station.
- 2.42 Public comment has been published on 16 January 2013 which suggests the site is subject to flooding and is constrained by the Shropshire Hills AONB. The site is not in a floodplain and any concerns over land drainage can readily be managed through the design process to the benefit of neighbouring residents. The AONB designation does not constrain this site. Wenlock Estates does not consider this site is suitable for local food production as there are more suitable sites elsewhere, for example the southern part of Site H on Bridgnorth Road which can be considered further. The southern part of Site G is considered suitable for residential use with a capacity of some 5 dwellings.
- 2.43 Site O is considered suitable for housing development in the longer term served off the improved section of Sytche Lane. The existing lane is being improved through the committed affordable housing scheme where development has already commenced. An initial further early release of affordable homes could be considered off the approved access. It is contended that through appropriate masterplanning an acceptable form of development can be designed which is entirely in character with the town following release of the east of Bridgnorth Road site. The access is considered suitable for further housing and surface water run-off can be managed through design with attenuation measures that fully meet the Environment Agency's requirements. Site O has also a role in part to deliver one of the identified strategic flood management facilities for the town.

3 CONCLUSIONS

- 3.1 Wenlock Estates welcomes the inclusion of land east of Bridgnorth Road for consideration for residential development and fully supports Scenario 2a in this context.
- 3.2 The site is suitable for some 85 to 90 dwellings on a minimum area of some 3.7ha and associated open space and flood attenuation scheme.
- 3.3 There is potential to achieve additional recreational open space under Scenario 2a through locating such green space to the south of the housing site on adjoining land.
- 3.4 The site can deliver an appropriate level of affordable housing in accordance with Shropshire Council policy.
- 3.5 The Scenario of no positive housing land allocations is not appropriate and is considered to be out of accordance with the Shropshire Core Strategy which looks to focus modest housing growth at an appropriate scale at defined Market Towns and Key Centres, including Much Wenlock. A windfall only approach is not 'planning' in RPS's view and does not merit the level of public funding and staff resources that has been supplied to the process by DCLG and Shropshire Council. The plan would not be sound in the absence of positive land allocations.
- 3.6 Persimmon Homes and Wenlock Estates are willing to engage with representatives of the local community to discuss a development brief and design approach to the east of Bridgnorth Road site.
- 3.7 References to Sites C, D, G, H, O and P in Section 2 should be taken into consideration.
- 3.8 The general approach of the Draft Plan to other policy matters is broadly supported subject to the comments made in Section 2 above particularly in respect of meeting current national standards in terms of water usage and sustainable construction.