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Proof of Evidence: Planning

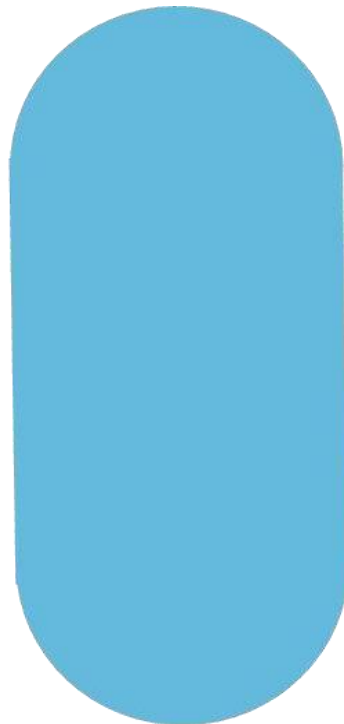
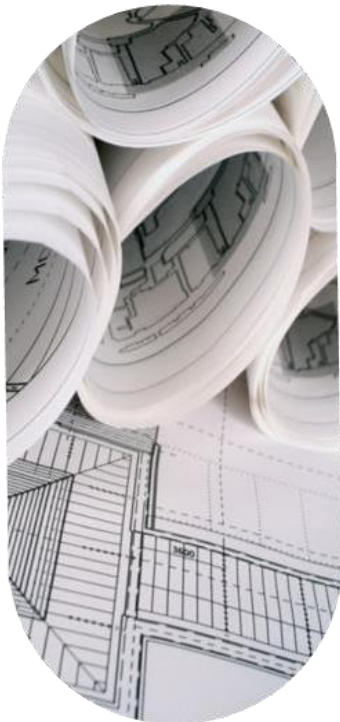
Evidence of Megan Wilson BSc (Hons) MSc MRTPI CIHCM

**In Respect of the S. 78 Appeal at Land at Tilstock Road, Tilstock,
Shropshire**

On behalf of Boningale Developments Ltd.

Appeal Reference: APP/L3245/W/25/3362414

LPA Reference: 24/04176/FUL



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0.Preamble

Qualification and Experience

- 0.1. My name is Megan Wilson. I hold a Bachelor of Science Degree with Honours in Human Geography, together with a Master of Science Degree in Urban Regeneration. I am a Chartered Member of the Royal Town Planning Institute and the Chartered Institute of Housing. I am employed as a Planning Director at Marrons and lead the Sheffield Office.
- 0.2. I have over 10 years' experience working in a variety of planning roles and have previously worked for a national strategic land promoter, a regional housebuilder and in planning consultancy. I have advised a range of clients in relation to the promotion of land through the Local Plan process and the submission of planning applications. I have appeared at Local Plan Examination hearings and planning appeals as a witness.
- 0.3. The evidence I have prepared and provide to this Inquiry on behalf of Boningale Developments Limited is true and given in accordance with the code of conduct of the Royal Town Planning Institute.

Involvement in the Planning Application

- 0.4. I have provided strategic planning advice to Boningale Developments on this site since 2023, with my team at Marrons having submitted the application in October 2024.
- 0.5. I have visited the site and Tilstock on 4 separate occasions and was in attendance for the full duration of the public exhibition detailed in the Statement of Community Involvement [CD 5.4].
- 0.6. I am fully aware of and understand the planning and related issues involved in this Appeal.

Scope of Evidence

- 0.7. My Proof of Evidence relates principally to matters of planning policy, development in open countryside, sustainability and the overall planning balance in respect of the Appeal proposal.
- 0.8. Included at Appendix 1 is a Local Housing Need Assessment prepared by Mr Dan Usher of Marrons. This was provided as part of the previously submitted Hearing Statement.
- 0.9. Additional Proofs of Evidence are provided under separate cover with regard to the following matters:
1. Highways and Transport matters prepared by Miss Anna Meer of DLP Planning Ltd [CD1.10].
 2. Landscape matters prepared by Mr Neil Furber of Pegasus [CD1.11].
 3. Urban Design matters prepared by Mr Colin Pullan of Pegasus [CD1.12].
 4. Five Year Housing Land supply matters prepared by Mr Ben Pycroft of Emery Planning [CD1.13].
- 0.10. I refer in this Proof of Evidence to documents that are listed in the agreed Core Documents list, using the abbreviations stylised '[CD X.XX]'.
- 0.11. My evidence has been compiled having regard to the December 2024 version of the National Planning Policy Framework (NPPF) [CD.2.1].

1. Introduction & Context

Introduction

- 1.1. This Proof of Evidence has been prepared on behalf of Boningale Developments Limited (“the Appellant”), in respect of an Appeal made pursuant to section 78 of the Town and Country Planning Act 1990 (as amended) (“TCPA 1990”). This Appeal has been made against the non-determination by Shropshire Council (“the Council”) of a full application for 70 no. residential dwellings at land at Tilstock Road, Tilstock.
- 1.2. This Proof of Evidence is submitted pursuant to the Town and Country Planning (Inquiry Procedure) (England) Rules 2000, as amended by the Town and Country Planning (Hearings and Inquiries Procedures) (England) (Amendment) Rules 2009 and the Town and Country Planning (Hearings and Inquiries Procedure) (England) (Amendment) Rules 2013.
- 1.3. The site and site context are as agreed in the Planning Statement of Common Ground (“SoCG”), signed 23rd June 2025 between the Appellant and the Council [CD 4.2] and further updated in September [CD4.7].

The Site and Context

- 1.4. The Site subject of this Appeal comprises approximately 4.05 hectares of Greenfield land off Tilstock Road, to the north of the built form of the village of Tilstock.
- 1.5. The Site is bound by agricultural land to the north and east, with the village built form to the south. To the west lies Tilstock Road, separating the Site and agricultural land, along with some ribbon development to the south-west.
- 1.6. The Site slopes from east to west and is currently used for the grazing of horses. The Site is bordered to the west and the south by mature hedgerows and trees. The northern boundary is bordered by a smaller hedgerow, separating the site from the field adjacent to the northern boundary. The eastern boundary is made up of fencing.

Vehicular access into the site will come from off Tilstock Road, entering the site from the western boundary. Pedestrian access will be provided by a public footpath, entering the Site from the south eastern corner, offering connections to Tilstock village centre, utilising and enhancing existing Public Rights of Way that run adjacent to Tilstock Primary School.

- 1.7. Tilstock has a Primary School, a public house, a Village Hall and a bowling and tennis club. These amenities are all located within 400m of the Site on foot. The Village Hall is approximately 400m from the application Site, and the Primary School is 280m from the application Site. Tilstock does not have any convenience store, GP practice, post office or petrol station. Limited employment opportunities exist within Tilstock at the Primary School, Public House, and various agricultural establishments within/on the edge of the settlement, there are no significant employment (e.g. offices, research & development, financial & professional services, commercial and/or industrial activities) opportunities within the settlement.
- 1.8. Approximately 3.6km to the north of the Site is the town of Whitchurch. This town is defined as a Market Town in the Core Strategy 2006-2026, and a Principal Centre in the SAMDev Plan. Prees and Prees Highers Heath are located approximately 1.8km from the Appeal site and like Tilstock, are identified as a Community Cluster in the Core Strategy 2006-2026.

Planning History

- 1.9. There is no known planning history associated with the Appeal site before the submission of the application to which this Appeal relates.

The Appeal Application

- 1.10. The planning application was validated on 31st October 2024 under reference 24/04176/FUL.

1.11. The description of development read as follows;

“Residential development of 70 dwellings including access, open space, landscaping and associated works..”

1.12. The application was supported by a suite of documents and plans, including a Masterplan which depicts the arrangement of the site.

1.13. The application remained undetermined in May 2025, and in the absence of any comments from the Local Highway Authority and confirmation from the Case Officer that no additional information would be accepted in regard to the application, the Appellant was forced to make the difficult decision to Appeal against the non-determination of the application.

Council's Statement of Case

1.14. The Council's Statement of Case [CD3.2] states that the proposed development conflicts with the spatial strategy of the adopted Development Plan in relationship to its nature, scale and poor relationship to facilities and services, particularly by sustainable modes of travel. The proposed improvements to the PROW and developer contributions cannot overcome these locational disadvantages of the site or materially reduce the reliance on private vehicles.

1.15. With reference to sustainable location, the Council state that the Appeal site lies outside of any identified settlement, in an area of open countryside, whereby the proposed development would have an over reliance on private motor vehicle for most day-to-day and essential services and failing to provide genuine choice for sustainable modes of transport. Furthermore, the proposed development would adversely impact upon the setting, character and function of the receiving settlement, whereby there are limited economic and community benefits to support the development.

1.16. With specific reference to the Appeal site itself, the Council state that it is not brownfield land, it is an undeveloped agricultural site that is devoid of any built form and includes Best and Most Versatile Agricultural Land.

1.17. At paragraph 8.3 of the Statement of Case [CD3.2] the Council confirm that the proposal is at a density commensurate with its surroundings but curiously states that it cannot be said that the development the site would represent effective use of land.

1.18. Within the same paragraph, and as repeated throughout the Statement of Case, the Council appear to conflate matters pertaining to urban design and sustainability and actually stating;

“good design is not just aesthetic; it also relates to wider sustainability and community matters. The above Statement has demonstrated how the proposed development fails to respond to the local character, would disrupt the existing built form and would result in an over-reliance on private vehicle use”.

1.19. The Council acknowledge within their SoC that the development would over deliver on affordable housing requirements.

1.20. The Council afford significant weight to the provisions of new housing, moderate weight to the provision of public open space and enhanced PRow options, and moderate weight to the economic benefits.

1.21. The Council afford substantial weight to the ‘unsustainable location’ in relation to encroachment into the countryside, substantial weight to the ‘unsustainable location’ in regard to access to services and facilities, significant weight to the failure of the internal layout to respond to sustainable travel modes hierarchy, significant weight to highway safety concerns relating to the site access, significant weight to potential harm to protected species, significant weight to visual impact at years 1-14, reducing to moderate harm from year 15 onwards, moderate weight to the impact on the Public Right of Way and limited weight to engagement with stakeholders.

1.22. I consider that the above consistently and repeatedly duplicates matters, with sustainability being referenced multiple times.

1.23. I address each of the Putative Reasons for Refusal in Section 5 below.

The Main Issues

1.24. As discussed in the Case Management Conference held on 15th August 2025, and detailed within the Inspector's Post Conference Note the main issues in this case are:

- Whether the Appeal site is an appropriate location for the development, having particular regard to relevant provisions of the Development Plan;
- Whether the Appeal site is an appropriate location for the development, having particular regard to accessibility to facilities and services;
- The effect of the development on the character and appearance of the area, including consideration of urban design matters;
- The effect of the development on highway safety, having particular regard to the suitability of the site's access;
- The effect of the development on biodiversity, having particular regard to the effect upon skylarks;
- The effect of the development on the Brown Moss Special Area of Conservation and Ramsar site and the Cole Mere Ramsar site; and
- The extent of the Council's acknowledged housing supply shortfall.
- The overall planning balance

1.25. As detailed and was confirmed during the CMC, I understand that the Council will be calling planning, policy (Housing land supply) and highways witnesses only and that matters pertaining to ecology are now agreed between the Appellant and Council. The Case Officer will address in evidence matters pertaining to landscape and urban design.

1.26. In light of the above, my evidence will seek to address the following matters:

- The extent to which the most important policies for determining the Appeal proposal are out of date, having regard to the shortfall in housing land supply and then the weight to be applied to these policies having regard to the development, the NPPF and relevant case law.
- The weight to be applied to other material considerations, notably the withdrawn Local Plan.
- Consideration of the Putative Reasons for Refusal having regard to planning policy and the weight to be applied to the benefits and disbenefits of the scheme.
- I will then undertake a planning balance exercise in accordance with paragraph 11(d) of the NPPF to weigh the benefits and disbenefits of the scheme.

2. Statement of Common Ground

- 2.1. A draft Statement of Common Ground (“SoCG”) was submitted with the Appeal in May 2025 [CD4.1]
- 2.2. A final, signed, version of the SoCG [CD4.2] has subsequently been agreed between the Appellant and the Council on 23rd June 2025. A minor update has been made and can be note at CD4.8.
- 2.3. Within the final iteration of the SoCG, the following key issues are agreed:
- Background to the Appeal
 - Description of the site
 - The relevant Development Plan policies comprising;
 - The policies within the Development Plan with which the proposal complies;
 - The policies within the Development Plan which the Council allege the proposal conflicts.
 - Relevant material considerations.
 - The absence of a five-year housing land supply
 - The quantum of affordable housing to be delivered and the public benefit of providing affordable housing
 - The conclusions of the LVIA
 - The absence of a heritage RfR
 - That the impacts on the loss of trees and hedgerows will be relatively low and compensatory planting is to be undertaken.

- That subject to conditions, the Lead Local Flood Authority have raised no objection in regard to flood risk and drainage.
- The settlement of Tilstock is a sustainable and suitable location to accommodate development in accordance with the adopted Development Plan policies.

2.4. Key matters of disagreement are as follows;

- The weight to be attributed to the out-of-date policies.
- Whether the policies are consistent with national policy.
- The robustness of the Council's Housing Land Supply position.
- The weight to be ascribed to the provision of market and affordable housing.
- The overall sustainability of the site, having regard to its location and scale.
- The scale and proportionality of the proposed development and the residual impact upon the receiving settlement and its character.
- The weight attributed to landscape and visual effects.
- The economic benefits of the scheme and the weight it should be afforded in the planning balance.
- The impact of the proposed development on protected species and the provision of Biodiversity Net Gain.
- Vehicle and pedestrian access arrangements – approach and delivery
- Internal layout and connectivity in promoting active travel and sustainable modes.

2.5. In addition to the 'Planning SoCG', topic specific SoCG's have been prepared in regard to Highways [CD4.3.], Ecology [CD4.5], Landscape [CD4.4] and Urban Design [CD4.7]. Work is ongoing on a Housing Land Supply SoCG.

3. National Policy and Guidance and the Development Plan

National Planning Policy Framework (December 2024)

- 3.1. I have considered this Appeal in the context of the December 2024 NPPF but again note that the application was submitted under a different national policy context and against the provisions of the December 2023 NPPF. I consider that it is only appropriate, in line with the provisions set out in Annex 1 (paragraph 231) of the NPPF 2024 to consider the Appeal proposals against the current iteration of the NPPF. This is common ground between parties.
- 3.2. Paragraph 2 of the NPPF 2024 sets out that it is an important material consideration of planning applications. I make reference throughout this Proof of Evidence to relevant paragraphs with the NPPF.
- 3.3. In summary, the Appeal proposal has been considered against the various relevant chapters of the NPPF 2024, which confirms that it comprises of sustainable development as a result of;
- I. Providing a deliverable housing development that will make a valuable contribution towards national and local objectives for economic growth;
 - II. Making an important contribution towards meeting the five-year housing land requirement in the District;
 - III. Contributing to housing choice and the mix of housing in the area, making effective use of land and in particular making an important contribution to affordable housing needs;
 - IV. Promoting healthy communities through integration with the existing settlement and the provision of open space;
 - V. Being located on land at low risk of flooding and ensuring that the development will not increase flood risk elsewhere;

VI. Being resilient to the challenge of climate change; and

VII. Conserving and enhancing the natural and historic environment.

- 3.4. The policy presumption in favour of sustainable development is disseminated between paragraphs 11 and 14 of the NPPF. Holgate J provided a detailed analysis of the presumption and the circumstances in which it is engaged (see, *Monkhill Ltd v SSHCLG* [CD 12.1]). This analysis was accepted by the Court of Appeal.
- 3.5. Insofar as relevant, where a case does not fall within paragraph 11(c) (as is the case with this Appeal), the next step is to consider whether paragraph 11(d) applies. In this case, this requires examining whether the most important Development Plan policies for determining the application are out-of-date.
- 3.6. If paragraph 11(d) does apply, then the next question is whether one or more Footnote 7 policies are relevant to the determination of the application or Appeal (limb (i)). Footnote 7 policies are those that protect areas or assets of particular importance. In the present case, no Footnote 7 policies apply.
- 3.7. As regards paragraph 11(d), Footnote 8 confirms that the presumption is triggered for applications involving the provision of housing where:
- a) The local planning authority cannot demonstrate a five-year supply of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 78); or
 - b) Where the Housing Delivery Test indicates that the delivery of housing was below 75% of the housing requirement over the previous three years (emphasis added).
- 3.8. Footnote 8 qualifications are not contingent on one another; to engage the presumption, the satisfaction of one will suffice. I accept that the 2023 Housing Delivery Test Measurement (December 2024) [CD2.12] shows a 152% delivery in Shropshire. However, the significant change to the standard method following publication of the December 2024 NPPF (to 2,025 dwellings per annum) will soon

erode the HDT results unless significant and urgent action is taken to release new land for housing.

3.9. It is common ground, as detailed within the Planning Statement of Common Ground, and as set out in February 2025 Housing Land Supply Statement [CD2.4] that the Council cannot demonstrate a sufficient supply of housing. The degree of shortfall is a matter of disagreement between parties. The Appellant's position is set out within the Proof of Evidence of Mr Pycroft [CD1.13].

3.10. Footnote 8a) is therefore satisfied, engaging the tilted balance. This means:

- The most important policies are deemed out-of-date. The weight to be given to them is a matter of judgment for the decision taker, albeit noting the Supreme Court judgment in *Suffolk Coastal DC v Hopkins Homes Ltd* [CD 12.3] that if a planning authority that was in default of the requirement of a five-years' supply were to continue to apply its environmental and amenity policies with full rigor, the objective of the Framework could be frustrated; and
- That the decision taker should be disposed to grant planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

3.11. Despite the aforementioned, policies are not considered outdated solely because of the scarcity of available housing land. The tilted balance may be triggered on a different basis if policies that influence the decision are outdated, regardless of the housing land supply or the outcome of the Housing Delivery Test.

3.12. In *Gladman Developments Ltd v SSHCLG* [CD 12.4] Sir Keith Lindblom held that:

"In paragraph 11 [of the NPPF] two main currents running through the NPPF converge: the Government's commitment to the "plan-led" system and its support for "sustainable development [...] the provisions on "decision-taking" in the second part of paragraph 11 set out a policy to guide decision-makers on the performance of their statutory responsibilities under section 70(2) of the 1990 Act and section 38(6) of the 2004 Act, in the specific circumstances to which they relate. "

- 3.13. In *Peel Investments (North) Ltd v SSCLG & Anor* [CD12.5] in his judgment with which Lord Justice Lewison and Sir Stephen Richards agreed, Lord Justice Baker expressly endorsed and adopted the ‘careful and precise’ analysis of paragraph 14 of the 2012 NPPF by Mr Justice Lindblom (as he then was) in the case of *Bloor Homes East Midlands Ltd v SSCLG & Anor* [CD12.6].
- 3.14. Mr Justice Lindblom was referring to paragraph 14 of the 2012 NPPF when at paragraph 45 of his judgment in *Bloor Homes* he held that:

“If the plan does have relevant policies these may have been overtaken by things that have happened since it was adopted, either on the ground or in some change in national policy, or for some other reason, so that they are now “out-of-date.”

- 3.15. In *Peel Investments* [CD12.5], Lord Justice Baker found that this analysis plainly applies to the revised terms of the presumption in favour of sustainable development in paragraph 11(d) of the NPPF. Indeed, he went on to find that: *“If the policies which are most important for determining the planning application have been overtaken by things that have happened since the plan was adopted, either on the ground or through a change in national policy, or for some other reason, so that they are now out-of-date, the decision makers must apply the tilted balance expressed in the presumption in favour of sustainable development.”*
- 3.16. The phrase, “the policies most important for determining the application”, has been the subject of judicial consideration. In *Wavendon Properties Ltd v SSHCLG* [CD12.7], Dove J held that:

“In my view the plain words of the policy clearly require that having established which are the policies most important for determining the application, and having examined each of them in relation to the question of whether or not they are out of date applying the current framework [...] an overall judgement must be formed as to whether or not taken as a whole these policies are to be regarded as out-of-date for the purpose of the decision.”

- 3.17. In *Paul Newman New Homes Ltd v SSHCLG*, the Court of Appeal approved the analysis of Dove J in *Wavendon*. Indeed, at [44], Lady Justice Andrews held that:

“The first step in the exercise is to identify the policies that are the most important for determining the application; the second is to examine each of those policies to see if it is out-of-date; and the third is to stand back and assess whether, taken overall, those policies could be concluded to be out-of-date for the purposes of the decision.”

Development Plan

- 3.18. Section 70(2) of the Town and Country Planning Act (TCPA) 1990 sets out that, in dealing with proposals for planning permission, regard must be had to the provisions of the Development Plan, so far as material to the application, and to any other material considerations.
- 3.19. Furthermore, section 38(6) of the Planning and Compulsory Purchase Act 2004 (“PCPA 2004”) states that, if regard is to be had to the Development Plan for the purpose of any determination, then that determination must be made in accordance with the plan unless material considerations indicate otherwise. Taking these sections together, a decision-maker must, therefore, consider the Development Plan, identify any provisions within it which are relevant, and then properly interpret them.
- 3.20. For the purposes of this Appeal, the Development Plan comprises the Core Strategy Development Plan Document 2006-2026 (adopted 24th February 2011) [CD2.2] and SAMDev Plan 2006-2026 (adopted 17th December 2015) [CD2.3]. The Council have failed to review the policies contained in the Development Plan within the last five years, or indeed at any point since adoption, as required by Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 and detailed at paragraph 34 of the NPPF 2024.
- 3.21. It is noted that the introduction of development boundaries as a concept is set out in the Core Strategy, but that the actual boundaries weren’t introduced until adoption of the SAMDev [CD2.3].

3.22. For the purpose of this Appeal, I consider the most important policies for determination are as follows;

- CS1: Strategic Approach
- CS4: Community Hubs and Community Clusters
- CS5: Countryside and Green Belt
- CS6: Sustainable Design and Development Principles
- MD1: Scale and Distribution of Development
- MD2: Sustainable Design
- MD3: Delivery of Housing Development

3.23. I acknowledge the importance of S18.2: Whitchurch Area Community Hub and Cluster Settlements but remain unclear on the status of the 'schedules set out in the SAMDev.

3.24. I note conflict with CS17 and MD12 is referenced within the second Putative Reason for Refusal. The Council have confirmed in the Ecology SoCG that they are satisfied with all information provided and as such matters pertaining to ecology are now in agreement.

CS1: Strategic Approach

3.25. Core Strategy Policy CS1: Strategic Approach outlines Shropshire's strategic strategy for development from 2006 to 2026. It proposes to build around 27,500 new dwellings, including 9,000 affordable flats, as well as 290 hectares of employment land and related infrastructure. The rural areas of Shropshire will become more sustainable through a "rural rebalance" approach, accommodating 35% of Shropshire's residential development over the plan period. Development in rural areas will be located predominantly in community hubs and community clusters.

- 3.26. I consider Core Strategy Policy 1 to be one of the most important policies in determining this Appeal. By virtue of an acknowledged shortfall, noting the degree of shortfall is an area of disagreement between parties, in housing land supply and the restriction on development placed on numerous settlements by the policy, which thus acts to prevent sustainable development coming forward to address this unmet need, I consider CS1 to be out-of-date. My conclusion in this regard is formed on the basis that the Council cannot demonstrate a sufficient supply of housing, along with changes to national policy through the introduction of the standard method of calculating local housing need and the associated significant uplift in the minimum number of houses that Shropshire is now required to deliver (2,025 local housing need requirement against the planned for figure of just 1,375 dpa)
- 3.27. Additionally, as is demonstrated in Tables 12 through to 14 of the February 2025 Five Year Housing Land Supply Statement [CD2.4] development that has been permitted in Shropshire over the plan period has failed to follow the prescribed spatial strategy, with more than 40% of the growth achieved across the plan period (through completions and sites with planning permission), being in rural areas (comprising Community Hubs, Community Clusters and Rural Areas), which Policy CS1 clearly limits to 35%. This is reflective of the significant change in minimum local housing need and the need to permit additional development in rural areas above and beyond that set out in CS1.
- 3.28. In addition to being out-of-date by virtue of a lack of a five-year housing land supply, I also consider that in rigidly applying the policy, and seeking to avoid deviating from the prescribed percentages associated within the policy, has been fundamentally superseded by events, namely the significant increase in the housing delivery required across Shropshire through the application of Local Housing Need. The spatial strategy, approach to rural housing delivery and the definition of limits to development each and collectively reflected the lower housing requirement at the time of adoption of the Core Strategy back in 2011. Plainly, the spatial strategy within the Core Strategy no longer reflects the position up-to-date requirements and fails to take account of or allow the ability to meet an up-to-date assessment of need.
- 3.29. Notwithstanding this, and noting that a significant level of growth is attributed to development in community hubs and community clusters, such as Tilstock, I do not

consider, that the Appeal proposals conflict with CS1 and indeed consider that the proposed development will, as required by policy rebalance a rural area of Shropshire through the provision of a policy compliant mix of modern houses that can attract younger residents and families to Tilstock.

CS4 4: Community Hubs and Community Clusters

- 3.30. Policy Core Strategy Policy CS4 states that in rural areas, communities will become more sustained by;

“Focusing private and public investment in the rural area into Community Hubs and Community Clusters, and not allowing development outside these settlements unless it meets policy CS5.”

- 3.31. Supporting text associated with Policy CS4 recognises the importance of ensuring and enhancing rural vitality and states at paragraph 4.65;

“Rather than abandoning settlements that have lost services as perpetually ‘unsustainable’, this approach seeks to improve the sustainability of rural settlements and their hinterlands, even those that start from a low base. Shropshire Council will work with communities, including delivery stakeholders and landowners that wish to achieve this vision”.

- 3.32. The support for ensuring ongoing vitality and viability is engrained in the NPPF at paragraphs 82-84.

- 3.33. The Tolleshunt d'Arcy decision [CD12.8] at paragraph 11 builds on this and recognises that that where there are groups of smaller settlements, development in one village may support services in a village nearby. As defined through the introduction of community clusters and hubs, this is a position taken by SCC and one which is relevant to this Appeal, with Tilstock, as a cluster settlement. acting as settlement that not only supports its residents, but also those in surrounding more rural villages.

- 3.34. There are a number of criteria listed under CS4 which the policy prescribes will act to ensure rural communities are sustained. I take each of these in turn below and consider the Appeal proposal against them.
- 3.35. The first requires private and public investment is focused on Community Hubs and Community Clusters. Tilstock falls within this broad group as confirmed in the SoCG and as such, the Appeal proposals are focusing investment in line with policy requirements.
- 3.36. The second criterion required development in Hubs and Cluster that helps rebalance rural communities by providing facilities, economic development or housing for local needs. Significantly there is no policy requirement for each development to provide all of these elements, and as is demonstrated in the Local Housing Need Assessment at Appendix 1 of the Proof of Evidence, there is a significant identified and unmet local housing need in Tilstock, and further more an urgent need to rebalance the population and shift the trend away from one of an ageing and unsustainable population, which is detailed in the Local Housing Need Assessment provided at Appendix 1 of this Proof of Evidence.
- 3.37. Criterion three requires that proposals make sufficient contribution to improving local sustainability through a suitable mix of housing that caters for local needs and by delivering community benefits in the form of contributions to affordable housing for local people and contributions to identified requirements for facilities, services and infrastructure. The Appeal proposal comprises a policy compliant housing mix and delivers in excess of the policy compliant level of affordable housing. Where requested, and as demonstrated in the draft Section 106 agreement and through CIL, the development will contribute towards health and education and will provide public open space and play space for the use of new and existing residents. There are no outstanding requests for infrastructure improvements with the Section 106 Agreement making provision for all requested financial contributions.
- 3.38. The final criterion requires that all development is of scale and design that is sympathetic to the character of the settlement and it's environs. The Council's case appears to suggest that the proposed development is of a scale that with conflict with this criterion and which will result in harm to the settlement. I address this further

below, in respect of the Putative Reasons for Refusal, but noting the scale of development attributed to Tilstock through the SAMDev, I do not consider that the scale proposed conflicts with the intention of the policy.

3.39. I consider that there is **no conflict** with CS4.

CS5: Countryside and Green Belt

3.40. Core Strategy Policy CS5 goes on to state that new development in the countryside will be strictly controlled. It goes on to state that development in rural areas will be supported where it meets one of the criteria listed within the policy. Criterion 2 states that the below form of development will be supported;

“dwellings to house agricultural, forestry or other essential countryside workers and other affordable housing / accommodation to meet a local need in accordance with national planning policies and Policies CS11 and CS12; - With regard to the above two types of development, applicants will be required to demonstrate the need and benefit for the development proposed. Development will be expected to take place primarily in recognisable named settlements or be linked to other existing development and business activity where this is appropriate”.

3.41. In accordance with the findings of the Local Housing Need Assessment (Appendix prepared by Marrons’ Socio-Economic team, there is an identified outstanding local need for 183 to 295 dwellings in the Tilstock cluster, and 402-624 dwellings in the combined Tilstock & Prees clusters. Policy CS5 is clear in stating that development within the Countryside will be controlled save for where there is an identified local need, particularly noting that Tilstock is a ‘recognisable named settlement’.

3.42. On the basis that at the time of preparing the Core Strategy, settlement boundaries had not been identified and indeed were not defined until the SAMDev was adopted, I do not consider that the inclusion of the word ‘in’ within the second to last sentence of the above extract suggests that only proposals within the boundaries later defined could comply with Policy CS5. To take such an approach would have resulted in any and all proposals submitted between the adoption of the Core Strategy and SAMDev conflicting with this element of Policy CS5.

3.43. Notwithstanding this, even if the decision taker is minded to suggest that this is implied through the use of the word 'in', I note that the preceding word is 'primarily', thus indicating that proposals outside of the defined limits can comply with CS5.

3.44. I consider that there is **no conflict** with CS5.

CS6: Sustainable Design and Development Principles

3.45. Policy CS6 requires that proposals likely to generate a significant level of traffic are located in accessible locations where opportunities for walking, cycling and use of public transport can be maximised. Ensuring that all development protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character. Ensuring that there is capacity and availability of infrastructure to serve any new development.

3.46. As is detailed below and within the evidence of Miss Meer [CD1.10], I consider that the Appeal proposals are located within a sustainable and accessible location, where opportunities exist for residents to safely walk and cycle and where there is a regular bus service.

3.47. As is detailed below and within the evidence of Mr Pullan [CD1.12] and Mr Furber [CD1.11], I consider the proposed development to be of an appropriate scale, density and design having regard to national and local policy and upon review of recent developments within the settlement.

3.48. I consider that the services and facilities within Tilstock can accommodate the scale of development proposed with appropriate financial contributions.

3.49. I consider that there is **no conflict** with CS6.

MD1: Scale and Distribution of Development

- 3.50. In the SAMDev, Policy MD1: Scale and Distribution of Development seeks to ensure sufficient land availability to meet Core Strategy development targets, including housing and employment land. Sustainable development is supported in designated areas including the identified Community Hubs and Community Cluster settlements. In addition, Schedule MD1.1 attached to this policy identifies Tilstock as a community cluster settlement.
- 3.51. It is a matter of common ground that Tilstock is a community cluster settlement.
- 3.52. I note that at paragraph 7.14 of the Council's Statement of Case [CD3,2], the Mr Thomas alludes to the fact that the cluster status is an indication that Tilstock is one of Shropshire's smaller settlements, which have fewer facilities, services and infrastructure. This position is fundamentally unsubstantiated, with the adopted Development Plan not providing commentary within policy or the supporting text to corroborate his position. Indeed, the inclusion of Tilstock as a cluster settlement, where meaningful growth is attributed, confirms that the settlement is a suitable and sustainable location for growth.
- 3.53. The policy does not refer to development being limited to that within the defined settlement boundaries.
- 3.54. I consider that there is **no conflict** with MD1.

MD2: Sustainable Design

- 3.55. Policy MD2 requires development to contribute to and respect locally distinctiveness or valued character and existing amenity value through responding appropriately to the form and layout of existing development and the way it functions. Ensuring development demonstrates there is sufficient existing infrastructure capacity.
- 3.56. As is demonstrated in the submitted Design and Access Statement [CD5.5], and in the Proofs of Evidence of Mr Pullan [CD1.12] and Mr Furber [CD1.11], detailed

consideration has been given to the character and local distinctiveness of the settlement of Tilstock. The proposals reflect the scale, form, density and layout of more recent additions to Tilstock.

3.57. There is no evidence, as is explored further below that there are any capacity issues associated within the existing infrastructure.

3.58. I consider that there is **no conflict** with MD2.

MD3: Delivery of Housing Development

3.59. Policy MD3 states that in addition to supporting development on allocated sites, there may be circumstances whereby development beyond the settlement housing guidelines is appropriate.

3.60. Policy MD3 is supported by Settlement Schedules. Schedule 18.2 relates to Tilstock. Within the Schedule, development boundaries are identified, as is phased development for Tilstock. It is stated that this phased delivery of the 50 dwellings allocated in the settlement is so as to reflect the character of the village. With reference to the Appeal scheme, naturally development of 70 dwellings would occur over a period of time and it certainly would not be the case that all 70 dwellings would be delivered in a single year.

3.61. I acknowledge as a matter of principle that the proposed development would exceed the defined settlement housing guidelines for Tilstock, however, having regard to the criterion i-v under paragraph 2 of MD3, I consider that the uplift in supply is proportionate in the context of the minimum housing requirement and the lack of a housing land supply. I consider that there is a raft of benefits associated with the proposed development, including the provision of market and affordable housing, public open space, PRoW improvements and wider economic benefits. There is no evidence before the Inquiry to indicate that the cumulative impacts of a number of developments coming forward is unsustainable.

3.62. Despite the Council's questionable position in regard to weight afforded to a lack of stakeholder engagement, the Appellant submitted a pre-application enquiry prior to a planning application being submitted, undertook a public exhibition and question and answer session, hosted a website and provided residents with a leaflet about the proposed development. As is detailed in the Statement of Community Involvement [CD5.4] regard was had to local responses and the proposed development was amended to reflect this. As such, extensive community consultation, as required by Policy MD3 has taken place.

3.63. I consider that there is **no conflict** with MD3.

MD7a: Managing Housing Development in the Countryside

3.64. Policy MD7a defines where development in the open countryside will be permitted and essentially acts as a countryside protection policy, limiting development to exception sites and to sites to meet the specific needs of rural workers.

3.65. The Policy does not explicitly state that development outside of, but directly adjacent to the defined settlements boundary will be considered to be located in the open countryside, but unlike with CS5 above, a settlement boundary for Tilstock was established alongside Policy MD7a through the SAMDev, so reasonably, it is assumed that development beyond said boundary would be located in the open countryside.

3.66. As a matter of principle, I accept that the Appeal proposals conflict with Policy MD7a with the Appeal site being located beyond, but directly adjoining the settlement boundary of Tilstock, which is an identified Community Cluster. However, in order to assess the weight to be afforded to this conflict, it is important to consider the degree of harm that would be caused to the countryside protection policy if the Appeal proposal were to be allowed and further consider the degree to which the policy has been effectively superseded by events since adoption of the Core Strategy back in 2011.

3.67. I note that in order to maintain a supply at points between adoption of the Development Plan and the current time, the Council or the Planning Inspectorate have

granted planning permission for sites outside the defined settlement boundaries and have further granted permission for more dwellings within the rural areas of the County than the spatial strategy, which informed Policy MD7a, prescribed (see paragraph 3.27 above).

- 3.68. I have undertaken a search of planning permission granted by the Council in the last five years (major applications only) and the below all fall outside of the defined boundaries);

Table 1: Planning Permissions Granted Outside of Defined Boundaries

Reference	Settlement	Dwellings	Date
19/02385/FUL	Stoke Heath	38	05/04/2022
23/00087/FUL	Oswestry	15	16/11/2023
24/04470/REM	Wem	100	Appeal decision 28/01/2022
24/02808/OUT	Shrewsbury	400	07/07/2025
24/02662/OUT	Albrighton	150	30/05/2025
24/02828/FUL	Ditton Priors	44	31/01/2025
24/02260/FUL	Whittington	61	25/11/2024
22/05744/FUL	Bomere Heath	62	15/05/2024
21/00666/FUL	Baschurch	34	14/10/2021

- 3.69. The Council cannot reasonably expect, and indeed again by virtue of the significant increase in the minimum local housing need, that land within the defined settlement boundaries of the settlements identified for growth within the spatial strategy will collectively have sufficient scope to accommodate anywhere near 2,025 dwellings per annum.
- 3.70. Very evidently, the Council have permitted multiple schemes that conflict with Policy MD7a and at no point in granting these planning permissions did the Council consider that doing so would fundamentally undermine the countryside protection measures set out within the policy so as to render the policy ineffective.

- 3.71. Bringing all of the above together, it is my professional opinion that the level of planning harm which would result in this case from conflict with Policy MD7a would be very limited, and it follows logically therefore that I attach only **limited weight** to that policy conflict.

The Development Plan as a Whole

- 3.72. I acknowledge that the proposed development lies beyond the defined settlement boundary of Tilstock and delivery of 70 dwellings would exceed the defined settlement guidelines and conflicts with Policy MD7a. As this is a key Development Plan policy for determining the principle of the development proposed, I accept therefore that the Appeal proposals conflict with the Plan when read as a whole. However, for the reasons I have stated above, I consider that this policy, and by association the basket of policies most important for the determination of the application, are out-of-date and conflict with them should be afforded no more than **limited weight** in determining the Appeal.

4. Other Material Considerations

Introduction

- 4.1. This chapter sets out other material considerations which I consider should be taken into account in the planning balance and ultimately the decision-making process.

Withdrawn Local Plan

- 4.2. As is confirmed in the Council's SoC at section 6, following extensive Examination in Public, the emerging Shropshire Local Plan was withdrawn following confirmation from the examining Inspectors' that the Plan was incapable of being found sound.
- 4.3. The Council consider that in recognition of the amount of work conducted in preparing the evidence base underpinning and supporting the Draft Local Plan, the Council are attaching weight (at a scale to be determined by the decision-maker) to this evidence base in the decision-making process where relevant. To confirm, the LPA are not attaching weight to any of the former draft policies contained within.
- 4.4. Within the Draft Local Plan, Tilstock was remaining as an identified settlement for new growth, retaining its status as a Community Cluster within the hierarchy of settlements. It was proposed that Tilstock would have its development boundary removed, in recognition of the anticipated growth that would be delivered through the next plan period.
- 4.5. The Appellant's position, aligned with the Basildon decision [CD12.9] and Hertsmere decisions [CD12.10 and CD12.11] neither the Local Plan as a whole, nor specific policies within the withdrawn Local Plan carry any weight, but the evidence underpinning said policies can be considered a material consideration.

Planning Practice Guidance

- 4.6. The Planning Practice Guidance (or PPG) was first published on 6th March 2014 and it expands and provides additional guidance on policies within the Framework. The most recent revisions to the PPG were published on the 24th June 2021.
- 4.7. Where necessary, this proof of evidence makes reference to relevant sections of the PPG.

Affordable Housing

- 4.8. As is detailed within the Appellant's Statement of Case [CD3.1] and within this Proof of Evidence, the Appeal proposal, in exceedance of adopted policy requirement of 10% in the north of the County, will deliver 15% of the site as affordable dwellings. This totals delivery of 10 affordable dwellings and a financial contribution amounting to the value of 0.5 affordable dwellings.
- 4.9. It is common ground between the Appellant and the Council, as detailed in the agreed Planning SoCG [CD4.2] that the site will deliver 15% of the site capacity as affordable housing. The parties agree that the over delivery of affordable housing when compared to the policy requirement is afforded additional weight, but the parties do not agree on the level of weight which should be afforded to the delivery of affordable housing. The parties agree the benefit of affordable housing weighs positively in the planning balance.
- 4.10. The planning application was supported by an Affordable Housing Statement [CD5.2] which considers performance against this identified need.
- 4.11. Notwithstanding the fact that Shropshire has a more acute affordability problem than the regional and national averages, the area local to the proposal site has more acute affordability issues than the Shropshire average.
- 4.12. New housing is needed locally to try and reverse this trend and ensure that there is more opportunity for people to live in the area and maintain its amenities.

4.13. Taking the above into consideration, and as will be considered in my planning balance below, I consider the provision of 10 affordable dwellings on site to carry **very significant weight**.

Five Year Housing Land Supply

4.14. The following sections of the NPPF 2024 are relevant to consideration of Housing Land Supply and the implications of a failure to demonstrate a sufficient supply;

- Footnote 8 which explains that the tilted balance to the presumption in favour of sustainable development applies where a) a local planning authority cannot demonstrate a 5YHLS or b) where the Housing Delivery Test result is less than 75%;
- Section 5: Delivering a sufficient supply of homes, including:
 - Paragraph 61, which refers to the Government's objective of significantly boosting the supply of homes;
 - Paragraph 62, which explains that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment calculated using the standard method set out in the PPG. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for;
 - Paragraph 75, in relation to an allowance for windfall sites;
 - Paragraph 78, which states:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should

identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a. 5% to ensure choice and competition in the market for land; or
 - b. 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or
 - c. From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework , and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.
- Footnote 39 states: "Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five-year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning practice guidance"
 - Footnote 40 states: "This will be measured against the Housing Delivery Test, where be this indicates that delivery was below 85% of the housing requirement"
 - Paragraph 79, in relation to Housing Delivery Test Action Plans and the policy consequences for failing the HDT.
- Annex 1: Implementation, including;

- Paragraph 232, which explains that where a local planning authority can demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78) and where the Housing Delivery Test indicates that the delivery of housing is more than 75% of the housing requirement over the previous three years, policies should not be regarded as out-of-date on the basis that the most up to date local housing need figure (calculated using the standard method set out in planning practice guidance) is greater than the housing requirement set out in adopted strategic policies, for a period of five years from the date of the plan's adoption.

4.15. The Council currently accepts that it cannot demonstrate a five-year housing land supply, having published a Five Year Housing Land Supply Statement [CD2.4] in February 2025 stating their supply to be 4.73 years.

4.16. I rely on the evidence of Mr Pycroft [CD1.13] in regard to Housing Land Supply. As is detailed in his Proof of Evidence, the Appellant considers that the Council can only demonstrate a 3.56 year supply of deliverable housing. A summary of the difference between parties is set out in the table below;

Table 2: Summary of Five Year Housing Land Supply Position

	Requirement	Council	Appellant
A	Annual local housing need figure	1,994	2,025
B	Five year housing requirement without buffer (A X 5 years)	9,970	10,125
C	5% buffer (5% of B)	499	506
D	Five-year supply to be demonstrated (B + C)	10,469	10,631
E	Annual requirement plus 5% buffer (D / 5 years)	2,094	2,126
	Supply		
F	Five-year supply at 1 st April 2024	9,802	7,586
G	Supply in years (F / E)	4.68	3.56
H	Undersupply against the five-year requirement plus buffer	-667	-3,045

- 4.17. Davis LJ, Lindblom LJ and Hickingbottom LJ in *Hallam Land vs SSCLG* [CD12.12] made clear that the extent of the five-year housing land supply shortfall is a material consideration in determining the weight to be afforded to the benefits of providing new housing on a particular proposal:

“The policies in paragraphs 14 and 49 [as were] of the NPPF do not specify the weight to be given to the benefit, in a particular proposal, of reducing or overcoming a shortfall against the requirement for a five-year supply of housing land. This is a matter for the decision-maker’s planning judgment, and the court will not interfere with that planning judgment except on public law grounds. But the weight to be given to the benefits of new housing development in an area where a shortfall in housing land supply has arisen is likely to depend on factors such as the broad magnitude of the shortfall, how long it is likely to persist, what the local planning authority is doing to reduce it, and how much of it the development will meet.” [para. 51]

- 4.18. As such, while the tilted balance applies in any event in this case, the weight to be afforded to the benefit of market and affordable housing, and the corresponding weight to harm resulting from conflict with policies which restrict the supply of new housing, will depend on the extent of the shortfall. In this Appeal, it is common ground between the Appellant and the Council that the Council cannot demonstrate a sufficient supply, but the degree of shortfall is a matter of disagreement.
- 4.19. If the Appeal is allowed, for the reasons I have set out, I consider all of homes will be delivered within the five year period and that this will make a considerable contribution towards the existing shortfall.
- 4.20. In the context of this supply position, as detailed below in my planning balance, I consider the provision of 70 dwellings carries **very significant weight**.

National Housing Crisis

- 4.21. It is widely acknowledged at all levels and across all political divides that there is a housing crisis in this country, which has arisen as a direct consequence of too few

houses being built to keep pace with a growing population and a change in household formation.

4.22. Since the planning application was submitted, a new Government has been elected and has, immediately upon coming into office, confirmed a commitment to delivering 1.5 million new homes over the current Parliament, turbocharging growth with new, mandatory targets to ramp up housebuilding which are now detailed and set out in national policy. This requires the delivery of 370,000 new homes per year, with all areas of the country required to play their part in the national effort.

4.23. Then Deputy Prime Minister and Secretary of State for Housing, Angela Rayner stated with the release of updated national policy in December 2024;

“We cannot shirk responsibility and leave over a million families on housing waiting lists and a generation locked out of home ownership. Our Plan for Change means overhauling planning to make the dream of a secure home a reality for working people. Today’s landmark overhaul will sweep away last year’s damaging changes and shake-up a broken planning system which caves into the blockers and obstructs the builders. I will not hesitate to do what it takes to build 1.5 million new homes over five years and deliver the biggest boost in social and affordable housebuilding in a generation. We must all do our bit and we must all do more”.

4.24. I consider the national housing crisis to be a **material consideration** in relation to this Appeal.

Local Housing Need

4.25. Noting reference within CS4 to identified local housing needs and so as to assist the Inspector, Marrons Socio-Economic team have prepared a Local Housing Need Assessment (LHNA). This is contained at Appendix 1 of my proof of evidence.

4.26. The report has assessed housing need in Tilstock and the combined area of the Tilstock cluster.

- 4.27. Tilstock and Tilstock & Prees have experienced significant declines in the child age population and first-time buyer population which contrasts with lower declines or increases across Shropshire and the West Midlands. This is emphasised by sharper declines in Household Representative Persons (HRPs) in Tilstock & Tilstock & Prees compared with Shropshire and the West Midlands. The proportion of HRPs aged under 49 is also noticeably lower in Tilstock and Tilstock & Prees than across Shropshire and the West Midlands.
- 4.28. Furthermore, a much higher proportion of homes in both the Tilstock (85.8%) and Tilstock & Prees (85.7%) clusters are under-occupied compared with Shropshire (79.9%) and the West Midlands (70.3%). These larger households are unlikely to come back onto the market in affluent rural areas. The increase in larger unoccupied homes where 2 or more bedrooms are unoccupied has increased at a far greater rate locally and across Shropshire when compared to the West Midlands.
- 4.29. There has also been a significantly higher increase in retirees in Tilstock and Tilstock & Prees than across Shropshire and the West Midlands between 2011 and 2021. This highlights how many of the under-occupied properties will be inhabited with older residents.
- 4.30. These demographic factors combine to indicate that housing need in Tilstock and Tilstock & Prees for the under 49 population in particular is much more acute than across Shropshire and West Midlands.
- 4.31. Without providing adequate housing, the trends experienced over the 2011-2021 period will continue and worsen, creating an increasing lack of balance in the communities and therefore failing to align with the NPPF objective of creating mixed and balanced communities.
- 4.32. The median affordability ratio in Shropshire is 8.15 as of 2024, exceeding both the regional and national averages and highlighting how affordability constraints are more pronounced than average levels.

- 4.33. Locally, the median affordability ratio for the MSOA in which the development site is located is 6.35, within the 10% least affordable MSOAs (of 39 MSOAs in total) in Shropshire.
- 4.34. Notwithstanding the fact that Shropshire has a more acute affordability problem than the regional and national averages, the area local to the proposal site has more acute affordability issues than the Shropshire average. New housing is needed locally to try and reverse this trend and ensure that there is more opportunity for people to live in the area and maintain its amenities.
- 4.35. Taking the above into consideration, and as confirmed at table 5.1 of the Local Housing Need Assessment at Appendix 1, there is a minimum need for between 132 and 146 dwellings in the village of Tilstock, a need for between 188 and 300 dwellings in the Tilstock Cluster and a need of between 459 and 681 dwellings in the Tilstock and Prees Cluster combined.
- 4.36. In the context of the significant level of identified and evidenced local housing need in Tilstock, I again consider that the provision of 70 dwellings carries **very significant weight**.

5. Putative Reasons for Refusal & Main Issues

- 5.1. This section addresses the Main Issues identified by the Inspector alongside the Reasons for Refusal (RfR) detailed within the Council's Statement of Case [CD3.2] including my views on the issue and the extent to which impact concerns can be addressed. This is in addition to compliance with relevant Development Plan and NPPF policies and the weight to be attached in the planning balance.
- 5.2. As a matter of fact I consider the formulation of the putative Reasons for Refusal to be unhelpful, disjointed, repetitive and complex to follow, noting that there is significant overlap between urban design, landscape, highways and planning matters raised. The Appellant's team have sought to address and respond to what we believe to be the Council's case based on the latest information available to us, but remain fundamentally unclear on the precise nature of objections on urban design, sustainability and landscape.
- 5.3. The putative Reasons for Refusal identified (and summarised) are;
 1. Disproportionate scale to existing built form, rural character and available services and facilities.
 2. Insufficient information provided to demonstrate that the development will not harm or disturb protected species.
 3. Insufficient information provided to demonstrate that a safe and suitable highways access for vehicles to the site can be achieved. Additionally the site is located within an unsustainable location which would result in over-reliance of private car use.
 4. Repetition of the unsustainable location point, encroachment into the open countryside, harm to the character of the area. Loss of Best and Most Versatile Land. Poorly-designed development where residents are not provided a genuine choice for sustainable modes of travel. And yet more repetition in regard to unsustainable location.

PRfR #1 – Scale, Character & Appearance, Services and Facilities

5.4. PRfR #1 states;

“The proposed development is of such a scale that is disproportionate to the existing built form, rural character and appearance, and available services and facilities of Tilstock; and is inappropriately located so as to not respect the rural street pattern and urban grain, will adversely impact upon the settlements rural function, character and vitality, and result in encroachment to the open countryside, contrary to adopted Policies CS1, CS4, CS5, CS6, MD1, MD2 and MD7a, and NPPF paras 82, 83 and 135 (a)(c)(d)(e)(f)..”

- 5.5. I rely on the evidence of Mr Pullan [CD 1.12] and Mr Furber [CD1.11] and Miss Meer [CD1.10] respectively in regard to matters pertaining to character and appearance, rural street pattern, urban grain and encroachment into the open countryside and internal road layout.
- 5.6. Within his Proof of Evidence Mr Pullan [CD1.12] confirms that the proposed development is of an appropriate scale and pattern of development, has a well founded and integrated relationship with the settlement edge, and that all design principles set out locally and nationally in regard to internal layout has been achieved.
- 5.7. Mr Furber in his Proof of Evidence [CD1.11] confirms that the Site is well contained by existing hedgerows and trees to the north and west, and a new woodland belt to the east and that the opportunity to perceive indirect effects upon landscape character from lighting or increased traffic movements would be Negligible in the context of the existing settlement and Tilstock Road.
- 5.8. Views towards the Site from much of the village of Tilstock are restricted by the built form immediately adjacent to the Site, ribbon development along Tilstock Lane and trees along the southern boundary of the Site. There would be some localised adverse effects upon users of a single public footpath to the east of the Site and to fleeting views from a short section of Tilstock Road. These visual effects would be reduced following the growth of mitigation planting.

- 5.9. The review of the Pegasus LVIA by ESP Ltd on behalf of the Council, considered that further information was required. With reference to best practice guidance, and additional contextual analysis, Mr Furber disagrees that any further information was required in order for the Council to make a decision on the likely landscape and visual effects resulting from the Proposed Development.
- 5.10. Mr Furber is of the opinion that the Proposed Development would comply with the relevant national and local landscape policies. By virtue of the baseline context and design approach there would be very localised effects upon both landscape character and visual amenity. This evidence informs my conclusion that the Proposed Development could be satisfactorily accommodated within the landscape.
- 5.11. Within her Proof of Evidence, Miss Meer [CD1.10] considers the internal road layout and queries why the Council are raising concerns in speed limits associated with forward viability and the use of shared surfaces in regard to the Appeal proposal when they have indeed supported and continue to support applications across the County that follow the same guidelines. Notwithstanding this, Miss Meer's evidence confirms that there are no highway safety concerns and the orientation of the internal road layout will act to reduce the speed at which users are travelling.
- 5.12. In regard to parking, despite the absence of parking standards, Miss Meer confirms that the standard approach taken within Shropshire has been carried forward.
- 5.13. First, with regard to the proposed scale of development, it is noted that within the SAMDev Tilstock was allocated a growth requirement of 50 dwellings over the plan period, which I acknowledge has been delivered. As such, development of scale is not unusual for Tilstock.
- 5.14. As is detailed above the housing requirement that the SAMDev sought to facilitate was some 1,375 dwellings per annum. The latest local housing need for Shropshire is 2,025. This is a 47% increase in the minimum requirement. It invariably follows, that each of the identified sustainable settlements in Shropshire will have to take their fair share of growth. If the same 47% uplift were to be applied to the 50 dwellings allocated in the SAMDev, assuming that moving forward the adopted spatial strategy were to be replicated, a total of 73 dwellings would be an appropriate share for Tilstock to

accommodate. This is not withstanding the significantly higher level of need identified in the Local Housing Need Assessment set out at Appendix 1 of my Proof of Evidence which identifies an outstanding need for 183 to 295 dwellings in the Tilstock cluster, and 402-624 dwellings in the combined Tilstock & Prees clusters.

- 5.15. Within the response from Shropshire Policy Team [CD16.3] reference is made to the delivery of dwellings across the Community Cluster, with the March 2024 Housing Land Supply Statement demonstrating delivery of 108 dwellings across the cluster, against a requirement of 100. Reference here is made to SamDev Policy MD3 which states that the settlement housing guideline is a significant policy consideration. It is acknowledged that development of the Appeal site would bring about delivery of dwellings in excess of that planned for in the adopted Development Plan. However, the Development has not been updated within the mandated 5-year period post adoption and owing to a lack of a five year housing land supply, I consider that the most important policies for determining applications such as this are out- of-date and notwithstanding that the Core Strategy and SAMDev Plan only runs until 2026, less than a year from the point of writing this Proof of Evidence. Additionally MD3 makes provision as detailed above for exceeding the guidelines.
- 5.16. It appears from the PRfR, that one of the concerns of the Council centres largely on the impact that the 70 dwellings would have on the facilities and services within Tilstock and generally with regards to an increase in number of dwellings.
- 5.17. However, increase in number of dwellings is not in-and-of-itself harmful, nor does it automatically result in harm or unacceptable pressure to the availability of services. The increase in numbers must lead to some harm which is of relevance to the planning system if it is to be material to decision making.
- 5.18. In order to assess the impact on local services which could result from the development, a review of consultation responses is a helpful starting point. The table below summarises the consultations sent by the Council to parties which are relevant to the provision of services or at least likely to have a view on the matter.

Table 3: Summary of Consultee Comments

Organisation	Response
Trinity Area Residents Association	None
SC Parks And Recreation	None
West Mercia Constabulary	None
SC Learning & Skills	Due to the scale of development and the number of pupils it will generate it is recommended that contributions for both primary and secondary education provision are secured via a CiL agreement. Based on child yield: • new EARLY YEARS places (DFE Yield 0.0723) • new PRIMARY places (DFE Yield 0.27) • 9 new SECONDARY places (DFE Yield 0.14) • 4 new POST 16 places (DFE Yield 0.05) • and 1 child who will require an EHCP (Educational Health Care Plan) (DFE Yield 0.01)
Tilstock school (consulted as a neighbour of the Site)	None
Whitchurch Rural Parish Council	A development of 70 homes on one site is inappropriate in the context and setting of a rural village. It would increase the size of the village by unacceptable levels. Tilstock is largely a residential area and employment opportunities within Tilstock itself are limited. Employment would therefore need to be sought outside the settlement. This increases the need to travel and would, therefore, fail to reduce carbon emissions. The addition of 70 new homes in a residential settlement is contrary to its function and inappropriate, therefore, the proposals are contrary to strategic objective 3: Rebalance rural communities through the delivery of local housing and employment opportunities appropriate to the role, size and function of each settlement, or group of settlements, ensuring that development delivers community benefit.

	A development of 70 houses would place undue pressures on existing infrastructure: The School has no places available, there is not a GP surgery in the village, patients would therefore be expected to join practices in Whitchurch which are already struggling to absorb numbers from new developments in Whitchurch. Tilstock does not have any shops so residents must travel to small local shops in Prees Heath or into Whitchurch via car or the somewhat limited bus service. The Parish Council would like raise the long standing recognised sewerage/drainage infrastructure issues in Tilstock. Any new development will inevitably put the existing system under increased pressure and developers will need to clearly and positively demonstrate that capacity is adequate and sufficient to cater for 70 additional homes as specified. The Parish Council is aware that a recent attempt by the Village Hall to install electric car charging points failed due to lack of electrical capacity.
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5.19. Education Infrastructure is delivered through CIL in Shropshire and as such, a Section 106 financial contribution for education has not been requested by the Council and does not form part of the Section 106 Agreement.

5.20. As such, the Council have failed to provide evidence that any of the local services or facilities, beyond mitigation that is standard for this form of development, will be overwhelmed or do not have sufficient capacity to accommodate the scale of development proposed. Furthermore, the Appellant is willing to enter into a Section 106 Agreement with the Council and furthermore, a CIL Charging Schedule is in place in Shropshire.

PRfR #2 – Ecology

5.21. PRfR#2 states;

“The planning application, as submitted, has failed to adequately demonstrate that the proposed development will not harm or disturb protected species, namely skylarks, contrary to adopted Policies CS17 and MD12, and NPPF

paras 193 and 195. The proposed development has been assessed under the Conservation of Habitats and Species Regulations 2017 and has failed to demonstrate that it would not result in adverse effects on the integrity of protected sites, in the absence of sufficient mitigation to rule out likely significant effects on Cole Mere Ramsar and Brown Moss SAC and Ramsar the LPA is unable to conclude that the proposed development would not harm the designated features of the site”.

- 5.22. As is confirmed within the Ecology Statement of Common Ground [CD4.5] and in the Council’s email to the Planning Inspectorate and the Appellant, all areas of disagreement in regard to ecology have been resolved. I understand that the Council no longer wish to defend PRfR#2.
- 5.23. As is detailed within the Ecology SoCG [CD4.5] sufficient information has been submitted to demonstrate that there would be no adverse impact on protected species, including Skylarks.

PRfR #3a – Highway Safety

- 5.24. PRfR #3 indicates that insufficient evidence was provided to demonstrate a safe and suitable highways access for vehicles to the site can be achieved.
- 5.25. The impact of the Appeal proposals on highways safety is addressed in the accompanying evidence of Miss Meer [CD1.10]. I rely on the conclusions reached in the accompanying evidence for my position on the compliance of the Appeal proposal with national and local planning policy. I also rely on the assessment contained within Miss Meer’s evidence for undertaking my planning balancing exercise.
- 5.26. I note that a topic specific Highways SoCG [CD4.3] has now been signed and confirms that it is common ground between parties that there are no highway safety concerns pertaining to means of access/egress.

PRfR #3a – Sustainability of Location

5.27. The second element of PRfR #3 states that the site is in an unsustainable location in relation to key facilities with an over-reliance on private car use due to the limitations of public transport services, wider walking and cycling connectivity.

5.28. I again rely on the evidence of Miss Meer [CD1.10] in relation to private car use, public transport and wider cycling and walking connectivity, but I address the matter of sustainability below.

5.29. For ease, Miss Meer's evidence can be summarised as follows;

- All the key facilities within Tilstock village are within an acceptable walking distance;
- There is a genuine choice of travel by other modes such as walking, cycling, and public transport.
- Evidence has been provided to demonstrate that there is records of existing cycle activity on local roads, and that there is no ongoing safety issue that could be exacerbated by the proposed development.
- That the range of services and facilities available is sufficient to meet most day to day needs.

5.30. As a starting point and as confirmed in the Council's Statement of Case [CD3.2] at paragraph 7.2 states;

"For the very reason that the Case Officer in the cited email at 2.4 of the Hearing Statement confirms that Tilstock is an identified settlement for growth within the adopted development plan. A development that is in accordance with the adopted development plan and within the settlement confines of Tilstock is therefore said as being sustainable. Rather the main issue is whether the appeal site represents sustainable development by virtue of its location outside of Tilstock, scale and proximity to services/facilities, impact on the function of the settlement and whether there are any adverse impacts

which would significantly and demonstrably outweigh the benefits of the presumption in favour of sustainable development”.

- 5.31. It therefore appears to be the Council’s case that development within the settlement limits of Tilstock is considered sustainable, but development beyond said limit is unsustainable. I fail to understand how such a position is coherent and how a development within or directly adjoining the settlement boundary (assuming the same scale) can have a differing impact on the facilities within the settlement.
- 5.32. The settlement boundaries have been drawn up to accommodate a housing requirement that is significantly lower than current housing need, as is detailed above. The boundaries will need to flex to accommodate local housing need. They should not be seen as inviolable in this context.
- 5.33. Furthermore, SCC cannot demonstrate the minimum housing land supply, as required by Framework paragraph 74, and therefore Development Plan policies that seek to restrict housing delivery should not be applied with full rigour and should be considered out-of-date. Policy intervention is required and additional land outside of settlement boundaries should be released.
- 5.34. Indeed this is the very approach that has been taken by the Council and continues to be taken with the settlement boundaries shown on the proposals map do not reflect the extent of the built-up area across a number of Shropshire settlements. Significant areas of greenfield land, outside of the settlement, have been released for housing development, in order to help meet local needs. Across the last five years numerous applications have been granted planning permission in Shropshire outside defined settlement boundaries as is detailed in Table 1 above.
- 5.35. Within the supporting text contained in the SAMDev, it is also pertinent to note that at paragraph 3.22 the Council recognize that in the absence of a sufficient housing land supply, it is appropriate for development to take place beyond, defined settlement boundaries;

“Should there not be a five year supply of housing land in Shropshire as a whole, then paragraph 49 of the National Planning Policy Framework (NPPF)

effectively allows sustainable housing developments to take place beyond settlement development boundaries.”

5.36. More significantly, the Council’s claimed housing land supply statement comprises over 2,000 dwellings worth of land that is expected to come forward on land outside of the defined settlement boundaries.

5.37. Indeed, with specific reference to the February 2025 Housing Land Supply Statement, we draw the Inspectors attention to sites contained within Appendix F and Appendix G.

5.38. Of the claimed supply of 9,902, a minimum of 2,204 dwellings are located outside of the defined settlement boundaries. This is almost a quarter of the Council’s claimed supply.

5.39. As such, if the approach being taken by the Council as part of this Appeal were to be consistently applied, the Council’s supply position would be dire, would remain dire for a considerable period of time and would result in an absolute failure to deliver the homes required to support the population of Shropshire.

5.40. Reference within PRfR#3 is also made to limited services and facilities within Tilstock. This is again curious, when development, including that at scale, within the settlement boundaries would seemingly not give rise to similar concerns. I have however below sought to consider the ‘sustainability of the settlement as a whole’. I have done so in the context of the comments received from the Council’s Planning Policy team during the course of the planning application [CD16.3];

“Tilstock is part of a community cluster and is considered an appropriate location to achieve sustainable development”.

5.41. As is set out in the Planning Statement [CD5.1] submitted as part of the application Tilstock benefits from the following facilities;

- Tilstock Bradbury Village Hall and Play Park;
- Tilstock C of E Primary School;
- Tilstock Christ Church

- Tilstock Bowling and Tennis Club
- The Horseshoes Public House

5.42. As is detailed within the submitted Transport Statement [CD7.1] each of the above listed facilities are within an appropriate walking distance of the site. It therefore cannot reasonably be the Council's case that Tilstock is a sustainable settlement, but that the site is unsustainably located.

5.43. I rely on the evidence of Miss Meer [CD1.10] in regard to matters pertaining to pedestrian safety with regard to accessing the above listed facilities as detailed in her Highways Proof of Evidence.

5.44. In addition to these facilities, and in recognition that human interaction with our surrounding environment has changed and a 'modern-form' of sustainability has emerged. I below consider the provision of broadband, streaming services and delivery services to play a role in sustainability.

5.45. Broadband provision is available in Tilstock. Online research, using Thinkbroadband which is carried out using a postcode search, indicates internet services with speeds of up to 1000Mbps download are currently available, with the average being circa 55Mbps. These speeds are sufficient to support home working and home-based businesses and leisure/recreational activities such as streaming and gaming.

5.46. Residents of Tilstock can utilise online grocery delivery services for weekly food shops. I have confirmed through online address checkers, that the following major supermarkets, Tesco, Sainsburys, Morrisons, Asda and Waitrose all deliver to Tilstock.

5.47. A review of smaller food delivery services, again using an address checker, confirms that Just Eat and Uber Eats both deliver food and groceries to Tilstock.

5.48. All major delivery firms, including Amazon Prime, DHL, Yodel, Evri and the Royal Mail deliver parcels and post to Tilstock.

- 5.49. Firstly, it is clear that future residents would have access to a range of facilities within an acceptable walking distance to meet their day-to-day needs, including a Primary School, a public house and an active village hall.
- 5.50. I consider that for the average person, facilities required on a day-to-day basis are at a minimum, the requirement to access to work/education, access to a food store, access to open space and access to community facilities, such as a Public House or Village Hall. In addition to this and recognising the changing nature of sustainability set out above, on a day-to-day basis residents are likely to require access to high-speed broadband, shopping deliveries and streaming services. Tilstock has each of these facilities and services at present, save for a local convenience store, which is available via a regular bus service or via online services.
- 5.51. I therefore consider that future residents would have access to a range of facilities within an acceptable walking distance to meet their day-to-day needs, including a Primary School, a public house and an active village hall.
- 5.52. In terms of public transport, the Site is within easy walking distance of bus stops on Tilstock Lane, providing ready access to the 511 and 512 bus services. This service travels between Whitchurch and Shrewsbury, which includes stops in many other settlements including Prees Heath, Higher Heath. Prees and Wem.
- 5.53. This bus route includes Sir John Talbot's School and Sixth Form on the outskirts of Whitchurch, the nearest secondary school, which has a specific bus stop served by the 511 at school start/finish times. The journey time is approximately 15 minutes.
- 5.54. I have considered the services and facilities, beyond those that either exist or are proposed as part of the Appeal scheme.
- 5.55. The nearest GP Surgery is located in Whitchurch. The proximity of the Surgery to the Appeal site needs to be balanced against the likely frequency with which future residents would need to use such a facility, which would hopefully be on a seldom, as opposed to day-to-day basis. I do however note that the Shropshire Wheelers Scheme covers Tilstock and provides a service for residents who need to access medical

appointments. The community led scheme sees volunteer drivers offer transport from home to the relevant medical facility and then provides a return service if required.

- 5.56. Whilst there are some, albeit I accept, limited employment opportunities for employment in Tilstock at the Primary School, the village hall and the public house, aside from residents that work from home, employment opportunities will largely require travel outside of the settlement, which fundamentally is not unusual for the vast majority of settlements nationally.
- 5.57. Taking the above matters into account, I am of the clear view that the Appeal proposals would be situated in an accessible location, in so far as it is relevant to the ability to deliver sustainable development, and that any concerns in this respect cannot be substantiated.
- 5.58. I consider that maintaining and enhancing the rural vitality of Tilstock, through the provision of a policy-complaint housing mix to encourage younger residents into the area, the provision of publicly accessible open space including a local equipped area of play is a material benefit and as such I consider that **significant weight** is afforded to the maintenance and enhancement of the sustainability of Tilstock.

PRfR #4

- 5.59. PRfR states;

“While the presumption in favour of sustainable development is acknowledged, the adverse impact of the proposal would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole. Specifically:

The site lies in an unsustainable location whereby its development would result in encroachment into the open countryside, causing harm to the rural character and setting of Tilstock, failing to respect the existing built-form and adversely affecting the local landscape and visual amenity of the site and surroundings;

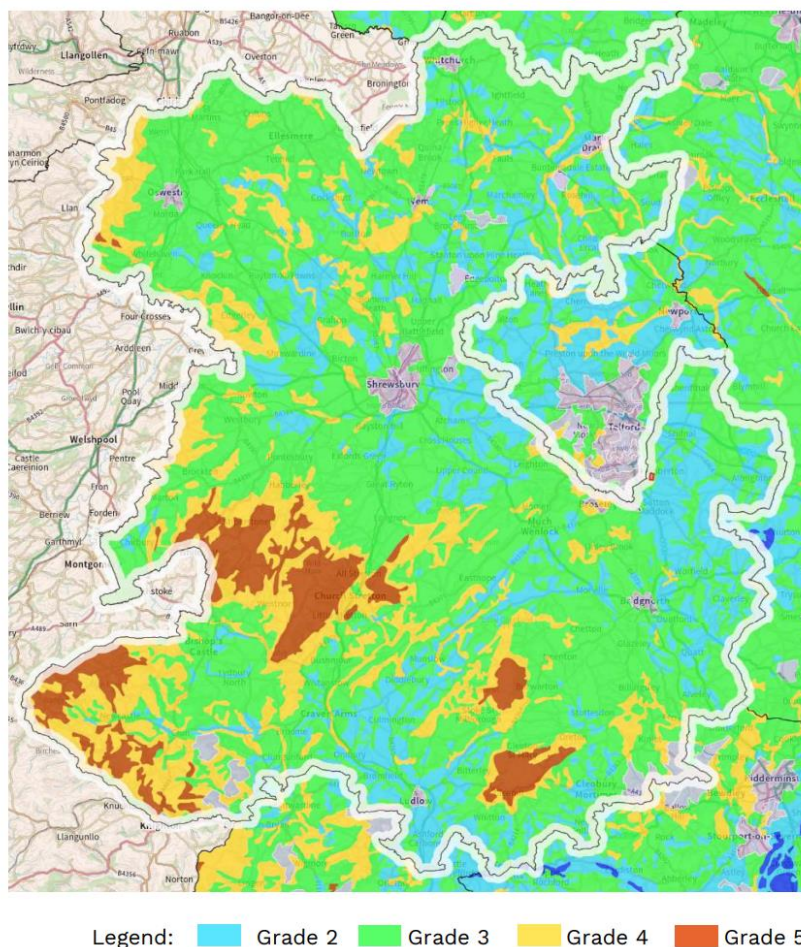
The development would not secure most efficient use of land through the loss of best and most versatile agricultural land, whereby limited economic benefits are realised as the development is for C3 dwellinghouses only and resulting in a poorly-designed development where future residents are not provided with genuine choice for sustainable and active modes of travel.

The development is in an unsustainable location, with limited access to services, facilities and public transport, leading to a high dependency on private care use, contrary to the overarching sustainability objectives of the NPPF”.

There are no material considerations which indicate that a decision should be made other than in accordance with the development plan”.

- 5.60. As noted above, unhelpfully much of this PRfR is nothing more than repeating what is listed in the preceding 3 putative Reason for Refusal. As such, I do not seek to repeat the points made in regard to sustainability of the site/Tilstock, open countryside and built-form.
- 5.61. I will however address the points made in regard to efficient use of land. Curiously the Council confirm at paragraph 8.6 of their Statement of Case [CD3.2] that the proposed development is of a commensurate and appropriate density. This density is in line with the provisions set out in national policy and guidance and also reflects the local built-form. In regard to density, the site fundamentally makes efficient use of land.
- 5.62. With vague reference to Best and Most Versatile land, it was confirmed by the Council’s spokesperson at the CMC that this was not a substantive point for the Council.
- 5.63. Notwithstanding, it is important to note that the Council are incorrect in asserting that the site is in agricultural use. Indeed, the site is used to house approximately 50 race horses, but as a matter of principle I acknowledge that development of the site would result in the loss of Best and Most Versatile Agricultural Land (BMV)
- 5.64. The County of Shropshire varies in soil grade with the majority being either Grade 2 or 3 soils with some lower Grade 4 areas and Grade 5 land which makes up the Shropshire hills in the South West of the County. The below map shows the Agricultural Land Classification across the whole Shropshire.

Figure 1: Agricultural Land Classification Map



5.65. Building on this, the below shows the area and percentages of the County which fall within each Grade;

Table 4: Agricultural Land Classification Breakdown

ALC	Ha	%
Grade 1	10	0%
Grade 2	55,304	17%
Grade 3	180,521	56%
Grade 4	57,009	18%
Grade 5	18,887	6%
Non Agricultural	4,224	1%
Urban	3,697	1%

Source: Landstack 2025

5.66. As is demonstrated on the above, the vast majority of Shropshire comprises BMV, including the sites within Tilstock that have come forward for development as part of the, or within the blanket 'settlement guidelines'. The simple fact is that this site is of no more value than the vast majority of Shropshire and were a blanket restriction to be placed on development in such areas, practically no development would ever come forward in Shropshire.

6. Benefits And Harm

The Benefits of the Scheme

6.1. I consider there to be considerable benefits associated with the Appeal proposal which include;

Social

- 60 market dwellings to meet a pressing local need in the context of the absence of a 5-year housing land supply and the national policy mandate to boost significantly the supply of housing.
- 10 affordable dwellings, where there is a considerable need for affordable homes and low affordability
- New areas formal and informal open space in areas previously inaccessible to the public including the provision of a LEAP.

Environmental

- On site Sustainable Drainage Systems to provide a betterment in surface water runoff from the site.
- At least 10% Biodiversity Net Gain on site in line with government aspirations through, for example, additional tree planting, reinforcement of existing hedgerows and boundary features to improve the connectivity of habitats.

Economic

- An estimated construction spend of £12.37 million, contributing to GDP.
- The creation of/support for approximately 102 direct Full Time Equivalent (FTE) construction jobs and 138 FTE indirect jobs, elsewhere in the economy.
- An estimated resident's gross expenditure of circa £2.5 million annually, a proportion of which will be spent locally.

- 6.2. Even in cases where these benefits are provided in order to mitigate the impact of the Appeal proposals, existing local people will also benefit from them, and there is no assurance that they would be provided if the Appeal scheme had not been proposed. The advantages are specific to this area and development.

Harm

- 6.3. The appellant has addressed the harm alleged by the Council through its putative reasons for refusal through evidence. For the reasons stated and given these issues are no longer disputed between the parties, I do not give any weight to harm alleged in respect of the following:

- Ecology

- 6.4. I consider that there will be some visual harm arising from the development.
- 6.5. I consider that there will be some harm associated with the loss of Best and Most Versatile Agricultural Land.
- 6.6. I consider, as detailed above that there is harm arising from the development as a result of conflict with the Development Plan.

Sustainable Development

- 6.7. Proposals are sustainable when assessed against the social, economic and environmental dimensions of sustainability.

An Economic Role

- 6.8. The demonstrable beneficial economic impacts of the Appeal proposal are included within the 2024 Economic Impact Assessment [Appendix 2]. Delivery of new homes now, in locations such as Tilstock is one component which will enable the Council to promote and sustain a strong, responsive and competitive economy.

A Social Role

- 6.9. The Appeal proposals will deliver well-designed new homes of the right type, in the right place and at the right time to meet market and affordable housing need. The Scheme will assist the Council towards improving its current significant housing land supply deficit. Without a sufficient supply of new homes, the Council cannot meet the housing needs of present or future generations. The site is located close to a range of day-to-day facilities, that I consider sufficient to render the Appeal site a suitable and sustainable location for development.

An Environmental Role

- 6.10. The proposals do not give rise to any material harm in terms of ecology and biodiversity, air quality, water quality or flood risk and drainage, subject to the imposition of appropriately worded planning conditions.

7.Planning Balance

Introduction

- 7.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) indicates that development proposals should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.2. I have set out my position that the paragraph11(d) tilted presumption in favour of sustainable development is engaged in respect of this Appeal as a result of a lack of a five-year housing land supply. This triggers the tilted balance, unless the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development.

NPPF: Heritage Assets

- 7.3. Paragraph 215 of the NPPF 2024 states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

- 7.4. Accordingly, I am required to undertake a simple, ‘un-tilted’ planning balance of the public benefits of the proposal against the identified harm to heritage assets, being mindful of the duty at S.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (which is repeated in policy at paragraph 193 of the Framework) to afford great weight to the preservation of the asset.
- 7.5. As confirmed within the agreed Heritage Assessment [CD11.1], heritage harm is limited to that associated with the Christ Church and it is concluded within the Statement the harm identified is less than substantial and is further at the lower end of the spectrum (and having regard to the absence of a heritage PRfR).

- 7.6. I note that within the signed Statement of Common Ground [CD4.2] the Appellant and Council have agreed that there is no heritage harm arising from the proposed development, but having regard to the conclusions of the Heritage Assessment, for completeness I have taken a precautionary approach and considered any harm against the wider benefits.
- 7.7. Applying the statutory duty to afford considerable weight to the preservation of heritage assets, I consider that any harm to the Christ Church is plainly far outweighed by the public benefits of the proposal, a position which I assume, based on the agreement detailed in the SoCG [CD4.2] and by virtue of the absence of reference to any heritage harm in the putative RfRs, that the Council must agree with.
- 7.8. As such, it is clear to me that there are no policies within the NPPF 2024 which indicated that the development should be restricted, and therefore the tilted balance at paragraph 11(d)(ii) comes into play.

The Balance

- 7.9. The numerous advantages listed in section 6 of my evidence above, in the first instance, are strong material considerations to which a great deal of weight is attached, suggesting that planning permission should be granted in this particular case.
- 7.10. The tilted balance at paragraph 11(d)(ii) of the Framework is another significant material consideration that might suggest that deviating from the Development Plan is justified in this instance, on the basis that I have not found any specific policies in the NPPF 2024 that give a clear justification for refusing the Appeal scheme.
- 7.11. The approach I have taken when assessing and grading weight is to use the following categories of descriptors – very significant, significant, moderate, limited and negligible.
- 7.12. In respect of public benefits, I afford **very significant weight** to the provision of 10 affordable dwellings given the acknowledged local affordable housing need (and lack

of supply) outlined in this proof of evidence, and **very significant weight** to the provision of 60 market dwellings given the substantial shortfall in housing land supply. I afford **significant weight** to a 10.6% (habitats) and 20.7% (hedgerow) net gain in biodiversity units. I afford **significant weight** to the enhancements in rural vitality and viability of Tilstock I afford **moderate weight** to the considerable economic benefits of the proposals. I afford **moderate weight** to the upgrading of the Public Right of Way. I afford **limited weight** to the other contributions which will be made towards community infrastructure, to the extent that they will provide a benefits for existing members of the community alongside new residents.

- 7.13. I have identified that the Appeal proposals conflict with the Development Plan as a whole, but consider that the basket of most important policies are out-of-date, so afford this conflict **limited weight**.
- 7.14. I have also concluded that there would be a small amount of adverse visual impact landscape harms, albeit note that this can be mitigated to some extent by condition. I afford **negligible weight** to the visual impact landscape harms.
- 7.15. I have concluded that there would be harm arising from the loss of Best and Most Versatile land, but noting that much of Shropshire falls within the same category and that planning permission has been granted on multiple schemes located on Best and Most Versatile land, I afford **negligible weight** to said loss.
- 7.16. In my view, the identified harm does not come close to significantly and demonstrably outweighing the benefits of the provision of up to 70 homes, including 10% affordable housing, in a County with a significant shortfall in housing land supply, with no credible strategy to meet the shortfall in the short to medium or long term, and in a sustainable location close to day-to-day services and facilities. The Putative Reasons for Refusal in respect of the Appeal can therefore not be substantiated and the balance clearly tips in favour of the grant of planning permission.

Appendix 1 – Local Housing Need Assessment

BONINGALE DEVELOPMENTS LIMITED

Tilstock Local Housing Need Assessment

April 2025



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1.0 INTRODUCTION AND PLANNING POLICY CONTEXT

Introduction

- 1.1 This Local Housing Need Assessment (LHNA) has been prepared by Marrons socio-economics team on behalf of Boningale Developments Limited, in support of their proposed development in the village of Tilstock, Shropshire Council.
- 1.2 The LHNA's purpose is to inform what the local housing need is for the local area and considers this in the context of the policies of the National Planning Policy Framework (NPPF, December 2024) and Shropshire Council's (SC's) adopted Development Plan and New Local Plan (proposed for withdrawal in July 2025).
- 1.3 We present analysis of demographics, affordability, and housing supply data to reach a conclusion on what the housing need for the area.

Planning Policy Context

- 1.4 The social objective of the NPPF is *"to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations"*¹ (our emphasis) and deliver *"mixed and balanced communities."*
- 1.5 It is therefore crucial for the area surrounding Tilstock to have enough housing planned to support this objective and those of SC's Development Plan.

Shropshire Council Development Plan

- 1.6 The adopted Development Plan for Shropshire currently comprises of the Core Strategy (adopted 2011); the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with the adopted formal Neighbourhood Plans.
- 1.7 A new Local Plan for Shropshire was submitted to the Secretary of State for examination on 03 September 2021. However, despite hearings taking place throughout 2023 and 2024 the Council wrote to the Planning Inspectorate on 13 March 2025 outlining their intention to recommend the plan for withdrawal at their full Council meeting of 17 July 2025.
- 1.8 This proposed withdrawal has followed the Planning Inspectorate concluding that significant modifications of the Plan were required and that this could not be completed within a reasonable period.

¹ Paragraph 8 b), page 5, NPPF, December 2024



Site Allocations and Management of Development (SAMDev) Plan (2015)

- 1.9 The most recent adopted development plan document is the SAMDev, adopted in December 2015.
- 1.10 Policy MD1: Scale and Distribution of Development of the SAMDev and its accompanying Settlement Policy Framework (Schedule MD1.1) set out the overarching approach to housing development in Shropshire for the 2006-2026 period.²
- 1.11 This framework includes several 'Community Cluster Settlements', one of which is listed as the Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall Cluster.³
- 1.12 Policy S18 of the SAMDev covers the Whitchurch area of Shropshire, and within this Policy S18.2(ii) refers to the Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall Cluster.
- 1.13 Policy S18.2(ii) states how there will be provision of 100 dwellings, 2011-2026, in this cluster made up of 50 dwellings in Tilstock, 15 dwellings in Ash Magna/Parva, 25 dwellings in Ightfield and Calverhall, and 10 dwellings in Prees Heath.⁴
- 1.14 A second cluster is made up of Prees and Prees Higher Heath as set out in Policy S18.2(i) and a further 100 dwellings were proposed for this area.⁵

Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038

- 1.15 Although the emerging Plan is now scheduled to be withdrawn, it should be noted how the Planning Inspectorate concluded the housing requirement to be 32,300 dwellings, 2016-2038. This was confirmed in document ID47 sent to the Council on 10th December 2024.
- 1.16 The submission version of the Plan (December 2020) maintained the same community cluster in which Tilstock was located in the SAMDev, but reclassified Prees and Prees Higher Heath as a community 'hub' with "*around 170 dwellings*" stated as a residential guideline.⁶

² Page 15, Shropshire Council Site Allocations and Management of Development (SAMDev) Plan Adopted Plan 17th December 2015

³ Page 18, Shropshire Council Site Allocations and Management of Development (SAMDev) Plan Adopted Plan 17th December 2015

⁴ Policy S18.2(ii), page 231, Shropshire Council Site Allocations and Management of Development (SAMDev) Plan Adopted Plan 17th December 2015

⁵ Policy S18.2(i), page 231, Shropshire Council Site Allocations and Management of Development (SAMDev) Plan Adopted Plan 17th December 2015

⁶ Policy S18.2, page 299, Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, December 2020



Neighbourhood Plans

- 1.17 None of the settlements listed above in the community clusters we have identified have made or emerging neighbourhood plans.

Study Area

- 1.18 In the context of the above we have determined local housing need based on two areas as follows:

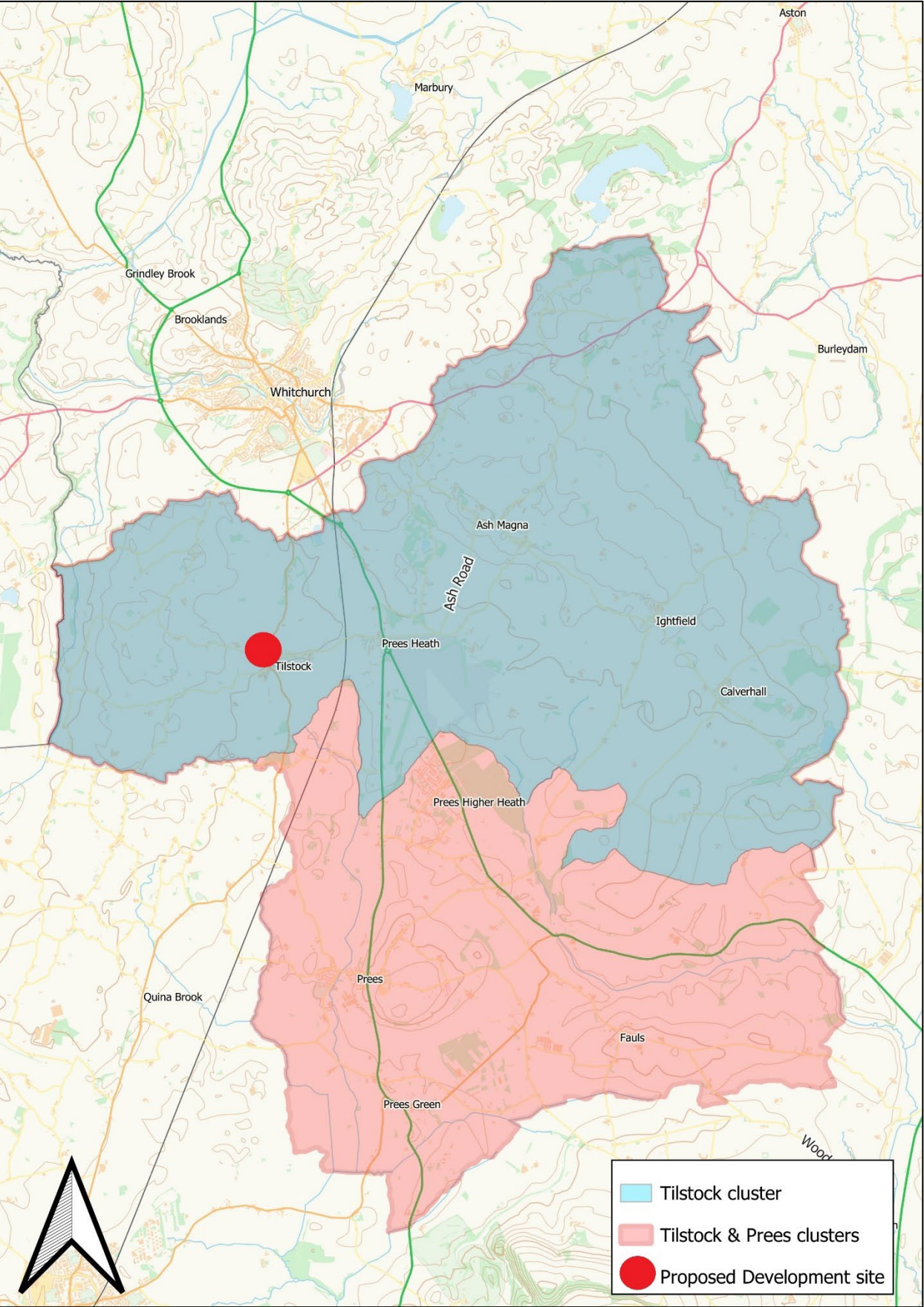
- Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall Community Cluster.
- Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall Community Cluster and Prees and Prees Higher Heath Community Cluster.

- 1.19 This is considered to represent a robust area to determine need, following the S18 Whitchurch Place Plan area set out in the SAMDev which remained consistent with the proposals maps submitted with the Regulation 19 Submission Local Plan 2016-2038.

- 1.20 The study areas are illustrated in Figure 1.1 and for ease we will now refer to the two areas as the Tilstock Cluster and the Tilstock & Prees Cluster.



Figure 1.1: Tilstock Cluster and Tilstock & Prees Cluster



Source: Ordnance Survey



2. DEMOGRAPHIC PROFILE OF THE STUDY AREA

2.1 This section of our analysis draws on the most recent demographic information available from the Office for National Statistics (ONS) to build a demographic profile of the two study areas illustrated in Figure 1.1. We will refer to these as the Tilstock Cluster and Tilstock & Prees Cluster.

2.2 This process will assist in determining the scale of housing need which exists to ensure the aims and objectives of the Development Plan, and the objectives of the National Planning Policy Framework (NPPF) to create mixed and balanced communities and locate housing where it will enhance or maintain the vitality of rural communities, are achieved.

Population change 2011-2021

2.3 Table 2.1 sets out the population change experienced in the two cluster areas between the 2011 and 2021 Census by broad age groups. We have compared this with the wider local authority area and region.

Table 2.1: Population change 2011-2021

	Tilstock	Tilstock & Prees	Shropshire Council	West Midlands
0-18	-13%	-14%	-5%	4%
19-29	4%	15%	-2%	-2%
30-44	-10%	-13%	-6%	3%
45-64	0%	4%	7%	8%
65+	27%	29%	30%	18%
All ages	2%	4%	6%	6%

Source: ONS, nomisweb.co.uk

2.4 Table 2.1 shows how the two clusters have experienced nearly three times the *decline* in their child age population (0-18 years) than Shropshire has. In contrast the region has experienced an *increase*.

2.5 Furthermore, the two clusters have experienced a *higher* decline in the 30-44 age group (those most likely to be first time buyers and/or younger families) compared with Shropshire. Again, there has been a small *increase* across the region.

2.6 The declines in the two clusters and (to a lesser extent) across Shropshire indicates a lack of housing delivery over the 2011-2021 period for the 30-44 demographic in particular.



- 2.7 This trend needs to be arrested to ensure local amenities and services such as Tilstock Primary school remain viable, and to ensure the 2024 NPPF objectives of creating mixed and balanced communities, and providing for local housing need, are achieved.

Household change by Household Reference Person's (HRP) age, 2011-2021

- 2.8 Notwithstanding the population change data which records all persons irrespective of where they reside, the change in the age of households by the HRP is another important measure.
- 2.9 The HRP is the household member who owns the accommodation; is legally responsible for the rent; or occupies the accommodation as reward of their employment, or through some relationship to its owner who is not a member of the household.
- 2.10 Table 2.2 summarises the change in households by the age of the HRP, between the 2011 and 2021 Census.

Table 2.2: Change in households by age of HRP, 2011-2021

	Tilstock	Tilstock & Prees	Shropshire Council	West Midlands
Under 24	3	14	-617	-20,159
25-34	17	42	861	9,521
35-49	-56	-117	-6,808	-52,739
50-64	15	76	5,616	100,392
65+	66	165	10,854	97,569
Total	45 (+6%)	180 (+9%)	9,906 (+8%)	134,584 (+6%)

Source: ONS, nomisweb.co.uk

- 2.11 Table 2.2 reflects the population data in Table 2.1, insofar as there has been a decline in households aged 35-49. However, again this decline is more pronounced in the Tilstock cluster (-26%) and Tilstock & Prees cluster (-22%) than across Shropshire (-19%) and the West Midlands (-8%).
- 2.12 In contrast however the Tilstock & Prees area has experienced the lowest change in the under 24 age group and a small increase in those aged 25-34, however the same area has experienced the *largest* increase by far in those aged 65+.
- 2.13 In the context of this change between 2011 and 2021, it is useful to consider the proportion of households in each age group recorded by the 2021 Census. Table 2.3 sets out this data.



Table 2.3: Proportion of households by age of HRP in 2021 Census

	Tilstock	Tilstock & Prees	Shropshire Council	West Midlands
Under 24	1%	1%	2%	3%
25-34	8%	8%	10%	13%
35-49	19%	19%	20%	26%
50-64	35%	33%	31%	29%
65+	37%	39%	37%	30%

Source: ONS, nomisweb.co.uk

- 2.14 Despite Table 2.2 showing an increase in HRPs under 24 and 25-34 in Tilstock and Tilstock & Prees, the proportion of HRPs in both age groups (both 9%) remains low compared with the wider local authority (12%) and region (16%).

Concealed Households

- 2.15 As the affordability of housing has deteriorated nationally and locally there has been an increase in the number of single adults and couples living with other adults as part of the same household. An example is where a younger couple may be living with one of the couple's parents and are therefore a 'concealed' household.
- 2.16 This is often indicative of a housing need not being met in an area, and we have set out the data available from the 2021 Census for households where there are three or more adults (with or without children) living in the same household.

Table 2.4: Proportion of all households with 3+ adults in 2021

Area	%
Tilstock	22.5%
Tilstock & Prees	19.4%
Shropshire Council	16.2%
West Midlands	18.8%

Source: ONS 2021 Census

- 2.17 As Table 2.4 illustrates, there is a higher proportion of households with 3 or more adults in the smaller Tilstock cluster (22.5%) and the Tilstock & Prees cluster (19.4%) than across Shropshire (16.2%) and the West Midlands (18.8%).
- 2.18 Some of these households will have dependent children and will therefore be concealed families in need of their own home. This indicates a higher-than-average proportion of concealed households in the local area to the development site, which in turn indicates a lack of suitable housing delivery.



Occupancy Rating (Bedrooms)

- 2.19 The occupancy rating of properties can help us to understand the extent of which homes are overcrowded or where they are under-occupied (i.e. empty bedrooms).
- 2.20 Table 2.5 considers the occupancy rating of households by number of bedrooms in the four areas studied as recorded by the 2021 Census.

Table 2.5: Proportion of households in each occupancy (bedrooms) category, 2021

	Occupancy rating of bedrooms: +2 or more	Occupancy rating of bedrooms: +1	Occupancy rating of bedrooms: 0	Occupancy rating of bedrooms: -1	Occupancy rating of bedrooms: -2 or less
Tilstock	58.6%	27.1%	11.9%	2.1%	0.2%
Tilstock & Prees	58.0%	27.7%	12.3%	1.9%	0.1%
Shropshire Council	46.1%	33.8%	18.3%	1.5%	0.3%
West Midlands	37.0%	33.3%	25.4%	3.5%	0.8%

Source: nomisweb.co.uk (Table TS052, 2021 Census)

Note: Figures may not sum due to rounding

- 2.21 The data in Table 2.5 reveals a much higher proportion of homes in both the Tilstock (85.8%) and Tilstock & Prees (85.7%) clusters are under-occupied compared with Shropshire (79.9%) and the West Midlands (70.3%).
- 2.22 In both clusters, nearly 60% of all houses are under-occupied by 2 or more bedrooms. This category falls to only 46.1% across Shropshire and 37.0% across the West Midlands.
- 2.23 This data, particularly the 2+ bedrooms proportion, indicates a significant number of family sized homes which are under-occupied by older people whose children have left home.
- 2.24 This is reflected by the higher comparable growth in the 65+ population summarised in Tables 2.1 and 2.2, and the higher-than-average number of households with 3 or more adults in both clusters compared with Shropshire and the West Midlands set out in Table 2.4.
- 2.25 This larger stock could be better utilised by families with children, but the likelihood of it coming back onto the market quickly is reduced in more affluent areas such as Tilstock if residents are not under any financial pressure to sell or downsize. Furthermore, this could also be indicative of a lack of suitable options for the older generation to 'right-size'.
- 2.26 Table 2.6 illustrates the change in under-occupied homes between 2011 and 2021.



Table 2.6: Change in under-occupied properties (bedrooms) 2011-2021

	Occupancy rating of bedrooms: +2 or more	Occupancy rating of bedrooms: +1
Tilstock	13.7%	-3.3%
Tilstock & Prees	18.3%	-0.8%
Shropshire Council	14.8%	3.7%
West Midlands	9.0%	2.3%

Source: nomisweb.co.uk (Tables QS412EW, 2011 Census and TS052, 2021 Census)

Note: Figures may not sum due to rounding

- 2.27 Table 2.6 illustrates how all areas have experienced an increase in under-occupied homes between 2011 and 2021.
- 2.28 The two cluster areas and Shropshire have experienced an increase in larger under-occupied properties, 2011-2021, which exceeds the average across the region.
- 2.29 The increase in the larger Tilstock & Prees area is particularly high, showing an 18.3% increase in larger under-occupied homes.
- 2.30 Taken together, Tables 2.5 and 2.6 illustrate how the existing housing stock in the two clusters is under-occupied at a greater rate than across Shropshire and West Midlands, and the number of homes under-occupied continues to increase.
- 2.31 Unless residents choose to downsize from these larger family sized homes to smaller properties there will be limited larger family sized housing returning to the market across the cluster areas. New properties of this size will need to be built to help reverse the unbalancing of the population which has been experienced between 2011 and 2021.

Number of Bedrooms

- 2.32 The number of bedrooms in households is a useful indicator of where need may lie, and we have set out the number of bedrooms by households in Table 2.7 below.

Table 2.7: Proportion of households by bedroom size, 2021

	1-bed	2-bed	3-bed	4+ bed
Tilstock	3%	16%	42%	38%
Tilstock & Prees	4%	17%	44%	36%
Shropshire Council	7%	24%	42%	26%
West Midlands	10%	25%	46%	20%

Source: nomisweb.co.uk (Table TS050, 2021 Census)



- 2.33 The relevance of this data needs to be considered in the context of the occupancy analysis set out above. The two cluster areas have a higher proportion of larger 4+ bed properties than Shropshire and the West Midlands.
- 2.34 Taken together, 3-bed and 4+ bed combined account for 80% of the housing stock in the two clusters, compared with only 68% across Shropshire and 66% across the West Midlands.
- 2.35 Notwithstanding this high proportion of 3+ bed homes, as we have shown earlier in this section there has been a decline in the first-time buyer and dependent children age groups in the clusters which indicates a particular lack of *available* family housing of this size.
- 2.36 One of the main reasons for this will be the high level of under-occupancy of this size of property in the two clusters. So, despite there being a high proportional level of stock, a limited amount is coming back onto the market and there is high demand.
- 2.37 Table 2.8 illustrates how the number of bedrooms has changed between 2011 and 2021.

Table 2.8: Change in households by bedroom size, 2011-2021

	1-bed	2-bed	3-bed	4+ bed	All households
Tilstock	19%	-1%	1%	13%	5%
Tilstock & Prees	40%	1%	4%	19%	9%
Shropshire Council	3%	4%	5%	19%	8%
West Midlands	6%	4%	3%	18%	6%

Source: nomisweb.co.uk (Table QS411EW, 2011 Census, and Table TS050, 2021 Census)

- 2.38 Table 2.8 shows how there has been lower growth in the Tilstock cluster (5%) than the Tilstock & Prees cluster (9%) and Shropshire (8%) between the two Censuses.
- 2.39 Furthermore, the Tilstock cluster has only experienced 14% growth in 3+ bed properties (only 1% in 3-bed) which compares with 23% in the Tilstock & Prees cluster and 24% across Shropshire. Across the West Midlands there has been 21% growth.
- 2.40 The smaller Tilstock cluster has therefore experienced much lower growth in family sized housing between 2011 and 2021 than on average.

Retirees

- 2.41 The economic activity status is a further indicator which helps to illustrate the character of an area. Table 2.8 summarises the proportion of the population aged 16 and over who are retired.

Table 2.8: Retirees in 2021

	All residents aged 16+	Retired population	% of 16+ population retired
Tilstock	1,799	520	29%
Tilstock & Prees	4,427	1,350	30%
Shropshire Council	272,245	77,553	28%
West Midlands	4,801,331	1,061,221	22%

Source: nomisweb.co.uk (Tables QS601EW, 2011 Census and TS066, 2021 Census)

Note: Figures may not sum due to rounding

- 2.42 Table 2.8 illustrates how the two clusters and Shropshire have a significantly higher proportion of retirees than the regional average.
- 2.43 The change in retirees between the 2011 and 2021 Censuses is also of use in understanding how the local area has developed. This data is summarised in Table 2.9.

Table 2.9: Change in retired residents 2011-2021

	2011 Census	2021 Census	% change 2011-2021
Tilstock	231	520	125%
Tilstock & Prees	639	1,350	111%
Shropshire Council	37,833	77,553	105%
West Midlands	586,305	1,061,221	81%

Source: nomisweb.co.uk (Tables QS601EW, 2011 Census and TS066, 2021 Census)

Note: Figures may not sum due to rounding

- 2.44 Table 2.9 illustrates how there have been significant increases in retirees across Shropshire when compared to the West Midlands average. However, the increase in the two clusters, particularly the smaller Tilstock cluster, has exceeded the Shropshire average.
- 2.45 This higher growth in retirees is another reason why the two clusters have such a high proportion of under-occupied properties, as many of these retirees who had children will now be living in larger family homes and those children will have left home.



Demographic summary

2.46 In summary the key points from this section are as follows:

- Tilstock and Tilstock & Prees have experienced significant declines in the child age population and first-time buyer population which contrasts with lower declines or increases across Shropshire and the West Midlands.
- This is emphasised by sharper declines in HRP in Tilstock & Tilstock & Prees compared with Shropshire and the West Midlands.
- The proportion of HRPs aged under 49 is also noticeably lower in Tilstock and Tilstock & Prees than across Shropshire and the West Midlands.
- Tilstock & Tilstock & Prees both have higher proportions of households with 3 or more adults than Shropshire or the West Midlands, indicating higher levels of concealed households.
- Furthermore, a much higher proportion of homes in both the Tilstock (85.8%) and Tilstock & Prees (85.7%) clusters are under-occupied compared with Shropshire (79.9%) and the West Midlands (70.3%). These larger households are unlikely to come back onto the market in affluent rural areas.
- The increase in larger unoccupied homes where 2 or more bedrooms are unoccupied has increased at a far greater rate locally and across Shropshire when compared to the West Midlands.
- Despite there being a high proportional level of 3+ bedroom stock, a limited amount is coming back onto the market as the underoccupancy data illustrates, fueling demand.
- The change in households 2011-2021 in Tilstock itself has been lower than the other three comparator areas for all bedroom sizes.
- There has been a significantly higher increase in retirees in Tilstock and Tilstock & Prees than across Shropshire and the West Midlands between 2011 and 2021. This highlights how many of the under-occupied properties will be inhabited with older residents.

2.47 These demographic factors combine to indicate that housing need in Tilstock and Tilstock & Prees for the under 49 population in particular is much more acute than across Shropshire and West Midlands.

2.48 Without providing adequate housing, the trends experienced over the 2011-2021 period will continue, creating an increasing lack of balance in the communities and therefore failing to align with the NPPF objective of creating mixed and balanced communities.



3. HOUSING AFFORDABILITY

- 3.1 The affordability of housing is a key consideration and one which represents the main adjustment in the calculation of minimum housing need for local authorities, using the 'standard method' set out in the National Planning Policy Framework (NPPF, 2024) and Planning Practice Guidance (PPG).
- 3.2 Affordability remained the main component in changes to the standard method proposed by the new government in their consultation on proposed changes to the planning system published on 30 July 2024. This stated how the revised method would use a *“stronger affordability multiplier”*⁷.
- 3.3 This 'stronger' multiplier was borne out by the proposal set out in the consultation as follows, *“we propose increasing the significance of affordability by revising the affordability adjustment. This would mean that the baseline stock figure is adjusted upwards in areas where house prices are more than four times higher than earnings: for every 1% above that 4:1 ratio, the multiplier increases to 0.6% (the current method multiplier is 0.25%).”*⁸
- 3.4 The reason for this proposed change was explained in the consultation as follows, *“High and rapidly increasing house prices indicate an imbalance between the supply of and demand for new homes, making homes less affordable. The worsening affordability of homes is the best evidence that supply is failing to keep up with demand.”*⁹
- 3.5 However following consultation of these proposed changes, the standard method published and adopted as part of the December 2024 National Planning Policy Framework (NPPF) was amended to include an even greater adjustment for affordability constraints.
- 3.6 The multiplier increased from the proposed 0.60% to 0.95% under the December 2024 NPPF, emphasising the importance placed on addressing existing affordability constraints.
- 3.7 In this section we consider affordability in the context of the Tilstock and Tilstock & Prees clusters we have focussed on in this report.

⁷ Paragraph 7b, Proposed reforms to the National Planning Policy Framework and other changes to the planning system, 30 July 2024

⁸ Paragraph 14, Proposed reforms to the National Planning Policy Framework and other changes to the planning system, 30 July 2024

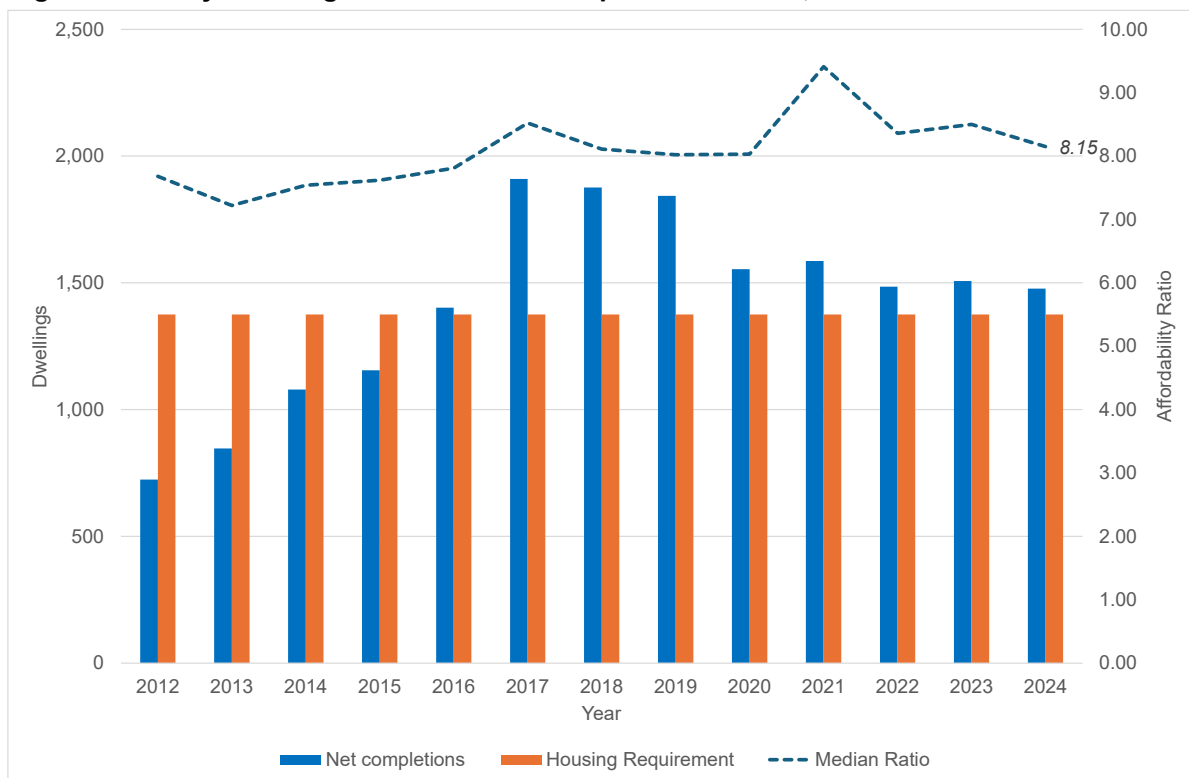
⁹ Paragraph 12, Proposed reforms to the National Planning Policy Framework and other changes to the planning system, 30 July 2024



Shropshire Council

3.8 Figure 3.1 illustrates the change in the median and lower quartile affordability ratios across Shropshire since 2011. We have also included net housing completions and housing need to consider the relationship between housing supply and affordability.

Figure 3.1: Key housing indicators in Shropshire Council, 2011/12 to 2023/24



Source: Shropshire Council and ONS

3.9 As Figure 3.1 illustrates, Shropshire has failed to deliver its cumulative housing requirement between 2011/12 and 2023/24. The shortfall has been minor at 570 dwellings.

3.10 However, this should be considered in the context of the 2024 NPPF's standard method assessment of minimum housing need which means minimum housing need is now 2,005 dwellings per annum for Shropshire.

3.11 Despite several recent years exceeding the adopted 2015 housing requirement (1,375 dpa), the median affordability ratio remains higher in 2024 than it did in 2011 at 8.15.



3.12 This means someone earning a median salary would need 8.15 times that salary to afford a median priced home in Shropshire. This means owning a house is out of reach for many.

3.13 The median ratio of 8.15 in Shropshire is also higher than the West Midlands average (6.87) and the England average (7.71).

Sub-District Analysis of Housing Affordability

3.14 The ratio of median house prices to net annual household income (equivalised) before housing costs is available at sub-district level for 2020 (published on 14 June 2024).

3.15 It is important to note that this is a different calculation to the district-wide figures above which are based on *individual* rather than gross *household* income.

3.16 The smallest area of geography this data is available at is Middle Super Output Area (MSOA). Notwithstanding this there are 39 MSOAs within Shropshire Council and this provides us with robust evidence of affordability in sub-markets of the district.

3.17 The larger MSOAs means that a larger area than our wider study area illustrated in Figure 1.1 has to be used, as the Woore, Prees & Tilstock MSOA covers a larger area. However, this includes all of our study area listed in Figure 1.1 which represents the majority of the MSOA.

3.18 Table 3.1 displays the 39 MSOAs along with their median affordability ratios, ranked by their median ratio as of 2020. The MSOA covering our study area is highlighted in yellow.



Table 3.1 Ratio of median house price (year ending Mar 2020) to gross annual household income (financial year ending 2020) by Middle layer Super Output Area (MSOA) in Shropshire

MSOA Name	Ratio	MSOA Name	Ratio
Clun & Bucknell	7.37	Shrewsbury Town	5.22
Alveley, Claverley & Worfield	7.16	Cosford & Albrighton	5.21
Cressage, Dorrington & Pulverbatch	6.86	Shrewsbury Sutton & Coleham	5.18
Craven Arms & Broadstone	6.81	Shawbury & Weston	5.16
Bishop's Castle, Brockton & Chirbury	6.67	Hanwood, Pontesbury & Minsterley	5.09
Baschurch, Cockshutt & Harmer Hill	6.49	Shrewsbury London Road	5.08
Woore, Prees & Tilstock	6.35	Bridgnorth West	5.01
Church Stretton	6.29	Bayston Hill & Atcham	4.87
Hinstock & Hodnet	6.2	Shrewsbury Monkmoor	4.63
Bomere Heath & Montford Bridge	6.14	Whitchurch	4.6
Cleobury Mortimer, Burford & Ashford Carbonell	5.85	Ellesmere	4.59
Much Wenlock & Broseley	5.72	Wem	4.59
Shrewsbury Copthorne & Bowbrook	5.54	Shrewsbury Harlescott Grange	4.58
Shifnal	5.53	Market Drayton	4.27
Bridgnorth East	5.51	Gobowen, St Martin's & Weston Rhyn	4.15
Ruyton-XI-Towns, West Felton & Whittington	5.4	Shrewsbury Harlescott & Sundorne	4.11
Shrewsbury Meole & Kingsland	5.39	Oswestry West	3.92
Highley & Ditton Priors	5.29	Shrewsbury Greenfields	3.85
Ludlow Town	5.25	Oswestry East	3.76
Trefonen & Pant	5.22		

Source: Housing affordability ratios for Middle layer Super Output Areas, England and Wales, year ending March 2020

3.19 As Table 3.1 illustrates, the median ratio was 6.35 when the last MSOA level affordability ratios were collected for the year ending 2020. Table 3.1 also illustrates how the study area we have used was less affordable than most Shropshire Council's 39 MSOAs.

3.20 Given the intervening period since the 2020 ratios, it is reasonable to expect that these have increased. Notwithstanding this a median ratio of 6.35 means housing ownership would have been beyond the majority in 2020.

Sub-District Analysis of House Prices

3.21 The lack of affordability in Shropshire is further emphasised by more recent house price data published as part of the ONS' 'House Price Statistics for Small Areas' (HPSSA) series, the most recent of which published median house prices lower quartile house prices for the year ending December 2022.

3.22 HPSSA dataset 48 provides lower quartile house prices by Lower Super Output Area (LSOA) in England and Wales. This is a more local area of geography than



the MSOA data used for the affordability ratios and whereas there are 39 MSOAs across Shropshire there are 193 LSOAs.

- 3.23 The LSOA in which Tilstock is located (Shropshire 002D) has experienced a 94% increase in its lower quartile house price over the decade from December 2012 to December 2022.
- 3.24 The lower quartile house price has increased from £155,000 to £300,000 over this period.
- 3.25 This means that of the 193 LSOAs in Shropshire, the LSOA covering Tilstock and Prees Heath has experienced the 18th highest increase in lower quartile house price (i.e. within the highest 10% of increases across Shropshire).
- 3.26 In terms of median house prices, HPSSA dataset 46 is available. This shows how the median house price increased by 64% in the LSOA in which the proposal site is located which is within the top 50% of increases.
- 3.27 The average median price is now £350,000, an increase of £135,000 from the figure of £215,000 a decade ago. This is also higher than the average across Shropshire of £299,000.

Summary

- 3.28 In summary the key points to note from this section are as follows:
- The median affordability ratio is 8.15 as of 2024, exceeding both the regional and national averages.
 - Locally, the median affordability ratio for the MSOA in which the development site is located is 6.35, within the 10% least affordable MSOAs (of 39 MSOAs in total) in Shropshire.
 - The lower quartile house price in the LSOA in which the proposal site is located is now £300,000, and the LSOA has experienced the 18th highest increase (94%) in Shropshire (of 193 LSOAs) over the last decade.
 - The median house price increase has not been as pronounced but has still been 64% and higher than average.



- 3.29 This analysis shows how Shropshire Council and the local area to the proposal site have acute affordability issues when considered locally, regionally, and nationally, indicating a need for new housing to drive down prices and make housing more affordable for all, particularly in the case of housing for those on lower incomes (i.e., younger age groups).
- 3.30 The requirement to provide for these age groups is highlighted by the demographic analysis set out in section 2 of this report, including the higher than average increases in households where 3 or more adults live (indicating adult children living at home) in the local areas of study, and the higher-than-average child age and first-time buyer age population decline between the 2011 and 2021 Censuses.



4. HOUSING NEED AND DELIVERY IN THE STUDY AREA

Introduction

- 4.1 This section of our report considers the amount of housing which has been delivered in Tilstock and Tilstock & Prees. In this context we then consider what the indicative housing need is based on the methodology set out in Appendix A of the 'Housing Needs Assessments at Neighbourhood Plan' document drafted by AECOM for Locality and referred to in paragraph ID: 41- 105-20190509 of the 'Neighbourhood Planning' section of Planning Practice Guidance (PPG).

Methodology for assessing housing need

- 4.2 For our assessment of overall need we follow the methodology referred to above from the PPG.
- 4.3 The **first step** in determining the need is to work down from the housing target or requirement for the local planning authority, however the guidance states *"If the Local Plan was adopted before January 2019, the housing target is likely to have been determined under previous planning policy and guidance. If this is the case, speak to your local authority about whether they intend to produce an up-to-date figure or whether the Local Plan requirement remains valid."*¹⁰
- 4.4 Because the most recently adopted housing requirement was the figure included in the Site Allocations and Management Development (SAMDev) Plan in December 2015, over 9 years ago, we consider that this figure could be used from 2006/07 to 2019/20. However, due to a lack of available information on completions for the first five years we have assessed need from 2011/12 onwards as we explain later in this section.
- 4.5 For future need we have used the December 2024 NPPF standard method minimum which is 2,005 dpa as of April 2025.
- 4.6 The **second step** is to determine the population in the Neighbourhood Plan area, and what proportion this is of the local authority area's population. As we have identified earlier in this report there are no Neighbourhood Plans covering the area where the development site is located.

¹⁰ Page 58, Housing Needs Assessments at Neighbourhood Plan Level, Locality



4.7 We have therefore used the Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall Community Cluster (referred to as Tilstock throughout this report) and the Tilstock cluster plus the Prees and Prees Higher Heath Community Cluster (referred to as Tilstock & Prees).

4.8 The 2022 mid-year population estimates published by the ONS are the most recent source available for this purpose. Table 4.1 sets out the population for the Tilstock area, the wider Tilstock & Prees area, and Shropshire Council.

Table 4.1: 2022 mid-year population estimates

Area	Population	% of District
Shropshire Council	327,479	100%
Tilstock & Prees	5,287	2%
Tilstock	2,077	1%

Source: ONS 2022 mid-year population estimates

4.9 As Table 4.1 illustrates, the Tilstock area accounted for 1% of Shropshire Council's 2022 population, and the Tilstock & Prees area accounted for 2%.

4.10 The next step is to consider whether the need would reflect the overall **development strategy** for the local planning authority, taking into account the intended distribution of development including targets for specific areas.

4.11 Although out of date, Table MD1.1 of the SAMDev allocated 10,000 dwellings to the 'Rural Areas' of Shropshire between 2006 and 2026. This excluded the 'County Town and Sub-regional Centre' of Shrewsbury, and 17 'Market Towns and Key Centres.'

4.12 This distribution of development meant that 36.4% of the 27,500-housing requirement in the SAMDev was allocated to Rural Areas, 2006-2026.

4.13 The population of the Rural Areas combined was 125,559 people as of mid-2022, meaning Tilstock's population (2,077 people) and Tilstock & Prees population (5,287 people) were 2% and 4% of the Rural Areas population respectively.

4.14 In the context of the above and the AECOM guidance, it is therefore considered that 36% of the housing need figure could be applied to the rural areas, and that 2% and 4% of this overall need for rural areas could be applied to Tilstock and Tilstock & Prees respectively.



4.15 **Step 3** of the guidance then states “any dwellings that have already been completed over the neighbourhood plan period to the present date (or to the last date for which data is available) should be deducted from the total to provide a housing need figure for the remainder of the Plan period that reflects past under- or over-delivery” ¹¹ (our emphasis).

4.16 We have not been able to obtain net housing completions for the 2006/07 – 2010/11 period for the two sub district areas and have not therefore assessed need for this period.

4.17 However, the most recent five-year housing land supply statement (published 13th February 2025) provides completions data for the 2011/12 to 2023/24 period, and we have set this out in Table 4.2.

Table 4.2: Net Completions 2011/12 to 2023/24 in the study areas

Area	Completions 2011/12 to 2023/24
Tilstock cluster	166
Prees and Prees Higher Heath cluster	84
Tilstock & Prees	250

Source: Pages 52-53, Shropshire Council Five Year Housing Land Supply Statement, 13th February 2025

4.18 As Table 4.2 illustrates, there have been 250 net completions across the two clusters (166 in Tilstock and 84 in Tilstock & Prees) since 2011 according to the Council's most recent five-year housing land supply statement.

4.19 Using this information, we are able to assess housing need to date, but also for the future.

Determining existing housing need

4.20 We have determined need based on the Council's own series of five-year housing land supply statements which incorporated the following housing requirements:

- 1,390 dpa 2011/12 to 2020/21.
- 1,530 dpa 2021/22 to 2023/24.
- 2,005 dpa 2024/25 to 2037/38.

¹¹ Page 59, Housing Needs Assessments at Neighbourhood Plan Level, Locality



4.21 Table 4.3 summarises what this would mean for need based on the population % and distribution strategy approaches set out in the guidance referred to by PPG.

Table 4.3: Housing need based on the adopted Local Plan housing requirement, 2011/12 to 2023/24 and the distribution of development strategy % of the adopted Local Plan

Area	Need based on Local Plan strategy	Need based on population %	Completions to date (2011/12-2023/24)	Outstanding housing need
Tilstock	150	185	166	-16 to 19
Tilstock & Prees	300	370	250	50 to 120

4.22 Table 4.4 illustrates how based on the outdated housing requirement of the adopted Local Plan there has been a slight over-delivery (16 dwellings) for the Tilstock cluster, but there remains a need for an additional 50 dwellings based on the distribution strategy of 10,000 dwellings to rural areas in the 2015 SAMDev Plan.

4.23 However, we consider this should be approached with caution due to the age of the Plan and this distribution strategy (i.e., over 9 years since adoption).

4.24 We consider the population % approach to be more robust as it is based on the most recent 2022 mid-year population estimate for Shropshire and the two study areas.

Future housing need

4.25 As we have already identified, Shropshire Council intend to withdraw their draft Local Plan in July 2025. In this context the most recent February 2025 five-year housing land supply statement uses the December 2024 NPPF's new standard method for the calculation of minimum housing need.

4.26 The new standard method was 1,994 dpa prior to new affordability ratios being published on 24th March 2025. The new affordability ratios have led to a slight increase to minimum housing need for Shropshire, and it is now 2,005 dpa.

4.27 We have therefore calculated future need from 2024/25 to 2037/38 based on this being the period for the most recent draft Local Plan. Need for this period is therefore summarised in Table 4.4.



Table 4.4: Housing need based on standard method minimum need, 2024/25 to 2037/38 and the distribution of development strategy % of the adopted Local Plan

Area	Need based on Local Plan strategy	Need based on population %
Tilstock	204	281
Tilstock & Prees	409	561

- 4.28 The outstanding need/surplus from the 2011/12-2023/24 period set out in the final column of Table 4.3 would need to be added to the figures for the 2024/25 to 2037/38 period in Table 4.4. Table 4.5 provides this calculation.

Table 4.5: Housing need based on standard method minimum need, 2024/25 to 2037/38 and the distribution of development strategy % of the adopted Local Plan plus outstanding need/surplus 2011/12-2023/24

Area	Need based on Local Plan strategy	Need based on population %
Tilstock	$204 - 16 = 188$	$281 + 19 = 300$
Tilstock & Prees	$409 + 50 = 459$	$561 + 120 = 681$

- 4.29 The AECOM guidance then moves on in Step 3 to state “*Outstanding housing commitments (planning permissions that have been granted but where construction is still underway or has not begun) can be considered here as well. However, they should not be discounted from the housing need figure until they are completed*”¹² (our emphasis).
- 4.30 Although the guidance states that outstanding commitments which haven’t been completed should not be deducted from the housing need figure, it is useful to understand how they would affect the need.
- 4.31 The commitments for each area is set out below in Table 4.6, taken from the Council’s February 2025 five-year housing land supply statement.

Table 4.6: Housing Commitments with Planning Permission in Tilstock and Tilstock & Prees on March 31st 2024

Area	Sites with Planning Permission or Prior Approval
Tilstock	5
Tilstock & Prees	57

Source: Table 12, Shropshire Council Five Year Housing Land Supply Statement, 13th February 2025

¹² Page 59, Housing Needs Assessments at Neighbourhood Plan Level, Locality



4.32 As Table 4.6 illustrates, there are a total of 5 commitments with planning permission in Tilstock, and 57 in Tilstock & Prees.

4.33 Table 4.7 therefore summarises how this affects the need for housing between 2024/25 and 2037/38.

Table 4.7: Housing need, 2024/25 – 2037/38, minus commitments

Area	Need based on Local Plan strategy	Need based on population %	Minus all commitments with planning permission	Outstanding Housing Need 2024/25 – 2037/38	
				Local Plan Strategy	Population %
Tilstock	188	300	5	183	295
Tilstock & Prees	459	681	57	402	624

4.34 Table 4.7 therefore shows how there remains an outstanding need of between 183 and 295 homes for the Tilstock area, and between 402 and 624 homes for Tilstock & Prees area, 2024/25 – 2037/38 even if we assumed that all commitments with planning permission are built out.

4.35 However, this is for illustrative purposes only as the AECOM guidance is clear that commitments with planning permission can be ‘considered’, but ultimately should not be discounted from the calculation of need until completion.

Need and Delivery in Tilstock Village

4.36 In the context of the proposed development being located in Tilstock village, we have taken the analysis one step further to establish need in the village in isolation. It should be noted that the smallest level of geography available (output area) dissects the village and includes the small hamlet of Alkington and a small area near to Ash Magna. Population in these areas is likely to be minimal due to their rural nature and is not considered to unduly affect the analysis for the village.

4.37 The population as of 2022 in Tilstock village was 843, which is 41% of the Tilstock cluster (2,077 people) as set out above.

4.38 If we were to apply 41% to the cluster need for 2011/12 to 2023/24 (185 dwellings) the village need would be 76 dwellings. Since 2011 we have recorded 45 completions in the village, leaving outstanding need of 31 in the village to 2023/24.



- 4.39 Added to this would be 41% of the future need for the Tilstock cluster (281 dwellings 2024/25 to 2037/38) which would be 115 dwellings.
- 4.40 In total, based on the outstanding need to date (31 dwellings) and the newly arising need (115 dwellings) there is a need for 146 dwellings in the village based on the population approach.
- 4.41 Based on the Local Plan Strategy approach, Tilstock village was proposed to take 50% (100 dwellings) of the total development for the cluster. This would have equated to 75 dwellings to 2023/24 and then 102 to 2037/38 based on our calculations for the wider Tilstock cluster.
- 4.42 Once completions to 2023/24 are taken account of (45) this would leave an outstanding need of 132 dwellings overall.
- 4.43 Within the village itself we therefore conclude the need to be between 132 and 146 dwellings to 2037/38. If the demolition of 17 dwellings at the village's nursing home are accounted for the need increases to between 149 and 163 dwellings.

Summary

- 4.44 In summary, this section of the report has determined there to be an outstanding housing need in the Tilstock cluster and Tilstock & Prees clusters combined from the period of 2011/12 to 2023/24.
- 4.45 This outstanding need and the calculation of need for the most recent emerging Plan period (to 2037/38) shows a need for between 188 and 300 dwellings in Tilstock and between 459 and 681 dwellings across the Tilstock & Prees area.
- 4.46 The AECOM local needs assessment guidance included in the national Planning Practice Guidance is clear that outstanding housing commitments (planning permissions that have been granted but where construction is still underway or has not begun) should not be discounted from the housing need figure until they are completed.
- 4.47 Notwithstanding this guidance, even if we were to deduct all the commitments with planning permission listed in the Council's most recent five-year housing land supply report, there would remain an outstanding need for housing over the most recent emerging Local Plan period of 2024/25 – 2037/38 of 183 to 295 dwellings in Tilstock and 402 – 624 dwellings across the combined Tilstock & Prees area.



- 4.48 If we were to distil this analysis down to the village of Tilstock alone the need is between 132 and 146 dwellings to 2037/38 (149 to 163 if the nursing home demolition of 17 units is accounted for).



5. SUMMARY AND CONCLUSIONS

- 5.1 The purpose of this technical report has been to assess what the housing need is in Tilstock and its surrounding area, within Shropshire Council.
- 5.2 As Figure 1.1 illustrates we have assessed need in the Tilstock, Ash Magna/Ash Parva, Prees Heath, Ightfield and Calverhall Cluster (referred to as the Tilstock cluster in this report) and the combined area of the Tilstock cluster with the separate Prees and Prees Higher Heath cluster (this combined area is referred to as Tilstock & Prees throughout the report).
- 5.3 We have chosen to include the combined area given the settlement of Tilstock being located very close to the Prees and Prees Higher Heath cluster, and because they represent most of the rural area outside of Whitchurch in area S18 of the Adopted SAMDev Policies Map.
- 5.4 Furthermore these cluster areas were proposed to remain consistent in the draft new Local Plan which is due to be withdrawn in July 2025.
- 5.5 As part of our analysis we have considered housing need and delivery over the course of the adopted SAMDev Plan period (2006-2026), alongside what the need is based on the National Planning Policy Framework's (NPPF, December 2024) standard method for calculating local housing need.
- 5.6 We have also considered the 2021 Census and how the demographics of the two areas have changed since the 2011 Census, and whether the trends experienced are likely to support NPPF objectives for rural areas. This includes ensuring that development encourages the creation of mixed, balanced, and inclusive communities.
- 5.7 The conclusion is that there is an outstanding need for housing in both areas as this report details, which can be summarised as follows.

Demographics

- 5.8 Tilstock and Tilstock & Prees have experienced significant declines in the child age population and first-time buyer population which contrasts with lower declines or increases across Shropshire and the West Midlands. This is emphasised by sharper declines in HRP in Tilstock & Tilstock & Prees compared with Shropshire and the West Midlands.



- 5.9 The proportion of HRPs aged under 49 is also noticeably lower in Tilstock and Tilstock & Prees than across Shropshire and the West Midlands.
- 5.10 Tilstock & Tilstock & Prees both have higher proportions of households with 3 or more adults than Shropshire or the West Midlands, indicating higher levels of concealed households.
- 5.11 Furthermore, a much higher proportion of homes in both the Tilstock (85.8%) and Tilstock & Prees (85.7%) clusters are under-occupied compared with Shropshire (79.9%) and the West Midlands (70.3%). These larger households are unlikely to come back onto the market in affluent rural areas. The increase in larger unoccupied homes where 2 or more bedrooms are unoccupied has increased at a far greater rate locally and across Shropshire when compared to the West Midlands.
- 5.12 Despite there being a high proportional level of 3+ bedroom stock, a limited amount is coming back onto the market as the underoccupancy data illustrates, fueling demand.
- 5.13 The change in the number of households 2011-2021 in Tilstock itself has been lower than the other three comparator areas for all bedroom sizes indicating limited growth.
- 5.14 There has also been a significantly higher increase in retirees in Tilstock and Tilstock & Prees than across Shropshire and the West Midlands between 2011 and 2021. This highlights how many of the under-occupied properties will be inhabited with older residents.
- 5.15 These demographic factors combine to indicate that housing need in Tilstock and Tilstock & Prees for the under 49 population in particular is much more acute than across Shropshire and West Midlands.
- 5.16 Without providing adequate housing, the trends experienced over the 2011-2021 period will continue and worsen, creating an increasing lack of balance in the communities and therefore failing to align with the NPPF objective of creating mixed and balanced communities.



Affordability

- 5.17 The median affordability ratio in Shropshire is 8.15 as of 2024, exceeding both the regional and national averages and highlighting how affordability constraints are more pronounced than average levels.
- 5.18 Locally, the median affordability ratio for the MSOA in which the development site is located is 6.35, within the 10% least affordable MSOAs (of 39 MSOAs in total) in Shropshire.
- 5.19 The lower quartile house price in the LSOA in which the proposal site is located is now £300,000, and the LSOA has experienced the 18th highest increase (94%) in Shropshire (of 193 LSOAs) over the last decade.
- 5.20 The median house price increase has not been as pronounced but has still been 64% and higher than average.
- 5.21 Notwithstanding the fact that Shropshire has a more acute affordability problem than the regional and national averages, the area local to the proposal site has more acute affordability issues than the Shropshire average. New housing is needed locally to try and reverse this trend and ensure that there is more opportunity for people to live in the area and maintain its amenities.

Housing delivery and need in Tilstock village, the Tilstock cluster, and the Tilstock & Prees clusters combined

- 5.22 Based on the guidance for determining local housing need referred to in Planning Practice Guidance (PPG), this report has established there to be an outstanding housing need in the Tilstock cluster when considered in isolation, and the wider study area of Tilstock & Prees as set out in Table 5.1.

Table 5.1: Housing need based on the Adopted Local Plan requirement, 2011/12-2023/24, and the 2024 NPPF's standard method minimum need for Shropshire over the emerging Local Plan period (2024/25-2037/38)

Area	Need based on Local Plan strategy	Need based on population %
Tilstock village	132	146
Tilstock cluster	188	300
Tilstock & Prees clusters combined	459	681



5.23 The guidance states that “*Outstanding housing commitments (planning permissions that have been granted but where construction is still underway or has not begun) should not be discounted from the housing need figure until they are completed*” and Table 5.1 therefore does not consider commitments.

5.24 However, even if we were to assume the delivery of all commitments listed in the most recent 2023/24 Five Year Housing Land Supply Statement published by Shropshire Council, an outstanding need would remain for 183 to 295 dwellings in the Tilstock cluster, and 402-624 dwellings in the combined Tilstock & Prees clusters.

Conclusion

5.25 This report has shown a clear and urgent need for additional housing in the Tilstock cluster and the Tilstock & Prees clusters combined to address worsening demographic and affordability trends in the local area and deliver housing need calculated using the methodology recommended by Planning Practice Guidance.

5.26 At the more local level in Tilstock village itself there also remains an outstanding housing need.

5.27 Failure to address demographic trends and worsening affordability indicators will mean the NPPF objective to “*be responsive to local circumstances and support housing developments that reflect local needs*” will not be achieved. Furthermore, without new housing it will be difficult to achieve the objective to “*enhance or maintain the vitality of rural communities*”.

Appendix 2 – 2024 Economic Impact Assessment

2024 Economic Impact Assessment for Housing at land at Tilstock Road, Tilstock

ECONOMIC IMPACT ASSESSMENT

A report for the proposed residential development
of 70no. residential dwellings
Land at Tilstock Road, Tilstock

2024 Economic Impact Assessment for Housing at land at Tilstock Road, Tilstock

ANNUAL OPERATIONAL BENEFITS



240 jobs

Operational net jobs created (direct, indirect and induced).



£0.3m

Council tax pa



£2.5m

Total net operational related Gross Value Added (Direct, indirect and induced).



£12.37m

Estimated construction spend

£1.1m

RETAIL

Retained expenditure pa from new residents in local area

TOTAL 10 YEAR BENEFITS



1,180 jobs

Net created and safeguarded (direct, indirect or safeguarded).



£118m

Net Present Value Total net related Gross Value Added (Direct, indirect and induced).



1 : 2.63

10 year cost benefit ratio (NPVC/NPV - after discounting).

2024 Economic Impact Assessment for Housing at land at Tilstock Road, Tilstock

Calculating Economic Impact

Construction Impacts

During the construction phase a considerable number of direct jobs will be created locally and regionally. It should be noted that investment in production-type activity rather than consumption, brings significant long-term economic and social benefits.

The construction industry is also a driver of growth in other sectors due to its heavy reliance on an extended and varied supply chain. It uses a wide range of inputs from many industries to produce its goods and services. Investment in the sector therefore indirectly supports a broad set of industries as the increase in final demand filters through to key industries which supply the sector.

Construction also has one of the lowest levels of imports, so the stimulus spending stays within the local or national economy.

The following sectors are amongst those that benefit most from increases in construction activity: aggregates, renting of machinery, real estate; architectural and technical consultancy; plastic, wood and metal products.

The suppliers and other services that are engaged in the delivery of the development are described in terms of both direct, indirect and induced jobs and resultant GVA. **Gross value added (GVA)** is the measure of the value of goods and services produced in an area, industry or sector of an economy.

Each is summarised as follows:

- **The direct impact:** Wage income and profit generated in the construction sector, plus spend on non-labour input.
- **Indirect impact:** The supply chain impacts of construction and their knock on effects, i.e., an increase in output and income up and down the supply chain.
- **Induced impact:** An increase in household income as a result of increased employment/income in construction and other sectors leads to an increase in spending and demand/output in the overall economy.

Jobs created during the construction phase only last as long as the construction takes place and are described in terms of job years. A composite multiplier was applied from the HCA Additionality Guide Fourth Edition (2015) (Table 4.11: Output multipliers, construction composite). The gross figures have also been adjusted to net figures to take account of the true added value of the investment (See **Annex One** technical note on impact assumptions).

2024 Economic Impact Assessment for Housing at land at Tilstock Road, Tilstock

Annex One: Technical Note on Impact Assumptions

When calculating jobs and GVA we have taken account of:

- Direct construction jobs for the proposal were calculated by dividing construction expenditure by GVA per FTE average for construction for East of England.
- Applying a composite employment multipliers from the HCA Additionality Guide Fourth Edition (2015) (Table 4.11: Output multipliers).
- To ensure the true added value of a development is assessed appropriate adjustments are required to alter the impacts from gross to net. These account for displacement (assumed low at 5%), and leakage (again assumed low at 10%).
- The persistence of the benefits i.e. how many years the benefits are expected to persist and the period over which benefits will accrue until they reach their full potential. In this instance, a ten year time frame has been chosen.
- The rate at which benefits will decay i.e. the proportion of annual benefits expected to be lost from one year to the next due to economic changes, other investment decisions etc. A decay of 10% per annum has been used.

- Calculation of the Net Present Value (NPV)* of the GVA benefit stream over the appropriate persistence time period by discounting back utilising an appropriate discount rate. HM Treasury Green Book guidance has been followed which recommends discounting by 3.5% in order to determine NPV.
- A cost benefit ratio calculated by Net Present Cost (NPC) against NPV i.e. the amount each £1 of investment generates.
- The estimates for GVA per FTE do not account for self-employment.

Net present value is a calculation that compares the amount invested today to the present value of the future cash receipts from the investment. In other words, the amount invested is compared to the future cash amounts after they are discounted by a specified rate of return.

2024 Economic Impact Assessment for Housing at land at Tilstock Road, Tilstock



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