
Shropshire Site Allocations and Management of Development (SAMDev) Plan

Main Modifications

Shropshire SAMDev Plan

Main Modifications



Project: SAMDev Main Modifications – Reps

Client: HDBoF

Job Number: SG 756

File Origin: Internal

Document Checking:

Prepared by: Donna Collier	Signed:	
-----------------------------------	----------------	--

Checked by: Steve Briggs	Signed:	
---------------------------------	----------------	--

Verified by: Steve Briggs	Signed:	
----------------------------------	----------------	--

Contents

1.0	Introduction	1
1.1	Scope of Response.....	1
1.2	Plan Methodology	1
2.0	Tests of Soundness	2
2.1	Basis for Response.....	2
3.0	Development Management Policies	2
3.1	MD1 - Scale and Distribution of Development – (Modification MM3).....	2
3.2	MD2 – Sustainable Design – (Modifications MM7 to MM10).....	5
3.3	MD3 – Delivery of Housing Development - (Modification MM14).....	6
3.4	MD4 – Managing Employment Development - (Modifications MM19 to 20)	7
3.5	MD7a – Managing Housing Development in the Countryside (Modifications MM40 to MM44).	7
3.6	MD7b – General Management of Development in the Countryside (Modification MM52)	9
3.7	MD11 – Tourism Facilities and Visitor Accommodation - (Modification MM64)	11
3.8	MD12 – The Natural Environment – (Modification MM67)	11
4.0	Settlement Policies	12
4.1	S2 - Bishops Castle Area (Modifications MM95 to MM110).....	12
4.2	S3 - The Bridgnorth Area - (Modifications MM111 to MM116).....	14
4.3	S7 - The Craven Arms Area – (Modifications – MM124 to MM139).....	15
4.4	S12 - The Minsterley and Pontesbury Area – (Modifications MM159 to MM162).....	16
4.5	S13 - The Much Wenlock Area – (No changes proposed).....	17
4.6	S16 - The Shrewsbury Area – (Modifications MM182 to MM200).....	18
5.0	Conclusion	20
5.1	Summary.....	20

Appendix A – Land adjoining Brookside Close, Worthen	i
Appendix B – Land north of Powke Hall Farm, Claverley	ii
Appendix C – Land adjoining the Rectory, Wistanstow	iii
Appendix D – Land off Hall Bank, Pontesbury (Indicitive site layout)	iv
Appendix E – Land off Manley Road, Cressage	v
Appendix F – Land south of St John Baptist Church, Stapleton	vi
Appendix G – Land to the west of the Rectory, Longden	vii

1.0 Introduction

1.1 Scope of Response

1.1.1 This consultation response has been prepared by Savills incorporating Smiths Gore on behalf of Hereford Diocesan Board of Finance (HDBoF). The submission has been prepared following an invitation from Shropshire Council to comment on its proposed Site Allocations and Management of Development (SAMDev) Plan Main Modifications. The consultation will run between 1st June – 13th July 2015.

1.1.2 HDBoF is a significant land and property owner in Shropshire and is keen to ensure that the emerging SAMDev Plan is responsive to local circumstances and supports rather than constrains appropriate development in the authority area to meet the social, economic and environmental needs of Shropshire's communities.

1.1.3 Smiths Gore submitted responses on behalf of HDBoF to the consultation regarding the SAMDev Pre-submission Draft in April 2014, as well as the previous stages of the plan. This submission draws on these earlier responses.

1.1.4 This response makes detailed comments on the soundness of the proposed main modifications. This assessment is carried out using the four tests of soundness, as set out in Section 2.0.

1.2 Plan Methodology

1.2.1 Although the HDBoF is highly supportive of the concept of identifying 'Community Hubs and Community Clusters', the Board does have some concerns regarding the methodology being used to identify which settlements should or should not form Community Hubs or Clusters. It is understood they have been identified solely upon the wishes of Parish Councils and not on a robust evidence base, therefore failing to meet 'objectively assessed needs'. These concerns were identified at the 'preferred options', 'revised preferred options' and later 'pre-submission draft' stages, though do not appear to have been properly addressed. More detail is provided below in sections 3.1 and 3.5.

1.2.2 Comments on particular Community Hubs and Clusters have been provided within the relevant sections of this document, and it is within the context of these concerns, that those comments should be considered.

2.0 Tests of Soundness

2.1 Basis for Response

2.1.1 In accordance with paragraph 182 of the National Planning Policy Framework (the Framework) which relates to Plan Making and specifically 'Examining Local Plans' a local planning authority should submit a plan for examination which it considers to be "sound". The paragraph states that this means it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.1.2 This response therefore examines the proposed changes to the SAMDev Plan against the above tests of soundness.

3.0 Development Management Policies

3.1 MD1 - Scale and Distribution of Development – (Modification MM3)

UN SOUND - In order for the strategy to be successful the scale and distribution of development needs to be based upon objectively assessed needs. Planned-for targets should not be approximate but should be the minimum target. At present the policy is not positively prepared.

3.1.1 The HDBoF continues to generally support policy MD1. Particularly, the clear recognition within this policy that future housing and employment growth should not be focussed solely within the county's larger settlements, but that it is also important to support appropriate levels of growth in smaller settlements in order to create and maintain sustainable rural communities.

3.1.2 However, having followed the progress of the SAMDev document and having read paragraph 4.66 of the adopted Core Strategy, it is understood that Community Clusters have been identified solely on the basis of the wishes of Parish Councils. Although the views of Parish Councils should of course be an important consideration in this process, the HDBoF would expect such decisions to be informed by a robust evidence base including the services and facilities present in settlements as well as information about how local people access services and facilities between the villages. The inter-relationship between settlements is highlighted in paragraph 55 of the framework which states that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.”

3.1.3 In this way it is possible to develop an understanding of the role each settlement plays in the locality which can then be used to determine which ones should, or should not, form Community Hubs or part of a Community Cluster.

3.1.4 By not adopting this type of approach there has been a clear lack of consistency in the types of settlement which has been identified as forming Community Hubs or part of a Community Cluster within the SAMDev settlement policies. For example there are numerous instances where settlements which are no more than small hamlets with no community facilities, (and in some cases comprise only a single farmstead) have been identified as forming part of a Community Cluster. Conversely there are numerous villages in Shropshire, which comprise a far greater number of homes and in some cases, provide a range of community services and facilities, which are proposed to be left as 'open countryside'. This is clearly inappropriate and is an issue which must be addressed prior to the adoption of the SAMDev Plan.

3.1.5 The proposed changes to the schedule of Community Hubs and Community Clusters within the SAMDev Plan, particularly the proposed modification MM3, which highlights the inadequacies of the

approach by outlining the opportunity for new allocations of Community Hubs and Clusters to come forward and modification MM6, which indicates the disputable nature of some of those settlements put forward / allocated to fulfil this role.

3.1.6 Whilst we discourage the overly simplistic view that a settlement should provide access to 'x' number of services in order to be deemed a sustainable location for development, the methodology implemented provides uncertainty and a lack of clarity on the criteria for sustainable rural locations for development. The inclusion of a 'bottom-up' policy approach should not be seen as an opportunity to ignore the requirement to undertake a proper evidence based assessment of settlements in identifying Community Hubs and Community Clusters.

3.1.7 The HDBoF would therefore like to reiterate its recommendations that the following settlements should be included within the SAMDev as Community Hubs;

- Claverley;
- Wistanstow; and
- Cressage.

3.1.8 Whilst the following settlements should be included as either making up part of, or entirely new, Community Clusters;

- Clunton and Hopton Castle;
- Burwarton;
- Aston Munslow, Munslow, Diddlebury and Shipton; and
- Bitterley and Knowbury..

3.1.9 These settlements all provide services and facilities whether individually or as part of a group and contribute to the overall sustainability of the local area. At present there are no proposals to accommodate development within them. Without development being directed to these settlements they may well be unable to support these existing services and facilities in the future and the sustainable nature of these local communities will be undermined and eventually lost.

3.1.10 The HDBoF's also recommends that the table within Policy MD1 (Table MD1.1) make it explicitly clear that those figures identified are the minimum figures. In order to do this the phrase '**at least**' should replace the term '**approximate**' in brackets below the targets columns. Presently this could be read as being negatively prepared rather than positively prepared, as required by paragraph 182 of the Framework. This amendment will ensure that these figures are clearly identified as being targets which should be met, at the very least, to allow flexibility within the plan, both in terms of those initial targets identified for the outset of the plan period, but also in order to accommodate needs not anticipated in the plan, such as changes in economic and market circumstances over time.

3.2 MD2 – Sustainable Design – (Modifications MM7 to MM10)

UNSOUND – In order to be found sound the policy should include a criterion which recognises that viability is crucial to delivery and allows flexibility where development might otherwise become unviable. The policy is not consistent with national policy.

3.2.1 This policy sets out the Councils' proposed sustainability and design standards for all types of development across a variety of issues and in terms of energy efficiency, construction techniques, appearance, local amenity and landscaping amongst others. The HDBoF is supportive of this policy insofar as it will be used alongside Core Strategy Policy CS6 and a Sustainable Design SPD to minimise carbon emissions resulting from the construction and operation of new buildings. However, in certain circumstances it may not be technically feasible or financially viable to achieve all of these standards and it might be the case that by requiring such standards it would affect the overall viability of the development. As such the HDBoF still recommends that a sentence be added to the policy to recognise this and allow necessary flexibility where development might otherwise become unviable.

3.2.2 The Framework, in paragraph 173, places a great deal of emphasis on the need for local planning authorities to pay careful attention to viability and costs in plan making and decision taking in order to ensure that Local Plans are deliverable. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Paragraph 174 then goes on to explain that the cumulative impacts of these standards and policies should not put implementation of the plan at serious risk and should facilitate

development throughout the economic cycle. It is important that the council takes this guidance into account in preparing Plans as consideration of overall viability is part of the evidence base which will be subjected to test, challenge and debate when it is examined. Demonstrably failing to consider this issue will almost certainly result in the document being found to be unsound.

- 3.2.3 Although developers vary in their approach to profit and risk, the key point is that a development which is not viable will not be delivered. This can mean that housing targets will not be met and delivery over the plan period will fall behind and fall short. In such cases, developers will await better market or financial conditions and put their resources into developing more profitable schemes elsewhere instead.

3.3 MD3 – Delivery of Housing Development - (Modification MM14)

UNSOOUND – Whilst the policy makes provision for windfall development, it fails to provide the necessary flexibility within the policy for meeting objectively assessed housing needs over the plan period and therefore is not consistent with national planning policy.

- 3.3.1 The third section of the policy entitled ‘settlement housing guideline’ identifies criteria against which development at identified settlements which have already met their identified requirement will be considered. Paragraph 4 explains that where a settlement housing guideline will not be met by the end of the Plan period additional sites can be considered. However, this approach does not provide the necessary levels of flexibility as required by paragraph 14 of national planning policy, which states that: “*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change*”
- 3.3.2 The approach proposed may well not result in the development needs of the entire area, or even the individual Place Plan Areas, being properly considered throughout the Plan period and will very likely result in the full needs of the area over the course of the Plan period remaining unmet. As such the HDBoF recommends that the identified housing requirements of each settlement at this point should not be considered as a significant material consideration throughout the Plan period but only for the first five year period of the Plan and subsequently as they are reviewed.

3.4 MD4 – Managing Employment Development - (Modifications MM19 to 20)

UNSOUND – Requires amendment to the wording of criteria 1(iii). The term ‘employment generating uses’ should be introduced rather than specific uses classes in order to make the policy more deliverable and therefore more effective.

3.4.1 The jobs and businesses within Shropshire’s rural areas are vitally important to the significant proportion of the population who live in these areas. The ongoing decline in employment within agriculture has meant that people in small rural communities often have to travel long distances to reach their places of work, which are generally in the area’s larger settlements. It also means that the life of rural communities is affected by a downward spiral in terms of economic activity and an increasing change from formerly vibrant rural communities to dormitory settlements providing increasingly expensive housing for non-indigenous house purchasers.

3.4.2 Strong rural economies offer those living in rural areas better opportunities to work in their local community. They help to reduce the level of out-migration of young people and retain skilled young people by providing more and better quality local employment opportunities. Being able to live and work in the same settlement or at least nearby, will also have sustainability advantages as it will reduce the need for people to travel long distances to their place of work.

3.4.3 The use of the term ‘**employment generating uses**’ rather than ‘**Class B or sui generis**’ will allow for greater flexibility and represents a better opportunity to introduce employment uses on rural sites that will create new jobs rather than simply provide ‘employment space / land’ that might never come forward for development. As such it is also recommended that the term ‘employment generating uses’ should be included within 1(iii).

3.5 MD7a – Managing Housing Development in the Countryside (Modifications MM40 to MM44).

UNSOUND - The process of selection of Community Hubs and Clusters has not been positively prepared and should be informed by robust evidence and, in accordance with paragraph 55 of The Framework and the NPPG on Rural Housing, understand the inter-relationship between rural settlements for meeting local need.

3.5.1 Policy MD7a sets out where housing development will be treated favourably in the countryside along

with criteria against which such schemes will be considered. It is understood that unless a settlement is designated as a Community Hub or part of a Community Cluster it will be treated as 'open countryside' in planning policy terms. This means that development in these villages will be strictly controlled and would only be permitted in exceptional circumstances. Throughout the SAMDev consultation process the HDBoF has identified two issues regarding this proposed approach, which are set out below.

- 3.5.2 Firstly, it is important to note that Shropshire's smaller rural settlements make up a significant proportion of the county's overall population. It is therefore essential that these communities are not overlooked during the coming plan period. The key issue is whether those with a strong local connection can have the opportunity to rent or buy a home in that community. It is possible that a small village might only require a small handful of homes (perhaps 3-5) to be provided over the lifetime of the plan. Although this is only a small number the provision of these homes is of critical importance to those local people who are in housing need. Under the policy proposed in MD7a the development needs of smaller rural communities will continue to be neglected over the coming years.
- 3.5.3 The second concern relates to the methodology being used to identify which settlements should or should not form Community Hubs or part of Community Clusters. It is understood that Community Hubs and Clusters have been identified solely on the basis of the wishes of Parish Councils. Although the views of Parish Councils should of course be an important consideration in this process the HDBoF would expect the designation of Community Hubs and Clusters to be informed by a robust evidence base including data on settlement populations, local built form, the services and facilities present and information about the way in which local people travel between the villages (how often, for what reason and by what means). In this way it is possible to develop an understanding of the role each settlement plays in the locality which can then be used to determine which ones should or should not form Community Hubs and parts of Community Clusters.
- 3.5.4 It is considered that not adopting this type of approach has led to a number of settlements being inappropriately defined as forming part of Community Cluster's while others, which have a closer functional relationship with surrounding settlements, have been overlooked. Again it is important to note that whether or not particular settlements are designated as forming Community Hubs or part of a Community Cluster will have significant implications in terms of their future development and could

be a defining factor in whether local communities' development needs are satisfied in the coming years.

3.5.5 The inter-relationship between settlements is recognised in Paragraph 55 of the Framework states that: *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."*

3.5.6 Additionally, Paragraph 1 of the National Planning Practice Guidance (NPPG) section on Rural Housing explains that it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.

3.5.7 Furthermore, paragraph 1 of this section of the NPPG goes onto explain that all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development to some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. It is clear that the approach to the designation of the Community Hubs and Clusters (based upon the wishes of the Parish Council, or otherwise) is not based upon robust evidence.

3.6 MD7b – General Management of Development in the Countryside (Modification MM52)

UN SOUND - More detail is required regarding other types of development which are appropriate within the countryside.

3.6.1 The HDBoF previously recommended that more detail is required regarding other types of development which are appropriate within the countryside. One such development of this type is *renewable energy*. These types of developments almost exclusively need to take place in the countryside due to their inherent locational requirements but are not acknowledged within this policy. While these other types of development are generally supported by other policies in the Core Strategy, it is important that reference to them is made in policy MD7b to achieve consistency

throughout the Plan and with the Framework.

- 3.6.2 Another type of development which might be appropriate in countryside is *live-work units* (this is included in the explanation accompanying the policy). In recent years the principle of live-work units within the countryside has become more accepted as a means of promoting both the sustainable re-use of existing buildings and the development of new purpose-designed live-work units. Such schemes are inherently sustainable as they help to meet local demand for housing (socially sustainable) and they provide local employment opportunities (economically sustainable). They also serve to reduce the need to travel by car and safeguard the character and can create ‘creative hubs’ of embryo rural businesses (environmentally sustainable).
- 3.6.3 Fuelled by the impact of new technology (such as improved internet access in rural areas), a growing frustration with the stress and time wasting associated with the daily commute and a desire for a better work/life balance, self-employed people in rural areas are increasingly choosing to opt for home-working. Live-work units have a positive impact upon the rural economy and are often the source of new businesses which are able to benefit from access to appropriately designed and developed buildings without the expense of having to find both a dwelling and a business unit on separate sites.
- 3.6.4 The Office of National Statistics (ONS) also reported an increase in the level of home working, based on 2011 census data, and attributes this increase to a greater prominence of home businesses in rural areas. Furthermore, the Annual Population Survey 2010/2011 carried out by the ONS identified working from home as being more common in rural areas of England than in urban areas.
- 3.6.5 This type of development is specifically supported within paragraph 21 of the Framework which states that local planning authorities should “*facilitate flexible working practices such as the integration of residential and commercial space within the same unit*”. The Council is therefore strongly urged to include reference to this form of development within this and policy MD7a of the SAMDev Plan.

3.7 MD11 – Tourism Facilities and Visitor Accommodation - (Modification MM64)

SOUND – The policy now supports the conversion of existing rural buildings for tourism facilities and visitor accommodation.

3.7.1 The HDBoF support modification MM64 relating to point 8 of policy MD11, which allows for the conversion of existing appropriate rural buildings for tourism facilities and visitor accommodation uses.

3.8 MD12 – The Natural Environment – (Modification MM67)

UNSOUND – The policy fails to make it explicitly clear that the various ‘natural assets’ have differing levels of importance and significance and is therefore not consistent with national policy.

3.8.1 Modifications 67 make significant additions to policy MD12. However, whilst the policy provides a comprehensive list of natural environmental ‘assets’, the policy still fails to acknowledge the differing degrees of importance and significance.

3.8.2 The Framework describes how nationally important landscapes, such as the Shropshire Hills AONB, should be given the ‘highest level of protection’ and that their conservation should hold great weight. Visual amenity, locally designated sites and local distinctiveness would clearly hold significantly less weight, in terms of their preservation, than those nationally designated sites. This is an important consideration when considering the degree of impact and reasonable mitigation required to justify a development proposal.

3.8.3 In order to make this explicit in the policy, an additional line at the end of criterion 1 should read:

“Consideration of the impact of any proposal and mitigation measures should be commensurate to the importance and significance of the natural asset”.

4.0 Settlement Policies

4.1 S2 - Bishops Castle Area (Modifications MM95 to MM110)

UNSOUND - The strategy for the area, and specifically the designation of Community Clusters and Community Hubs, is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, is not based on proportionate evidence and the housing figures proposed are not based upon the objectively assessed needs.

4.1.1 The HDBoF does not consider that the Council's decision to designate Worthen and Brockton as part of a Community Cluster rather than a Community Hub is justified.

4.1.2 Worthen is a reasonably sized village which contains a range of local facilities including two churches, two food shops, a post office, a primary school, village hall, doctor's surgery and the Worthen Priory Country Store. There is also a local bus service which passes through Worthen that provides access to surrounding settlements such as Montgomery, Chirbury, Westbury, Shrewsbury and other smaller villages.

4.1.3 With the wide range of local services and facilities available it is considered that Worthen and Brockton, when considered together, form an important functional unit and should therefore be designated as a Community Hub. Together they provide an important local centre for the wider rural community, with people travelling to the village from Burweston, Marton, Rorrington, Meadowtown as well as numerous other small settlements and isolated homes in the countryside.

4.1.4 It is therefore considered that Worthen and Brockton already act naturally as a Community Hub and so it is entirely appropriate that they should be formally designated as such within the Shropshire SAMDev Plan, as was proposed within the previous iteration of the document.

4.1.5 The HDBoF therefore recommends that the Council undertakes a more rigorous assessment of the community within this Cluster to ensure that the housing growth target reflects the needs and aspirations of the community and to ensure that the viability of the settlements is retained.

4.1.6 The HDBoF also still has concerns about the reduction in the housing growth target for the area from the original 60 down to 30. The proposed growth target of 60 dwellings within this area was

considered to be appropriate for the Worthen and Brockton Community Hub. The proposed Worthen Ward of Worthen with Shelve Parish now includes a greater number of settlements over a more dispersed area and to reduce the housing growth target is flawed and not based upon the objectively assessed needs of the community.

- 4.1.7 The figures for growth within this and any other Cluster should not simply be plucked from the air or based upon the preference of Parish Councils. The SAMDev Plan must aim to meet the full, objectively assessed needs for market and affordable housing. At Examination all evidence used by the Council in determining the proposed housing target(s) will be rigorously assessed and tested. If this evidence is found not to be sufficiently robust the plan will be found unsound and its adoption will be delayed, leaving the Council vulnerable to 'planning by appeal'. It is important to note that the vast majority of Local Plans rejected at examination are due to the fact that their housing targets are too low and are not seeking to meet the projected growth in households, i.e. the full, objectively assessed needs.
- 4.1.8 The HDBoF does not object to the principle of a realistic housing growth target being met through windfall and infill development. This approach will allow for appropriate small scale, sensitively designed development to take place to help deliver the housing growth target over the coming plan period which will ensure that the growth can be achieved. The HDBoF fully supports this approach.
- 4.1.9 However, the HDBoF also questions the principle of putting restrictions upon the phasing of housing growth for the area. Through attaching these restrictions to the housing growth target the HDBoF considers that insufficient flexibility will be included within the plan. As such the HDBoF does not believe that a restriction on the number of houses which should be built in each 1/3 of the plan or the number of houses which should be built on each site should be included within the plan.
- 4.1.10 Furthermore it is recommended that the Council should not adopt an arbitrary maximum number on sites as, whilst not being flexible, it may be entirely appropriate to provide more than five dwellings. Each site should be considered on its own merits and on the basis of what will produce an attractive and sympathetic development complementing the character of the settlement that also meets the objectively assessed needs of the settlement. In addition there might be circumstances where a community requires a service or facility that could be funded by development but could not be achieved if that development only provides five dwellings. Opportunities for facilities such as village

halls, car parks and other community amenities should not be overlooked due to a restrictive and arbitrary figure relating to a maximum housing number on development sites.

- 4.1.11 There are sites within and adjacent to the built up areas of the larger settlements of Worthen and Brockton which can be brought forward for development over the coming years to meet the allowance of dwellings. The HDBoF is well positioned to assist in this regard as it owns the area of land to the south of Rectory Gardens in Worthen (see location plan in **Appendix A**). This land is adjoined by residential development to the north (Rectory Gardens) and to the west (Brookside) and so can certainly be described as being well related to the existing built form of the village and within walking distance of the local shops, the primary school and other facilities.
- 4.1.12 Development on this site could take the form of a small scale scheme, comprising a small number of units on the eastern boundary of the site fronting on to the adjoining lane. Alternatively a greater proportion of the site could be brought forward for a more comprehensive scheme. The most appropriate option for the development of the site will need to be determined based upon the evidence of need in the locality and a process of meaningful consultation with Shropshire Council, the Parish Council and the local community.
- 4.1.13 The HDBoF is aware that part of the site is subject to a low level of flood risk. It is however considered that this issue can be sufficiently overcome through the application of appropriate mitigation measures as part of any development scheme on the site. Furthermore, development on this site would ensure that the gap between the two settlements is maintained.

4.2 **S3 - The Bridgnorth Area - (Modifications MM111 to MM116)**

UNSOUND – The strategy for the area, and specifically the designation of Community Hubs is not justified as it is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

- 4.2.1 Although the HDBoF presents no objection to the identification of Ditton Priors as a Community Hub within the area the Board strongly believes that the village of Claverley should also be afforded this designation.
- 4.2.2 After Bridgnorth, Claverley is one of the larger settlements in the Bridgnorth area. In addition to being

home to a relatively large population, the village actually provides a far greater range of local services and facilities than Ditton Priors. These include a primary school, doctor's surgery, village hall, post office, hairdressers, tennis courts, a church and three pubs. It is therefore clear that Claverley acts as an important local centre for the wider rural community, with people travelling to the village to meet their daily needs from Seisdon, Shipley and Hilton as well as many isolated dwellings in the surrounding countryside.

4.2.3 A clear case can therefore be presented that Claverley should be identified as a Community Hub within the Bridgnorth area on the basis of its role as an important centre in the locality. As such the village is considered to represent a sustainable location to accommodate a modest level of growth over the coming plan period, the level of which should be determined and based upon evidence of need in the area and through an assessment of local need and engagement with the local community. The HDBoF is well positioned to assist in this regard as it owns the area of land to the north of Powke Hall Farm (see location plan in **Appendix B**). This site is well related to the built form of the village and within walking distance of shops, the primary school and other facilities.

4.3 **S7 - The Craven Arms Area – (Modifications – MM124 to MM139)**

UNSOUND – The strategy for the area and specifically the decision not to designate Wistanstow as a Community Hub is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

4.3.1 No Community Hubs have been identified in the Craven Arms area. The HDBoF would strongly encourage Shropshire Council to reconsider this position and to examine the potential to designate Wistanstow as a Community Hub.

4.3.2 After Craven Arms Wistanstow is one of the larger settlements in the Craven Arms area. It is also one of the most accessible by virtue of its location just off the main A49 road. In addition to accommodating a relatively large population the village also provides a range of services and facilities including a primary school, village hall, public house, a church and a regular bus service. There is also a brewery in the village which provides jobs for local people. Wistanstow therefore already acts as a Community Hub to the surrounding smaller settlements and so a strong argument can be presented that the village should be formally identified as such in the SAMDev Plan.

4.3.3 Due to the size of the village and the range of facilities and jobs available Wistanstow is considered to represent a sustainable location to accommodate a modest level of growth over the coming plan period. The HDBoF is well positioned to assist in this regard as it owns the area of land adjoining the Rectory to the east of Wistanstow (see location plan in **Appendix C**).

4.4 S12 - The Minsterley and Pontesbury Area – (Modifications MM159 to MM162)

UNSOUND – The details provided in modification MM161 is inaccurate.

4.4.1 The HDBoF strongly supports Shropshire Council’s decision to identify Pontesbury and Minsterley as Key Centres within the Place Plan Area. This is entirely appropriate given the wide range of services, facilities and jobs available within these settlements and the role they play in terms of meeting the needs of the surrounding rural communities.

4.4.2 The HDBoF is also entirely supportive of the Council’s allocation at the Hall Bank site in Pontesbury for a mix of uses including the development of up to 60 dwellings, retail, open space and parking. As the Council will be aware this land is in the ownership of the Diocese and work is ongoing to promote and develop proposals for the site (see latest indicative plan in **Appendix D** (subject to community consultation)). This work has included detailed flood modelling work, which has identified the developable area of the site, and local engagement with the Parish Council and ward members as well as communication with a Shropshire based retail provider.

4.4.3 Modification MM161, in relation to allocation PBY018/29 – Hall Bank, Pontesbury, states the following addition at the end of the second paragraph:

“Increase local affordable housing provision of up to 25% dependant on viability assessment will be sought to deliver additional community benefits.”

4.4.4 Whilst the HDBoF are developing proposals for the site to include affordable housing, the reason given for the 25% figure states that it is “to deliver additional community benefits agreed through negotiation with site promoters”, assumed to be referring to ourselves on behalf of the HDBoF. Whilst a higher percentage was negotiated, our records show that in a meeting held on the 7th June 2013, Shropshire Council’s Senior Policy Officer confirmed that the figure was increased from 15% affordable housing (to meet the needs assessment published in September 2013) to 20% (minimum

requirement), with the mix to be determined at a later stage based on local need. It is our understanding that this position has not changed. We therefore propose that the additional wording should read **20%** instead of **25%**.

4.5 S13 - The Much Wenlock Area – (No changes proposed)

UN SOUND – The strategy for the wider Much Wenlock area, and specifically the designation of no Community Hubs in the area, is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

4.5.1 Although the HDBoF is fully supportive of Much Wenlock Parish Council's ambition to prepare a Neighbourhood Plan the Board is concerned many settlements that fall outside the boundaries of the parish, such as Cressage, appear to have been entirely overlooked.

4.5.2 Cressage is a relatively large village in the context of Shropshire and is the second largest village in the area after Much Wenlock. It is also one of the most accessible villages in the locality as it is situated on the A458 and is served by a regular bus service which passes through the village. The village provides a wide range of services and facilities including a primary school, doctor's surgery, village hall, public house, post office, sports field and place of worship. As a result Cressage naturally acts as a Community Hub to the smaller settlements in the surrounding rural areas including Sheinton, Harley, Kenley as well as many other isolated homes in the countryside. It is therefore considered appropriate that Cressage should be formally recognised as a Community Hub within the SAMDev Plan.

4.5.3 In light of the village's size, the range of facilities available and its accessibility from other parts of the county, Cressage is considered to represent a sustainable location to accommodate a modest level of growth over the coming plan period. The HDBoF is well positioned to assist in this regard as it owns the area of land to the south west of Cressage off Manley Road (see location plan in **Appendix E**).

4.5.4 Furthermore, through dismissing those areas outside of the parishes of Much Wenlock and Buildwas proper assessment of the potential to deliver housing to meet the needs of the community within the remainder of the area has not being undertaken.

4.5.5 The Framework continually repeats the theme of 'planning positively' and clearly recommends that Councils take a positive approach to plan preparation and the identification of settlements which are capable of accommodating housing development.

4.6 S16 - The Shrewsbury Area – (Modifications MM182 to MM200)

SOUND - The overall strategy for the area is based upon up-to-date evidence of the objectively assessed needs of the community within the Shrewsbury Area. In particular the Community Clusters of Dorrington, Stapleton and Condover & Longden are effective and justified.

4.6.1 The HDBoF retains its support for the Council's decision to identify Dorrington, Stapleton and Condover as a Community Cluster.

4.6.2 With only a small number of homes proposed to be provided within Stapleton over the coming plan period it seems reasonable that the Parish Council have opted to rely on windfall sites coming forward rather than allocating a particular site.

4.6.3 The HDBoF would also like to reiterate that the Diocese owns an area of land which is well related to the built form of the village and that can be brought forward to meet housing need. A plan identifying the location of this site, and highlighting the area suitable for development, can be found in **Appendix F** of this document. With a sensitive design, a small scale development scheme can be delivered in the western area of the site, with access derived from the adjacent road, which will provide a positive contribution to the character and appearance of Stapleton.

4.6.4 The HDBoF also supports the Council's decision to identify the following settlements as a Community Cluster: Longden, Annscroft, Hook-a-Gate, Longden Common and Lower Common / Exfords Green Community Cluster.

4.6.5 Longden plays an important role as a service centre to the wider rural community in this part of the area. With a relatively large employment site, a primary school, post office, community hall, public house and sports facilities Longden would represent a strong candidate for designation as a Community Hub in any other part of Shropshire (where the rural settlements are generally smaller in size and population). The HDBoF therefore considers that, in the context of the Shrewsbury area, the decision to identify Longden as the 'main focus' of a Community Cluster is appropriate.

- 4.6.6 To ensure that sufficient housing is developed it will inevitably be necessary for some greenfield sites to be developed. It will of course be important to ensure that such sites are appropriately located either within or adjoining the built up area of the village and that schemes are sensitively designed so as to safeguard the village's valued character and appearance.
- 4.6.7 One site which satisfies these criteria is located to the west of the Rectory (**see Appendix G**). This site represents a suitable location for a small-scale housing development and can be delivered in the early years of the plan period.

5.0 Conclusion

5.1 Summary

5.1.1 This response has been submitted on behalf of the Hereford Diocesan Board of Finance, who are a significant land and property owner in the Shropshire area.

5.1.2 It has been stressed throughout that the methodology used in identifying Community Hubs and Community Clusters has been based upon the expressed wishes of Parish Councils and should be informed by a more robust evidence base. Paragraph 3.1.5 demonstrates the disputable nature of such an approach. The Community Hub and Clusters allocations are therefore not 'objectively assessed' resulting in several of the policies having been found to be not 'positively prepared' and consequently failing to meet the 'tests of soundness'.

5.1.3 The HBDoF support the inclusion of Land off Hall Bank, Pontesbury within the SAMDev Plan, although the additional detail in regards to affordable housing provision at the site is believed to be inaccurate.

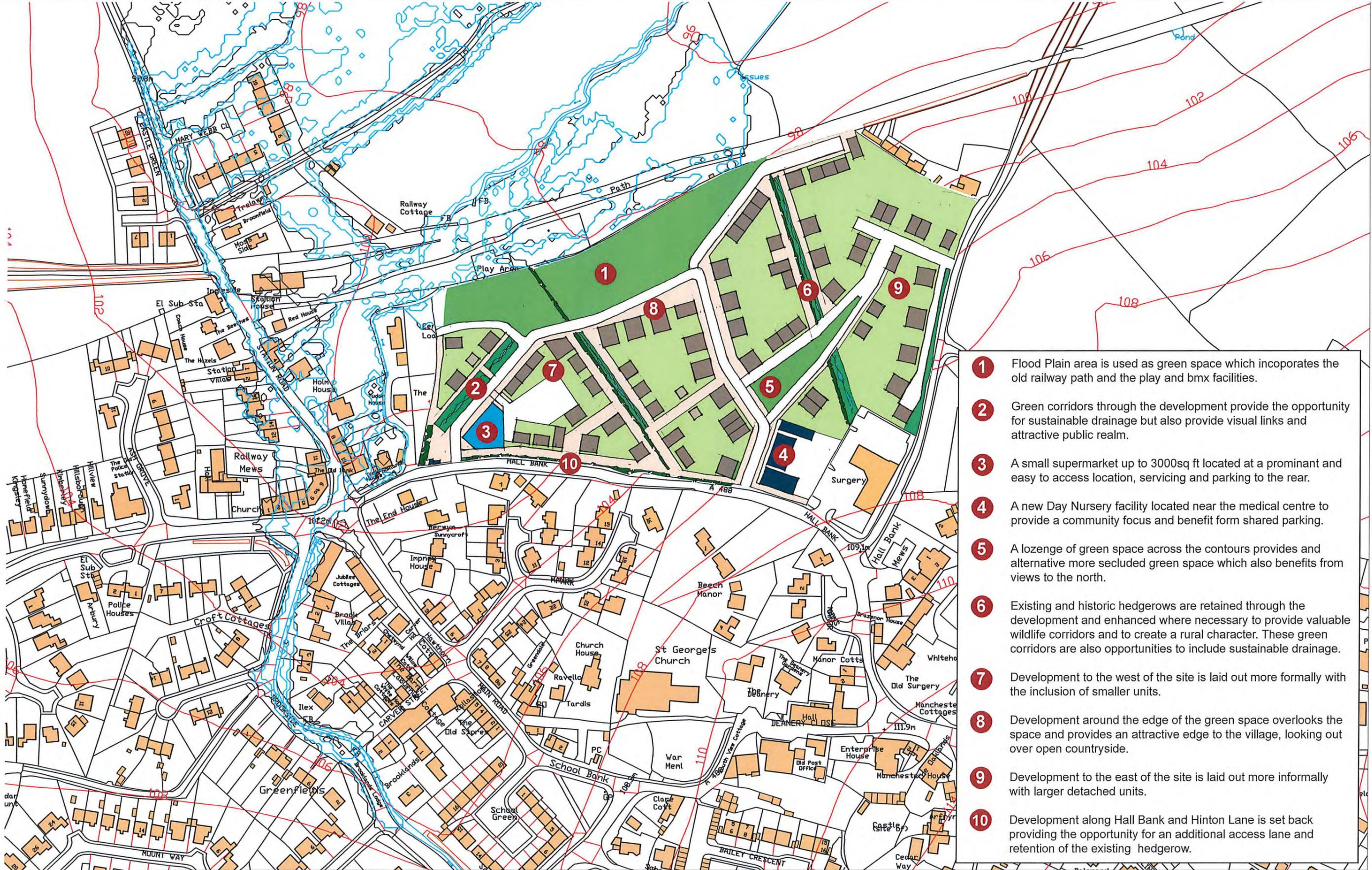
5.1.4 Additionally, based on our assessment, The HBDoF has the following suitable and sustainable sites that are recommended for allocation:

- Land adjoining Brookside Close, Worthen (see Appendix A);
- Land north of Powke Hall Farm, Claverley (see Appendix B);
- Land adjoining the Rectory, Wistanstow (see Appendix C);
- Land off Manley Road, Cressage (see Appendix E);
- Land south of St John Baptist Church, Stapleton (see Appendix F); and
- Land to the west of the Rectory, Longden (see Appendix G).

Appendix C – Land adjoining the Rectory, Wistanstow



Appendix D – Land off Hall Bank, Pontesbury (Indicitive site layout)



- 1** Flood Plain area is used as green space which incorporates the old railway path and the play and bmx facilities.
- 2** Green corridors through the development provide the opportunity for sustainable drainage but also provide visual links and attractive public realm.
- 3** A small supermarket up to 3000sq ft located at a prominent and easy to access location, servicing and parking to the rear.
- 4** A new Day Nursery facility located near the medical centre to provide a community focus and benefit from shared parking.
- 5** A lozenge of green space across the contours provides and alternative more secluded green space which also benefits from views to the north.
- 6** Existing and historic hedgerows are retained through the development and enhanced where necessary to provide valuable wildlife corridors and to create a rural character. These green corridors are also opportunities to include sustainable drainage.
- 7** Development to the west of the site is laid out more formally with the inclusion of smaller units.
- 8** Development around the edge of the green space overlooks the space and provides an attractive edge to the village, looking out over open countryside.
- 9** Development to the east of the site is laid out more informally with larger detached units.
- 10** Development along Hall Bank and Hinton Lane is set back providing the opportunity for an additional access lane and retention of the existing hedgerow.

© Crown copyright and database rights 2014 Ordnance Survey 0100031673



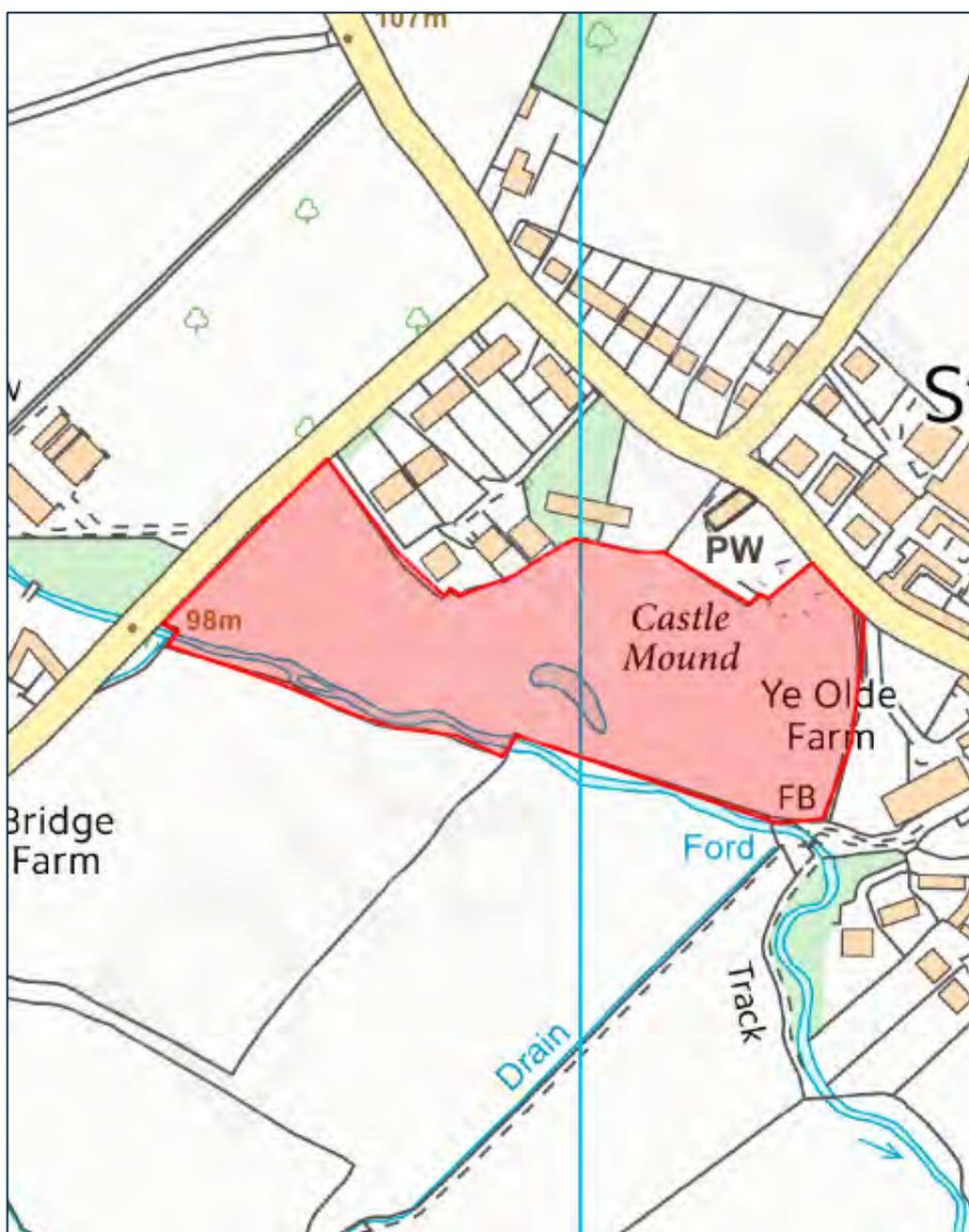
Scale: 1:2000@A3



DRAWN BY: DH	CLIENT: Smiths Gore	DHUD PLACE MAKING REGENERATION URBAN DESIGN 6 Bakers Cottages Longmesdown Road Lymington EX8 5LP t: 01395 227052 e: info@dhud.co.uk www.dhud.co.uk
DATE: 04/06/15	PROJECT: Hall Bank, Pontesbury	
SCALE: 1:2000@A3	DRAWING TITLE: Drill Masterplan	
REVISION: 150604	DRAWING NUMBER: PONT_DRAFT003	

The contents of this drawing are subject to the Copyright, Designs and Patents Act 1988.

Appendix F – Land south of St John Baptist Church, Stapleton





Savills incorporating Smiths Gore
York House, Blackbrook Business Park, Taunton, TA1 2PX
t 01823 445030 f 01823 445031 e taunton@savills-smithsgore.co.uk
www.savills-smithsgore.co.uk