



Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan

Main Modifications consultation

1 June 2015 – 13 July 2015

For Shropshire
Council use

Respondent
no:

Main Modifications Consultation Form

The SAMDev Plan Schedule of Main Modifications includes a series of changes to the published SAMDev Plan. These suggested changes are being consulted on for a period of six weeks. For advice on how to respond to the consultation, and how to fill in this form please see the guidance notes on the Council's SAMDev Plan website at: <http://shropshire.gov.uk/planning-policy/samdev-examination/main-modifications-consultation/>.

Submitting comments:

Please fill in this form and return:

- Via email to: Programme.Officer@shropshire.gov.uk
- By posting to: Daphne Woof - Programme Officer
c/o Planning Policy Team
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND
- Comments must be received by 5pm on 13 July 2015. **Comments received after this time will not be accepted and will not be considered by the Inspector.**
- Please fill a separate for each Main Modification you are commenting on.
- Please clearly identify which Main Modification your comments refer to using the reference (i.e. MM1, MM2 etc) in the SAMDev Plan Schedule of Main modifications.
- Please do not repeat your previous comments as these have already been considered by the Planning Inspector. **Comments will only be considered that refer to a change as shown in the SAMDev Plan Schedule of Main Modifications.**

Shropshire Council SAMDev Plan Main Modifications Response Form

- All comments received on the proposed changes within the time period will be considered by the Planning Inspector as part of the examination of the SAMDev Plan. The Inspector may wish to contact you to discuss your comments and concerns, prior to concluding the formal examination into the Plan.
- The personal information will only be used for purposes related to the consultation and the SAMDev Plan examination. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. However other information will be shared with the Planning Inspector.
- The information relating to your comments on the Main Modification (Part B) will be published on the Shropshire Council SAMDev Plan examination webpage.

A) Your details:

1) Who is making this representation?

Name:	Susan Fellows [Managing Director]
Organisation (if applicable):	LAND RESEARCH & PLANNING ASSOCIATES LTD.
Address:	
Email:	
Telephone:	

Client's details (only applicable if you are acting as agent on behalf of another person or business)

Name:	Messrs Needs and Family
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

B) Your representations: What do you wish to object to/support?

Please use a separate form for each Main Modification you wish to comment on. Only comments relating to a proposed Main Modification will be considered.

1) Please give the Main Modification reference your comment relates to.

Main Modification reference - MM: **MM2 and MM111**

2) Do you consider the proposed Main Modification addresses the following issues in relation to the policies concerned?

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3) If you have answered 'no' to any of the above please specify your reason for objecting below. You should make clear why the Main Modification is either not legally compliant and/or unsound having regard to whether the modification is not: positively prepared; justified; effective; or, not consistent with national policy. Please see guidance notes for explanation of these terms:

Continue on a separate sheet if necessary

REPRESENTATION 1: MM2

We respectfully submit that the plan is wholly unsound and that it is absolutely vital that Shropshire Council takes immediate steps to advance the LDS within the next 3 to 6 months to allow the Local Plan process to have an urgent Review so that more land can be allocated where landowners are willing to allow at least 40% of any proposed development to be for Affordable Homes.

Shropshire has a major Affordable Homes crisis in that on 10 June 2015 it confirmed in an Appeal (2227555) it required 9000 affordable homes by 2026 [Policy CS11 confirms]. Paragraph 47 of the NPPF states [To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and **affordable housing** in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period
- identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

The above confirms that: A LPA must demonstrate sufficient land is available for not just normal homes but affordable ones as well in the five period referred to by the NPPF.

It is respectfully submitted that the Shropshire Council Local Plan as is now in front of Inspector Claire Sherratt **does not meet the criteria set out above of the NPPF** because of the absence of land for 9000 affordable homes.

It cannot do so now, in the next five years, nor indeed by 2026 provide such unless radical steps are urgently taken to release some land out of the Green Belt and/or many places around the towns and Cluster settlements. Accordingly unless immediate steps are taken for a full review the Plan is, and should be found UNSOUND for the reasons cited above.

- 4) Please set out what change(s) you consider necessary to make the SAMDev Main Modification legally compliant and/or sound. It will be helpful if you are able to put forward your suggested**

revised wording of any policy or text. Please be as precise as possible.

MM2 ~ Insert within paragraph 1.11 and add a paragraph to read: "Local Development Scheme and Local Plan Review"

The Local Development Scheme (LDS), available on the Shropshire Council website, helps to inform the community and other partners of the planning policy documents being produced for the area and the timescales they can expect for their preparation. The LDS should be immediately advanced so that a proper and detailed Review can commence within the next six months in order to ensure sufficient land is allocated to accommodate the shortage of affordable homes and normal homes.

Additional text:

Any landowner/developer who is willing to provide a minimum of 40% and up to 50% of affordable homes on their land that lies outside any settlement boundary once a threshold of 10 dwelling units has been passed should be invited and allowed to have their land included as an allocation for housing development whether in a Green Belt, AONB designation or otherwise.

MM111 Amend S3.1 (2) to read: "Around 1,400 homes dwellings and around 19.13 hectares of employment land with 6.6 hectares to relocate the existing Livestock Market will be delivered in Bridgnorth on a mix of windfall and allocated sites..." To include the Grove Farm Site, Stourbridge Road which will provide a minimum of 40% affordable homes on site up to 110 dwellings for such.

Continue on a separate sheet if necessary.

Please note you should cover all the information, evidence and supporting information necessary to justify the representation and the suggested change. After this stage, further submissions will only be accepted at the request of the Inspector.

You must return this form by 5pm on Monday 13 July 2015.

You can e-mail it to:

Programme.officer@shropshire.gov.uk

Or return by post to: Daphne Woof - Programme Officer, c/o Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

The Programme Officer will acknowledge receipt of comments submitted by e-mail.