

13 July 2015

By email

Daphne Woof - Programme Officer
Planning Policy Team
Shropshire Council
Shirehall
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Shrewsbury
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Dear Ms Woof

SHROPSHIRE SAMDEV MAIN MODIFICATIONS

I am writing to you on behalf of our client, the Stanley Beckett Partnership ('SBP'), to set out representations on the SAMDev Main Modifications ('MM'), published for consultation on 1st June 2015.

These representations are in addition to, and without prejudice to, the comments made in my previous letter of 5th June regarding the reporting process following the Examination Hearing sessions. I note your response of 18th June confirming that the Inspector's main report on the soundness of the SAMDev Plan will be finalised and issued once she has had the opportunity to consider representations on the proposed Main Modifications. The concerns raised in that letter over the proper consideration of fundamental issues raised in the Examination which concern the soundness of the plan therefore still stand.

Representations

I set out my representations to the MM upon which SBP wishes to comment below.

MM14 (Policy MD3)

SBP welcomes the majority of the changes which result in a more positively worded policy, particularly the new paragraph which is to be added in respect of the approach to the delivery of housing, which is reflective of national planning policy.

Greater emphasis should be placed, however, on the presumption in favour of sustainable development as the starting point in the determination of applications. This could be achieved by adding appropriate text to the first paragraph (i.e. the new paragraph proposed by MM14).

The removal from the policy of the requirement to demonstrate community support is also welcomed, as doing so recognises concerns that such a requirement be likely to have the effect of elevating the weight given to the views of local residents regardless of the planning merits of any issues that they may raise thereby constraining housing development, rather than boosting supply.

SBP does have concerns over the amendment proposed to part 3 of the policy. The revised wording potentially restricts the ability to bring forward appropriate and sustainable windfall sites beyond settlement boundaries early in the plan period. This is due to the difficulties in any forecasting of housing delivery relative to the settlement guideline over the remainder of the plan period (a 10+ year period) in order to

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demonstrate that a particular guideline is unlikely to be met. Introducing such obstacles to the delivery of housing conflicts with national planning policy objectives to significantly boost housing supply and would reduce the prospects of an early application which otherwise complies with the other criteria of the policy and is a suitable, sustainable housing site. This approach is at odds with the plan's recognition of the need to bring forward greenfield sites beyond the settlement boundary.

MM15 (Policy MD3 supporting text)

SBP supports the recognition which the new paragraph gives to the importance of windfall housing sites (including greenfield sites within the countryside), which reflects the essential contribution that such sites can make to the delivery of sustainable residential development, particularly in areas like Shropshire where the supply of previously developed land is limited. The use of greenfield windfall housing sites (including those beyond the settlement boundary) will be essential if the housing requirement is to be met and positive outcomes associated with doing so are achieved.

MM17 (Policy MD3 supporting text)

The additional guidance that the settlement guideline is not a maximum is supported. SBP has consistently made representations that the Whitchurch settlement guideline proposed by the SAMDev is too low. Allowing flexibility is essential to provide a positive policy context for the delivery of sites which are capable of comprising sustainable housing development to meet the housing requirement.

MM203 (Policy S18.1 (5))

The Policy is unclear as proposed. The previous drafting made clear that the release of exceptional sites would be focussed on suitable sites adjoining the settlement boundary and included land to the west of Whitchurch, within the A41 bypass. This includes land owned by SBP which the Council have assessed as being a suitable long-term housing site in its 2014 Strategic Housing Land Availability Assessment.

The wording now proposed is far less precise and appears to require developments in Whitchurch to also comply with the Whitchurch Town Plan. Doing so presents a significant danger that a non-statutory plan could be used to prevent or frustrate otherwise sustainable development from taking place and frustrate the delivery of otherwise suitable housing sites to the detriment of the delivery of the Council's strategy and objectives. This, combined with the ambiguity over the broad locations for future housing presents a significant risk to securing sustainable housing development. SBP therefore objects to the proposed wording.

I trust that proper consideration will be given to these representations in preparing the Inspector's Report and I look forward to hearing from you in due course.

Yours sincerely



Sam Ryan
Director

cc: Justin Beckett, Stanley Beckett Partnership