



For Shropshire  
Council use

Respondent  
no:

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

**Pre-Submission Draft (Final Plan)**  
**17 March 2014 – 28 April 2014**

### Representations Form

Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:  
[www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev)

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at [www.shropshire.gov.uk/samdev](http://www.shropshire.gov.uk/samdev).

#### Your details: Who is making this representation?

Name:	
Organisation (if applicable):	MORRIS HOMES (MIDLANDS) LTD
Address:	MORLAND HOUSE, 15 DAVY COURT, CASTLE MOUND WAY, RUGBY, CV23 0NY
Email:	
Telephone:	

If you are acting as an Agent, please use the following box to tell us who you are acting for:

Name:	TONY McATEER
Organisation (if applicable):	McATEER ASSOCIATES LTD
Address:	4 ST JOHN'S WOOD, WOSTOCK, BOLTON BL6 4FA
Email:	tony@mcateerassociates.co.uk
Telephone:	07817 200571

## Your Representations

**Please note, you must use a separate form for each representation you wish to make.**

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy M13

Is your representation in support or objection? (please tick as appropriate)

Support	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Object	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

Positively prepared	<input checked="" type="checkbox"/>
Justified	<input type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

**In the box below please specify your reason for supporting or objecting.**

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

PLEASE SEE ATTACHED SUBMISSIONS

**Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound?** You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

SEE ATTACHED SUBMISSIONS.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

**Do you consider it necessary to attend and give evidence at the examination?**

Yes, I wish to give evidence about my representation at the examination.



No, I wish to pursue my representations through this written representation.



If you wish to attend the examination, please explain why you think this is necessary in the box below:

THE REPRESENTATION REQUIRES ORAL SUBMISSIONS TO BE MADE IN RESPECT OF THE HOUSING ALLOCATIONS.

**Do you wish to be notified of any of the following?** Please tick all that apply. We will contact you using the details you have given above.

When the SAMDev Plan has been submitted for examination	<input checked="" type="checkbox"/>
When the Inspector's Report is published	<input checked="" type="checkbox"/>
When the SAMDev Plan is adopted	<input checked="" type="checkbox"/>





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In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy S16

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Object	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

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**REPRESENTATIONS TO THE  
SAMDEV PLAN – Pre-Submission Draft (Final Plan)**

**ON BEHALF OF**

**MORRIS HOMES (MIDLANDS)LTD**

**McAteer Associates Ltd  
4 St Johns Wood  
Lostock  
Bolton  
BL6 4FA**

## **SHROPSHIRE COUNCIL**

### **SAMDEV Plan Pre-Submission Draft (Final Plan)**

#### **1 INTRODUCTION**

- 1.1** We refer to the consultation exercise being carried out on the above DPD and enclose representations on behalf of Morris Homes (Midlands) Ltd in respect of the proposed housing allocations within and on the edge of Shrewsbury.
- 1.2** The draft DPD follows on from the adoption of the Core Strategy in February 2011, and, whilst the publication of the National Planning Policy Framework has changed the emphasis in plan making to the production of Local Plans, it is considered that the Core Strategy should, at present, be regarded as providing the “strategic priorities” referred to in paragraph 156 of the Framework. However, it is submitted that the weight to be attached to the Core Strategy must be tempered by the fact that it was adopted prior to the publication of the Framework, and must therefore be covered by the requirements of paragraph 214 of the Framework, especially, having regard to the need for housing provisions to be based on realistic assumptions about delivering housing over the entire plan period.
- 1.3** As a result of the changed emphasis brought about by the publication of the Framework, Morris Homes (Midlands) Ltd consider that the draft DPD does not provide for the adequate and continuous supply of housing, especially in the early years of the plan period, required by the Framework.
- 1.4** Policy CS1 of the adopted Core Strategy states that Shrewsbury will accommodate approximately 25% of Shropshire’s residential development over the plan period 2006 – 2026, whilst Policy CS2 indicates that this will amount to approximately 6,500 dwellings at 325 dwellings per annum.
- 1.5** Policy CS2 goes on to state that this provision will be made by two sustainable urban extensions providing 25% of Shrewsbury’s housing growth and other sustainable housing land releases on the edges of Shrewsbury, identified in the SAMDev DPD.



- 1.6 The two SUEs are identified as being:
- Shrewsbury south which will provide approximately 900 dwellings
  - Shrewsbury west which will provide approximately 700 dwellings
- 1.7 Policy CS10 states that the availability of housing land will be kept under review to maintain a continuous supply of suitable sites to deliver the overall target and the need to maintain a 5 year supply of housing land. The Explanation to the policy then indicates the phasing measures proposed in order to enable the managed release of housing land to meet the overall targets. It proposes five year time bands based on anticipated housing trajectories.

2006/2011 - 1190 dwellings per annum

2011/2016 - 1390 dpa

2016/2021 - 1390 dpa

2021/2026 - 1530 dpa

## **2 PROPOSED POLICIES**

### **Policy MD3**

- 2.1 In order to meet the Core Strategy requirements the draft SAMDEV DPD allocates both brownfield and greenfield sites within and on the edge of Shrewsbury.
- 2.2 Based on the information provided at Table MD 1.1 in the Pre-Submission Draft, it is clear that in the period 2006 – 2013, the policies being operated by the Council have failed to provide the number of dwellings on Shrewsbury required by Policy CS1 of the Core Strategy. As a result, it is considered important that the draft plan addresses this failure immediately, and that the reliance on growth in the market towns/Key centres and rural areas, is properly related to the role that the Core Strategy envisages.
- 2.3 Morris Homes agree that the allocation of housing and indeed employment sites requires a co-ordinated approach to ensure that necessary infrastructure improvements are made at the same time as development proceeds. The need for additional

infrastructure must therefore be taken into account when allocating new housing sites, especially if the Council are to meet their housing requirements in the early part of the plan period.

- 2.4 Morris Homes consider that the reliance on large sites to meet housing needs will result in an under supply of housing in Shrewsbury in the early part of the plan period, and that it is essential that additional sites are allocated to ensure a continuous supply of housing land. Given the increased emphasis placed on ensuring choice in the NPPF, and the use of a 5% buffer, it is submitted that the Council should allocate additional sites that can be delivered without needing to rely on significant infrastructure improvements.
- 2.5 Morris Homes therefore object to the fact that Policy MD 3 of the draft does not recognise this fact and Point 4 can only seek to rectify the failure towards the end of the plan period. It is submitted that the wording of the policy should be amended to allow new housing allocations to come forward in the early part of the plan period as well.
- 2.6 It is submitted that the current reliance on large allocations brings into question the deliverability of the Council's allocations, and thus the soundness of the DPD.

### **Policy S16**

- 2.7 Morris Homes consider that whilst the SUEs will ultimately provide a significant contribution to housing supply in Shrewsbury, it is unrealistic to expect them to deliver anything more than a nominal contribution over the next five years. The need for considerable infrastructure improvements will delay production on the sites and even if a start was made within the next 12 months the contribution from each site is unlikely to deliver the 100 dwellings per annum anticipated by the Council. Based on their experience of developing a 1200 dwelling urban village in Cheshire, an unconfirmed allocation requiring an outline and reserved matters approval is highly unlikely to deliver any dwellings inside five years. Furthermore the majority of the Shrewsbury south SUE does not have a housebuilder involved which is likely to delay

delivery even more than 12 months, and the 400 units it is stated will be delivered between 2011-2016 will simply not be achieved.

- 2.8** Similarly, Morris Homes would question whether the two large allocations proposed at Brownbrook/Redbrook and Weir Hill Farm/Robertsford House will be able to deliver significant number of dwellings for the same reasons. The former site is not being promoted by a housebuilder and again this will considerably delay delivery.
- 2.9** In addition the size of the allocations appear to have been decided by the need for infrastructure rather than any regard to whether they would represent a reasonable edge to the built up area. Neither site has any regard to the topography and physical characteristics of the area and as such it is submitted they would have an unacceptable impact on the landscape character and setting of the part of Shrewsbury.
- 2.10** It is also submitted that by relying on two large allocations at Bowbrook/Radbroke and at Weir Hill Farm/Robertsford House, the draft DPD is not in conformity with the Core Strategy. In the Core Strategy it is clear that housing allocations on the edge of Shrewsbury would come from the two SUEs and then a series of smaller sites which would provide both choice of location and a continuous supply of housing. By proposing the allocation of two large sites (550 houses and 550-600 houses) the draft DPD will remove choice and the continuous supply required by the Core Strategy.
- 2.11** Morris Homes are also of the view that the densities required to achieve the housing numbers on a number of other sites is unrealistically high, and that such densities would be out of keeping with the character of the localities in which they sit. In particular the proposed number of dwellings for the Shillingstone Drive draft allocation is considered unrealistic, especially as there is a proposal to create an eco-park as part of the development. On this site alone it is considered that the actual delivery could be less than 50% of that being proposed.

As a result of the above factors, Morris Homes consider that the SAMDev DPD will not deliver the number of dwellings required, especially in the early part of the plan period. As a consequence they object to Policy S16.1a as failing to allocate sufficient housing to meet the housing requirements set out in the Core Strategy. As a result the



draft, as currently drafted is considered to be unsound. In addition, it is submitted that the draft DPD conflicts with the requirements of NPPF in that it fails to provide the choice in the market required of documents proposing housing allocation.

- 2.12** Morris Homes consider that the draft DPD should allocate additional sites which are not subject to infrastructure requirements which will delay deliverability if its current unsoundness is to be overcome.

### **3 NEW ALLOCATIONS**

- 3.1** Morris Homes consider that the land edged red on the attached plan should be allocated for housing in the SAMDEV DPD. It is capable of delivering some 125 dwellings utilising the existing infrastructure in the area and would therefore make a full contribution to the housing needs within the next five years. Morris Homes have carried out, and submitted to the Council, a Transport Assessment, a Flood Risk and Drainage Assessment, a mining risk assessment and ecological reports which demonstrate the site is capable of delivering the numbers indicated. Together with the adjacent site, which is already allocated, the site forms a natural extension of the built up area up to the clearly defined boundary created by Nobold Lane. Because of the site being previously mined, it has very limited agricultural value and would represent the type of site that should be preferred to others in this part of Shrewsbury which are of higher quality.
- 3.2** It is submitted that the two sites would have no adverse impact on the setting of this part of Shrewsbury and are to be preferred to existing allocations which have a far greater impact.
- 3.3** Morris Homes would therefore submit that the land edged red should be allocated for housing in the SAMDEV DPD and that it should be indicated that it can be delivered in the early part of the plan period, as there are no planning or technical reasons to prevent its immediate delivery.

Land at Sweetlake, Longden Road, Shrewsbury

