



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: Andrew	Coley
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

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

Name:	
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

## 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:

S3 Bridgnorth Area

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

**Support**      **Yes**       **No**   
**Object**      **Yes**       **No**

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**       **No**   
**Sound**      **Yes**       **No**

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

<b>Positively prepared</b>	<b>X</b>
<b>Justified X</b>	
<b>Effective X</b>	
<b>Consistent with National Policy</b>	<b>X</b>

**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

**Not positively prepared** – The SAMDev plan does not meet objectively assessed development and infrastructure requirements. S.3.1 (page 100) states that around 1,400 homes will be delivered but this is far in excess of the Option D Maximum of 1,000 new homes for Bridgnorth identified on page 39, with no explanation.

There is no clear stated objective assessment for exceeding the maximum development or even for the maximum development itself. This in turn undermines the justification for ELR011a and ELR011b.

The document fails to include brownfield development sites in Bridgnorth which will be available for housing development and which Shropshire Council is already aware of – in particular I refer to land occupied by Westgate Council Offices (owned by Shropshire Council, which it has

already decided to sell off for development) and to the adjoining Police Station which West Mercia Police has already publicly stated as a site to be closed and sold off soon. It appears therefore that as it currently stands, the SAMDev plan prefers greenfield development to the development of brownfield sites, and this would be in contravention of paragraph 111 of the National Planning Policy Framework (NPPF).

In summary, if unaltered I believe that the SAMDev plan will lead to a gross excess of land allocated for housing which would not be sustainable development and not meet objectively assessed development requirements.

**Not Justified** – In view of my comment above, there is no justification for the BRID001/BRID020a/BRID020b residential development on land north of Wenlock Road, and north of Church Lane, Tasley. Nor has any objective assessment been made to justify a new hotel and petrol station on this site. Petrol stations have closed down in Bridgnorth recently, suggesting that an increase in such a facility would be unjustified and not economically viable. Equally there has been no assessment shown to justify the need for another hotel – a new hotel has already been approved for development in Bridgnorth.

The development of a business park (ELR011a) on land at Tasley south of the bypass has not been shown to be justified. The land-owner of this greenfield site has already benefited from investment by the West Midlands Regional Development Fund for the infrastructure of a site off the Stourbridge Road, Bridgnorth, which has for several years since that investment lain empty and unused (and remains so) – there is no need shown in the SAMDev plan for further land allocation in Bridgnorth for another Employment Site, and reasonable alternatives (such as the disused employment land at neighbouring Telford (Halesfield) do not appear to have been given any consideration as an alternative to developing a greenfield site. ELR011a and ELR011b are unjustified and would lead to the urbanisation of greenfield land outside Bridgnorth.

It also fails to take account of the reasonable alternative of windfall development which Shropshire Council knows to be in the region of 30 dwellings per annum in Bridgnorth. By themselves, these windfall developments over the life of this SAMDev plan would meet the target for new housing in Bridgnorth without any more land being allocated.

**Not effective** – The document fails to evidence that any effective cross-boundary strategic priorities have been considered.

**Not consistent with national policy** – The views of Bridgnorth Town Council, Tasley Parish Council and Bridgnorth Civic Society have been totally disregarded and there has been a failure to respond to invitations by Bridgnorth Town Council to discuss SAMDev with them. Equally, the document itself admits (paragraph 5.24, page 102) that great concerns have been raised by the local community about the concentration of development at Tasley and crossing the bypass – yet goes on to completely disregard these concerns. I believe that this fails to meet the requirements of paragraphs 54, 69 and 157 of the NPPF.

The SAMDev plan contravenes paragraph 157 of the NPPF in that BRID001, BRID020a, BRID020b, ELR011a and ELR011b have not been shown or justified by the plan to be necessary and do not meet the criteria for sustainable development. In particular it does not meet the requirements of paragraph 159 of NPPF in that there has not been a strategic housing market assessment on which the proposed 1,400 new homes for Bridgnorth is based upon. It fails to meet the requirements of paragraphs 62 and 162 of NPPF by not assessing local education capacity to meet its planned housing growth for Bridgnorth.

The SAMDev plan does not meet the requirements of paragraph 161 of NPPF in its proposals for ELR011a and ELR011b. In particular the disused land already allocated for economic development in Bridgnorth, particularly on land off the Stourbridge Road, has been disregarded. There has been a failure by the SAMDev plan to properly apply paragraph 161 of NPPF in ELR011b in that the existing livestock market is already adequately accommodated and no case has been put forward for expansion. Indeed the only justification for ELR011b is to enable the existing livestock market site to be used for housing, which is not a need for land for economic purposes in accordance with paragraph 161 of NPPF.

The SAMDev plan does not meet the requirements of paragraph 181 of NPPF in that it has not shown an assessment of the cross-boundary impacts with other local authorities. In the context of Bridgnorth, proposal ELR011a has ignored the availability of large areas of disused employment land with infrastructure already in place, in the south of Telford (Halesfield), which already has easy car and public transport access to Bridgnorth.

The document misleadingly uses paragraph 182 of the NPPF in paragraph 5.25, page 102. The reality is that it is impossible to see how the number of new homes and employment land allocated for each settlement add up to the Shropshire-wide totals required by the Core Strategy. The development proposals for Bridgnorth have not been shown to have objectively assessed the town's development requirements, but instead reflect the desire by some landowners to have their land developed irrespective of any objectively-assessed need.

**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)

1. The SAMDev Plan needs to properly reflect and respect consultation with local authorities and representative groups and to not ignore them.
2. The Plan needs to show that proper account has been taken of a strategic housing market assessment for the area and of brownfield sites which are known to Shropshire Council. It also needs to assess local education capacity for any significant increasing in housing/population. I believe that this would result in a far more proportionate and reasonable allocation of new land for housing.
3. BRID001, BRID020a and BRID020b (land allocation for housing north of Wenlock Road, and north of Church Lane, Tasley) should be withdrawn from the plan. There is no strategic housing market assessment to justify them. Brownfield sites and windfall developments will meet Bridgnorth's need for more housing.
4. ELR011a and ELR011b (land at Tasley south of the bypass for the development of a business park and relocation of existing livestock market) should be withdrawn from the plan. There is no requirement for this additional employment land to be allocated near Bridgnorth as there is already adequate supply to meet foreseeable demand in already allocated employment land at Stanmore, off Stourbridge Road, and at Halesfield, and the livestock market is already adequately accommodated and even has surplus land within its boundaries should it need to expand further. The physical feature of the bypass in Tasley should be respected and preserved as the defined and recognisable boundary to Bridgnorth (see paragraph 85 of NPPF). Any future development should remain contained within that boundary.

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:

**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	YES
When the Inspector's Report is published	YES
When the SAMDev Plan is adopted	YES

**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

[Planning.policy@shropshire.gov.uk](mailto:Planning.policy@shropshire.gov.uk)

**Or return it to:** Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

**Please note, we will acknowledge receipt of representations made by e-mail.**

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. 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. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.