



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:	Matthew Green
Organisation (if applicable):	Green Planning Studio Ltd
Address:	Unit D, Lunesdale, Upton Magna Business Park, Upton Magna, Shrewsbury, SY4 4TT
Email:	

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

Name:	Mr Kevin Evans
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:

S18.2(i) – Community Clusters – Prees and Prees Higher Heath Community Cluster

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

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

<b>Legally compliant</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Sound</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<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*):

<b>Positively prepared</b>	<b>x</b>
<b>Justified</b>	<b>x</b>
<b>Effective</b>	<b>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 (Continue on a separate sheet if necessary).

Please see accompanying Representations Document

**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)

Please see accompanying Representations Document

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	x
When the Inspector's Report is published	x
When the SAMDev Plan is adopted	x

**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.



Unit D, Lunesdale, Upton Magna Business Park, Upton Magna, Shrewsbury, SY4 4TT

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## **Shropshire Council Site Allocations and Management of Development (SAMDev) Plan – Pre-Submission Draft**

**Submission by Green Planning Studio Ltd**

**On Behalf of Mr Kevin Evans of The Beeches, Lower Heath, Prees, SY13 3BT**

**28<sup>th</sup> April 2014**

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**Applicant: Kevin Evans**

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## 1. INTRODUCTION

1.1. Green Planning Studio Ltd is instructed by Mr Kevin Evans to make representations in respect of the Shropshire Site Allocations and Management of Development Plan (SAMDev) Pre-Submission document (March 2014). Our client has land interests in Shropshire, at a site adjacent to The Beeches, Lower Heath, Prees, Whitchurch, SY13 2BT' which is currently not allocated or located in Community Cluster within the Pre-Submission SAMDev Plan but was considered as part of the Lower Heath area of the Prees Community Cluster.

1.2. In making these representations Green Planning Studio Ltd has consulted the following documents; National Planning Policy Framework (NPPF, March 2012), in particular paragraph 55, Planning Practice Guidance (March 2014), Shropshire Council Core Strategy (February 2011), Shropshire Site Allocations and Management of Development Plan- Sustainability Appraisal Report (March 2014) and Shropshire Site Allocations and Management of Development Plan Consultation Statement (March 2014).

The representations contained herein relate to:

- Settlement Policies
  - o S18.2: Hub and Cluster Development Strategy
  - o S18.2(i): Community Clusters - Prees and Prees Higher Heath Community Cluster

These are all discussed below in Section 2 – Representations

## 2. REPRESENTATIONS

2.1. The submission herein relates to the policies set out in the Pre-Submission Site Allocations and Management of Development Plan consultation document (Final Plan) (March 2014).

### Chapter 5: Settlement Policies

#### S18.2: Hub and Cluster Development Strategy

2.2. Green Planning Studio Ltd agree that development should be directed towards identified Community Hubs and Clusters as set out in Policy MD1 and subject to the criteria of policy MD2. The cluster and hub approach to development in rural communities is clearly supported by paragraph 55 of the NPPF:

*'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.'*

2.3. The recently published Planning Practice Guidance (March 2014), builds further on the importance of shared services between rural communities outlined in the NPPF stating:

*'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.*

*Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and / or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.'*

## S18.2 (i): Community Clusters – Prees and Prees Higher Heath Community Cluster

- 2.4. Green Planning Studio Ltd is promoting the inclusion of Lower Heath within the SAMDev Community Cluster and therefore objects to the selection of Prees and Prees Higher Heath as a Community Cluster.
- 2.5. Appendix D: 'Preferred Options 2012 Consultation: Key Issues Raised' of the SAMDev Consultation Statement (March 2014) states 78% of those who responded to the consultation supported the designation of Prees, Higher Heath, Prees Green, Lower Heath, Fauls and Sandford as a Community Cluster as *'the settlements already acts as a cluster, sharing services and facilities.'*
- 2.6. Despite the obvious public support in favour of this community cluster, the Revised Preferred Options Draft (July 2013) amended the Prees Community Cluster and the settlements of Prees Green, Lower Heath, Fauls and Sandford were removed from the Community Cluster at the Parish Councils request.
- 2.7. Appendix G: 'Revised Preferred Options Consultation 2013: Key Issues Raised' of the SAMDev Consultation Statement (March 2014) highlights the Parish Council argued the areas of Prees Green, Lower Heath, Fauls and Sandford were removed from the cluster as they did not have sufficient services and would therefore result in increased reliance upon the car and increased pressure on local roads.
- 2.8. It is the view of Green Planning Studio Ltd that contrary to the opinions expressed by the Parish Council, Lower Heath would make a positive contribution to the sustainability of the Cluster as a whole.
- 2.9. Lower Heath is sustainably located approximately 2.2km South East of Prees and associated services therein, including schools, shops and a health centre and 9km south of Whitchurch. The area benefits from regular bus services from both Lower Heath Cross Roads and nearby Prees Green (1.7km) providing a service between Whitchurch and Shrewsbury hourly. The area benefits from a primary school of its own, located at the centre of the settlement serving the wider community. Should housing development be directed towards Lower Heath, this would be of significant benefit to existing and future young families resident of the area providing education facilities within walking distance of potential new homes.

- 2.10. It should be noted that Higher Heath, does not benefit from local services such as schools, medical centres or shops within walking distance. The closest schools to Higher Heath are located to the south of Whitchurch, approximately 4.5km to the north of the community or Lower Heath Primary School, 3.2km to the south. It is clear Higher Heath is less sustainable than Lower Heath and other areas removed from the cluster and therefore does not make a positive contribution to the sustainability objectives of the SAMDev.
- 2.11. The removal of Lower Heath from the Prees and Higher Heath Community Cluster limits the potential of the cluster to contribute to the objectives of Core Strategy Policy CS1: Strategic Approach, more specifically the requirement of the policy to improve the sustainability of rural areas through 'rural rebalance'. The policy seeks to direct development and investment to Community Hubs and Clusters to contribute to social and economic vitality. However the exclusion of communities such as Lower Heath places existing local business and facilities, such as Lower Heath Primary School at risk as investment is directed elsewhere.
- 2.12. The inclusion of the Lower Heath as part of the Community Cluster would not only ensure that vitality of the local Primary School but also local businesses. As it is proposed that no further employment land will be allocated within the Cluster it is essential that existing employment sites are safeguarded. Lower Heath is home to a number of businesses; the inclusion of Lower Heath within the Community Cluster will attract inward investment to the area and ensure that Lower Heath and the wider community area remains attractive to local businesses.
- 2.13. Both the NPPF and Planning Practice Guidance are clear in promoting a cluster approach to development in rural areas and that housing development is essential to safeguarding services and facilities depended upon by rural communities. It is the opinion of Green Planning Studio Ltd that the inclusion of Lower Heath within the Prees Community Cluster would strengthen and be of benefit to the cluster and surrounding settlements.
- 2.14. To concentrate development to only the two areas of Prees and Prees Higher Heath as proposed by the Pre Submission SAMDev Document (March 2014) would weaken other smaller communities and be contrary to paragraph 55 of the NPPF as discussed

above. It is clear that Higher Heath does not present a sustainable location for future development and so weakens the community cluster.

2.15. Both Planning Practice Guidance and the NPPF support the inclusion of multiple settlements within community clusters, therefore Green Planning Studio Ltd submit that Lower Heath should be included in the Community Cluster in addition to Prees and Higher Heath. However should it be considered increasing the number of communities within the cluster would result in over development of a rural location, Green Planning Studio Ltd believe there to be sufficient evidence to support the removal of Higher Heath from the Community Cluster in favour of Lower Heath to reflect the sustainability contributions of each location.

### **3. CONCLUSION**

3.1. In conclusion it is clear that the exclusion of Lower Heath from the Community Cluster weakens both the Cluster and smaller surrounding communities. It is the option of Green Planning Studio that the Prees Community Cluster should be amended to include the Lower Heath Community.