



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

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.

Your details: Who is making this representation?

Name:	Charlene Sussums
Organisation (if applicable):	See Below
Address:	
Email:	
Telephone:	

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

Name:	As Above.
Organisation (if applicable):	Carter Jonas LLP
Address:	South Pavilion, Sansaw Business Park, Hadnall. SY4 4AS
Email:	Charlene.sussums@carterjonas.co.uk
Telephone:	01939 210111

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:

Shropshire Policy Inset Map Albrighton Area S1 Inset 1 (ALB003)

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

Support **Yes** Y
Object **Yes** Y

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

Legally compliant **No** Y
Sound **No** Y

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	Y
Justified	Y
Effective	
Consistent with National Policy	

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).

The Plan states that:

Land at White Acres (ALB003) (ALBa in the Albrighton Plan)

Development to deliver housing that is appropriate for people of retirement age. A high proportion of the development should be one and two-bed units. Development proposals should respect and enhance the character of the conservation area and its setting, and provide an attractive pedestrian route between the High Street and Garridge Close. Vehicular access should accord with the 'Manual for Streets' concept of shared streets with very low vehicular speeds. The target unit provision is 20.

Whilst we support the release of the site for residential development, we do not support the following aspects of the allocation:

- 1- *Housing that is appropriate for people of retirement age*
- 2- *High proportion of the development should be one and two-bed units*
- 3- *The target unit provision is 20*

The reason for our objection is that the above assumptions have not been justified and therefore the plan is unsound in that respect. The detailed analysis of the local housing market (by settlement) (as part of the SHMA update) has not been completed to evidence points 1 and 2 above.

The allocation of site ALB-003 (Presently in the development boundary of Albrighton) is based around the Albrighton community-led Plan (the non-statutory 'Albrighton Neighbourhood Plan Light', hereafter called 'the Albrighton Plan') which was adopted by the Parish Council in June 2013 and adopted by Shropshire Council for development management purposes on 26th September 2013.

The Policy goes onto say:

In accordance with paragraph 50 of the NPPF, site ALB003 at Whiteacres (site ALBa in the Albrighton Plan) is identified for housing for people of retirement age and should therefore be designed to be attractive for the 55-75 or 75+ age groups rather than general family or executive housing. The site is particularly well located for the active retired market, being within easy walking distance of Albrighton centre's services and facilities. An attractive pedestrian route that maximises the opportunity provided by the existing right of way should be an integral part of any scheme;

On 11.06.2013, we wrote to the Parish Clerk to express concern over the evidence base used to assume that Site ALB003 should be appropriate for those of retirement age and a requirement for 1 and 2 bed units.

We understood that the reasoning behind the decision for providing housing suitable for those of retirement age was based on the demographic figures of Albrighton, rather than a specific survey to establish if there is demand for people falling into this category. The three separate (but in communication) landowners were not even involved in any consultation with regards the site's suitability for 'retirement age'.

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)

For justification to be fully endorsed for Site ALB003 the following should have been undertaken:

- 1- Survey of local residents requiring 1 and 2 bed units (at retirement age).
- 2- Clarification of what is appropriate for those of 'retirement age, 55+
- 3- Survey of what size dwelling 55+ would require. It is likely that many retirees' would probably look for manageable gardens and Lifetime Homes Standards with sufficient space to allow the family to visit and spare bed rooms for family to stay in.
The owners of the site support the development of it for good quality residential development built to Life Time Standards.
- 4- The target provision should be increased from 20 to 30, as per formal discussions with Shropshire Council (Helen Howie and Gemma Lawley)

It is the aspiration of the landowners to develop a quality site. With this in mind, it has always been their intention to see the site developed to serve a range of ages by providing properties of differing size, yet ensuring that homes are built to 'Lifetime' standard. As way of a background, *Lifetime Homes are ordinary homes designed to incorporate 16 Design Criteria that can be universally applied to new homes. Each design feature adds to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life, including the provision of wider door ways and even surfaces suitable for wheelchair users.*

Lifetime Homes are all about flexibility and adaptability; they are not 'special', but are thoughtfully designed to create and encourage better living environments for everyone. This would be in accordance with the Shropshire Council adopted Core Strategy, CS11 Type and Affordability of Housing which seeks to ensure that all housing developments are designed to be capable of adaptation to accommodate lifestyle changes, including the needs of the elderly and people with disabilities, and to achieve the Lifetime Homes standard.

With Lifetime Homes Standard the development would therefore be suitable for all age ranges, including those of retirement age. But it would allow flexibility in unit size to what the market demands. This is better than providing a site for 1 and 2 bed units which has not been justified. Above all, the site needs to be fully deliverable.

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.

 Y

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:

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

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

You can e-mail it to:

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.