

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:	See below.
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:	<i>Various – as promoted through LDF process</i>
Organisation (if applicable):	Les Stephan Planning Ltd
Address:	9 Sweetlake Business Village, Longden Road, SY3 9EW.
Email:	info@lesstephanplanning.co.uk
Telephone:	01743 231040

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:

See attached statement

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 type="checkbox"/>	No	<input checked="" 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 checked="" 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).

See attached statement.

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 statement

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.

x

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:

We wish to retain the right to attend the examination depending on the extent of further information supplied and requested prior to this time.

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

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.

COMMENTS ON SAMDev CONSULTATION

28.04.14

PRE-SUBMISSION DRAFT FINAL PLAN

CONSULTATION 17.03.14 – 28.04.14

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1.0 INTRODUCTION

- 1.1 These comments follow on from the Representations Form completed and submitted by this Practice.
- 1.2 Comments are made on behalf of a number of our clients who have promoted land throughout this process (some of which have had their land allocated and some not) but also general comments about the way in which the SAMDev process has evolved and whether we believe it to be ‘sound’.
- 1.3 The representation form asks us to consider whether we believe the SAMDev to be sound, on the basis of the below sub-headings.
- 1.4 The objection will follow the format of the soundness tests in the NPPF and will also refer to the relationship between the Core Strategy and the SAMDev. Guidance notes provided in the consultation document also provide a basis for responding to these elements.

2.0 SOUNDNESS

2.1 POSITIVELY PREPARED

2.1.1 The SAMDev plan is not based on an objective assessment of development and infrastructure requirements.

2.1.2 The choice of sites and the designation of settlements has been based on a misinterpretation of the Localism Act which has allowed Town and Parish Councils to either opt out of the process altogether (e.g. significant areas of Shropshire do not have a Place Plan or any designated hub or cluster) or choose not to accept development due to pressure from local residents.

2.1.3 The Revised Preferred Options consultation stated that “*if your village is not included in the list of Community Hubs or Community Clusters (above), then this means that your Parish Council has not advised us to date that it wishes your village to be identified as a location for new open market development*”

2.1.4 This has resulted in, firstly, the status of settlements in terms of their designation as Hubs or Clusters not being based on an objective assessment of the characteristics or sustainability of the settlement and secondly on an objective assessment of the infrastructure needs of the settlement in accordance with the LDF Implementation Plan. Consequently, certain settlements, which should have been designated as a Hub or within a Community Cluster (such as Morda or Ford which have always been development villages, prior to this process) and entire areas of Shropshire are completely absent from the plan. See **Appendix 1** for examples.

2.1.5 This lack of objectivity has manifested itself in the decision making process in relation to the progress of the SAMDev towards pre-examination submission where decisions to include or exclude potential development sites have been based on political or community pressure.

2.1.6 A prime example of this is the allocation of land for development in Church Stretton where sites were objectively and correctly assessed in relation to their suitability and deliverability by professional Planning Officers but removed from the final plan by the Shropshire Cabinet and Council Members following pressure from the Town Council and local residents.

2.1.7 Another example is Bucknell where potential SAMDev sites were objectively assessed by the Officers and included in the SAMDev Preferred Options only to be removed from the Revised Preferred Options following intervention from the Parish Council.

2.1.8 This approach has resulted in an under supply of housing when compared to the targets set out in Core Strategy CS1. A comparison of the figures is included at **Appendix 2**.

2.1.9 This significant under-delivery of housing is particularly noticeable in the rural areas where there is a serious discrepancy between the Core Strategy CS1 figures for housing in the rural areas (35% of 27,500 dwellings) and the latest SAMDev aspirational figures for the rural area (12.92% of 21,597 dwellings). See **Appendix 3**. This is despite the Core Strategy stating that *“The SAMDev DPD will make provision for housing and employment needs in the towns key centres and rural areas”* (Policy CS1).

2.1.10 In allowing Towns/Parish Councils to dictate the level and allocation of housing in the rural areas, Shropshire Council has perpetuated a situation where there is no prospect of the SAMDev being in accordance with its own adopted Core Strategy, particularly in respect of the CS4 requirement to enable “rural rebalance”.

2.1.11 No update has been made to the 5 year housing land supply statement since September 2013 to take account of both cross-boundary issues and also evidence shown in the Shropshire Housing Market Assessment (SHMA) 2014. The downward trend of supply is shown to continue until at least 2018, as is identified by table 7.1 of page 122. It is therefore necessary for an updated five year supply statement to be provided to allow the SAMDev to be accurately assessed and its deliverability determined by the Inspector.

2.1.12 One of the core planning principles of the NPPF (para 17) states that plans should be *“genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plan”* and *“be a creative exercise in finding ways to enhance and improve places”*. By allowing Parish and Town Councils to opt out of the process simply by choice and not based on robust sustainability assessments, the SAMDev does not adopt this approach. There is only a single settlement in Shropshire that is nearing completion of a Neighbourhood Plan (Much Wenlock) to support their vision. Those areas which have opted out of the process (such as Morda and Ford) by becoming open countryside, have also opted out of the Place Plan process and have not therefore considered any means and ways in which development can enhance and improve their locality.

2.2 JUSTIFIED

2.2.1 The SAMDev plan is the most appropriate strategy to identify land for development. However, the justification for the choice of sites is open to question. An example of this is the reliance on a single site to deliver the housing requirements for Ellesmere (ELL003) where the chosen site had already been rejected during the Stage 2 Site Assessments due to its position in Flood Zone 3.

2.2.2 There is no justification for rejecting sites (ELL004, ELL008 & ELL017) which have already been assessed as suitable, deliverable, actively promoted by developers, and **not** in Flood Zone 3, in preference to a site which has untested deliverability and

has not been the subject of an accurate sequential test as required by the NPPF (ELL003).

2.2.3 The promoters of site ELL003 state that *“no other development sites at a lower flood risk (which) would be able to deliver the vast array of land use opportunities that the development would provide”*. This is not a valid reason to locate the entire town’s housing requirement on a site in Flood Risk Zone 3 and 2. Other promoted sites (including our clients – site ELL017) have additional land within their ownership to provide some of the facilities being offered by this development, but they have not been approached by Shropshire Council or the promoter of this site to make any enquiries to form the basis of their sequential test.

2.2.4 We also note that Shropshire Council has recently updated its Housing Site Assessments and changes have been made to “suit” the changes made to the SAMDev. For example, site ELL003 was previously assessed by the Council on a sequential basis and the Council recommended that the site was *“not progressed to Stage 2 assessment as significantly affected by FZ3”*. The recently updated Housing Site Assessment (April 2014) states that it is now taken forward to Stage 2 subject to the findings of a FRA.

2.2.5 Other sites were assessed in the earlier Housing Site Assessments (such as Selattyn; SEL004) as appropriate sites for housing growth. In this particular instance, the Parish Council then chose to reduce their housing aspirations by 20 dwellings, asked to retain its existing development boundary, and only accept infill of up to 5 dwellings. This was simply accepted by Shropshire Council without any robust assessment or challenge.

2.2.6 Para 4.4 of the guidance notes on responding to this consultation state that the SAMDev should provide the most appropriate strategy when considered against reasonable alternatives. These should be realistic and subject to a sustainability appraisal. In the case of some of the decisions being made (examples given above), this approach has not been taken but has been primarily politically-led.

2.2.7 Whilst we can agree that there is evidence of participation with the local communities throughout the process, we feel that their involvement in the process has been a little misdirected. Parish/Town Councils should be encouraged to steer and

shape development where it is considered appropriate for planning and infrastructure gain, not simply prevent it based on the wishes of local residents.

2.2.8 The Localism Act is clear on this point and allows local communities to steer new development to places where they most want to see it go, via a Neighbourhood Plan. It does not allow local communities to completely reject development and in effect opt out of the planning system. The decision to allocate sites for development in the absence of a Neighbourhood Plan falls to the Local Planning Authority based on an objective assessment of the development needs of the area.

2.2.9 In the case of the rural areas the lack of an objective assessment of settlements has resulted in a large proportion of the rural area of Shropshire and the settlements within it becoming completely omitted from the SAMDev as if they do not exist.

2.3 EFFECTIVE

2.3.1 The SAMDev Final Plan does not include any information or evidence of co-operation with neighbouring authorities to achieve cross boundary strategies policies. It merely states that engagement with neighbouring authorities has taken place and is on-going.

2.3.2 In particular there is no evidence of the outcome of negotiations with neighbouring authorities in relation to the requirement to achieve the strategic delivery of housing growth as set out in paragraphs 178-181 of the NPPF.

2.3.3 Whilst we appreciate the attempts being made by the Council to be flexible, particularly through the provisions of Policy MD3, this policy still requires **evidence of community support** for any alterations/additions to the SAMDev and in recent experience, this has not been forthcoming. Further consideration needs to be given to how this policy will be flexible to meet the needs of the county as a whole.

2.4 CONSISTENT WITH NATIONAL POLICY

2.4.1 The SAMDev will not enable the delivery of sustainable development sufficient to meet the requirements of the NPPF to enable housing growth to occur “*without delay*” (paragraph 15).

2.4.2 It does not include sufficient flexibility (para 14) in the choice and allocation of sites to ensure that there is a range and choice of housing to achieve competition in the housing market (Part 6).

2.4.3 Also it will not result in Shropshire Council achieving a 5-year supply of deliverable sites as required by the NPPF (paragraph 47) as it does not take into account the recent cumulative shortfall and significant under-delivery of housing in Shropshire as identified in the Strategic Housing Market Assessment (SHMA) (page 122).

2.4.4 The allocation of housing sites in settlements in order to meet the Core Strategy housing figures in Policy CS1 and the requirement to maintain a 5 year supply of housing throughout the plan period has been dependant on a projected level of delivery via windfall sites which is unrealistic and does not accord with the criteria for the allowance of windfall sites in paragraph 48 of the NPPF.

2.4.5 The Council has made a projection on the theoretical availability of windfall sites without providing evidence that they are a reliable source of supply.

2.4.6 For example, the figure of 69 dwellings to be provided via windfall in Church Stretton is based on past growth rates but does not take into account the fact that the majority of market dwellings built in Church Stretton since 2006 have occurred on residential garden sites of which there are very few left and are now precluded from development by paragraph 48 of the NPPF.

2.4.7 In addition to this, the projected growth rates for housing delivery in the settlements have been reduced rather than increased in accordance with NPPF requirements.

2.4.8 For example, there is no justification for reducing the annual delivery of housing in Bishops Castle and Church Stretton particularly as there has been a consistent under delivery of housing in these (and other) settlements.

2.4.9 In instances such as this, the NPPF requires an oversupply of housing sites to be provided to make up the shortfall in the 5 year supply with a 20% buffer.

2.4.10 The SAMDev does not recognise this need and, more importantly, does not allocate sufficient sites for development within the plan period with, in many instances, a single site (with no alternate proposals) being relied upon.

2.4.11 It appears, therefore, that there is little prospect of the SAMDev addressing the cumulative shortfall of housing identified in the SHMA which is expected to continue beyond the end of the plan period.

2.4.12 The recently published (06/03/2014) Planning Practice Guidance provides further guidance as to how Local Planning Authorities should ensure that “*up-to-date housing requirements and the deliverability of sites to meet a 5 year supply will have been thoroughly considered and examined prior to adoption*” (para 033). In the case of Shropshire the SAMDev, in its current form, is incapable of meeting this objective as it simply does not allocate sufficient sites for development to ensure that a 5 year supply of sites are available “*at all points during the plan period*” (para 030).

2.4.13 The SAMDev, therefore, in its current form, is incapable of delivering the vision and objectives of the Core Strategy in respect of the allocation of land “*to deliver enough new housing and employment land to meet Core Strategy targets*”.... (para 1.18 of the Core Strategy)

2.4.14 The exclusion of certain settlements at the request of the local community without an objective assessment of their sustainability to be designated as Hubs or Community Clusters is contrary to the requirements of para 55 of the NPPF and will not assist Shropshire Council to meet the aspirations of policy CS4 of the Core Strategy to “*rebalance rural communities*”.

2.4.15 This has also contributed to the shortfall in housing supply and has prevented Shropshire Council from meeting its obligations to provide a 5 year supply of housing.

3.0 **SUGGESTED CHANGES**

3.1 The representations form gives us the opportunity to suggest changes that we think should be made to the SAMDev plan to make it legally compliant and/or sound.

3.2 We consider that the Council should take the following comments on board:

- 3.3 In light of five year supply deficit, speculative sites have been coming forward for consideration. Despite some initial difficulties, we have noticed very recently that Parish Council's are now becoming more accepting of growth and are working with us to provide schemes that improve and provide services and facilities for the village.
- 3.4 In the light of this, and to avoid the possibility of the examining Inspector returning the SAMDev, we suggest that the submission of the SAMDev for pre-examination is postponed until Shropshire Council has carried out an objective assessment free from political influence of the potential for ALL the sustainable settlements in Shropshire to receive an appropriate level of new development based on the adopted Core Strategy figures and the requirement to achieve and maintain a 5-year supply of deliverable housing.

4.0 CONCLUSION

- 4.1 It is concluded that the SAMDev, in its current form, is unsound as it does not “*plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework*” (NPPF).

5.0 APPENDICES

- 5.1 Suggested Hubs and Community Clusters absent from the SAMDev
- 5.2 Comparison of CS1 Adopted Figures and SAMDev Housing Aspirations.
(*& copy of Shropshire Council Hub & Cluster Info*)
- 5.3 Strategic Housing Percentages

APPENDIX 1

Suggested Hubs and Clusters that are absent from the SAMDev Plan

Suggested Hubs & Clusters that are absent from the SAMDev

Some examples of Community Hubs & Clusters that should have been formed based on their local and shared facilities.

HUBS

- Morda^o
- Ford^o
- Westbury^o
- Cressage^o

CLUSTERS:

- Acton Burnell, Longnor^o & Pitchford
- Clunbury*^o & Clunton
- Diddlebury^o, Munslow & Aston Munslow
- All Stretton, Little Stretton & Leebotwood
- Hope Bowdler, Tickerton, Wall-underOheywood, Rushbury^o & Longville
- Bitterley^o, Farden, Knowbury, Hints, Dhustone
- Ashford Carbonell^o, Ashford Bowdler, Caynham
- Buildwas^o – *should include in their cluster; Leighton & Eaton Constantine.*
- Wistanstow^o, Marshbrook, Bushmoor
- Cross Houses, Wroxeter, Atcham

**previously included in a Cluster with Clungunford but removed in latest consultation (PSFP) in place of other settlements.*

^o School located in this settlement

APPENDIX 2

Comparison of CS1 Adopted Figures and SAMDev Housing Aspirations.

COMPARISON OF HOUSING FIGURES

SHROPSHIRE COUNCIL

COMPARISON OF FIGURES GIVEN IN:
SHROPSHIRE COUNCIL CORE STRATEGY POLICY CS1 (2011)
AND
SAMDev PRE-SUBMISSION FINAL DRAFT PLAN (MARCH 2014)

DATED 25.04.14

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OVERVIEW

This is a basic mathematical comparison of the figures provided in the Revised Preferred Options (RPO) [Consultation, July 2013] and the recently published Pre-Submission Final Draft Plan (PSFP) [Consultation, March 2014] against the adopted housing targets given in the Shropshire Council Core Strategy (2011).

It is simply intended to demonstrate whether Shropshire Council is able to meet the adopted housing figures through their Site Allocations & Management of Development (SAMDev) process.

FIGURES:

Policy CS1 requires an average of 27,500 homes as was approved by the Core Strategy Inspector.

The **CS1 projections** cited are the maximum adopted housing figures outlined in Table 1: Settlement Strategy of the Core Strategy (2011) Policy CS1.

We have also cited the minimum CS1 projections in the concluding page for reference.

The SAMDev figures cited are the housing aspirations for the plan period (2006-2026) outlined in the two consultation documents. They are the aspirational figures provided by Town and Parish Council's to Shropshire Council to cover the plan period 2006-2026.

These figures correspond with the summary provided to us by Shropshire Council (by email) on Monday 14th April 2014 titled *Shropshire Council SAMDev – Shrewsbury, Market Towns and Community Hub & Cluster housing requirements*. This document is not dated but is attached for reference.

The total housing aspirations up to 2026 cited in the SAMDev consultation documents tally with the *SAMDev Plan Housing Guideline 2011-2016* (column 3) outlined in the above mentioned document.

When relating to Hubs and Clusters in this document, the Housing Guideline (column 3) is calculated by deducting any builds during 2006-2011 (column 2) from the total housing targets for that area (column 4) to cover the plan period.

The Housing Guideline figure in this document matches the SAMDev housing aspirations.

The SAMDev housing aspirations are then subdivided between:

- Housing Commitments April 2011 – March 2013 and;
- Remainder to be allocated:
 - Allocations;
 - Balance/infill/windfall allowance;

Spatial Area	CS1 Projections (max)	Location	R.P.O SAMDev Aspiration (max)*	PSFP SAMDev Aspiration (max)
North-West	6325	Ellesmere	800	800
		Cockshutt	50	50
		Duddleston Heath/Elson	40	40
		Dudleston and Street Dinas	15	15
		Tetchill, Lee and Whitemere	20	20
		Welsh Frankton, Perthy, New Marton and Lower Frankton	30	30
		Welshampton & Lyneal	25	25
		Oswestry	2600	2600
		Gobowen	200	200
		Knockin	20	20
		Llanmynech & Pant	100	100
		Ruyton XI Towns	15	15
		St Martins	200	200
		Whittington	100	100
		Kinnerley, Westbrook, Dovaston and Knockin Heath	50	50
		Llanblodwel, Porthywaen de goch, Llanidys and Bryn Melyn	25	15
		Park Hall, Hindford, Babbinswood and Lower Frankton	50	50
		Selattyn, Upper/Middle/Lower Hengoed and Pant Glas	5	5
		Weston Rhyn, Rhoswiol, Wern and Chirk Bank	78	78
		TOTAL PROJECTED:	4423	4413
		Discrepancy between CS1 Projections and SAMDev	1902	1912

Note: Ellesmere has changed from 3 smaller allocations for 222 dwellings, to 1 large allocation for 250 dwellings.

Spatial Area	CS1 Projections (max)	Location	R.P.O SAMDev Aspiration (max)*	PSFP SAMDev Aspiration (max)	
North-East	6050	Market Drayton	1200	1200	
		Adderley	25	14	-11
		Cheswardine	11	11	
		Childs Ercall	10	10	
		Hinstock	60	60	
		Hodnet	77	80	3
		Stoke Heath	25	25	
		Woore	50	15	-35
		Colehurst, Tyrley, woods ave (sutton Lane) and Woodseaves (Sydnall Lane)	25	15	
		Marchamley, Peplow, Wollerton	15	15	
		Bletchley, Longford, Longwell Green, Wootton Bassett	20	20	
		Whitchurch	1200	1200	
		Prees; Prees Higher Heath	100	100	
		Tilstock, Ash Magna/Parva, Prees Heath, Ightfild, Calverhall	105	100	-5
		Wem	500	500	
		Shawbury	50	50	
		Myddle & Harmer Hill	50	50	
		TOTAL PROJECTED:	3513	3465	
		Discrepancy between CS1 Projections and SAMDev	2537	2585	-48

Spatial Area	CS1 Projections (max)	Location	R.P.O SAMDev Aspiration (max)*	PSFP SAMDev Aspiration (max)
Central	8800	Shrewsbury	6500	6500
		Baschurch	200	200
		Bayston Hill	60	60
		Bomere Heath	50	50
		Nesscliffe	30	30
		Albrighton	5	5
		Bicton village (part) and Four Crosses (part)	15	15
		Dorrington, stapleton and Condoover	65	65
		Fitz, Grafton, Mytton and Newbank	1	6
		Great Ness, Little Ness, Wilcot, Wopson/Valeswood, Kinton and Felton Butler	15	15
		Hanwood and Hanwood Bank	50	30
		Longden, Annscroft, Hockley, Longden Common and Lower Common/Lifford Green	50	50
		Montford Bridge West (Montford Parish part)	10	10
		Mytton	5	5
		Walford Heath	6	5
		Uffington	5	5
		Weston Common, Weston Wharf & Weston Lullingfields	25	25
		Minsterley/ Pontesbury	260	260
		TOTAL PROJECTED:	7357	7336
		Discrepancy between CS1 Projections and SAMDev	1443	1464

-20

-1

-21

Spatial Area	CS1 Projections (max)	Location	R.P.O SAMDev Aspiration (max)*	PSFP SAMDev Aspiration (max)
South	4125	Ludlow	875	875
Notes: Ludlow allocation 038 removed.		Burford	40	40
		Clee Hill	30	30
		Onibury	25	25
		Bishops Castle	150	150
		Bucknell	100	100
		Chirbury	30	30
		Clun	70	70
		Lydbury North and Brockton	20	20
These clusters have merged , but reduced their overall figures from 45		Binweston, Leigh & Aston Rogers (+ Rowley, Acton Piggott)	15	
		Worthen & Brockton (+ Little Worthen & Little Brockton)	30	30
Notes: Church Stretton 027 removed just prior to publication of Final Plan Draft (at Cabinet meeting) in favour of two other sites - previously discounted on deliverability issues.		Brompton, Marton Middleton, Little Weston, Litchington & Rorrington (+ Pentreheyling)	25	20
		Clungunford (+Abcot, Beckjay, Hopton & South, Stretton & Twitchen (Th	15	20
		Hope, Bentlawnt and one	15	15
		Snailb, Bache, Stones & Pennerley (+ Tankerville, Black Hall, Crow Nest & The Dog)	15	15
		Wentnor & Norbury	15	25
		Church Stretton	370	370
		Cleobury Mortimer	350	350
		Hopton Wafers and Doddington	12	12
		Oreton, Farlow and Hill Houses	12	12
		Silvington, Bromdon and Loughton	12	12
		Stottesdon, Chorley and Bagginswood	12	12
		Kinlet, Button Bridge, Button Oak	30	30
		Craven Arms	500	500
		Aston on Clun, Hopesay, Broome, Lond Meadow End, Rowton, Round Oak, Beambridge and Horderley	15	15
		Bache Mill, Boulton, Broncroft, Corfton, Middlehope, Peaton, Seifton (Great/Little), sutton, Westhope	45	45
		TOTAL PROJECTED:	2828	2823
		Discrepancy between CS1 Projections and SAMDev	1297	1302

-15

-5

5

10

-5

Spatial Area	CS1 Projections (max)	Location	R.P.O SAMDev Aspiration (max)*	PSFP SAMDev Aspiration (max)	
East	3575	Bridgnorth	1000	1400	400
No figures given in Preferred options and RPO *based on Scenario 2A of Neighbourhood Plan		Ditton Priors	50	26	-24
		Neenton	5	7	2
		Acton Round, Aston Eyre, Monkhopton, Morville and Upton Cresset	0	15	15
		Albrighton	25	250	
		Broseley	175	200	25
		Highley	170	200	30
		Much Wenlock*	90	202	112
		Buildwas		10	10
		Shifnal	1600	1250	-350
		TOTAL PROJECTED:	3340	3560	220
		Discrepancy between CS1 Projections and SAMDev	235	15	

Produced by
Les Stephan Planning Ltd
24 April 2014

**Overall Housing Figures for Shropshire Council
(Plan Period 2006-2026)**

CS1: 27500 new homes (average)

Spatial Area	CS1 Projections (min)	CS1 Projections (max)	RPO SAMDev Aspiration (max)*	PSFP SAMDev Aspiration	Discrepancy between CS1 (max) and PSFP SAMDev (max)
North West	5775	6325	4423	4413	1912
North East	5500	6050	3513	3465	2585
Central	8250	8800	7357	7336	1464
South	3575	4125	2828	2823	1302
East	3025	3575	3340	3560	15
TOTAL	26125	28875	21461	21597	7278
Discrepancies using PSFP SAMDev figures	4528	7278			

CS1 requires an average of 27500 homes as was approved by the Inspector for the Core Strategy. It then sets out the figures for each spatial area as above in column 2 and 3. The figures given in column 3 and 4 are the number of dwellings being allocated/ supported by Parish/Town Councils through the SAMDev process. (***These are the maximum housing target aspirations for the plan period (2006-2026) which includes all build commitments to date and windfall allowances**)

*RPO = Revised Preferred
Options*

*PSFP = Pre-Submission
(Draft) Final Plan*

*Produced by
Les Stephan Planning Ltd
24 April 2014*

CONCLUSION

At para 1.18 of the Introduction to the Core Strategy it clearly states that the **emphasis of the SAMDev “...will be on allocating land to deliver enough new housing and employment land to meet Core Strategy targets...”**

The concluding table clearly illustrates that the number of dwellings being put forward through the SAMDev do not meet the requirements of the Core Strategy.

Even using the best case scenario (i.e. the maximum number of dwellings supported in the SAMDev but the minimum figure given in Policy CS1), there is still a under provision county-wide by nearly 5,000 homes.

There is an under-delivery of 4938 to 7288 homes.

Whilst we are fully aware of the provisions of policy MD3 and the suggested flexible approach to further development, we believe that the SAMDev DPD submitted to the Inspector should provide housing to cover the plan period as was approved by the Core Strategy. Policy MD3 would, realistically, be used to provide housing where there is a proven need for additional development and/or allocated sites are unable to come forward. **It should not be used to provide the housing necessary to cover the plan period.** That is the purpose of the SAMDev.

This is particularly important when policy MD3 requires evidence of community support, as the Town/Parish Councils have already provided their aspirations for the plan period and will be unlikely to support further development beyond this.

This has been proven recently with the lack of Parish/Town Council support for additional sites to boost the five year housing land supply.

Shropshire Council SAMDev – Shrewsbury, Market Towns and Community Hub and Cluster housing requirements

Table 1- Overall housing requirements table taken from SAMDev Plan Table MD1.1

Housing	Number of dwellings			
	Built 2006-2013	Committed* 2013	Planned 2006-2026 (Approximate)	Remaining to deliver to 2026
Shrewsbury	1,602	957	6,500	3,941
Market Towns/Key Centres	3,355	2,273	11,000	5,372
Rural Areas	2,314	2,259	10,000	5,427
Total	7,271	5,489	27,500	14,740

*with planning permission at 01/04/13

Overall housing requirements from Core Strategy set out above as shown in Draft Policy MD1 with a breakdown of completions from 2006-2013 and commitments as of April 2013 for Shrewsbury, market town/key centre and rural areas (following approach in Core Strategy Policy CS1).

Settlement	SAMDev Plan Housing Guideline 2006-26
Albrighton	250
Bishop's Castle	150
Bridgnorth	1400
Broseley	200
Church Stretton	370
Cleobury Mortimer	350
Craven Arms	500
Ellesmere	800
Highley	200
Ludlow	875
Market Drayton	1200
Minsterley and Pontesbury	260
Much Wenlock	202
Oswestry	2600
Shifnal	1250
Shrewsbury	6500
Wem	500
Whitchurch	1200
Totals	18807

Table 2 - Housing guidelines for Shrewsbury and the market towns/key centres

Table 3 - Community Hubs and Clusters housing guideline indications

Indication of the housing requirements across the Hubs and Clusters including completions information for 06-11 and 06-13. These figures reflect the individual settlement position as accurately as possible. It is important to take into consideration that the housing requirements reflect conversations locally with the Parish Councils so how the guideline has been arrived at may not be the same in each case. We reserve the right to amend and adjust ahead of submission.

* some housing guidelines are 2006-26 as identified and include completions just from 2006-13 rather than 06-11 and 06-13.

Hub or Cluster Settlements	built 2006-11	SAMDev Plan Housing Guideline 2011-26*	Total housing 2006-2026	built 2006 to 2013	o/s consents at 31/3/2013
BISHOPS CASTLE PLACE PLAN AREA					
Bucknell		100	100	8	22
Chirbury	6	30	36	6	0
Clun (2006-26)		70	70	10	7
Lydbury North (2006-26)		20	20	1	0
Brockton	1	5	6	2	4
Brompton, Marton, Middleton, Pentreheyling, Priest Weston, Stockton and Rorrington	7	20	27	9	1
Abcot, Beckjay, Clungunford, Hopton Heath, Shelderton and Twitchen (Three Ashes) (2006-26)		15	15	3	0
Hope, Bentlawnt, Hopesgate, Hemford, Shelve, Gravels (including Gravels Bank), Pentervin, Bromlow, Meadowtown and Lordstone	1	15	16	1	0

Shropshire Council SAMDev – Shrewsbury, Market Towns and Community Hub and Cluster housing requirements

Snailbeach, Stiperstones, Pennerley, Tankerville, Black Hole, Crows Nest and The Bog.	7	15	22	7	0
Wentnor and Norbury	0	25	25	0	3
Worthen, Brockton, Little Worthen, Little Brockton, Binweston, Leigh, Rowley, Aston Rogers and Aston Pigott.	4	30	34	4	2
BRIDGNORTH PLACE PLAN AREA					
Ditton Priors	8	26	34	8	1
Neenton	0	7	7	0	0
Acton Round, Aston Eyre, Monkhopton, Morville and Upton	3	15	18	3	0
CLEOBURY MORTIMER PLACE PLAN AREA					
Kinlet, Button Bridge, Button Oak	0	30	30	0	0
Hopton Wafers and Doddington	0	12	12	0	1
Oreton, Farlow and Hill Houses	7	12	19	10	0
Silvington, Bromdon, Loughton and Wheathill	3	12	15	4	1
Stottesdon, Chorley and Bagginswood	11	12	23	11	7
CRAVEN ARMS PLACE PLAN AREA					
Aston on Clun, Hopesay, Broome, Horderley, Beambridge Long Meadow End, Rowton, Round Oak (2006-26)		15	15	1	8

Shropshire Council SAMDev – Shrewsbury, Market Towns and Community Hub and Cluster housing requirements

Bache Mill, Boulton, Broncroft, Corfton, Middlehope, Peaton, Seifton, (Great/Little) Sutton, Westhope (2006-26)		45	45	3	0
ELLESMERE PLACE PLAN AREA					
Cockshutt	21	50	71	40	3
Dudleston and Street Dinas	1	10	11	2	1
Dudleston Heath and Elson	4	40	44	4	10
Tetchill, Lee and Whitemere	7	20	27	8	6
Welsh Frankton, Perthy, New Marton and Lower Frankton	4	30	34	5	1
Welshampton and Lyneal	19**	25	44	10	11
LUDLOW PLACE PLAN AREA					
Burford	8	40	48	8	3
Clee Hill	1	30	31	1	45
Onibury	2	25	27	2	0
MARKET DRAYTON PLACE PLAN AREA					
Adderley	1	13	14	1	11
Cheswardine	1	11	12	1	24
Childs Ercall	28	10	38	31	12
Hinstock	37	60	97	40	12
Hodnet	0	80	80	1	15
Stoke Heath	0	25	25	0	3
Bletchley, Longford, Longslow & Morton Say	4	20	24	6	13
Woore, Irelands Cross and Pipe Gate	86	42	128***	85	28
Colehurst, Tyrley, Woodseaves (Sutton Lane), Woodseaves (Sydnall Lane)	3	15	18	3	3

Shropshire Council SAMDev – Shrewsbury, Market Towns and Community Hub and Cluster housing requirements

Marchamley, Peplow and Wollerton	3	15	18	3	2
MUCH WENLOCK PLACE PLAN AREA					
Buildwas	1	10	11	1	4
OSWESTRY PLACE PLAN AREA					
Gobowen	36	200	352****	48	125
Kinnerley, Maesbrook, Dovaston and Knockin Heath	13	50	63	19	3
Knockin	0	20	20	0	4
Llanymynech and Pant	74	100	216*v	92	46
Llanyblodwel, Porthywaen, Dolgoch, Llynclys and Bryn Melyn	4	15	19	4	4
Park Hall, Hindford, Babbinswood and Lower Frankton	4	50	54	4	21
Ruyton X1 Towns	26	115	141	27	102
Selattyn, Upper, Middle & Lower Hengoed and Pant Glas	2	21	23	3	15
St Martins (2006- 26)		200	200	16	94
Weston Rhyn, Rhoswiell, Wern and Chirk Bank	52	78	130	63	16
Whittington	4	100	104	8	3
SHREWSBURY PLACE PLAN AREA					
Baschurch	72	200	272	84	70
Bayston Hill	15	60	75	29	3
Bomere Heath	17	50	67	18	4
Albrighton	0	5	5	0	0
Bicton and Four Crosses	1	15	17	1	1
Condober	2	25	27	3	1
Dorrington	5	35	40	5	4
Stapleton	2	5	7	2	0
Fitz, Grafton and Newbanks	3	13	16	5	0

Shropshire Council SAMDev – Shrewsbury, Market Towns and Community Hub and Cluster housing requirements

Great Ness, Little Ness, Wilcott, Hopton/Valeswood, Kinton and Felton Butler	3	15	18	6	11
Hanwood and Hanwood Bank	7	30	37	9	3
Nesscliffe	0	30	30	-1*vi	15
Montford Bridge West	2	10	12	4	7
Longdon, Hook-a-gate, Annscroft, Longden Common and Lower Common/Exfords Green	5	50	55	6	13
Uffington	1	5	6	1	0
Walford Heath	0	6	6	0	0
Mytton	0	5	5	0	0
Weston Lullingfoeds, Weston Wharf and Weston Common	1	20	21	1	1
WEM PLACE PLAN AREA					
Shawbury	29	50	79	30	2
Myddle and Harmer Hill	43	50	93	52	25
WHITCHURCH PLACE PLAN AREA					
Prees	36	100	136	36	16
Whitchurch Rural & Ightfield and Calverhall	1	90	91	1	16
	749	2920	3828	919	889

** includes 11 outstanding

***requirement of 50 plus existing allocations at Pipe Gate 35 dwellings and Candle Lane 51 dwellings

**** 116 units at Almond Avenue are included in total because they are already allocated in Oswestry Local Plan – carried forward in commitments at 2013

*v incl +74 completions and +42 o/s at March 2011

*vi includes demolition

Shropshire Council SAMDev – Shrewsbury, Market Towns and Community Hub and Cluster housing requirements

The table below reflects housing guidelines set out in the SAMDev for market towns/key centres (2006-2026) and the Community Hubs and Clusters guidelines for the period 2006-2026 as a whole. The table also includes existing completions in rural areas minus those completions and commitments already accounted for in the Community Hubs/Cluster settlements.

This is all clearly work in progress at this stage and we will want to carefully consider allowances for windfall, overall housing guidelines, up to date data on completions/commitments for each area etc as we progress through the formal plan stages reserving the right to amend the figures for subsequent submission.

	Approximate Housing numbers
Shrewsbury/Market Towns housing guideline (06-26)	18807
* Additional allocations in Shrewsbury above housing guideline	890
Community Hubs/Clusters requirements (2006-26)	3828
Rural area completions from MD1 (2006-13) minus Hubs/Clusters completions	1395
Rural area commitments from MD1 (at 2013) minus Hubs/Clusters commitments	1370
Rural windfall 2013-26 (conversions, affordable exceptions, ag workers dwellings allowable under CS5**) totalling around 155 a year	2015
	28305

Table 4 - SAMDev Plan housing guidelines

* reflects over allocation identified in Draft Policy S16: Shrewsbury Area

** does not reflect expected increase in rural windfall development from sites permitted since Shropshire Council published latest 5 year land supply position.

APPENDIX 3

Strategic Housing Percentages

Strategic Housing Percentages for Shropshire Council (Plan Period 2006-2026)

Location	Strategic Targets in Policy CS1	Housing Aspirations (max) in SAMDev - PSFP	Resultant percentages based on PSFP SAMDev
Shrewsbury	25%	6500	30.10%
Market Towns & Key Centres	40%	12307	56.98%
Rural (Hubs & Clusters)	35%	2790	12.92%
TOTAL		21597	

PSFP = Pre-Submission (Draft)

Final Plan

Hubs & Cluster Summary	
North West	1013
North East	565
Central	576
South	578
East	58
	2790

Produced by
Les Stephan
Planning Ltd 24
April 2014