



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):	JVH Town Planning Consultants
Address:	Houndhill Courtyard, Houndhill, Marchington, Staffordshire, ST14 8LN
Email:	<a href="mailto:office@jvhplanning.co.uk">office@jvhplanning.co.uk</a>
Telephone:	01283 820040

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

Name:	
Organisation (if applicable):	Redrow Homes Ltd
Address:	Redrow House, Kinsall Green, Wilnecote, Tamworth, B77 5PX
Email:	

## 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:

Paragraph 2.4, Policy MD1, Policy MD3, Policy MD6, Policy S15, Inset Map S15 - Inset 1

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>	<input checked="" type="checkbox"/>
<b>Justified</b>	<input checked="" type="checkbox"/>
<b>Effective</b>	<input checked="" type="checkbox"/>
<b>Consistent with National Policy</b>	<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).

**Object**

**Paragraph 2.4**

The Shropshire Core Strategy was adopted in March 2011 and before the localism act and the duty to co-operate. The second part of the plan in the form of the SAM Dev must demonstrate that co-operation has taken place with adjoining districts and authorities. Paragraph 2.4 says that this will be

published upon submission and at this stage there is no evidence that the duty to co-operate has been fulfilled within this stage of the development plan. Since the plan was prepared the Regional Strategy [RS] has been revoked and the NPPF has come into effect in March 2012. The Plan as drafted does not meet the NPPF in terms of the need to boost the housing supply and meet the fully assessed needs of the area.

## **Object**

### **MD 1**

MD1 Relies on the Core Strategy policies; CS1, CS2 and CS3

These require that over the plan period from 2006 to 2026 some 27,500 new homes will be delivered, this is sub divided into the areas of the County and some 3,025-3,575 new homes required for the East Shropshire Area which includes Shifnal. There is no evidence that the SAM Dev has updated the housing projections in accordance with paragraph 159 of the NPPF to keep the plan up to date and to boost the housing supply or indeed with the findings of the 2014 SHMA that indicates that this is an area where housing will be delivered by the market.

Paragraph 159 of the NPPF says that there should be a clear idea of the full housing needs and taking into account the needs of the housing market area through the SHMA. The housing forecasts have not been updated since the approval of the Core Strategy in 2011 which was based on the now revoked Regional Spatial Strategy and on this basis the plan can be found to be unsound in that it fails to comply with the NPPF in this regard.

Para 4.5 of the Core Strategy acknowledges that the housing figures may need to be revised as a result of changes including the RS and household projections but the plan fails to do this. The 2014 SHMA recognises that new projections are required and that they will be available later in 2014. It also recognises that there is a step change needed in housing delivery in the County and that some market area are more likely to deliver than others

Page 122 sets out :-

*A considerable step-change in delivery is only likely to be achieved by working with rather than against the market. For instance, increased delivery is more likely where the market is strong in East Shropshire and in Shrewsbury, and least likely in areas with low viability such as North West*

*Shropshire and the North East towns.*

*The market is also strongest for certain types of housing, particularly 3, 4 and 5 bedroomed homes. Demand has yet to catch up with the evident need for affordable homes, smaller units and retirement housing. In brief, flexibility is required in the geographical location, mix and type of housing to ensure that Shropshire meets its housing requirements.*

Notwithstanding that the household figures have not been reviewed, table MD1.1 shows the proposed split of development between the levels of settlements and that within the tier of the key centres there are some 5,372 dwellings to allocate for the plan period. However there is nothing in that table that explains how the requirement for the key centres has been apportioned to the individual settlements including Shifnal.

## **Object**

### **MD3**

Part 3 refers to the settlement housing guideline and how applications will be determined when the guideline may be exceeded. The list in i-v of this policy should include a note that the figures in the guidelines should be regarded as a minima as should the overall housing targets in the plan.

The settlement housing guideline is only found in the policies S 1-18 and as set out above it is not clear how those guidelines have been arrived at.

Currently the Local Planning Authority do not have a five year housing land supply and it is therefore imperative that land is made available to ensure that there is an adequate supply of land in the area.

Paragraph 4.20 sets out that where a settlement is not achieving the guideline then a positive approach will be taken for that settlement. However this approach relies on the rationale of the Housing Guidelines being appropriate targets for the settlements, it is suggested that this rationale is applied at a higher level rather than that of individual settlements and that if there is a failure in the land supply then developments outside development boundaries may be allowed without recourse to the individual settlement targets. It would be difficult to assess the land supply for individual

settlements and this is not reflective of the test in the NPPF.

## **Object**

### **MD6**

This policy is titled green belt and safeguarded land. However there is no reference in the Policy or the justification to the role of safeguarded land. As safeguarded land is only referred to later in the individual settlements and on the maps; the Policy should be clear about the role and function of safeguarded land.

## **Object**

### **S15 Shifnal**

We object to the Shifnal Area Policy on the basis that the development strategy is flawed in that it fails to identify sufficient land at Shifnal for residential development and omits the site at “The Uplands” which is an appropriate site for 68 dwellings and is the subject of a current planning application.

### **We object to S15 1 Part 1**

On the basis that there is no clear justification for the limit of 1,250 dwellings to be met in the settlement over the plan period. This figure should be increased to allow for the inclusion of sustainable and developable sites. The SAM Dev preferred options of July 2013 considered that the housing target for Shifnal was some 1,600 new homes which was more realistic and this target should be re-instated as a minimum. The lower figures in the published Plan go against the grain of the 2014 SHMA and the need to deliver homes and the ability of the eastern part of the county to deliver.

### **Part 2**

We object to the Proposals Maps Inset 1 that depicts the proposed site allocations and the extent of safeguarded land. This is on the basis that the site at “The Uplands” as shown on the attached plan should be allocated for housing development to accommodate 68 dwellings and that there is no need for the land to be retained in a safeguarded notation on the plan.

### **Part 4**

We object to Part 4 on the basis that it is not necessary to retain “The Uplands” site as safeguarded land, firstly the land should be allocated in this plan for development and secondly the policy as drafted would restrict the release of the land in the circumstances where the area was short of housing land and new land needed to be made available to meet the housing targets as proposed in paragraph 4.20.

## **Object**

### **S15.1.a**

We object to the list of allocated sites as these omit the site at “The Uplands” which should be included in the list for up to 70 dwellings.

Land at ‘The Uplands’ was a preferred site in the SAM Dev preferred options of July 2013 as site SHI002 for 160 homes. This site is now the subject of two planning applications for a development of 68 homes, including 10 affordable homes and a care home for 42 bed spaces. The site was considered to be a sustainable and developable site and nothing has changed since that time. There are no technical objections to the development that make the development unsustainable in any regard. The omission of the site goes against the grain of the 2014 SHMA and the need for homes including affordable homes and retirement housing.

Proposed site 006 is an extension of an existing development that is currently on safeguarded land [from the 2006 adopted plan] It is not clear from the evidence base how this site was a carried forward site and how it is superior to the land at ‘The Uplands’. At the Inquiry into the Bridgnorth Local plan in 2006 the Inspector found regarding omission site H 49 south west of the A464 to be a good development site with little to choose between it and the then proposed allocation to the north of the A464 which has subsequently been developed. He found at paragraph 29.4.2 of his report that the site was well screened and well related to the urban form and least constrained in landscape terms. He found the site would have less impact on the setting of the town over the preferred site. He further recommended that if the preferred site was omitted due to any reason the omission site should be substituted and proposed a modification to this effect.

## **RECOMMENDATIONS**

**In the event that policy SHIF1 is deleted, I recommend that the Local Plan be modified as follows.**

- a. Add a policy to replace SHIF1, allocating 6.5 ha of land to the south west of the A464 road (omission site H49) for housing development.**
- b. Add a brief reasoned justification for the new policy**

### **and add the site**

In the circumstances of the examination of this matter and the findings there is no logical reason why the site at 'The Uplands' is not an allocated site for housing.

### **Object**

#### **Inset Maps S15 and Inset 1**

We object to the maps as drafted on the basis that the plan depicts the proposed site allocations and the extent of safeguarded land. The plan includes 'The Uplands' as safeguarded land and this should be replaced by the allocation of the site for housing.

**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. Include in the document evidence of the duty to cooperate and how the plan is sound on the basis of cooperation; given the revocation of the RS and the introduction of the NPPF explain how the housing numbers remain sound.
2. Include in the plan the evidence from the SHMA that indicates the areas where housing is most likely be delivered and re-weight the allocations to that effect.
3. Update the housing requirement to a fully, objectively assessed housing need reflective of the housing market area.
4. Amend Table MD1 to allocate more development to the key centres in accordance with a revised housing requirement and explain how the requirement is divided amongst the individual settlements and attach a greater housing requirement for Shifnal.
5. Insert in MD3 that the housing figures are a minima.

6. Amend paragraph 4.20 to relate to a wider area than individual settlements to trigger a review of the housing supply.
7. Amend MD6 to refer to safeguarded land and a justification.
8. Amend S15 to include the site of 'The Uplands' as a housing allocation.
9. Amend S15 to increase the housing guideline figure for Shifnal to at least 1,600 homes.
10. Amend the proposals map S15 Inset 1 to remove 'The Uplands' from safeguarded land and allocate as a housing site.
11. Reconsider the list of allocations in S15 and insert 'The Uplands' as an allocation in preference, to 006 if there is a restriction on numbers.

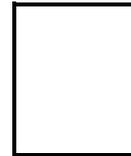
Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at 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:

We act for a major house builder who has land interests in a wide variety of locations in the Borough and who are concerned to participate in the examination to ensure that the strategy is robust and that the interests of the sustainable settlements are promoted, and to ensure a robust and flexible housing land supply to meet the requirements of the market.

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

**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.