

Site Allocations and Management of Development (SAMDev) – Pre-Submission Draft

**Response made on behalf of the Hereford
Diocesan Board of Finance**



April 2014

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Section 1 – Introduction to the consultation response

1.0 Introduction

- 1.0.1 This consultation response has been prepared by Smiths Gore on behalf of the Hereford Diocesan Board of Finance (HDBoF). It has been prepared in response to an invitation from Shropshire Council to comment on its Site Allocations and Management of Development (SAMDev) Plan, Pre-Submission Draft.
- 1.0.2 As a significant landowner in Shropshire the HDBoF is keen to ensure that the policies, sites and settlement strategies identified within the SAMDev are appropriate, respect local circumstances and support, rather than constrain, the development that the communities need.
- 1.0.3 This written document has been submitted both electronically and as a hard copy to Shropshire Council.
- 1.0.4 This response makes detailed comments on particular sections of the consultation document, clearly identified by each subheading. The responses to specific elements of the document are organised in the same order as they appear within the consultation document for ease of consideration. This document is divided into separate sections which set out the responses made in relation to the following consultation topics:
- Policy Directions Document
 - Bishop's Castle Area
 - Bridgnorth Area
 - Craven Arms Area
 - Minsterley and Pontesbury Area
 - Much Wenlock Area
 - Shrewsbury Area
- 1.0.5 Although the HDBoF is highly supportive of the concept of identifying Community Clusters the Board does have some concerns regarding the methodology being used to identify which settlements should or should not form Community Clusters. The HDBoF therefore wishes to set out these concerns clearly before making detailed comments in response to the final consultation on the SAMDev. These concerns were identified at the 'preferred options' and later 'revised preferred options' stages, though do not appear to have been properly addressed in this latest iteration of the document.
- 1.0.6 Having followed the progress of the SAMDev document and having read paragraph 4.66 of the core strategy and policy MD1 of the SAMDev, it is understood that Community Clusters have been identified solely on the basis of the wishes of parish councils. Although the views of parish councils should of course be an important consideration in this process the HDBoF would expect such decisions to be informed by a robust evidence base including the services and facilities present in settlements as well as information about how local people travel between the villages. In this way it is possible to develop an understanding of the role each settlement plays in the locality which can then be used to determine which ones should, or should not, form Community Hubs or part of a Community Cluster.
- 1.0.7 By not adopting this type of approach there has been a clear lack of consistency in the types of settlement which has been identified as forming Community Hubs or part of a Community Cluster within the SAMDev settlement policies. For example there are numerous instances where settlements which are no more than small hamlets with no community facilities, (and in some cases comprise only a single farmstead) have been

identified as forming part of a Community Cluster. Conversely there are numerous villages in Shropshire, which comprise a far greater number of homes and in some cases, provide a range of community services and facilities, which are proposed to be left as 'open countryside'. This is clearly inappropriate and is an issue which must be addressed prior to the adoption of the SAMDev.

- 1.0.8 Comments on particular Community Hubs and Clusters have been provided within the relevant sections of this document, and it is within the context of the concerns highlighted above, that those comments should be considered.

1.1 Local Plan preparation – tests of soundness

- 1.1.1 Local Plans and Development Plan Documents at the pre-submission stage should accord with certain tests which are outlined within the National Planning Policy Framework (the Framework). The tests are in place to allow a planning Inspector to assess whether a plan is 'sound'. A sound plan is described at paragraph 182 of the Framework as being:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 1.1.2 This consultation response has been prepared with these tests in mind and considers the policies contained within the SAMDev Pre-Submission document against each of them. It also tests them against the other relevant policies within the Framework in order to ensure it is consistent with national policy.

Section 2 – Development Management Policies

2.0 MD1 – Scale and distribution of development

UNSOUND – In order for the strategy to be successful the scale and distribution of development needs to be based upon objectively assessed needs. Planned for targets should not be approximate but should be the minimum target. At present the policy is not positively prepared.

- 2.1 The HDBoF retains its generally supportive position in respect of policy MD1. Specifically the HDBoF supports the retention of the clear recognition within this policy that future housing and employment growth should not be focussed solely within the county's larger settlements, but that it is also important to support appropriate levels of growth in smaller settlements in order to create and safeguard sustainable rural communities.
- 2.2 In smaller rural communities the key issue is often whether those with a strong local connection, either because they grew up and/or work there, can have the opportunity of affording a home to rent or buy in that same community. In these settlements it is decisions about small scale development schemes that are of key importance and are crucial to the sustainability of those communities. Although it is of course crucial to conserve the character of these settlements and their wider rural settings, if planning policies are too restrictive then local housing and employment needs will not be satisfied. As a result, certain groups of people, primarily the young, especially young families and those working on relatively low wages, will continue to find it difficult to afford to rent or buy properties on the open market, or find an appropriate affordable non market alternative. These people are effectively being priced out of their own communities. Such exclusion undermines the sustainability of rural communities.
- 2.3 All too often local planning policies take the overly simplistic view that a settlement should provide access to 'x' number of facilities and services in order to be deemed a sustainable location for development. This is an overly simplistic and flawed approach which fails to recognise the complex inter relationships that exist between settlements which mean that they should be considered in a holistic way. A small settlement may have limited access to services and facilities when considered in isolation but may actually demonstrate sustainable patterns of living when you take account of its shared functional relationship with surrounding settlements. For example one settlement may have a primary school, another might contain employment units, whilst a third might form the centre for social life in the area with a community hall and active clubs and societies. Any or all may be appropriate locations for modest housing and economic development on the basis that all combine to provide a sustainable community life. The Framework specifically supports this approach in paragraph 55 which states that:

"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".

- 2.4 This approach is also supported by many high status observers. In his review entitled 'Living Working Countryside' Lord Matthew Taylor explained that those villages that are 'protected' from development face becoming increasingly exclusive communities of the retired and of wealthy commuters travelling ever longer distances to work. As a result rural communities all over the country are losing local services such as schools and shops as they are often no longer viable.

- 2.5 These facts are supported by Paragraph 1 of the NPPG section on Rural Housing which explains that it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. 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.
- 2.6 Furthermore, paragraph 1 of this section of the NPPG goes onto explain that all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development to some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.
- 2.7 The approach presented in policy MD1 should ensure this does not happen within the villages and rural communities of Shropshire. There is a clear prospect that the settlements retain their vitality and will be viable for the good of the communities which rely upon them, throughout the plan period.
- 2.8 However, in order for this approach to be successful and sound it is necessary to ensure that an adequate supply of housing and employment development is directed to the rural areas and the plan itself allows enough flexibility to ensure sufficient development can be delivered. The HDBoF notes from the figures within table MD1.1 that the 'Rural Areas' have delivered 4,573 built or committed dwellings and 45 hectares of built or committed employment land over the last seven years. However, over the remaining plan period (13 years) the remaining figures to be delivered are only 5,427 dwellings and 25 hectares of employment land. Considering the state of the market and the economic crisis which has taken place over the last six year period it is considered that the Rural Areas would likely support a far higher number of dwellings and number of hectares of employment land than is to be provided over the remaining 13 years of the plan period.
- 2.9 If the Rural Area has been able to deliver such high figures in such a weak market it is reasonable to consider that there will be a more significant need as the market picks up over the remainder of the plan period. As such the HDBoF would recommend that these figures are reconsidered in order to ensure that the necessary levels of development are directed to the Rural Areas to ensure the Community Hubs and Community Clusters are able to grow at a sustainable level over the plan period.
- 2.10 Turning to flexibility, the HDBoF recommends that, once amended to reflect the above, the table within Policy MD1 (Table MD1.1) makes it explicitly clear that those figures identified are the minimum figures. In order to do this the phrase '**at least**' should replace the term '**approximate**' in brackets below the targets columns. Presently this could be read as being negatively prepared rather than positively prepared, as required by paragraph 182 of the Framework. This amendment will ensure that these figures are clearly identified as being targets which should be met, at the very least, to allow flexibility within the plan, both in terms of those initial targets identified for the outset of the plan period, but also in order to accommodate needs not anticipated in the plan, such as changes in economic and market circumstances over time.
- 2.11 The HDBoF supports the inclusion of point 3 of Policy MD1 which allows for the formation of further Community Hubs and Community Cluster settlements. The inclusion of this element of the policy will allow local communities to come together in order to try to achieve the development they feel they need to ensure their settlements are also allowed to grow in a sustainable and viable way. In their previous response to the 2012 Preferred Options consultation on the SAMDev the HDBoF was critical of the

methodology used in identifying and forming Community Clusters. Through the inclusion of this element of the policy, if there are any settlements which are excluded at this stage will still have the opportunity to receive development to retain and increase their viability, vitality and sustainability later in the plan period.

2.12 However, the inclusion of this element of the policy should not be seen as an opportunity to ignore the requirement to undertake a proper evidence based assessment of settlements within the county, which should be identified as Community Hubs or as part of Community Clusters. The HDBoF would like to reiterate its recommendations that the following settlements should be included within the SAMDev as Community Hubs;

- Claverley;
- Wistanstow; and
- Cressage.

Whilst the following settlements should be included as either making up part of, or entirely new, Community Clusters;

- Clunton and Hopton Castle;
- Burwarton;
- Aston Munslow, Munslow, Diddlebury and Shipton; and
- Bitterley and Knowbury.

These settlements all provide services and facilities whether individually or as part of a group and contribute to the overall sustainability of the local area. At present there are no proposals to accommodate development within them. As described at 2.3-2.5 above, without development being directed to these settlements they will be unable to support these existing services and facilities and the sustainable nature of them will be undermined and eventually lost.

3.0 MD2 – Sustainable Design

UN SOUND – In order to be found sound the policy should include a criterion which recognises that viability is crucial to delivery and allows flexibility where development might otherwise become unviable. At present the policy is not consistent with national policy.

3.1 This policy sets out the Councils' proposed sustainability and design standards for all types of development across a variety of issues and in terms of energy efficiency, construction techniques, appearance, local amenity and landscaping amongst others. The HDBoF is supportive of this policy insofar as it will be used alongside Core Strategy Policy CS6 and a Sustainable Design SPD to minimise carbon emissions resulting from the construction and operation of new buildings. However, in certain circumstances it may not be technically feasible or financially viable to achieve all of these standards and it might be the case that by requiring such standards it would affect the overall viability of the development. As such the HDBoF recommends that a sentence be added to the policy to recognise this and allow necessary flexibility where development might otherwise become unviable.

3.2 The Framework, in paragraph 173, places a great deal of emphasis on the need for local planning authorities to pay careful attention to viability and costs in plan making and decision taking in order to ensure that Local Plans are deliverable. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide

competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Paragraph 174 then goes on to explain that the cumulative impacts of these standards and policies should not put implementation of the plan at serious risk and should facilitate development throughout the economic cycle. It is important that the council takes this guidance into account in preparing Plans as consideration of overall viability is part of the evidence base which will be subjected to test, challenge and debate when it is examined. Demonstrably failing to consider this issue will almost certainly result in the document being found to be unsound.

- 3.3 Although developers vary in their approach to profit and risk, the key point is that a development which is not viable will not be delivered. This can mean that housing targets will not be met and delivery over the plan period will fall behind and fall short. In such cases, developers will await better market or financial conditions and put their resources into developing more profitable schemes elsewhere instead.

4.0 MD3 – Managing Housing Development

UNSOOUND – The policy must include recognition of the potential for the settlement housing guidelines to be revised up as the Plan period progresses. Council’s must review and meet the full, objectively assessed housing needs of the community and should this increase there must be flexibility in this policy to ensure this can happen.

- 4.1 This policy sets out various criteria for the ongoing management and delivery of housing land within the county.
- 4.2 The third section of the policy entitled ‘Matching the settlement housing guideline’ identifies criteria against which development at identified settlements which have already met their identified requirement will be considered. Paragraph 4 explains that where a settlement housing guideline will not be met by the end of the Plan period additional sites can be considered. However, this approach does not provide the necessary levels of flexibility as required by national planning policy.
- 4.3 One of the key tests of a Local Plan’s soundness is that it is ‘positively prepared’. The Framework describes positively prepared plans, at paragraph 182, as those which, “should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”.
- 4.4 Sustainable development is described at paragraph 14 of the Framework as a, “golden thread running through both plan-making and decision-taking.” It continues to state that, “For plan-making this means that local planning authorities should positively seek opportunities to meet the development needs of their area”, and that “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”.
- 4.5 The approach proposed may well not result in the development needs of the entire area, or even the individual Place Plan Areas, being properly considered throughout the Plan period and will very likely result in the full needs of the area over the course of the Plan period remaining unmet. As such the HDBoF recommends that the identified housing requirements of each settlement at this point should not be considered as a significant material consideration throughout the Plan period but only for the first five year period of the Plan and subsequently as they are reviewed.

- 4.6 Over the course of the plan period the needs of the wider community is the most important material consideration and indeed, in the context of housing needs should be the most significant material consideration based upon an updated and reviewed assessment. Meeting the overall objectively assessed needs of the area will ensure the plan is consistent with national policy and has the flexibility to be considered sound.
- 4.7 The HDBoF is pleased to note that the presumption is favour of sustainable development has been included within this policy. Should the housing land supply in Shropshire (across each HMA) fall below the necessary levels required (a five year supply) it should be the sustainability of the location; the impact upon the character of the locality; and the other policies within the Framework which determine whether or not an application should be approved to address that supply issue, rather than a locally identified housing requirement for an individual settlement.

5.0 MD4 – Managing Employment Development

SOUND – Subject to a minor amendment to the wording of criteria 1.iii. the policy now allows for other, suitable small scale development sites outside of the larger, urban areas. The term ‘employment generating uses’ should be employed rather than specific uses classes.

- 5.1 The jobs and businesses within Shropshire’s rural areas are vitally important to the significant proportion of the population who live in these areas. The ongoing decline in employment within agriculture has meant that people in small rural communities often have to travel long distances to reach their places of work, which are generally in the area’s larger settlements. It also means that the life of rural communities is affected by a downward spiral in terms of economic activity and an increasing change from formerly vibrant rural communities to dormitory settlements providing increasingly expensive housing for non-indigenous house purchasers.
- 5.2 Strong rural economies offer those living in rural areas better opportunities to work in their local community. They help to reduce the level of out-migration of young people and retain skilled young people by providing more and better quality local employment opportunities. Being able to live and work in the same settlement or at least nearby, will also have sustainability advantages as it will reduce the need for people to travel long distances to their place of work.
- 5.3 Furthermore use of the term ‘**employment generating uses**’ rather than ‘Class B or sui generis’ will allow for greater flexibility and represents a better opportunity to introduce employment uses on rural sites that will create new jobs rather than simply provide ‘employment space / land’ that might never come forward for development. As such it is also recommended that the term ‘employment generating uses’ should be included within 1.iii.
- 5.4 It is considered that by altering these elements of the policy, as described above, it will be consistent with the Framework and will allow the decision maker, and the other stakeholders within the process, to understand exactly what the policy will allow in the rural as well as urban areas of the county.

6.0 MD7a – Managing Housing Development in the Countryside

UNSOUND – The process for the selection of Community Hubs & Clusters is unjustified and is not positively prepared. Designation as a Community Hub or Clusters should be informed by a robust evidence base including data on settlement populations, local built form, the services and facilities present and information about the way in which local people travel between the villages.

- 6.1 Policy MD7a sets out where housing development will be treated favourably in the countryside along with criteria against which such schemes will be considered. It is understood that unless a settlement is designated as a Community Hub or part of a Community Cluster it will be treated as 'open countryside' in planning policy terms. This means that development in these villages will be strictly controlled and would only be permitted in exceptional circumstances. Throughout the SAMDev consultation process the HDBoF has identified two issues regarding this proposed approach and those are reiterated below.
- 6.2 Firstly it is important to note that Shropshire's smaller rural settlements make up a significant proportion of the county's overall population. It is therefore essential that these communities are not overlooked during the coming plan period as they have been in the past. As explained in paragraph 2.2 the key issue is whether those with a strong local connection can have the opportunity to rent or buy a home in that community. It is possible that a small village might only require a small handful of homes (perhaps 3-5) to be provided over the lifetime of the plan. Although this is only a small number the provision of these homes is of critical importance to those local people who are in housing need. Under the policy proposed in MD7a the development needs of smaller rural communities will continue to be neglected over the coming years.
- 6.3 The second concern relates to the methodology being used to identify which settlements should or should not form Community Hubs or part of Community Clusters. It is understood that Community Hubs and Clusters have been identified solely on the basis of the wishes of parish councils. Although the views of parish councils should of course be an important consideration in this process the HDBoF would expect the designation of Community Hubs and Clusters to be informed by a robust evidence base including data on settlement populations, local built form, the services and facilities present and information about the way in which local people travel between the villages (how often, for what reason and by what means). In this way it is possible to develop an understanding of the role each settlement plays in the locality which can then be used to determine which ones should or should not form Community Hubs and parts of Community Clusters.
- 6.4 It is considered that not adopting this type of approach has led to a number of 'settlements' being inappropriately defined as forming part of Community Cluster's while others, which have a closer functional relationship with surrounding settlements, have been overlooked. Again it is important to note that whether or not particular settlements are designated as forming Community Hubs or part of a Community Cluster will have significant implications in terms of their future development and could be a defining factor in whether local communities' development needs are satisfied in the coming years.
- 6.5 Paragraph 1 of the NPPG section on Rural Housing explains that it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. 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.
- 6.6 Furthermore, paragraph 1 of this section of the NPPG goes onto explain that all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development to some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. It is clear that the approach to the designation of the Community

Hubs and Clusters (based upon the wishes of the Parish Council, or otherwise) is not based upon robust evidence.

- 6.7 Now turning to the more detailed content of this policy, it is significant to note that this policy seems to deal almost exclusively with new build development, making very little reference to other forms of development such as converting rural buildings and no reference to
- 6.8 The HDBoF would also like to encourage the council to avoid relying on the concept of settlement boundaries to determine whether or not a development is considered to be sustainable. The emphasis should not be on whether a proposed development is on the right side of an arbitrary line but should rather take account of all issues of sustainability. For example, there is no reason why a sensitively designed development proposal located outside of a town or village, which is well related to a cluster of existing buildings and positioned along a public transport corridor, should be considered unsustainable. Such a scheme would be far less visually intrusive than a development which is simply tacked on to the edge of a settlement.
- 6.9 The HDBoF supports the alterations to the policy making it more explicit in its support of the re use and conversion of rural buildings for residential uses. This is an approach which has not historically been taken within local planning policies but it is pleasing to see that Shropshire Council are responding to the recent changes in national planning policy brought about by the publication of the Framework. Paragraph 55 of the Framework sets out a number of 'special circumstances' where residential development in the countryside should be supported. These include:
- *"Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*
 - *Where development would re-use redundant or disused buildings and lead to an enhancement of the immediate setting".*
- 6.10 Residential conversions provide the basis for a broad spectrum of enterprises that do not require commercial or industrial facilities or infrastructure as required by the planning system. With improving access to broadband, there is considerable evidence from national and regional research that home-working is growing in terms of its potential for rural communities and economies.
- 6.11 In July 2010 a study was carried out by English Heritage in collaboration with regional development agency Advantage West Midlands and local county and metropolitan authorities into the future uses of farm buildings (West Midlands Farmsteads and Landscapes Project). The findings below relate to residential conversions and are specifically results based on rural farms and farm buildings in the rural areas of Herefordshire, Warwickshire, Shropshire, Worcestershire and Staffordshire.
- One in twelve of the farmsteads in residential use is also the registered office of a limited company. This measure serves as a proxy indicator of professional home-based working. This form of business activity, which excludes companies engaged in property management, exceeds the number of historic farmsteads in farming use which have significantly diversified and the number converted for industrial or commercial use.
 - The economic activity of companies based in residential farmsteads covers a very wide spectrum of activity. Of particular importance are business services (30%),

construction (10%), real estate (8%), recreational and cultural services (5%), medical and related services (5%), retail (5%) and catering (4%).

- They often provide homes for a business elite, with 22 directorships of substantial firms (defined as companies with a turnover in excess of £1.5 million per annum) for every 100 farmsteads. This outstrips the national average for all residential property of this type, of 5 in 100 households for urban areas and 8 in 100 households for rural areas.

- 6.12 Of particular importance the study found that residential (C3) property can accommodate significant, and until now largely hidden, business activity on historic farmsteads. This partly reflects the fact that the need for office space (a subset of B1 uses) has declined as high-speed internet connection has allowed dispersal of activity into the homes of professional workers, thus reducing employers' office costs. In the West Midlands the proportion of historic farm properties with home-based limited liability companies is more than three times higher than in other dwellings regardless of where they are located. Also, relative to households, they are concentrated in desirable rural locations with high property values which are close to major population centres of high economic mass.
- 6.13 One other type of development which is not mentioned within this policy is the establishment of live-work units. Fuelled by the impact of new technology (such as improved internet access in rural areas), a growing frustration with the stress and time wasting associated with the daily commute and a desire for a better work/life balance, self-employed people in rural areas are increasingly choosing to opt for home-working. In fact this is now a well-established trend. Live-work units have a positive impact upon the rural economy and are often the source of new businesses which are able to benefit from access to appropriately designed and developed buildings without the expense of having to find both a dwelling and a business unit on separate sites. The sustainable credentials of this type of development are also considerable. By constructing live-work units it removes the need for people to travel to work removing any need to choose to use a car, reducing carbon emissions that would otherwise result from a regular commute. The establishment of buildings providing a live-work arrangement offers a wide range of benefits, not only to individuals and their businesses, but also to the wider economy and environment as well.
- 6.14 In May 2013 the Trade Union Congress (TUC) published an analysis of the number of people working from home in the UK. This analysis found that the number of people working from home has increased by 13% in the last five years. Just over four million employees usually worked at home in 2012, a rise of 470,000 since 2007.
- 6.15 Accordingly one opportunity to help rural businesses deliver far more for the local economy is through the promotion and enabling of home-based work. The Office of National Statistics (ONS) also reported an increase in the level of home working, based on 2011 census data, and attributes this increase to a greater prominence of home businesses in rural areas. Furthermore, the Annual Population Survey 2010/2011 carried out by the ONS identified working from home as being more common in rural areas of England than in urban areas.
- 6.16 With approximately 25 million people in the UK commuting to work, it is estimated that commuting costs approximately £337 million of potential work time every day. Therefore one opportunity to help rural businesses deliver far more for the local economy is through the promotion and enabling of home-based work. Home working is therefore clearly a highly significant factor in the local economy and is a trend that the local authority should support.

- 6.17 Over recent years the principle of live-work units within the countryside has become more acceptable as a means of promoting the sustainable re-use of existing buildings. Such schemes are inherently sustainable as they help to meet local demand for housing (socially sustainable) and they provide local employment opportunities (economically sustainable). They also serve to reduce the need to travel by car and safeguard the character and appearance of traditional buildings (environmentally sustainable).
- 6.18 This type of development is specifically supported within paragraph 21 of the Framework which states that local planning authorities should "*facilitate flexible working practices such as the integration of residential and commercial space within the same unit*". The Council is therefore strongly urged to include reference to this form of development within policy MD7a of the SAMDev.

7.0 MD7b – General Management of Development in the Countryside

UNSOUND - more detail is required regarding other types of development which are appropriate within the countryside.

- 7.1 The HDBoF is pleased to note that more detail has been provided on other types and forms of development which are acceptable in the countryside in this additional policy. However, it is recommended that more detail is provided regarding other types of development which are appropriate within the countryside. One such development of this type is renewable energy. These types of developments almost exclusively need to take place in the countryside due to their inherent locational requirements but are not acknowledged within this policy. While these other types of development are generally supported by other policies in the Core Strategy, it is important that reference to them is made in policy MD7b to achieve consistency throughout the Plan and with the Framework.

8.0 MD11 – Tourism Facilities and Visitor Accommodation

UNSOUND – the policy needs to include a specific section relating to the conversion of existing buildings to tourism facilities and visitor accommodation.

- 8.1 Shropshire has long been a popular tourist destination which provides an important contribution to the local economy, providing enormous benefits to local businesses both directly and indirectly. Furthermore, tourist related developments help to underpin the quality of the local environment and facilitate enjoyment of it both by local people and visitors alike.
- 8.2 The HDBoF contributes significantly to the tourism industry in Shropshire. The HDBoF is responsible for managing the areas of countryside and traditional rural and ecclesiastical buildings within its ownership, which form an important component of the valued landscape which attracts so many tourists to Shropshire each year.
- 8.3 The HDBoF is generally supportive of the approach taken by the council in relation to tourism and leisure attractions and accommodation in policy MD11. The policy demonstrates a clear intention to facilitate high quality tourism development, improve upon the existing draw and to maximise the benefits gained from the industry. Allowing the diversification of the accommodation available to tourists will ensure that the local tourism industry progresses and moves with the times as visitors' expectations broaden and diversify. In order to achieve this Shropshire's tourism offer must be enhanced and this policy will allow that enhancement to take place accordingly.

- 8.4 However, the HDBoF is concerned that the policy appears to neglect the potential for the conversion and reuse of redundant buildings in the countryside for tourism purposes. When buildings are no longer fit for purpose and require a new viable, reuse it can be a significant enhancement to the rural economy and landscape to make use of such buildings for tourism related purposes. As such the HDBoF recommends that a section be included within the policy which makes reference to the reuse of redundant buildings for tourism related purposes.

9.0 MD12 – The Natural Environment

UNSOUND – The policy should make it explicitly clear that the various ‘natural assets’ have differing levels of importance and significance. Without this detail the policy cannot be considered to be consistent with national policy.

- 9.1 With a significant amount of land and property located within the open countryside the HDBoF is pleased to see that Shropshire Council is committed to safeguarding and enhancing the county’s special natural environments. It is important that Shropshire’s most valued landscapes and habitats are safeguarded against inappropriate development which would harm their objectives.
- 9.2 That said it is important to remember that the rural landscape is, of course, the product of centuries of interaction between human activity and the land. The HDBoF considers human settlement and development to be part of that continuous history and that they are part of what is loved about the English countryside. Therefore the notion of protecting the countryside should apply to the countryside as a ‘human habitat’ as well as a ‘wildlife habitat’.
- 9.3 In considering the future development of Shropshire it is important to understand that sustainable development is not solely confined to environmental issues but also encompasses the full range of factors including economic prosperity, the promotion of strong, vibrant and healthy communities as well as the protection and enhancement of the natural and built environment. This view is supported within paragraph 8 of the NPPF where it states that:
- “These roles [economic role, social role and environmental role] should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities.”*
- 9.4 The policy provides a comprehensive list of natural environmental ‘assets’. The policy describes that development which is likely to have a significant adverse effect on those assets will need to demonstrate that the social and economic benefits of the proposal clearly outweigh the environmental harm. However, included within that list is a wide variety of constraints and assets all of which should be afforded varying degrees of protection commensurate to their local or national level of importance.
- 9.5 The Framework describes how nationally important landscapes, such as the Shropshire Hills AONB, should be given the highest level of protection and that their conservation should hold great weight. Visual amenity, locally designated sites and local distinctiveness would clearly hold significantly less weight, in terms of their preservation, than those nationally designated sites. This should be made explicit within this policy through the addition of the words, ‘...**commensurate to the importance and significance of the natural asset**’ at the end of the final sentence of criteria 1. of the policy.

10.0 MD13 – The Historic Environment

SOUND – the policy recognises the varying degrees of importance of heritage assets and includes explicit detail to ensure assessment of impact and mitigation is commensurate.

- 10.1 The HDBoF is pleased to note that the recommendation to separate the Natural and Historic Environment into two separate policies has been taken on board and there are now two policies covering these important subjects. Similarly to the natural environment, the HDBoF is pleased to see that Shropshire Council is committed to safeguarding and enhancing the county's heritage assets. It is important that Shropshire's most valued historic buildings are safeguarded against inappropriate development which would harm their significance and special interest.
- 10.2 The HDBoF is also encouraged to note that the policy recognises the varying degrees of significance and the various facets this can take. This approach far better reflects, and is consistent with paragraphs 132 – 135 of the Framework which introduces a sliding scale in terms of the preservation and protection of heritage assets relating to their significance as well as the degree to which that significance is impacted.

Section 3 – Settlement Policies

11.0 Bishops Castle Area

UNSOUND – The strategy for the area, and specifically the designation of Community Clusters and Community Hubs, is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, is not based on proportionate evidence and the housing figures proposed are not based upon the objectively assessed needs.

- 11.1 The HDBoF does not consider that the Council's decision to designate Worthen and Brockton as part of a Community Cluster rather than a Community Hub is justified.
- 11.2 Worthen is a reasonably sized village which contains a range of local facilities including two churches, two food shops, a post office, a primary school, village hall, doctor's surgery and the Worthen Priory Country Store. There is also a local bus service which passes through Worthen that provides access to surrounding settlements such as Montgomery, Chirbury, Westbury, Shrewsbury and other smaller villages.
- 11.3 With the wide range of local services and facilities available it is considered that Worthen and Brockton, when considered together, form an important functional unit and should therefore be designated as a Community Hub. Together they provide an important local centre for the wider rural community, with people travelling to the village from Burweston, Marton, Rorrington, Meadowtown as well as numerous other small settlements and isolated homes in the countryside.
- 11.4 It is therefore considered that Worthen and Brockton already act naturally as a Community Hub and so it is entirely appropriate that they should be formally designated as such within the Shropshire SAMDev, as was proposed within the previous iteration of the document.
- 11.5 The HDBoF therefore recommends that the Council undertakes a more rigorous assessment of the community within this Cluster to ensure that the housing growth target reflects the needs and aspirations of the community and to ensure that the viability of the settlements is retained.
- 11.6 The HDBoF also still has concerns about the reduction in the housing growth target for the area from the original 60 down to 30. The proposed growth target of 60 dwellings within this area was considered to be appropriate for the Worthen and Brockton Community Hub. The proposed Worthen Ward of Worthen with Shelve Parish now includes a greater number of settlements over a more dispersed area and to reduce the housing growth target is flawed and not based upon the objectively assessed needs of the community.
- 11.7 The figures for growth within this and any other Cluster should not simply be plucked from the air or based upon the preference of Parish Councils. The SAMDev must aim to meet the **full, objectively assessed needs for market and affordable housing**. At Examination all evidence used by the Council in determining the proposed housing target(s) will be rigorously assessed and tested. If this evidence is found not to be sufficiently robust the plan will be found unsound and its adoption will be delayed, leaving the Council vulnerable to 'planning by appeal'. It is important to note that the vast majority of Local Plans rejected at examination are due to the fact that their housing targets are too low and are not seeking to meet the projected growth in households, i.e. the full, objectively assessed needs.

- 11.8 The HDBoF also questions the principle of putting restrictions upon the phasing of housing growth for the area. In order to be found sound Local Plans and documents making up Local Plans such as this SAMDev must be consistent with national policy. Paragraph 14 of the Framework describes that,

*"At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*

*For **plan-making** this means that:*

●...Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change"

The Framework continues at paragraph 50, when discussing plan and policy making in the context of, 'Delivering a wide choice of high quality homes' to describe that, "*such policies should be sufficiently flexible to take account of changing market conditions over time.*"

- 11.9 Through attaching these restrictions to the housing growth target the HDBoF considers that insufficient flexibility will be included within the plan. As such the HDBoF does not believe that a restriction on the number of houses which should be built in each 1/3 of the plan or the number of houses which should be built on each site should be included within the plan.
- 11.10 Furthermore it is recommended that the Council should not adopt an arbitrary maximum number on sites as, whilst not being flexible, it may be entirely appropriate to provide more than five dwellings. Each site should be considered on its own merits and on the basis of what will produce an attractive and sympathetic development complementing the character of the settlement that also meets the objectively assessed needs of the settlement. In addition there might be circumstances where a community requires a service or facility that could be funded by development but could not be achieved if that development only provides five dwellings. Opportunities for facilities such as village halls, car parks and other community amenities should not be overlooked due to a restrictive and arbitrary figure relating to a maximum housing number on development sites.
- 11.11 The HDBoF does not object to the principle of a realistic housing growth target being met through windfall and infill development. This approach will allow for appropriate small scale, sensitively designed development to take place to help deliver the housing growth target over the coming plan period which will ensure that the growth can be achieved. The HDBoF fully supports this approach.
- 11.12 There are sites within and adjacent to the built up areas of the larger settlements of Worthen and Brockton which can be brought forward for development over the coming years to meet the allowance of dwellings. The HDBoF is well positioned to assist in this regard as it owns the area of land to the south of Rectory Gardens in Worthen (see location plan in appendix A). This land is adjoined by residential development to the north (Rectory Gardens) and to the west (Brookside) and so can certainly be described as being well related to the existing built form of the village and within walking distance of the local shops, the primary school and other facilities.
- 11.13 Development on this site could take the form of a small scale scheme, comprising a small number of units on the eastern boundary of the site fronting on to the adjoining lane. Alternatively a greater proportion of the site could be brought forward for a more

comprehensive scheme. The most appropriate option for the development of the site will need to be determined based upon the evidence of need in the locality and a process of meaningful consultation with Shropshire Council, the parish council and the local community.

- 11.14 The HDBoF is aware that part of the site is subject to a low level of flood risk. It is however considered that this issue can be sufficiently overcome through the application of appropriate mitigation measures as part of any development scheme on the site. Furthermore, development on this site would ensure that the gap between the two settlements is maintained.

12.0 The Bridgnorth Area

UNSOUND – The strategy for the area, and specifically the designation of Community Hubs is not justified as it is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

- 12.1 Although the HDBoF presents no objection to the identification of Ditton Priors as a Community Hub within the area the Board strongly believes that the village of Claverley should also be afforded this designation.
- 12.2 After Bridgnorth, Claverley is one of the larger settlements in the Bridgnorth area. In addition to being home to a relatively large population, the village actually provides a far greater range of local services and facilities than Ditton Priors. These include a primary school, doctor's surgery, village hall, post office, hairdressers, tennis courts, a church and three pubs. It is therefore clear that Claverley acts as an important local centre for the wider rural community, with people travelling to the village to meet their daily needs from Seisdon, Shipley and Hilton as well as many isolated dwellings in the surrounding countryside.
- 12.3 A clear case can therefore be presented that Claverley should be identified as a Community Hub within the Bridgnorth area on the basis of its role as an important centre in the locality. As such the village is considered to represent a sustainable location to accommodate a modest level of growth over the coming plan period, the level of which should be determined and based upon evidence of need in the area and through an assessment of local need and engagement with the local community. The HDBoF is well positioned to assist in this regard as it owns the area of land to the north of Powke Hall Farm (see location plan in appendix B). This site is well related to the built form of the village and within walking distance of shops, the primary school and other facilities.

13.0 The Craven Arms Area

UNSOUND – The strategy for the area and specifically the decision not to designate Wistanstow as a Community Hub is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

- 13.1 No Community Hubs have been identified in the Craven Arms area. The HDBoF would strongly encourage Shropshire Council to reconsider this position and to examine the potential to designate Wistanstow as a Community Hub.
- 13.2 After Craven Arms Wistanstow is one of the larger settlements in the Craven Arms area. It is also one of the most accessible by virtue of its location just off the main A49 road. In addition to accommodating a relatively large population the village also

provides a range of services and facilities including a primary school, village hall, public house, a church and a regular bus service. There is also a brewery in the village which provides jobs for local people. Wistanstow therefore already acts as a Community Hub to the surrounding smaller settlements and so a strong argument can be presented that the village should be formally identified as such in the SAMDev Plan.

- 13.3 Due to the size of the village and the range of facilities and jobs available Wistanstow is considered to represent a sustainable location to accommodate a modest level of growth over the coming plan period. The HDBoF is well positioned to assist in this regard as it owns the area of land adjoining the Rectory to the east of Wistanstow (see location plan in appendix C).

14.0 The Minsterley and Pontesbury Area

SOUND – The overall strategy for the area is based upon up to date evidence and objectively assessed needs and will ensure that the vitality and viability of the settlements is retained through sustainable development.

- 14.1 The HDBoF strongly supports Shropshire Council’s decision to identify Pontesbury and Minsterley as Key Centres within the Place Plan Area. This is entirely appropriate given the wide range of services, facilities and jobs available within these settlements and the role they play in terms of meeting the needs of the surrounding rural communities.
- 14.2 The Board also fully supports the increased housing target for the two settlements on the basis that these figures have been derived from accurate data relating to housing need in the area. Furthermore, the increased target would provide the opportunity to realise housing and other community aspirations in Pontesbury and facilitate the retention of buildings with heritage value in Minsterley. Most importantly there would be no conflict with indicative levels of development set out in the adopted Core Strategy. The net new housing provision over the remaining plan period would be similar to previous development rates.
- 14.3 The HDBoF is also entirely supportive of the Council’s allocation at the Hall Bank site in Pontesbury for a mix of uses including the development of up to 60 dwellings, retail, open space and parking. As the Council will be aware this land is in the ownership of the Diocese and work is ongoing to promote the site for development. This work has included detailed flood modelling work, which has identified the developable area of the site, and local engagement with the parish council and ward members as well as communication with a Shropshire based retail provider.
- 14.4 Local aspirations included within the Parish Plan have identified objectives to provide additional village car parking, open space, opportunities to enhance the local retail offer and provide better integration of the recreation area. Furthermore the land off Hall Bank has been prioritised by the parish council for residential development because of its central location and close proximity to the existing area of play space. The latest iteration of the indicative plan for the site is provided in appendix D and illustrates how the development might be delivered on the site, taking into account the presence of the children’s nursery, doctor’s surgery and the minor flooding issue on the northern edge of the site.
- 14.5 All of the work which has been undertaken to this point has provided greater support for the allocation and the development of the site. The flood modelling work has accurately indicated the extent of the likely flood zones taking account of the 1 in 100 year, 1 in 1000 year and 1 in 1000 year plus climate change scenarios. This work has been undertaken in light of discussions with the Environment Agency and they have

initially approved the methodology upon which the work was undertaken and are aware of the results of the modelling.

- 14.6 Furthermore, the developable area which remains, as identified on the plan at appendix D, is easily capable of accommodating 60 residential dwellings (63 are shown), the small scale village shop, parking space and public open space in two locations. In addition the scheme would also connect the children's play area to the village. The design scheme will however continue to evolve as further local consultation is undertaken and it is important to note that the final scheme will be determined through that ongoing engagement.
- 14.7 This allocation and the subsequent development will therefore go a considerable way toward meeting the aspirations of the community and meeting the need for housing and additional services and amenities that are required in the village over the course of the plan period. As such the scheme will ensure that the vitality of the village is sustained and the policy in this regard is considered to be sound.

15.0 The Much Wenlock Area

UNSOUND – The strategy for the wider Much Wenlock area, and specifically the designation of no Community Hubs in the area, is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

- 15.1 Although the HDBoF is fully supportive of Much Wenlock parish council's ambition to prepare a Neighbourhood Plan the Board is concerned many settlements that fall outside the boundaries of the parish, such as Cressage, appear to have been entirely overlooked.
- 15.2 Cressage is a relatively large village in the context of Shropshire and is the second largest village in the area after Much Wenlock. It is also one of the most accessible villages in the locality as it is situated on the A458 and is served by a regular bus service which passes through the village. The village provides a wide range of services and facilities including a primary school, doctor's surgery, village hall, public house, post office, sports field and place of worship. As a result Cressage naturally acts as a Community Hub to the smaller settlements in the surrounding rural areas including Sheinton, Harley, Kenley as well as many other isolated homes in the countryside. It is therefore considered appropriate that Cressage should be formally recognised as a Community Hub within the SAMDev Plan.
- 15.3 In light of the village's size, the range of facilities available and its accessibility from other parts of the county, Cressage is considered to represent a sustainable location to accommodate a modest level of growth over the coming plan period. The HDBoF is well positioned to assist in this regard as it owns the area of land to the south west of Cressage off Manley Road (see location plan in appendix E).
- 15.4 Furthermore, through dismissing those areas outside of the parishes of Much Wenlock and Buildwas proper assessment of the potential to deliver housing to meet the needs of the community within the remainder of the area has not been undertaken.
- 15.5 The Framework continually repeats the theme of 'planning positively' and clearly recommends that Councils take a positive approach to plan preparation and the identification of settlements which are capable of accommodating housing development. At paragraph 16, when describing the presumption in favour of sustainable development in the context of neighbourhood planning, the Framework states;

The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:

- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.*

15.6 Furthermore, when describing the plan making process and the production of local plans, the document states;

Crucially, Local Plans should:

- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*

15.7 Finally, as identified in the introduction of this document, one of the key tests in assessing a planning policy document's soundness is that it is 'positively prepared', as described at paragraph 182 of the Framework;

Positively prepared – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.*

15.8 All of these assertions and statements make it patently clear that a positive approach should be taken to plan preparation, based on objectively assessed needs at all levels of the process, otherwise the plan cannot be sound. Through not objectively assessing the needs or attempting to identify suitable locations for development within the remainder of the area this approach cannot be described as positive. The approach leaves the area in a vacuum as it has not been considered by the LPA or through the neighbourhood plan process.

16.0 The Shrewsbury Area

SOUND – The overall strategy for the area is flexible and based upon up to date evidence of the objectively assessed needs of the community within the Shrewsbury Area. In particular the Community Clusters of Dorrington, Stapleton and Conover & Longden et al are effective and justified.

16.1 The HDBoF retains its support for the Council's decision to identify Dorrington, Stapleton and Conover as a Community Cluster.

16.2 With only a small number of homes proposed to be provided within Stapleton over the coming plan period it seems reasonable that the parish council have opted to rely on windfall sites coming forward rather than allocating a particular site. The HDBoF supports the use of the word 'around' in reference to the housing figure as this will allow flexibility to be built in the plan in order that it can respond to changing market conditions.

16.3 The HDBoF would also like to reiterate that the Diocese owns an area of land which is well related to the built form of the village and that can be brought forward to meet housing need. A plan identifying the location of this site, and highlighting the area suitable for development, can be found in appendix F of this document. With a sensitive design, a small scale development scheme can be delivered in the western area of the

site, with access derived from the adjacent road, which will provide a positive contribution to the character and appearance of Stapleton.

- 16.4 The HDBoF also supports the Council's decision to identify the following settlements as a Community Cluster: Longden, Annscroft, Hook-a-Gate, Longden Common and Lower Common / Exfords Green Community Cluster.
- 16.5 Longden plays an important role as a service centre to the wider rural community in this part of the area. With a relatively large employment site, a primary school, post office, community hall, public house and sports facilities Longden would represent a strong candidate for designation as a Community Hub in any other part of Shropshire (where the rural settlements are generally smaller in size and population). The HDBoF therefore considers that, in the context of the Shrewsbury area, the decision to identify Longden as the 'main focus' of a Community Cluster is appropriate.
- 16.6 To ensure that sufficient housing is developed it will inevitably be necessary for some greenfield sites to be developed. It will of course be important to ensure that such sites are appropriately located either within or adjoining the built up area of the village and that schemes are sensitively designed so as to safeguard the village's valued character and appearance.
- 16.7 One site which satisfies these criteria is located to the north west of the village to the west of the Rectory. This site represents a suitable location for a small scale housing development and can be delivered in the early years of the plan period.
- 16.8 The site has been the subject of some local assessment in collaboration with a neighbouring land owner to the south and the potential for its development has been presented to and debated by the Parish Council. There is a recognised issue within the village due to a lack of car parking at the school. Initial discussions have taken place with the Council and the school regarding the option of providing development of this site as well as an additional public benefit of achieving access / car parking for the school and reducing congestion and parking problems along nearby residential streets. The school are supportive of the proposals and recognise the clear need for the significant benefits it can bring to the community.
- 16.9 The development of this site could therefore bring combined community benefits in the form of meeting part of the identified housing need within the village and overcoming ongoing concern regarding congestion and parking around the school. A plan showing the latest iteration of the proposed development which could meet all of these needs, and which was presented to the Parish Council, is included at appendix G. The design scheme will however continue to evolve as further local consultation is undertaken and it is important to note that the final scheme will be determined through that ongoing engagement.



Appendix A

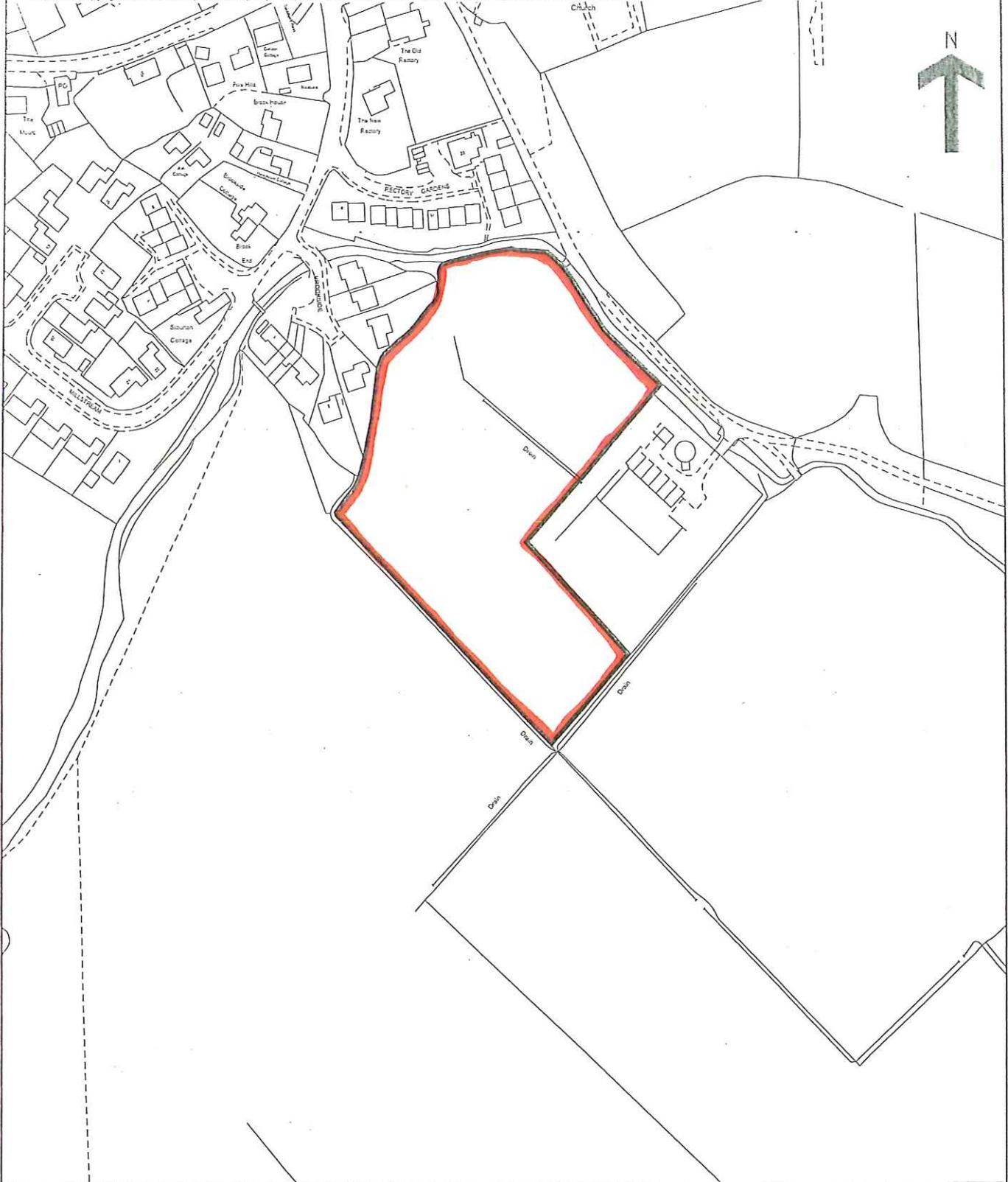
Land adjoining Brookside Close, Worthen

Land Registry
Official copy of
title plan

Title number SL189260
Ordnance Survey map reference SJ3204SE
Scale 1:2500
Administrative area Shropshire: South Shropshire



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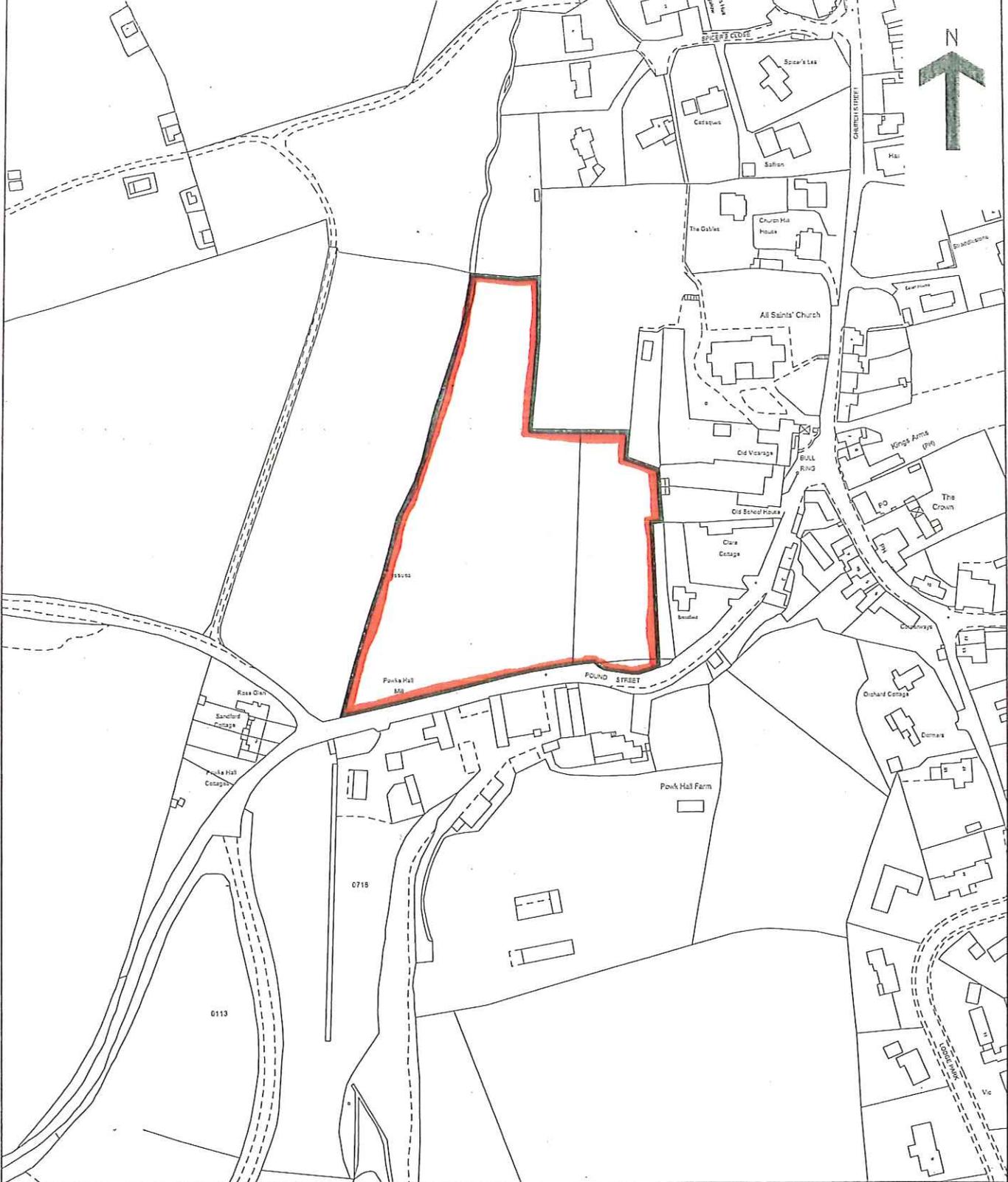
Appendix B

Land north of Powke Hall Farm, Claverley

Land Registry
Official copy of
title plan

Title number SL189114
Ordnance Survey map reference SO7993SW
Scale 1:2500
Administrative area Shropshire: Bridgnorth

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Appendix C

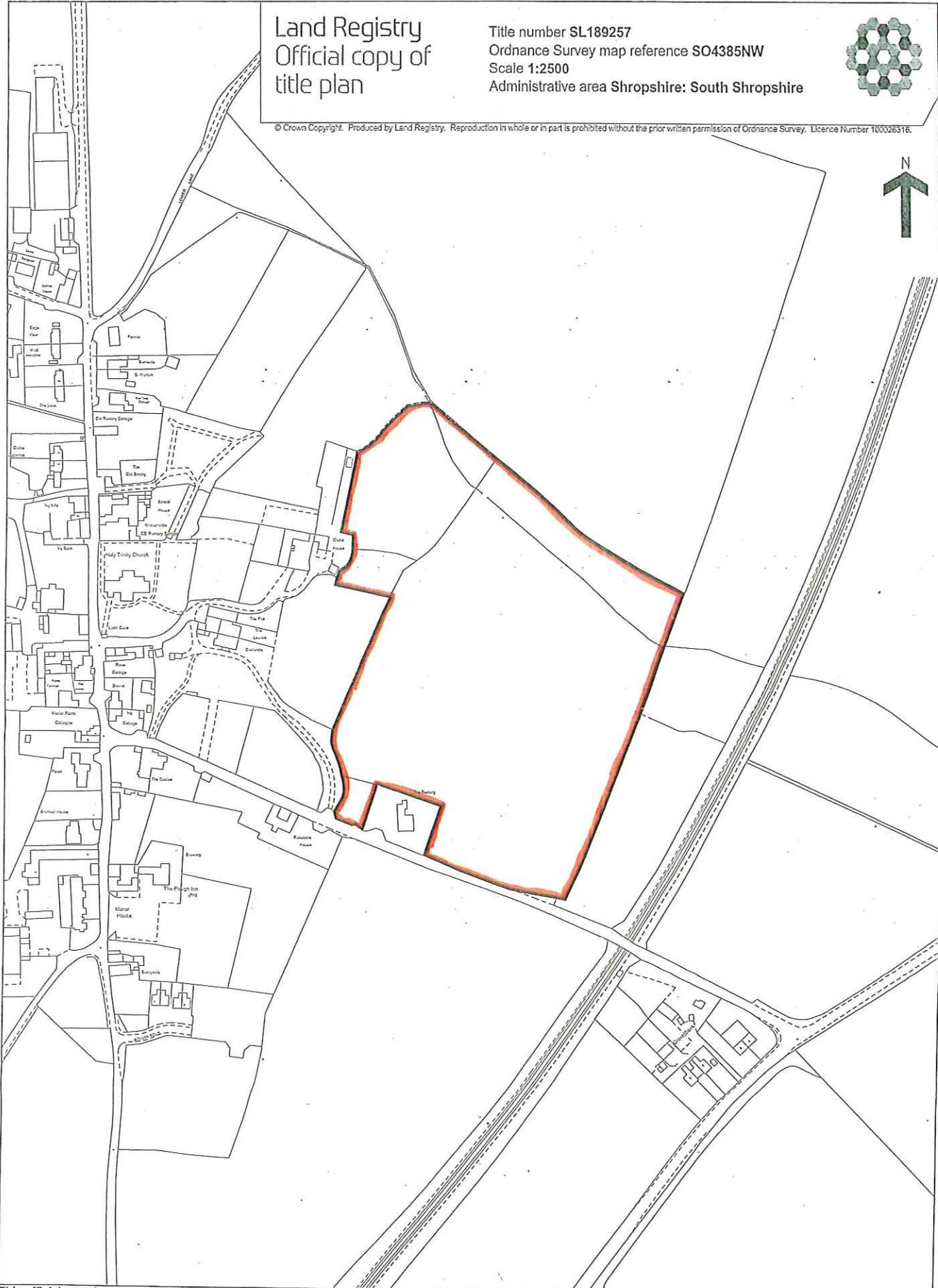
Land adjoining the Rectory, Wistanstow

Land Registry
Official copy of
title plan

Title number SL189257
Ordnance Survey map reference SO4385NW
Scale 1:2500
Administrative area Shropshire: South Shropshire



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Appendix D

Land off Hall Bank, Pontesbury Indicative site layout



NOTES

Do not scale from this drawing unless for Planning purposes.
 Figured dimensions only are to be used.
 All dimensions must be checked on site by the Contractor prior to the commencement of any fabrication or building works.
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REVISIONS

REV	NOTE	DATE



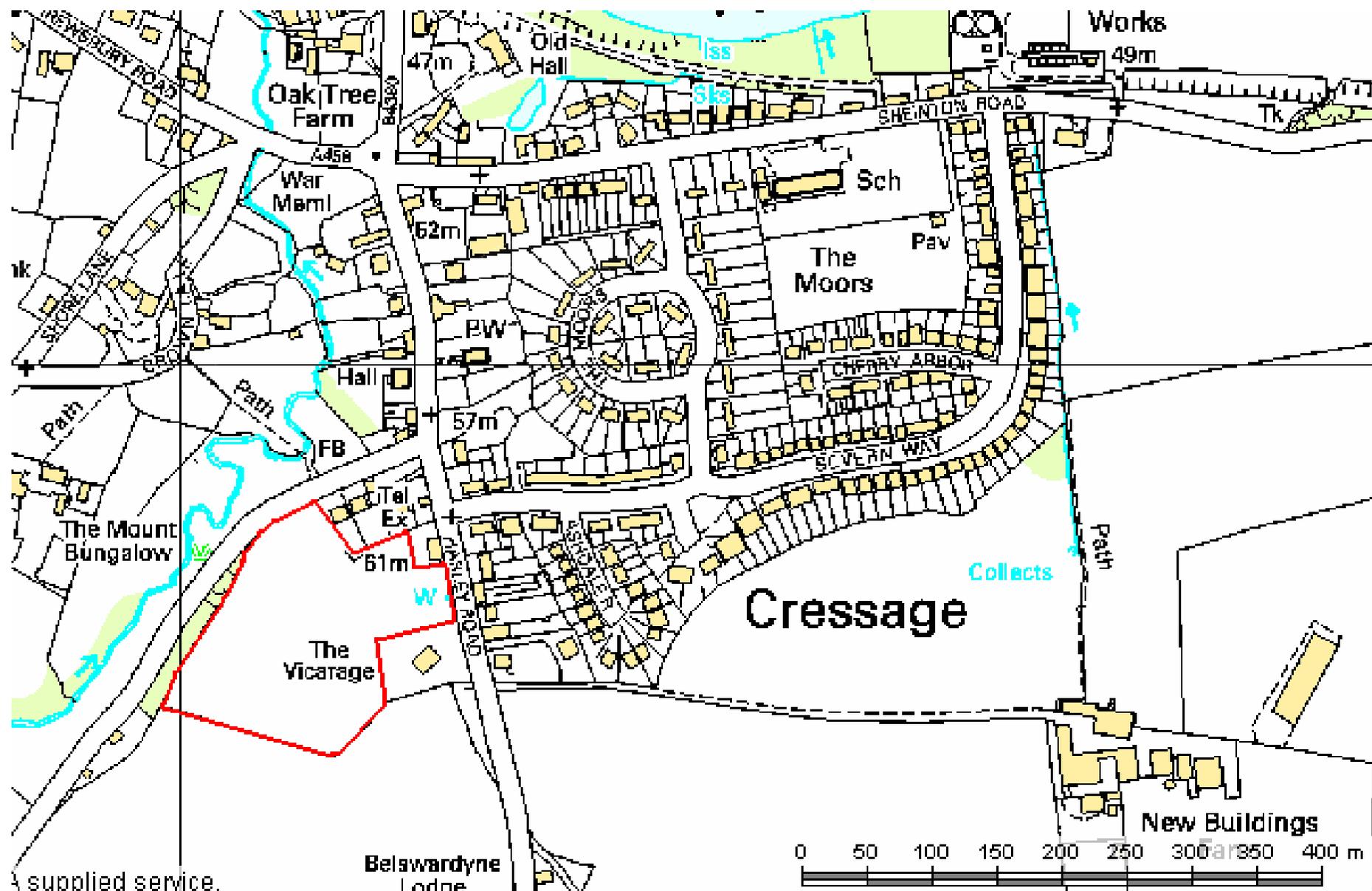
SMITHSGORE

JOB TITLE Hall Bank, Pontesbury		
CLIENT Hereford Diocese Board of Finance (HDBoF)		
DRAWING TITLE Indicative Site Plan		
SCALE 1:1250 @ A3	DRAWING NUMBER 1014394/PL-05	REV
DRAWING STATUS Pre App		
DRAWN SJB	CHECKED	DATE Nov 2013
YORK HOUSE, BLACKBROOK BUSINESS PARK, TAUNTON SOMERSET, TA1 2PX. TEL. 01823 445030, FAX. 01823 445031		



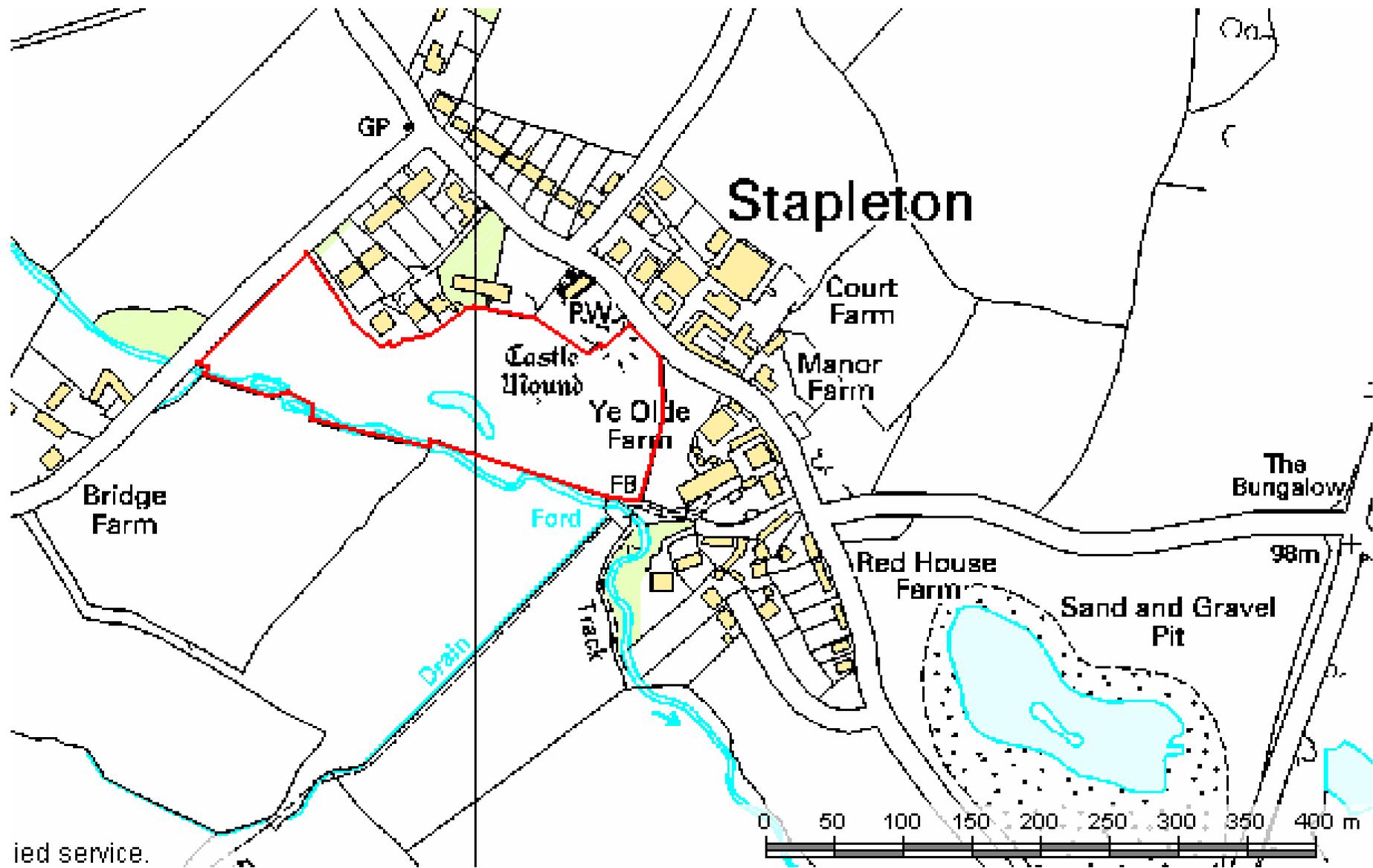
Appendix E

Land off Manley Road, Cressage



Appendix F

Land south of St John the Baptist Church, Stapleton



Appendix G

Land to the west of the Rectory, Longden Indicative site layout

NOTES

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REVISIONS

REV	NOTE	DATE
B	Changes to layout	04/11/13



SMITHSGORE

JOB TITLE
 Longden car park, playing field and village housing

CLIENT
 HDOBF

DRAWING TITLE
 Initial layout

SCALE
 1:1000 @ A3

DRAWING STATUS
 Planning

DRAWN SJB **CHECKED** **DATE** Nov 2013

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Planning Services

Planning applications and statutory processes

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- Site appraisals and development briefs
- Pre-application and stakeholder negotiations
- Community consultation
- Preparation, co-ordination and submission of planning applications
- Planning appeals – written representations, informal hearings and public inquiries
- Planning agreements
- Lawful development certificates
- Enforcement matters

Rural planning projects

- Alternative use assessments
- Residential development and affordable housing projects
- Employment development
- Agricultural and equestrian projects
- Farm diversification
- Barn conversions
- Agricultural occupancy conditions
- Tourism and leisure development
- Conservation and historic buildings advice
- Renewable energy and energy conservation
- Rights of way

