

#63

COMPLETE



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Q1: Your details:

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Q2: Are you acting on behalf of anyone? Yes

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Q3: Who are you acting on behalf of:

Organisation (if applicable):	The Church Commissioners of England
Address:	C/O Agent
Email:	C/O Agent
Telephone:	C/O Agent

PAGE 3: Representation details

Q4: Please give the policy/paragraph/policies map details for your first representation relates to: MD1

Q5: Is your representation in support or objection? Object

Q6: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.

Legally compliant	No
Sound	Yes

Q7: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply) Not consistent with the National Planning Policy Framework

Q8: 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.

Policy MD1 relates to the scale and distribution of development, setting out that sufficient land will be made available to deliver the development planned in the Core Strategy (as outlined in Core Strategy policy CS1). The policy states that sustainable development will be supported in the Market Towns and Key Centres, of which Broseley is designated.

Table MD1.1 demonstrates the proportional split of the planned housing provision within Shropshire, allocating 40% to Market Towns and Key Centres, and 35% to rural areas.

There is a concern that this approach could potentially undermine the objective of prioritising sustainable development should significant proposals be made in the rural areas. Rural areas will be less sustainable than sites located in or on the edge of development boundaries, due to the likely need to access facilities and services by private car as opposed to more sustainable modes of transport. We therefore consider that the proportional split for residential development in Shropshire should be altered to favour sites in and around Market Towns and Key Centres rather than support less sustainable development in the rural areas.

Furthermore, paragraph 4.2 of the SAMDEV Plan sets out that the level of housing development being provided is sufficient to enable the Core Strategy target to be met. Given that Shropshire Council does not have a 5 year housing land supply, with recent figures suggesting a supply of less than 4.95 years, we consider that this approach is contrary to paragraph 47 of the National Planning Policy Framework (NPPF) which seeks to encourage Local Authorities to take measures to significantly boost their supply of housing land. Therefore, we do not consider that the SAMDEV Plan is compliant with the NPPF.

Paragraph 52 of the NPPF goes on to state that the supply of new homes can sometimes be best achieved through planning for larger scale development such as extensions to existing villages and towns. It is clear that such an approach has not been considered in respect of the future for Broseley and by choosing not to allocate land for any residential development within Broseley, there is a concern that a lack of investment and without improvements or contributions to existing infrastructure will lead to a decline of the quality of Broseley, and a loss of services and facilities as it is unlikely that they could be sustained without growth of population.

Paragraph 55 of the NPPF relates to sustainable development in rural areas, stating that housing should be located where it will enhance or maintain the vitality of rural communities. Shropshire, by its very nature, is predominantly rural. We therefore consider that Broseley is a prime location for residential development given its facilities and services within the village and access to public transport.

Paragraph 55 also states that new isolated homes in the countryside should be avoided. There is a concern that the strategy to deliver housing through the SAMDEV Plan could be over-reliant on the delivery of isolated homes in the countryside. We consider that policy MD1 should therefore be amended to take account of this risk.

Q9: 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.

We consider that Broseley is a prime location for residential development given its facilities and services within the village and access to public transport, and a suitable allocation in Broseley for residential development should be made.

We consider that policy MD1 should therefore be amended to take account of the risk of the strategy being over-reliant on the delivery of isolated homes in the countryside.

Q10: Do you wish to make another representation? Yes

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Q11: Please give the policy/paragraph/policies map details for your first representation relates to: MD3

Q12: Is your representation in support or objection? Object

Q13: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.

Legally compliant No

Sound Yes

Q14: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply) Not consistent with the National Planning Policy Framework

Q15: 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.

Policy MD3 concerns delivery of housing predominantly. Furthermore, the policy also refers to the settlement housing guideline as a significant policy consideration, noting that where the settlement housing guideline is unlikely to be met, additional sites beyond the development boundary may be acceptable subject to the criteria noted below :

- i) The degree by which the requirement is exceeded; and
- ii) The likelihood of delivery of the outstanding permissions; and
- iii) Evidence of community support; and
- iv) The benefits arising from the development; and
- v) The presumption in favour of sustainable development.

We support this element of policy MD3 and consider that this provides an opportunity to achieve a sufficient housing land supply and plan for the future needs of Shropshire. Given that a five year housing land supply cannot be demonstrated at present, we consider that this approach should be explored further now .

Q16: 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.

In order to ensure that the Councils avoid the situation of not achieving the settlement housing guideline in the first instance, we recommend that further appropriate land allocations for residential development are identified in order to achieve the housing requirement for the County.

Q17: Do you wish to make another representation? Yes

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Q18: Please give the policy/paragraph/policies map details for your first representation relates to: S4

Q19: Is your representation in support or objection? Object

Q20: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.

Sound Yes

Legally compliant No

Q21: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply) Not consistent with the National Planning Policy Framework

Q22: 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.

Residential Development

The Broseley Development Strategy is set out at S4.1 and states that over the plan period, around 200 dwellings and 2 hectares of employment land are proposed for Broseley. This has not changed from that which was proposed in the Revised Preferred Options, despite our previous representations. The Development Strategy does not include a residential allocation and relies on a combination of the delivery of committed residential development and the development of windfall sites for up to 24 dwellings.

The absence of an allocation for residential development within Broseley could have a considerable impact on the future deliverability of development in Broseley which subsequently could severely restrict the opportunities for younger people to continue living in the town as they become adults. The proposed approach of relying on the delivery of committed residential development through planning permissions and a windfall of approximately 24 properties is not considered to be robust and is unlikely to deliver residential development to support the growth of the town. Equally, by not allocating sites suitable for residential development, the local authority could be subjected to speculative planning applications for residential development in future.

As set out in response to Policy MD1 above, we consider that the SAMDEV Plan in its current form is contrary to the NPPF, and is therefore not legally compliant. Given that there is a need for Shropshire to demonstrate a five year housing supply, and significantly boost the supply of housing land, it is imperative that appropriate residential allocations are made.

The Commissioners' site is closely linked to the market town of Broseley. The site is on the edge of the existing development boundary of Broseley and we consider that our Client's site could make a positive contribution towards the long term growth of Broseley. The site has good access to the town centre and is bounded to the north, east and south west by residential development.

There is also a possibility that affordable housing would not be deliverable on any of the windfall sites as they will be too small to trigger the requirement to deliver affordable housing. Policy CS11 of the adopted Shropshire Core Strategy sets out that only sites of 5 or more dwellings would be required to provide affordable housing onsite. Smaller sites will require a contribution to be made to the off-site delivery of affordable housing however this situation could lead to no affordable housing being made available in Broseley because of the omission of residential sites. As a larger site our Client's landholding could potentially contribute a proportion of affordable housing should residential development be permitted on site, unlike windfall developments which would be unlikely to deliver the level of development that triggers the requirement for affordable housing.

Development Boundary

We maintain our objection to the development boundary of Broseley. This was altered as part of the Revised Preferred Options consultation, removing a significant portion of the urban area to the west from what is considered to be the built up area of Broseley. This consequently removed a number of undeveloped sites that could make a positive contribution towards the future of Broseley and the surrounding area. The Council's commitment to the altered boundary of Broseley is concerning in respect of their ambition to achieve the residential and employment targets set out in respect of the for the whole of Shropshire to the extent of 27,500 dwellings and to take account of the future requirements, particularly in terms of the need to demonstrate a sufficient five year housing land supply and beyond.

Employment

The proposed employment area promoted through the previous SAMDEV plan has been reduced from an allocation of 2 hectares to an allocation of 1.25 hectares. As it was previously concluded that 2 hectares of employment would be required to contribute towards the growth and the sustainability of the town, there is a concern that this allocation will significantly undermine the future success of Broseley.

We therefore consider that there is a need to assess the employment requirements further, particularly in and around Broseley, and increase the allocation to 2 hectares. This could be delivered on our Client's land as part of an appropriate mixed use development which has good access to the centre of Broseley.

Conclusion

As set out throughout these representations, we consider that the SAMDEV Plan in its current form is contrary to the NPPF as the Plan does not seek to significantly boost the supply of housing land. Policy MD3 sets out that there may be opportunities for unallocated development to come forward that meets the relevant criteria should the housing requirement not being met, or a five year housing land supply not being demonstrated. This approach is reasonably positive however should be explored further on the basis that Shropshire Council cannot demonstrate a five year housing land supply at present.

If further allocations were to be identified in the SAMDEV Plan, this could contribute to significantly boosting the supply of housing land, in accordance with the guidance in paragraph 47 of the NPPF.

We consider that by prioritising the allocation and development of sites in and on the edge of Market Towns and Key Centres, a sufficient housing land supply could be made available in order for the Council to proactively plan for the future growth of the Market Towns and Key Centres within Shropshire.

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Q23: 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.

We request that our Client's site is considered for a residential allocation within Broseley. The site is well located to the town centre, is within walking distance to the town and could accommodate a significant portion of development. The development of the site would not have a detrimental impact on neighbouring sites, and would contribute towards the existing residential nature of the area.

We consider that there is a need to assess the employment requirements further, particularly in and around Broseley, and increase the allocation to 2 hectares. This could be delivered on our Client's land as part of an appropriate mixed use development which has good access to the centre of Broseley.

PAGE 6: Finally...

Q24: 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

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Q25: If you wish to attend the examination please explain why you think this is necessary.

To fully demonstrate the opportunities that our Client's site could provide to achieving sustainable development in Shropshire.

Q26: Do you wish to be notified of any of the following: (we will contact you using the details you have provided)

When the SAMDev plan has been submitted for examination	Yes
When the Inspector's report is published	Yes
When the SAMDev plan is adopted	Yes