



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):	Harris Lamb Limited
Address:	75 – 76 Francis Road, Edgbaston, Birmingham B16 8SP
Email:	james.hollyman@harrislamb.com
Telephone:	0121 213 6022

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

Name:	
Organisation (if applicable):	Bovale Limited
Address:	c/o agent
Email:	
Telephone:	

## 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:

Policy S16: Shrewsbury Area

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>	✓
<b>Justified</b>	✓
<b>Effective</b>	✓
<b>Consistent with National Policy</b>	

**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).

We believe that the continued reliance on windfall sites in Shrewsbury is inappropriate and that the council should identify a larger supply of specific deliverable sites. The NPPF requires councils to make realistic assumptions about housing delivery (paragraph 154) and the advice at paragraph 47 of NPPF requires councils to provide for the full needs for market and affordable housing in the housing market areas.

**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)

As stated above, we believe that the continued reliance on windfall sites in Shrewsbury is inappropriate and that the council should identify a larger supply of specific deliverable sites. In this context we suggest the allocation of land at the The Sentinel Works, Whitchurch Road, Shrewsbury.

This is a site in existing employment use but it is occupied by buildings the age, condition and layout of which are not attractive to modern employment occupiers. Given the location of the site next to a Morrison's supermarket, we believe that the site should be allocated for a mix of uses including retail and residential development. Paragraph 22 of the NPPF states that planning policies should avoid the long term protection of sites for employment use if there is no reasonable prospect that they will be continue to be used for that purpose. Land allocations should be reviewed regularly.

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:

In order to fully explain the sustainability credentials of The Sentinel Works site and its suitability and achievability for residential development.

**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	<input checked="" type="checkbox"/>
When the Inspector's Report is published	<input checked="" type="checkbox"/>
When the SAMDev Plan is adopted	<input checked="" type="checkbox"/>

**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.**

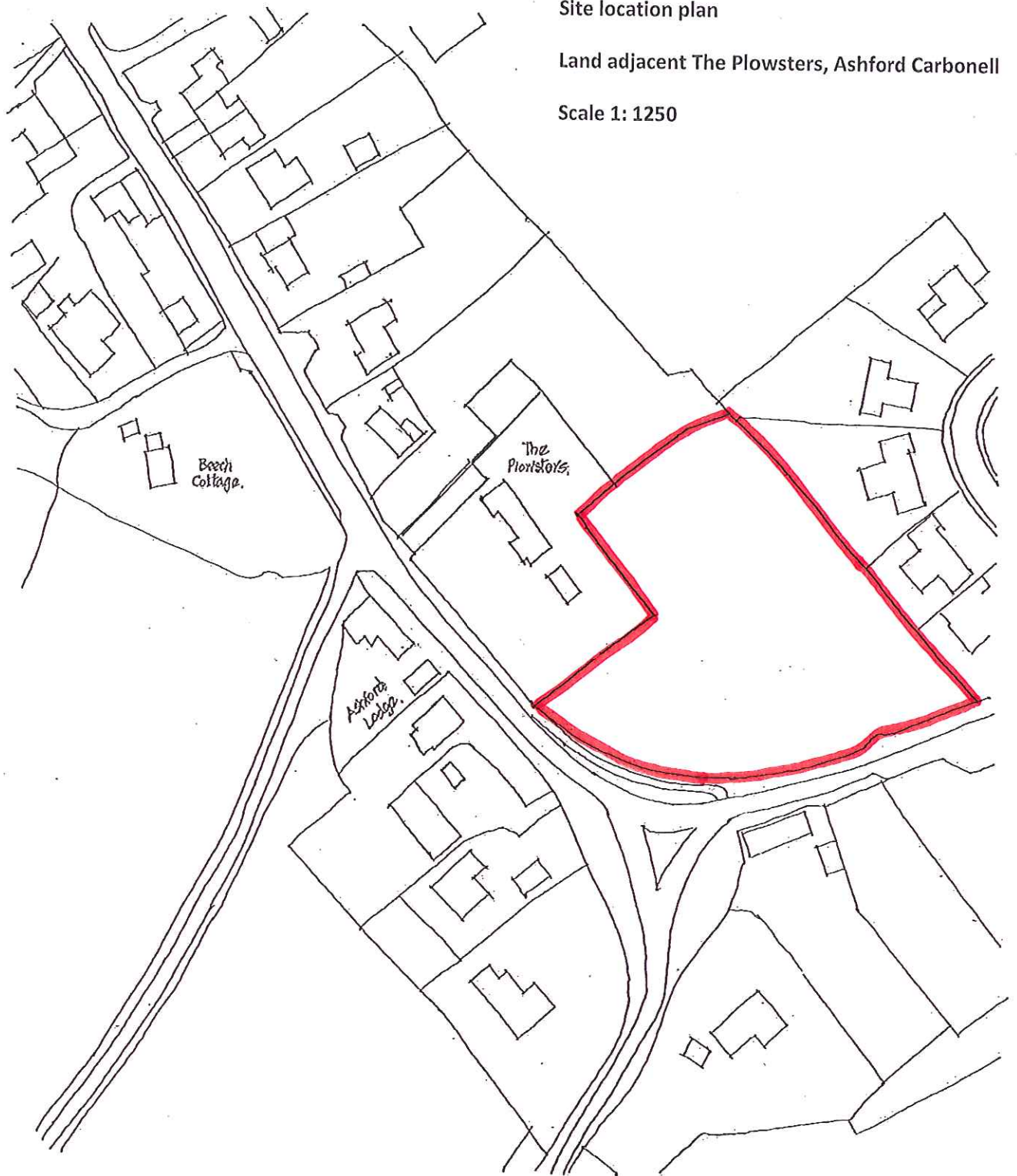
Data Protection Act 1998 and Freedom of Information Act 2000

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Site location plan

Land adjacent The Plowsters, Ashford Carbonell

Scale 1: 1250











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In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy S10: Ludlow Area

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>	✓
<b>Justified</b>	✓
<b>Effective</b>	✓
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We note that the emerging SAMDev document states that outside of Ludlow and the Ludlow area's community hubs / community clusters, development will be restricted and only allowed in accordance with Core Strategy Policies CS5: Countryside and Green Belt and CS11: Type and Affordability of Housing. We believe that the continued reliance on sites in Ludlow is inappropriate and that the council should identify a supply of specific deliverable sites in the rural area also. The NPPF requires councils to make realistic assumptions about housing delivery (paragraph 154) and the advice at paragraph 47 of NPPF requires councils to provide for the full needs for market and affordable housing in the housing market areas.



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Given the above, we believe that land adjacent to The Plowsters, Huntington Lane, Ashford Carbonell is well related to the settlement of Ashford Carbonell; it presents an opportunity to provide for the housing needs of the surrounding rural area, including affordable housing needs. The site is available within the next five years and there are no major technical reasons to prevent its development. We suggest that the site be allocated to provide up to six dwellings.

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.

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No, I wish to pursue my representations through this written representation.

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If you wish to attend the examination, please explain why you think this is necessary in the box below:

In order to fully explain the sustainability credentials of land adjacent to The Plowsters and its suitability and achievability for residential development.

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In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy S12.1 part 4i. – Hall Farm and 4ii – Callow Lane  
Schedule S12a site MIN002/MIN015 – Hall Farm and MIN007 – Callow Lane

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>	✓
<b>Justified</b>	✓
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### ***Hall Farm***

We object to the proposed extension of the Hall Farm site (MIN002, now including MIN015). As stated in the consultation document, the development of these sites would involve development around and the conversion of historic rural buildings and near the adjacent listed hall. The proposed allocations are inconsistent with the site assessment sheets for these sites which suggest that new development has the potential to harm the setting of historic buildings and the local landscape character.



The allocation of the Hall Farm sites clearly has the potential to cause significant harm to an interest of acknowledged importance and as such fails the National Planning Policy Framework's test that plans should be positively prepared, justified and effective.

### ***Callow Lane***

We also reiterate our concerns regarding the proposed Callow Lane allocation as set out in our July 2012 representations.

The development of this site has the clear potential to damage the adjoining Minsterley Meadows Site of Special Scientific Interest. This harm could constitute significant harm as defined by the NPPF.

This is a major constraint to the development of the site and must preclude its allocation.

**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)

The Hall Farm and Callow Lane sites should not be allocated for development for the reasons given above. We have previously sought the allocation of our client's land at The Grove, Minsterley for residential development and are disappointed to note that the revised SAMDev document does not propose the allocation of this site.

The Grove should be allocated for residential development since there are no overriding physical or environmental constraints which would prohibit the site coming forward for residential development, unlike Hall Farm or Callow Lane. Part of the site is within the flood plain but this can be protected and development can take place on land which would not cause flooding elsewhere.

The site is well connected the existing settlement pattern and is well related to the centre of the town including places of employment, pubs and shops. It is also well connected to the local bus network providing opportunities to access higher order centres.

The site, including its capacity to accommodate development, is attractive to the development industry. Some of the allocations proposed in Minsterley and Pontesbury are rather small to be attractive to house builders. For example, local companies generally prefer smaller sites that can deliver up to 10 or more dwellings due to the availability of finance and sales rates. The plc's prefer sites of 35 units plus. In this regard, the NPPF requires development plans to be realistic (see paragraph 154) and positively prepared with strategies which are justified and effective (paragraph 182).

In justifying the proposed strategy councils are required to promote the *most*

*appropriate* strategy, rather than merely an acceptable strategy. In this case we believe it is far better for a plan to be based on allocations which will be attractive to the development industry as opposed to ones which will be questionable. To do otherwise will mean that there is a prospect that the housing requirements set out in the plan will not be delivered in the plan period.

Accordingly we believe that The Grove should be allocated for up to 65 dwellings.

Our client's land at Station Road (shown as a committed employment site at Schedule S12c of the pre-submission draft SAMDev plan) is subject to a current planning application (reference 13/03197/OUT) to renew the existing permission for the erection of 12 business units and 13 dwellings (reference SA/08/1506/O). Furthermore, the site is previously developed and clearly well related to the centre of the town. As such it should be allocated for a mix of residential and employment development, rather than being shown as a committed employment site only.

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:

In order to fully explain the sustainability credentials of The Grove and Station Road sites and their suitability and achievability for residential development.

**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**

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