

## **Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan**

**Pre-Submission Draft (Final Plan)  
17 March 2014 – 28 April 2014**

### **Representations Form JBB7826: Much Wenlock**

**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:	Persimmon Homes West Midlands
Organisation (if applicable):	
Address:	c/o Agent
Email:	
Telephone:	

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

Name:	Mark Sackett
Organisation (if applicable):	RPS Planning & Development
Address:	Highfield House, 5 Ridgeway, Quinton Business Park, Birmingham B32 1AF
Email:	mark.sackett@rpsgroup.com
Telephone:	0121 213 5500

## 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:

Much Wenlock Section of Chapter 5, Policy S13.1, paragraphs 5.127-128, page 161

Is your representation in support or objection? (please tick as appropriate)

<b>Support</b>	<b>Yes</b>	<b>No</b> ✓
<b>Object</b>	<b>Yes</b> ✓	<b>No</b>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

<b>Legally compliant</b>	<b>Yes</b> ✓	<b>No</b>
<b>Sound</b>	<b>Yes</b>	<b>No</b> ✓

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).

### **Principle**

Persimmon Homes West Midlands (Persimmon) objects to the Shropshire SAMDev Pre-Submission Draft Plan on the basis that the Plan does not include proposals for Much Wenlock which is a Market Town identified in Core Strategy Policy CS3 where appropriate housing growth is envisaged of up to 500 dwellings between 2006 and 2026.

Policy S13.1 of the SAMDev states that "Much Wenlock has a Neighbourhood Plan which sets the development strategy for the town during the Plan period". The 'explanation' text in paragraph 5.127 similarly seeks to signpost users of the SAMDev to the Neighbourhood Plan.

The factual position is that as at 28 April 2014, there is no formal Much Wenlock Neighbourhood Plan. There is planned to be a referendum on 22 May 2014 on whether a majority of the electorate in Much Wenlock Parish wish Shropshire Council to adopt the draft Plan incorporating recommended changes by an

independent inspector.

It is not a foregone conclusion that the Neighbourhood Plan will be adopted. In the event that the Neighbourhood Plan is not adopted there would be a policy vacuum which should be filled by appropriate policies in the Shropshire SAMDev to address housing need and allocate land accordingly.

In summary, the first ground of objection relates to the need for SAMDev to include proposals for Much Wenlock on the same basis as any other Market Town or Other Key Centre under Core Strategy Policy CS3. This should include a specific housing requirement figure for Much Wenlock Town. The Independent Examiner concluded that 130 dwellings are required at Much Wenlock Town in the period 2013 to 2026.

### **Housing Delivery**

Notwithstanding the uncertainty over whether there will be an adopted Neighbourhood Plan for Much Wenlock, the level of housing that is required at Much Wenlock Town (the Core Strategy Policy CS3 Settlement) has been examined independently. This, however, relates to a 13 year period from 2013 to 2026 rather than the full term of the SAMDev (2006 - 2026). The Examiner found that the housing requirement for Much Wenlock Town is 10 dwellings per year which equates to about 260 dwellings over the 20 year period. This will exclude rural exceptions site housing proposals and housing in the rural areas of Much Wenlock

There is no evidence in RPS's view to support a contention that 130 dwellings can be constructed within a defined Much Wenlock Town settlement boundary between 2013 and 2026 on a basis that excludes undeveloped land on the edge of the settlement. This required level of house-building will require the formal allocation of land for housing on the edge of the settlement within an extension of the settlement boundary. This conclusion is based on the evidence provided by Shropshire Council in its latest Strategic Housing Land Availability Assessment (SHLAA) which, apart from the former Lady Forester Hospital Site (which has been build/committed) contains only very limited additional housing capacity and certainly not enough land to deliver a further 130 homes between 2013 and 2026.

There are only 2 'accepted sites' in the March 2014 SHLAA Update at Much Wenlock. These have a capacity of 5 dwellings and 10 dwellings. The first is an existing employment use (Site MW004) where the Council considers a mixed use scheme over three storeys could yield 5 homes, notwithstanding conservation area constraints. The other site (MW010) is also in employment use. There has been no formal developer interest in this site coming forward for residential use. The combined capacity of these sites would yield 15 homes or 1.5 years' supply against the objectively assessed housing need at Much Wenlock town of 130 homes between 2006 and 2026. Shropshire Council has advised RPS that the committed supply of housing within Much Wenlock Town at 1 April 2013 was 28 dwellings. Few if any new permissions have been permitted since April 2013.

The Independent Examiner for the Neighbourhood Plan stated that it was a consensual matter that land east of Bridgnorth Road, Much Wenlock (which adjoins the settlement boundary and which was partly proposed for allocation in the submitted Neighbourhood Plan) is a sustainable location for new housing. Officers of Shropshire Council gave evidence to the Examination that they had no objection to the allocation of an area east of Bridgnorth Road being allocated for 85 dwellings in the Neighbourhood Plan. At paragraphs 5.33 – 5.34, the Examiner concluded:

*5.33 Wenlock Estates and Persimmon Homes had made representations on this site and other policies and appeared at the hearing. Their joint submission had proposed a larger housing allocation and which incorporated the RES1 site [land east of Bridgnorth Road], together with land to its immediate east. That larger site*

*had been considered during the consultation phases of the Plan but had not been pursued by the qualifying body. There was a useful debate at the hearing on the respective ways in which the RES1 site and the larger scale site would meet the basic conditions, and with particular reference to complying with national planning policy and contributing to achieving sustainable development. Nevertheless my role as independent examiner is restricted to making a judgement on the extent to which the RES1 site as identified in the submitted plan meets the basic conditions.*

*5.34 Whilst there were different views on whether or not RES1 would contribute to achieving sustainable development, I am satisfied that this would be the case. The development of the site would contribute towards the economic, social and environmental future of the town. It would contribute towards meeting identified housing needs and in an appropriate location. It is conveniently located within walking distance of the town centre, the adjacent primary school, and the other retail and commercial facilities along the Bridgnorth Road."*

The submitted Neighbourhood Plan, without effective engagement with the site owners and promoters, included a proposal to allocate about a third of the East of Bridgnorth Road site for 25 homes as Proposal RES1 which recognised the locational merits of the site but failed to have regard to implementation and delivery issues. RPS had no option but to confirm to the Examiner that the site as proposed in the plan was not deliverable in respect of scale and site boundary. This was noted and accepted by the Examiner. It was not within the Examiner's gift to propose an extension of the site to create a deliverable proposal. The Examiner has proposed that a three year period be allowed for windfall proposals to address housing supply. In the event that windfalls do not materialise at the required scale and rate, the Inspector has recommended that the Neighbourhood Plan should be formally reviewed to allocate a required supply of housing land.

However, for reasons given above, RPS and Persimmon Homes do not consider that there is any credible evidence to conclude that 130 dwellings can be delivered at Much Wenlock Town between 2013 and 2026 within the defined settlement boundary. Accordingly, based on the tested merits of the site, Persimmon objects to the omission of a housing allocation for 85 dwellings on land East of Bridgnorth Road, Much Wenlock in the SAMDev and objects to the land's omission from the settlement boundary (as identified on the attached plan). The site is very well contained and represents a logical extension to the town on low-lying land which is not prominent in the landscape. It can take safe and convenient vehicular access off Bridgnorth Road while providing an attractive, short and direct safe pedestrian and cyclist route to the Town Centre.

There continues to be a housing supply shortfall in Shropshire whereby to comply with the NPPF, and national policy in particular which seeks to boost the supply of housing significantly, sustainable housing land should be released for early development. The land east of Bridgnorth Road, Much Wenlock has been independently examined and found to represent a sustainable location for development. If the scale of development proposed were increased to a site of 85 dwellings, potentially on a phased basis, there would be no impediment to the site's release and new homes being constructed.

The SAMDev can remedy the deficiencies in the Neighbourhood Plan by formally allocating land needed for new homes in a way that is demonstrably deliverable.

### **Advantages of the Alternative Strategy**

There are compelling advantages to the alternative approach advocated by Persimmon Homes for an overall allocation of land for some 85 homes East of

Bridgnorth Road, Much Wenlock.

1. Homes would be provided sooner at a time when there is a local shortfall and less than a 5 year supply.
2. 20% of the homes would be provided as Affordable Dwellings meeting an identified local need.
3. Under the Shropshire Community Infrastructure Levy (CIL), a greater level of funds would be secured for local infrastructure, which would be further increased in the event of a Neighbourhood Plan being adopted.
4. A comprehensive approach to the site would secure substantive benefits for flooding management without significant public costs, in contrast with a piece-meal approach (as advocated by the Neighbourhood Plan as submitted).
5. A comprehensive approach would also achieve benefits in terms of play provision in the south of the town which had been identified as a local objective for the Town.

These advantages can be secured through the allocation of land East of Bridgnorth Road, Much Wenlock through the Shropshire SAMDev. The Neighbourhood Plan, although it identified land east of Bridgnorth Road as a suitable and sustainable location for housing development, failed to adduce a deliverable proposal. In this respect the Neighbourhood Plan has failed to provide a workable means of addressing identified housing needs in this area. The SAMDev provides an effective means of ensuring the right homes are provided in the right location at the right time, complementing the other aspects of the Neighbourhood Plan.

### **Conclusion**

A new short chapter is required for Much Wenlock in the SAMDev. This should include cross-reference to the Neighbourhood Plan in respect of housing provision in the Rural Area of Much Wenlock Parish and other non-residential policy matters on the basis that the Neighbourhood Plan is adopted following referendum on 22 May 2014. If there is not a majority vote in favour of the Plan, there will be no Neighbourhood Plan and a policy vacuum would exist in the absence of a suitable SAMDev Chapter for Much Wenlock.

In any event, even if the referendum is passed on 22 May 2014, the evidence shows that a housing allocation is required at Much Wenlock Town to deliver needed homes. There is no justification for the release of land for new homes being deferred. Housing delivery should be 'plan led' and on this basis the SAMDev should take responsibility for the provision of new homes at the Town in this case.

**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)

A new short chapter is required for Much Wenlock in the SAMDev. This should include cross-reference to the Much Wenlock Neighbourhood Plan, assuming the referendum is passed on 22 May 2014. The Chapter should include in particular a Housing Allocation for Land East of Bridgnorth Road, Much Wenlock for about 85 dwellings. A site location plan is attached.  
In the event that the referendum fails, the SAMDev will need to include all relevant land use policies for the Much Wenlock area.

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:

**An oral appearance will enable the objection and the relationship between the site east of Bridgnorth Road, Much Wenlock and the Neighbourhood Plan to be explained.**

**Do you wish to be notified of any of the following?** *Please tick all that apply. We will contact you using the details you have given above.*

When the SAMDev Plan has been submitted for examination	✓
When the Inspector's Report is published	✓
When the SAMDev Plan is adopted	✓

**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

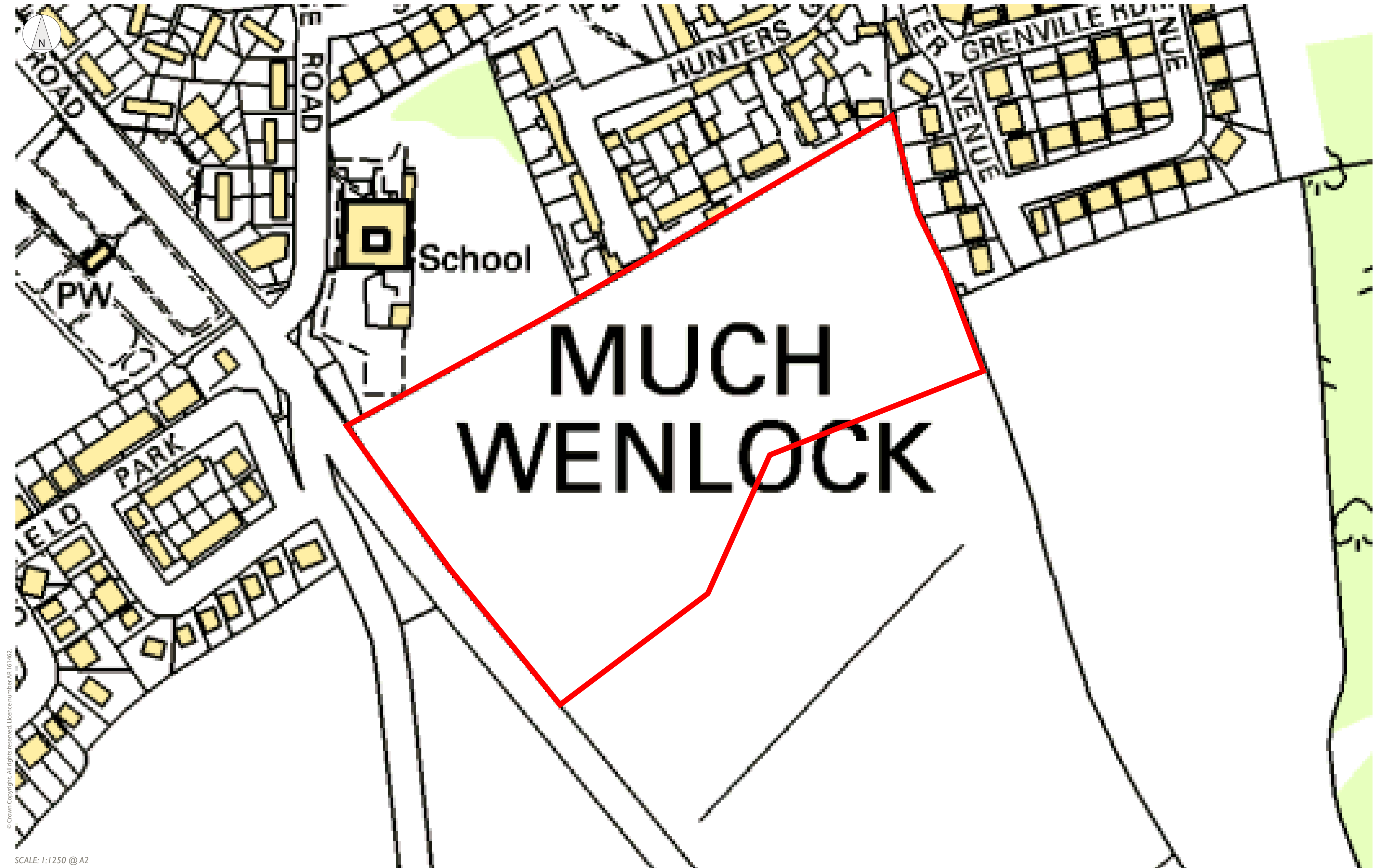
[Planning.policy@shropshire.gov.uk](mailto:Planning.policy@shropshire.gov.uk)

**Or return it to:** Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

**Please note, we will acknowledge receipt of representations made by e-mail.**

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.



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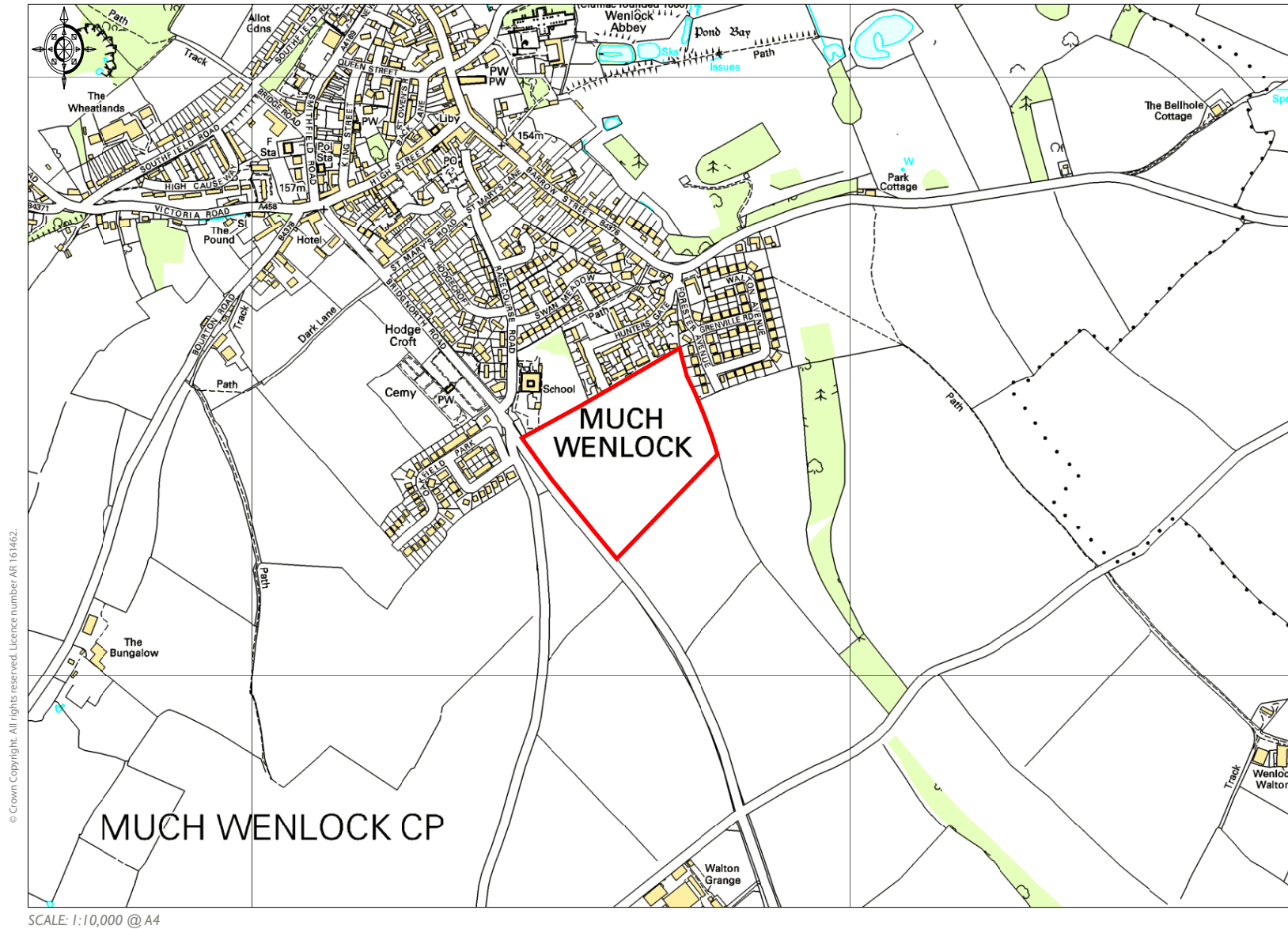
REF: JBB7826  
CLIENT: Wenlock Estates  
DATE: October 2012  
STATUS: Final

CHECKED BY: MS  
DATE CHECKED: 02/10/12  
REVISION: 00  
PREPARED BY: JP

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REF: JBB7826  
CLIENT: Persimmon Homes  
DATE: October 2009  
STATUS: Final

CHECKED BY: MS  
DATE CHECKED: 01/10/09  
REVISION: 00  
PREPARED BY: JP

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