



Planning Policy Team
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

Date: 25 April 2014
Our Ref: CB/EB M8/0814-10

By email only: planning.policy@shropshire.gov.uk

Dear Sir or Madam

RE: CONSULTATION ON THE PRE-SUBMISSION DRAFT OF SITE ALLOCATIONS AND MANAGEMENT OF DEVELOPMENT (SAMDev) PLAN

We represent the **West Midlands HARP Planning Consortium** which includes all the leading Registered Social Landlords (RSLs) across the West Midlands. Our clients' principal concerns are to optimise the provision of social/affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

It is not within our remit to comment on individual site allocations and our comments below focus on three of the proposed policies in the SAMDev Plan.

MD2 – Sustainable Design

Mindful of the advice in the NPPF, especially paragraph 60, we are concerned that the policy requirements, while seeking to engender locally distinctive development, are on the boundary of becoming too prescriptive. They should go no further than currently stated.

On a practical level, we are concerned how criterion 1 would be implemented in those settlements that do not have their *"local aspirations for design"* formally documented.

MD3 – Managing Housing Development

In our previous representation (M8/0814-09) we raised concern over the unduly onerous requirement for a time limit on renewal of planning consents. While we recognise the need for a pipeline of deliverable sites this is not, in our view, the correct means of achieving this. Our previous comments still stand.

MD7a – Managing Housing Development in the Countryside

We are disappointed that the Council has not taken forward our request to allow an element of market housing on rural exception sites, as a valid means of cross-subsidy, in Part 1 of this policy. Our previous comments on this still stand.

The wording of Part 1 would benefit from simplification. Maybe by placing different elements into separate paragraphs would help.

In addition, we are concerned about the inferred size restrictions on affordable dwellings on exception sites and, to a lesser extent, removal of their permitted development rights. Fortunately no specific

size is prescribed, but it should be noted that our clients would strongly oppose any such requirement whether in this Plan or in a Supplementary Planning Document.

Yours faithfully



CHRIS BURTON MPLAN
ASSISTANT PLANNER
For and On Behalf Of
TETLOW KING PLANNING

christopher.burton@tetlow-king.co.uk

cc: Accord Housing Association
Aspire Group
Bromford Housing group
Midland Heart Limited
WM Housing Group

Nick Wood - Housing Department
Helen Howie - Housing Department