

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

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 <a href="https://www.shropshire.gov.uk/samdev">www.shropshire.gov.uk/samdev</a>.

#### Your details: Who is making this representation?

Name:	Messrs Richard & Philip Needs
Organisation (if applicable):	"The Needs Family"
Address:	
Email:	
Telephone:	

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

Name:	Susan Fellows (Mrs)
Organisation (if applicable):	Land Research & Planning Associates Ltd
Address:	PO Box 265, MALVERN, Worcestershire WR14 9BZ
Email:	susan@lrapa.co.uk
Telephone: 077	73811417

### Your Representations

# <u>Please note, you must use a separate form for each representation you wish to make.</u>

(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:

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

Support No
Object Yes

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 No Sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is **not** (*Please tick all that apply*):

Positively prepared	✓
Justified	✓
Effective	✓
Consistent with National Policy	✓

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).

There is no evidence that the Policies referred to above; will provide the necessary amount of land to meet the housing requirement of 5 year period as defined in the NPPF - nor beyond that period.

Bridgnorth requires 1400 new homes.

The figures provided by SHLAA attempts to demonstrate that the 5 years supply is nearly met; but by do ing that it is submitted that this is at the cost of no t providing sufficient Affordable Homes where SC admit that there is a massive shortage.

The provision of sufficient Affordable Homes is a similar requirement in the NPPF. SC appears to have relied upon sites that have been "hovering

in the backg round" which have been provisiona lly p rovided to accommodate su fficient norm al hous ing, knowin g that if a prop er minimum percentage of 40% of Affordable Homes was man datory then Developers/House builders would be reluctant to proceed and the supply of normal market housing would simply be stalled and not be fulfilled and delivered to meet the 5 year supply plus 20%.

This issue is not exclusive to SC. It is common to the majority of Local Planning Authorities. This is confirmed by the ongoing problems with the South W orcestershire De velopment Plan [SW DP] where on reexamination by a senior Inspector the 3 Districts within the SWDP need nearly 5000 more homes that what was set out in the Core Strategies as being sufficient. A "Call for Sites" has had to be issued by the SWDP.

Please use the box below to explain the changes y ou think should be made to the SAMDev Plan in order to make it legally compliant or sound? You s hould 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)

It is sub mitted that land clo se by or adjacent to Brid gnorth should urgently and immediately be brought in to the Local Plan process; where the landowner(s) is/are willing to consider allowing up to 50% of Affordable and Intermediate Housing into the development. This will then immediately start to address the shortfall of all types of home in order to comply with the NPPF.

Our client's have ap proximately 16 a cres or more of developable land that is im mediately available and is close by to Stanmore Industrial Estate being a site which surely appears to employ a lot of people. It is accessible/adjacent to the A 454 and A458 main roads which are enjoined by a substantial roundabout that ought to prevent any possible traffic issues. Notwithstanding that; it would provide some large proportion of afford able hou sing, close to a major employment site, where the use of the carought generally not be necessary. This is a vitally important "material consideration" that should taken into account as referred to at Section 38(6) in the 2004 Planning Act

Site Post Code is WV15 5JF

Site OS Ref: SO374131 292580.

Importantly our clients confirm that this land ought to be a vailable for development in the immedia te future unlike some of the sites alloca ted in the Lo cal Plan. This should assist in making the plan positive, effective and in accordance with the NPPF.

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 emphasis the submissions abo	ve; and expand t	he
objections.		

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

**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 email.

#### 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.