



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 www.shropshire.gov.uk/samdev.

Your details: Who is making this representation?

Name:	Richard Wassell
Organisation (if applicable):	rjwplanning
Address:	20 Claremont Drive Bridgnorth Shropshire WV16 4LE
Email:	richardwassell@rjwplanning.co.uk
Telephone:	01746 764339

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

Name:	Tim Prior
Organisation (if applicable):	
Address:	

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:

MD1 Scale and Distribution of Development

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*):

Positively prepared	<input checked="" type="checkbox"/>
Justified	<input type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

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).

I have been asked by Mr T prior of Hilton House, Hilton, Bridgnorth to submit representations on his behalf in respect to the SAMDev Pre-Submission draft Plan. My client owns a 3.65ha (9 acre) site adjoining Hilton village (plan no. TP/1/002 attached). Although the site is presently allocated as green belt,

there are strong justifications for releasing this site for housing purposes.

The SamDev Pre-Submission draft Plan proposes to allocate new housing development on sites in and around Bridgnorth town, Ditton Priors (Community Hub) and Community Clusters of Neenton, Aston Round, Aston Eyre, Monkhopton, Morville and Upton Cresset. There are no housing development proposals east of Bridgnorth town. This will produce a significant imbalance of housing growth in the Bridgnorth area. Such housing growth is required to provide acceptable housing choice, meet local housing need, and support the strengthening of local services. The area is part of the East Spatial Zone of the adopted Shropshire Core Strategy. The Zone has an identified significant housing affordability issue, an identified need for a mix of housing types to meet the needs and aspirations of local people and a need to strengthen local services.

The Parish of Worfield and Rudge, part of the East Spatial Zone, contains a number of distinct settlements and there is strong justification for identifying these settlements, including Hilton, as Community Clusters where private and public investment would be focused. Such a decision would be consistent with the Shropshire Core Strategy Policies CS1 (Strategic Approach) and CS4 (Community Hubs and Clusters). By directing appropriate development to these villages and developing a sustainable extension to Hilton village would be entirely consistent with the NPPF and Core Strategy, providing an opportunity for a mix of housing and contribute, though section 106, CIL or on site provision, to improving local services, facilities and infrastructure within the Parish.

I note that the policy MD1 includes the wording *“Additional Community Hubs and Community Cluster settlements, with associated settlement policies, proposed by Parish Councils following formal preparation or review of a Community-led Plan or a Neighbourhood Plan and agreed by resolution by Shropshire Council, will be considered to be identified for the purposes of Policy CS4 and MD1”*. My concern with this open door policy position is that if Worfield and Rudge Parish Council remains non-committal in respect of acknowledging the need for additional housing provision and strengthening of local services through designation of Cluster settlements in future, the prospect of future additional housing development in the Parish appear to be non-existent. It is unfortunate that Shropshire Council, through the SAMDev, is delegating future growth in the county (outside the main settlements) to local parishes and is not providing any strategic overview to a planned spatial distribution of housing across Shropshire.

Looking at the role of Shropshire Council in the designation of Community Hubs and Clusters, there appears to be inconsistency between the following wording contained in the Draft Development Management Policies Consultation document, Core Strategy and Bridgnorth Place Plan 2012/13:-

- The **Core Strategy** states that “(Shropshire Council) works with communities at the parish and village level in together undertaking an intelligent analysis of the nature of their local community and how their village functions, and how it can be improved. This is done through an interactive toolkit that starts with the Parish Plan or Village or Town Design Statement where available; secondly adds statistics compiled by Shropshire Council, such as Census data, to provide a quantitative basis for discussion; and thirdly engages with the local community in a Community Testing Event to arrive at an agreed view of how the community regards its current sustainability. This methodology will provide quality evidence to help the planning authority make robust decisions on the designation of Community Hubs and Community Clusters.”
- The **Bridgnorth Place Plan** states “There is, however, an ongoing opportunity for communities to ‘opt in’ as either a Hub or a Cluster at a later stage in the Local Development Framework Plan period (2006-2026), for example through a review of local parish plans. The Council will therefore continue discussions with the local community to identify the community benefits that can be delivered through development.”(my underlining).
- The **SAMDev policy MD1** merely states “agreed by resolution by Shropshire Council”.

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)

1. Should there be any future indication from Worfield and Rudge Parish Council that a Community Led Plan or Neighbourhood Plan is to be prepared, the Plan preparation process must be robust, transparent and genuinely inclusive. Therefore there must be a clear framework set out in the SAMDev for Parish Councils to comply with in preparation and adoption of their Plans. I recommend that policy MD1 sets out a clear statement of intent, consistent with the Core Strategy, describing a clear transparent and inclusive process throughout Community Plan/Neighbourhood Plan preparation and decision making for Community Hub/Cluster designation across Shropshire and to define the role of Shropshire Council, local community residents, businesses, landowners and other organisations, in addition to Parish Council Members in that Plan making process.
2. In the absence of any willingness of Worfield and Rudge Parish Council to undertake any robust and transparent analysis of its area as part of preparation of a Community Led Plan or Neighbourhood Plan, future housing proposals should be considered in the context of 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:

--

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

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Data Protection Act 1998 and Freedom of Information Act 2000

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Your Representations

Please note, you must use a separate form for each representation you wish to make.

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

MD3 Managing Housing Development and Example Settlement Policies

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** ☒

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Positively prepared	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>

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I have been asked by Mr T prior of Hilton House, Hilton, Bridgnorth to submit representations on his behalf in respect to the SAMDev Pre-

Submission draft Plan. My client owns a 3.65ha (9 acre) site adjoining Hilton village (plan no. TP/1/002 attached). Although the site is presently allocated as green belt, there are strong justifications for releasing this site for housing purposes.

Policy MD3 states, *“Where a settlement housing guideline appears unlikely to be met by the end of the plan period, additional sites beyond the development boundary that accord with the settlement policy may be acceptable*”. However, paragraph 4.20 of the policy explanation states that *“Should there not be a five year supply of housing land in Shropshire as a whole, then paragraph 49 of the NPPF effectively allows sustainable housing development to take place beyond settlement development boundaries”*.

This policy is inconsistent with the NPPF. Shropshire Council has already demonstrated that there is not a 5 year supply of housing land in Shropshire as a whole, therefore in the context of the NPPF there is a presumption in favour of sustainable development across Shropshire as a whole. Shropshire’s housing policies should therefore allow for general market housing development to take place beyond the designated settlements of the market towns, key centres, hubs and clusters. Greater flexibility is required to allow for housing development to come forward in sustainable locations in and adjoining other village settlements and which would achieve the objectives of “Cluster” designation. Such flexibility is required to ensure that SAMDev and the Core Strategy fully comply with the NPPF in respect of the presumption in favour of sustainable development.

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)

To comply with the NPPF, the SAMDev must allow flexibility to enable housing proposals to come forward in sustainable locations outside the designated settlements of market towns, key centres, hubs and clusters.

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

MD6 Green Belt & Safeguarded Land

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** ☒

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Plan. My client owns a 3.65ha (9 acre) site adjoining Hilton village (plan no. TP/1/002 attached). Although the site is presently allocated as green belt, there are strong justifications for releasing this site for housing purposes.

Existing 'Saved' Development Plan policies for Shropshire identify the village of Hilton as being within the green belt, and indeed it appears (SAMDev paragraph 4.50) that the entire village itself is "washed over" and designated as green belt. Paragraph 86 of the NPPF is clear that villages should only be included in the green belt if the open character of that village makes an important contribution to the openness of the green belt. The NPPF also states that if normal development management policies are able to protect the character of the village, that village should be excluded from the green belt. In my opinion, Hilton does not demonstrate an open character and therefore should be excluded from the green belt and defined as an inset on the SAMDev Proposals Map and subject to normal development management practices.

The NPPF paragraph 84 states that as part of a green belt boundary review, local planning authorities should consider channelling sustainable development towards towns and villages inset within the green belt. The NPPF also states (Paragraph 52) that the supply of new homes can sometimes be best achieved through extensions to existing villages.

The policy explanation states that settlements that are 'washed over' by the green belt (e.g. Hilton) but which opt in to become community hubs or cluster settlements at any time of the Plan period will be considered suitable for limited infilling, including market housing in accordance with Policy CS4 and NPPF paragraph 89. Whilst I am of the opinion that Hilton should not be 'washed over' by green belt, paragraph 89 of the NPPF clearly does not restrict infill and affordable housing to specific 'designated' settlements such as hubs and clusters.

SAMDev paragraph 4.47 states that "a detailed review of the green belt boundary will be undertaken during the next plan period, as part of looking at sustainable growth options". SAMDev is therefore currently inconsistent with the NPPF in that this review should be undertaken as part of this current SAMDev.

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)

1.

A review of the green belt should be undertaken now as part of the preparation of the current SAMDev.
2.

Policy MD6 should be re-worded to comply with the requirements of the NPPF, allowing for infilling and sustainable extensions to settlements.

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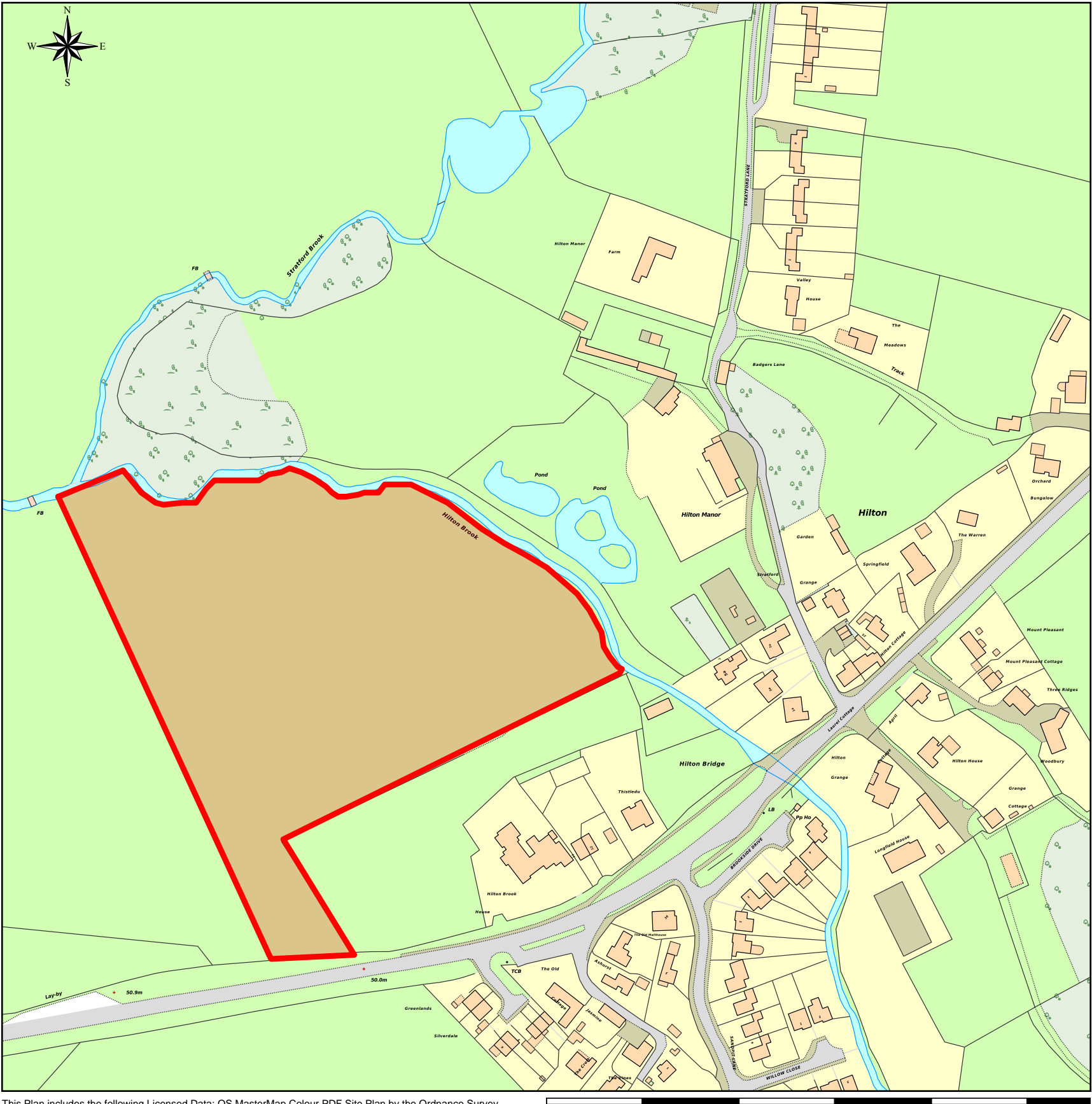
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Land at Hilton Bridgnorth



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0m 50m 100m 150m 200m 250m

Scale: 1:2500, paper size: A3

TP/1/002
Shropshire SAMDev Plan
Representations made by rjwplanning 24/04/2014