



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:	Mr Sam Metson
Organisation (if applicable):	Bidwells
Address:	Saxon House, 27 Duke Street, Chelmsford, Essex, CM1 1HT
Email:	sam.metson@bidwells.co.uk
Telephone:	01245 505071

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

Name:	Trustees of the Lord Bradford (1987) Settlement
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

You're 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 S14.2 (ii) Knockin

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

Support	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Object	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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).

I am acting on behalf of the Trustees of the Lord Bradford (1987) Settlement in relation to the above consultation. The Trustees own land north of Lower House Farm in Knockin which has been identified by the Council for allocation for residential development in the SAMDev Plan Pre-Submission Draft (ref: KK001).

Classification of Knockin as a Community Hub

The Trustees support the SAMDev's classification of Knockin as a Community Hub, which recognises its importance as a local service centre for its rural hinterland. Knockin is one of the largest settlements in the area and its Post Office, shop, medical centre, Assembly Rooms, pub and hotel, Church and cricket pitch all provide essential facilities that draw in users from the surrounding area.

These local facilities have helped foster a strong social fabric. The Assembly Rooms in particular provide a base for a range of community groups, including IT skills workshops, the Women's Institute, Luncheon and Youth Clubs and line dancing, Pilates, circuit classes. The cricket pitch hosts the Knockin and Kinnerley Cricket Club and, in turn, some very competitive matches. Indeed, the services available in Knockin complement those offered in nearby Kinnerley, which include the local Primary School. Kinnerley is the only settlement of comparable size in the surrounding area, and together the two villages act as an important service cluster.

The local hamlets of Maesbrook, Knockin Heath, Dovaston, Plassey, Kynaston, Maesbury Marsh and Woolston are all much smaller and in less accessible locations. They cannot support a comparable level of service provision and could be in danger of becoming dormitory satellite settlements for the larger towns nearby if Knockin and Kinnerley are not able to sustain their existing facilities and accommodate growth.

Although located in a rural area, Knockin is highly accessible on the main through route between Llanymynech and the A5/Shrewsbury, and at the junction of the B4396 and B4398. Several bus stops are located along the B4396 providing services to Oswestry, Shrewsbury, Radbrook, and Morda among others, ensuring ample opportunities to access higher order services via sustainable modes.

Knockin's location and accessibility helps the village support tourist trade, including the Bradford Arms Hotel, The Old Forge Bed and Breakfast and Holiday Barn, Knockin Shop and tea rooms and the Heathwain Log Cabins and Fisheries site nearby. Employment opportunities are also available in the agricultural industry and at the large Lloyds Animal Feeds site. In addition, the village is well suited to support businesses run from the home.

Its accessible location and good service provision suggest that Knockin has strong potential to accommodate sustainable growth to help meet local housing needs. It is more likely to attract required investment and demand for new homes and there is good scope for enhanced public transport. The settlement is well placed for designation as a Community Hub. New housing growth could help meet local needs, sustain and enhance local services and help mitigate any potential decline in the local economy, as is encouraged by the National Planning Policy Framework ('the Framework', March 2012) and national Planning Practice Guidance ('PPG', March 2014).

Critically, having undertaken widespread consultation with local residents Knockin Parish Council has confirmed that it supports the designation of Knockin as a Community Hub and the principle of new residential development in the village to help sustain its vitality and viability.

Proposed allocation of site KK001

The Trustees fully support the proposal to allocate site KK001 and are happy to work with Shropshire Council and the community to ensure that local aspirations for the limited sustainable expansion of the village are realised during the current plan period (2011-2026). Indeed, Bidwells has already commenced work on behalf of the Trustees to prepare the evidence base required to underpin a planning application

for the development of the site.

The Trustees maintain that site KK001 is most suitable of all those in Knockin considered for housing development via the earlier stages of the SAMDev. The allocated site KK001 is best placed in the local area to accommodate the limited growth required to help take account of local housing and employment needs. It is closest to the centre of Knockin, opposite the village shop, assembly rooms and public house, indicating that its development would present a favourable option in seeking to support existing facilities.

The location and characteristics of the site suggest that its development would provide a logical residential extension to the existing envelope of the village without unduly impacting upon the surrounding countryside. The site's location minimises the potential impact of development on the character of the settlement. It is largely screened from view from the south and east by existing development adjacent to the B4396 and Church Lane and its allocation would fill the gap between these two axes of development running east/west and north/south. Whilst development would continue the incremental expansion of the village to the north, the historic pattern of ribbon development alongside the main road would be preserved. There would be no discernible impact when approaching the village from the west on the B4396 due to the topography of the land and established hedgerows adjacent to the road. Views of the village from footpaths to the west and north would change, as would those of the countryside obtained from the war memorial in the village, the impact of additional built form, which is inevitable if Knockin is to grow, can be mitigated by boundary planting and the public open space on the site frontage. These matters are examined in more detail in the Landscape Capacity Appraisal submitted by Bidwells in October 2011.

The Trustees fully support Shropshire Council's proposal to include a small additional parcel of land in the corner of a field immediately to the north of St Mary's Close in the allocation for residential development. This land was excluded from the emerging allocation at the Preferred Options stage but its inclusion will help to provide a consistent settlement boundary on the northern side of the village, avoiding a gap that may become undevelopable if not considered as part of a comprehensive scheme now. It also provides a sensible plot for one detached dwelling in keeping with the density and pattern of development established immediately to the south and east.

Good access can be provided to site KK001 directly from the B4396 as demonstrated in the Access Appraisal undertaken by Bidwells and submitted to Shropshire Council in June 2010. The existing access point adjacent to Lower House Farm would only need to be slightly altered to accommodate the development. It is anticipated that this can be achieved in a sympathetic manner to preserve and enhance the Knockin Conservation Area. We would highlight that it is not essential to relocate the War Memorial to provide access to the site, as demonstrated by the submitted Access Appraisal.

The site is fully deliverable – the Ecological Assessment, Archaeological Assessment and Landscape Capacity Appraisal submitted to the Council in October 2011 demonstrate that there are unlikely to be undue constraints in any of these

respects.

I trust that you will find these responses useful in progressing the SAMDev DPD towards the Submission stage. I am happy to continue to engage throughout this process on behalf of my clients so that a positive outcome can be achieved for all.

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)

N/A

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	X
When the Inspector's Report is published	X
When the SAMDev Plan is adopted	X

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 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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Organisation (if applicable):	Bidwells
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Email:	sam.metson@bidwells.co.uk
Telephone:	01245 505071

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

Name:	Lord Bradford
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

You're Representations

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

Policy S14.2 (iii) Llanymynech and Pant

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

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I am acting on behalf of my client, Lord Bradford, in relation to the above consultation. Lord Bradford owns land east of Barley Meadows in Llanymynech which has been identified by the Council for allocation of residential development in the Pre-Submission Draft SAMDev DPD (site ref: LLAN009).

Lord Bradford fully supports this proposal and is happy to continue to work with Shropshire Council and the local community to ensure that aspirations for the limited sustainable expansion of the village are realised during the current plan period (2011-2026).

Llanymynech and Pant as a Community Hub

Lord Bradford fully supports Shropshire Council's proposed classification of Llanymynech and Pant as a Community Hub. Llanymynech and Pant already act as a significant hub for surrounding lower order settlements and an expansive hinterland. However, new development could add to the sustainability of both settlements and help boost the local economy, which is showing some signs of decay, in accordance with Shropshire Council's adopted Core Strategy's support for a 'rural rebalance'.

Helped by its location on the cross-roads of the A483 and B4398, I would highlight that Llanymynech in particular provides a good range of local services and employment opportunities, including two shops and a Post Office, a bakery, two hotels, a number of restaurants, a large motor repair business and a hair salon. Further employment prospects are offered in Pant and at the nearby Four Crosses Business Park.

Llanymynech provides a community focus for the area, being well served by a primary school and state of the art village hall which provides community ICT services and a base for a number of local groups. These include a pre-school, amateur dramatics, gardening and family history groups and thriving football and badminton clubs. The adjacent recreation ground, equipped play area and bowls ground further reinforce the role of the village as a community hub.

The strategic location of the Llanymynech has enhanced its public transport connectivity, with regular services available to Oswestry, Four Crosses, Welshpool, Shrewsbury and smaller satellite settlements in the wider area.

Being a sustainable, balanced, vibrant, and relatively self-reliant settlement, with an important relationship with nearby Oswestry for higher order services, Llanymynech (with Pant) is well placed for designation as a Community Hub. New housing and employment growth appropriate to local character would enhance the village and help mitigate and rebalance the decline in the local economy, as evidenced by the closure of the Lion Hotel.

Given the more prominent service function of Llanymynech, we would suggest that it is well placed for designation as a Community Hub in its own right. Nevertheless, given the proximity of Pant and the benefits of considering the needs of both villages together we do not object to both settlements being identified as one Hub. For the reasons identified above, we support Shropshire Council's intention to provide the majority of new development in Llanymynech over the plan period.

Allocation of site LLAN009

My client supports the allocation of site ref: LLAN009 for the following reasons:

- The site is the most sustainable of all those promoted for development via the SAMDev. It is the most centrally located in relation to village services and facilities. It is located adjacent to the recreation ground and village hall and benefits from a short, safe and attractive pedestrian link direct to the village centre via the canal tow path. Indeed, the availability of this route avoids the need to use the poor pedestrian facilities serving to the intersection of Station Road and the A483.

- This site would provide a logical and discrete extension to the existing village envelope by continuing the earlier development of Barley Meadows, which came forward in the late 1990's.
- Safe vehicular access can be obtained via Barley Meadows without the need to form an additional junction onto Station Road (as demonstrated by the Access Appraisal submitted to Shropshire Council by Bidwells in June 2010).
- The location of the site away from main public through routes, and the presence of established boundary trees and hedgerows, provides a valuable opportunity to minimise the urbanising impact of the growth allocated to Llanymynech and Pant. Its position and boundary features will help blend new development with the existing character of the village when viewed from Station Road, the recreation ground and the canal tow path. Importantly, the site is barely discernible from the few available viewpoints on the hills to the north surrounding the Llanymynech Limeworks Heritage Area, as demonstrated by the Landscape Capacity Appraisal submitted to Shropshire Council by Bidwells in October 2011. A sensitively designed scheme that responds to the character of the local area, particularly in respect of its more historic features, could positively enhance the character of the settlement.
- The location and boundary features of the site will also ensure that development would not have any undue impact on the amenity of adjacent properties. Existing development only adjoins on one boundary, to the west. Strong hedging along part of this boundary completely screens the site from one of the two adjacent dwellings. A smaller hedge marks the boundary with the second dwelling, which could be made stronger by further planting.
- The location of the site means that development for housing is unlikely to compromise the potential for a future bypass of Llanymynech, if it were to come forward in accordance with local aspirations.

Bidwells has undertaken two community consultation exercises on behalf of Lord Bradford regarding the potential development of site LLAN009:

- The first, held in July 2012 in conjunction with Llanymynech and Pant Parish Council, comprised a public exhibition of two possible options for the development of the site for around 35 dwellings, as proposed by Shropshire Council. The results of a questionnaire taken by the Parish Council at the exhibition showed that there was a degree of support amongst attendees for the development of the site and indicative proposals to provide an overflow car park for the village hall as part of the scheme.
- The second comprised attendance at a Parish Council meeting in November 2013, where draft layout proposals which could form part of an outline planning application for the development of up to 35 dwellings were presented to members (Indicative Site Layout – Consultation Draft enclosed). The Parish Council expressed broad based support for the draft proposals put forward, including overflow car parking for the village hall.

Bidwells will be taking forward an outline planning application for the development of site LLAN009 on behalf of Lord Bradford in accordance with the proposed allocation

of the site in due course.

Allocation of site LLAN001

Lord Bradford supports the Parish Council's aspiration to deliver housing on the former railway yard land at site LLAN001, which is not in his ownership, in addition to site LLAN009. Nevertheless, we would highlight that the site is located further from the village centre and does not benefit from a safe, direct pedestrian link to its services and primary school. The main route from this site to the village centre would be via Station Road which does not benefit from any footways at its junction with the A483, presenting a safety hazard for pedestrians. Unlike site LLAN009, which is closer to the village centre and benefits from a direct pedestrian link via the canal tow path, there is an absence of any alternative routes that would be easily accessed during the winter months. Access to the canal towpath from site LLAN001 would have to be obtained via pastureland used to graze cattle to the north, which is often waterlogged.

Development LLAN009 will provide the opportunity to improve the connectivity of this part of the village and provide safe, usable pedestrian links between LLAN001 and village services. A scheme for residential development on land east of Barley Meadows could potentially open up links between the canal tow path, playing field, village hall and LLAN001, as illustrated on the enclosed Indicative Layout Plan. To this end, it would be favourable for LLAN009 to come forward for development in advance of LLAN001.

We are aware that concerns have been raised in the past about the ecological and access constraints of site LLAN001 and the impacts of its development. We would urge Shropshire Council to ensure that these issues are addressed and that the site is deliverable. No such constraints apply to the land east of Barley Meadows.

Scale of development anticipated from sites LLAN001 and LLAN009

Lord Bradford has significant concerns about the soundness of the cap on development that can come forward from the combination of the proposed allocations at LLAN009 and LLAN001 that is seemingly imposed by the reference in policy S14.2 (iii) to the development of '*up to 67 dwellings*'. Lord Bradford **objects** to this element of policy S14.2 (iii).

The policy makes clear that the sites LLAN009 and LLAN001 are anticipated to provide 35 dwellings and 32 dwellings respectively, but it is possible that either one could come forward to provide slightly more or less housing than indicated. If more development than anticipated does come forward from the first site to be developed, the cap on development contained in policy S14.2 (iii) could artificially and unduly restrict the capacity of the second site, even if it was consistent with the allocation of the site on an individual basis and the amount of development planned for Llanymynech and Pant as a whole (around 100 dwellings, including windfall sites, as confirmed elsewhere in the same policy).

To overcome this discrepancy and ensure that policy S14.2 (iii) takes a more flexible, less arbitrary approach, we would strongly contend that its wording should

be altered to refer to the development of '*around 67 dwellings*' rather than '*up to 67 dwellings*'. This concession would accord with the proposed allocations of each site individually and ensure that this part of the Plan is positively prepared, justified, consistent with national policy and effective.

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 explained above, policy S14.2 (iii) should be amended to refer to the development of '*around 67 dwellings*' from the combination of allocations LLAN001 and LLAN009 rather than '*up to 67 dwellings*'. This change will avoid an unnecessary threat to the deliverability of the second of the two allocations proposed to come forward in Llanmynech and Pant if the first allocation to be developed delivers more housing than is anticipated at this stage.

The amendment would maintain consistency with the scale of housing development anticipated to arise from each of the sites individually and in Llanymynech and Pant as a whole (as confirmed elsewhere in the same policy), but it would allow a more flexible approach to be taken. This would help to ensure that this part of the Plan is positively prepared, justified, consistent with national policy and effective.

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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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