



Clun Town Council with Chapel Lawn

Dear Sirs,

28th April 2014

I am writing in regard to the SAMDEV Pre-Submission draft consultation. Overall, the Town Council supports S2.2 (iii). However, the Town Council considers that S2.2 (iii) is not sound in regard to windfall development (paragraph 2 of S2.2 iii). This paragraph states that:

"The balance of development will be delivered through opportunities for small scale development within the existing development boundary. Windfall development on small sites will be permitted within the development boundary to deliver an allowance of around 10 new homes or to balance the level of development on Clun002 to deliver the housing requirement for the town."

The wording of S2.2(iii) in relation to windfall is not sound for the following reasons:

The Town Council's position has consistently been an overall development target of 70 homes. It proposed that 60 homes be allocated to the development site CLUN002 with the balance of 10 houses being allocated to windfall housing which, given the nature of the settlement and the existence of a development boundary, would effectively be the same as infill development.

The Council was particularly concerned, in making its previous submissions, that the amount of infill housing be strictly limited. It was also concerned that the density of housing on the CLUN002 site should be such as to discourage the development of large houses which are likely to be unaffordable for local inhabitants.

Therefore, the Council has consistently made it clear that its position is that 10 homes is the MAXIMUM amount of windfall that is appropriate to Clun. As it is worded, the SAMDEV Pre-Submission Draft does not state that 10 windfall homes is a maximum number and it is open-ended and could result in more than 10 windfall homes. The implication of the reference to "a [windfall] ...allowance of around 10 new homes or to balance the level of development on Clun002 to deliver the new housing requirement" is that if 60 new homes were not delivered on Clun002, to meet a balance of 70 homes identified as a target for Clun overall, more than 10 windfall homes could come forward. *This is contrary to the Council's clearly stated position that 10 is the MAXIMUM number of windfall homes appropriate to Clun.*

The Council request that para 2 of S2.2(iii) be re-worded to state that:

"Windfall development on small sites will be permitted within the existing development boundary to deliver an allowance of a maximum of 10 new homes".

This submission should be read alongside the Council's submissions on previous consultations on SAMDEV.

The Town Council would like to be kept informed of progress of the SAMDEV and reserve the right to appear at the Examination.

Yours sincerely,

Rebecca Turner, Clerk to the Council