

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:	
Organisation (if applicable):	HOLLINS STRATEGIC LAND LLP
Address:	C/O AGENT
Email:	
Telephone:	

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

Name:	PETER TOOHER
Organisation (if applicable):	NEXUS PLANNING
Address:	EASTGATE, 2 CASTLE STREET, CASTLEFIELD MANCHESTER M3 4LZ
Email:	p.tooher@nexusplanning.co.uk
Telephone:	0161 819 6570

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:

Policy S18 Whitchurch

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

Support	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Object	Yes	<input checked="" 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 type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" 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	<input checked="" type="checkbox"/>
Justified	<input checked="" 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).

Please see attached supporting letter

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)

Please see attached supporting statement

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:

To enable us to formally present our case to the Inspector on behalf of our clients

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	<input checked="" type="checkbox"/>
When the Inspector's Report is published	<input checked="" type="checkbox"/>
When the SAMDev Plan is adopted	<input checked="" type="checkbox"/>

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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Date: 28th April 2014

Dear Sirs

Site Allocations and Management of Development (SAMDev) Plan Pre-Submission Draft Consultation

This representation on the Site Allocations and Management of Development (SAMDev) Plan is submitted on behalf of our client, Hollins Strategic Land LLP.

The Plan is 'Unsound'

We consider the SAMDev to be 'unsound' for the reason associated with the allocation of housing sites, specifically the allocation afforded to Whitchurch in the North Eastern part of Shropshire and thereby the scale of allocations made to ensure an appropriate supply of housing land.

Core Strategy

As noted in the Draft SAMDev, the Core Strategy, adopted in 2011, prior to the National Planning Policy Framework, provides the basis for the approach to proposed scale and distribution of housing land allocations. Whilst a Self Assessment has been undertaken on the Core Strategy this noted the lack of a 5 year land supply at that time whilst the Core Strategy itself is based upon a 2008 West Midlands West Housing Market Area (Shropshire & Herefordshire) Strategic Housing Market Assessment. It is not clear to what extent the latest ONS Household Projections from 2011 have been used to inform the Core Strategy and thereby the draft SAMDev.

Within this context and ahead of a review of the Core Strategy it is clear that a robust approach to housing land allocations needs to be taken in the SAMDev with housing targets being seen as minimum requirements; a high degree of certainty afforded to allocated sites; and additional sites allocated to introduce a degree of flexibility should other sites not come forward.

The strategic approach of the Core Strategy (CS1) is to distribute residential development as follows: Shrewsbury 25% (6,875 homes) the Market Towns and Key Centres 40% (11,000 homes) and 35% (9,625) in the rural areas.

Within the North East Spatial zone of Shropshire the SAMDev is required to provide at least 5,500-6,050 homes. This is to be distributed amongst the Market Towns and Key Centres of Market Drayton, Wem and Whitchurch; with Market Drayton and Whitchurch to deliver over 1,000 homes each and Wem to deliver between 500-1000.

Given this context SAMDev refers to housing guidelines in each of the settlements, taking account of commitments (and presumably potential windfalls) as follows:

Whitchurch	1200 units
Market Drayton	1200 units
Wem	500 units

This suggest a total current proposed provision in the market towns and key centres in North East Shropshire of some 2900 units. This represents less than 50% of the total minimum requirements for the area (ie 5500-6500). The remainder, are therefore assumed to be required in rural areas on sites not allocated in the SAMDev.

This is not consistent with the focus of the Core Strategy (Policy CS1) which focuses around 65% of new housing in Shrewsbury and the Market Town and other Key Centres with only around 35% to come forward in the rural areas. Similarly this passive approach to housing delivery in the North East of Shropshire is not consider consistent with the Framework requirement to plan positively, to provide certainty of delivery and as noted at para 47 of the Framework to identifying key sites which are critical to the delivery of the housing strategy over the plan period.

It is therefore considered the housing guidelines figures for the Market Towns and Key Centres of North East Shropshire as a whole are unsound and do not reflect the requirements of Policy CS1 of the Core Strategy. These should be reviewed and the guideline figures increased in those settlements, including Whitchurch, that can accommodate additional development as part of a sustainable development strategy. This will reduce housing land requirements in rural areas less well served by public transport and community infrastructure and enhance deliverability and in the case of the Whitchurch support further economic and community development = an approach favoured by Whitchurch Town Council.

This lack of consistency with the housing targets of Core Strategy CS1, is compounded in the draft SAMDev with the lack of certainty, flexibility and actual allocations identified to meet even the inappropriately low housing guideline figure.

Policy S18 of the draft SAMDev identifies the sites allocated for the Whitchurch area. The number of allocated sites amounts to only 733 additional dwellings.

At para 5.179 the draft SAMDev suggests that *'around a further 300 dwellings been developed or have planning permission'*. The paragraph also states, as noted earlier, that the *'settlement strategy actively plans to accommodate around 1,200 dwellings'*.

Therefore, notwithstanding our view that the guideline figure for Whitchurch should be reviewed and increased, even with reference to an inappropriate low figure, the draft SMADev still requires in the order of 180 dwellings to come forward during the plan period on unallocated sites as 'windfalls'. Clearly this also assumes that all existing sites with planning permission and those allocated will come forward. This is unlikely to be the case, not least as the schedule at 18.1a notes the significant infrastructure requirements enable a number of the sites to be delivered.

The need to identify more sites within the Whitchurch Area

It is therefore considered that there is a requirement to allocate additional housing sites at Whitchurch, both to be in accordance with Policy CS1 Core Strategy but also to deliver on the inappropriately low housing guideline figure identified in the SAMDev Policy 18. This will introduce additional flexibility and thereby certainty of delivery of housing requirements.

In this respect we would propose on behalf of our clients that Land off Chester Road, Whitchurch be included within the SAMDev as a site allocation.

The site is located to the north west of Whitchurch and immediately abuts the settlement boundary. The proposed site is bounded to the south by existing housing and to the north by an area of land recently given planning approval for housing development. The site has no site constraints and it is available for delivery the next 5 years.

The proposed allocation of land off Chester Road should be considered as a site in a sustainable location that would be able to deliver up to approximately 50 dwelling, contributing to the identified shortfall in housing allocations in Whitchurch.

I trust this is helpful and I look forward to hearing from you in due course.

Yours faithfully

Peter Tooher
Director



HOLLINS STRATEGIC LAND

PROPOSED RESIDENTIAL DEVELOPMENT
CHESTER ROAD, WHITCHURCH
SITE LOCATION

croft
Transport Solutions

Email: info@crofts.co.uk
Tel: 0161 827 1740
Web: www.crofts.co.uk

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DRAWN:	DATE:	CHECKED:	DATE:	SCALE:	DRAWING NUMBER:	REVISION:
JC	25.02.14	PJW	25.02.14	N.T.S	0617-01	.