



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:	Susan Fellows (Mrs)
Organisation (if applicable):	Land Research & Planning Associates Ltd.
Address:	PO Box 265, Malvern, Worcestershire WR14 9BZ
Email:	susan@lrpa.co.uk
Telephone:	07773811417

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

Name:	Paul Stokes
Organisation (if applicable):	R. Stokes & Sons Ltd.
Address:	Acorns, Cleobury Mortimer, Nr Kidderminster DY14 0H2
Email:	
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 - MD 1.1 - S3.2 - S3.2(i) Ditton Priors

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

☐

Sound

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 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).

There is little or no evidence that the Policies referred to above; will provide the necessary amount of land around Bridgnorth and its hinterland including land at and surrounding Ditton Priors to meet the housing requirement of the 5 year period as defined in the NPPF - nor beyond that period.

Policy S3.2 confirms that Ditton Priors is a settlement considered available for housing.

The table at MD1.1 confirms that 10,000 houses are needed in the Rural Area to contribute to the overall need of 27500 by 2026 and 5427 have to be delivered by 2006. The submissions herein confirm that this is not being met.

This same Table confirms that 25 more hectares are required for Employment to take matters to 2026.

It is submitted that it appears that SC has no Policy that refers to the mixture of employment and living space in one unit or attached units tied together referred to as Live/Work units. Such an approach would assist the shortfall of homes and provide the extra land needed to meet the land shortfall of 25 hectares which in turn would provide employment opportunities whilst reducing the need to travel. Provision of such could merge into the affordable or intermediate category as well as normal homes. It is submitted that this lack of Policy in this respect confirms amongst other matters that the SAMDev is not sound or effective and means the SAMDev is not in accordance with the provisions of the NPPF.

The provision of sufficient Affordable Homes is a mandatory requirement in the NPPF. SC appears to have relied upon sites over the whole District that have been "hovering in the background" which have been provisionally provided to accommodate sufficient normal housing, knowing that if a proper minimum percentage of 40% of Affordable Homes was mandatory then Developers/House builders would be reluctant to proceed with building and the supply of normal market housing would simply be stalled, not be fulfilled and not be delivered to meet the 5 year supply plus 20%.

This issue is not exclusive to SC. It is common to many Local Planning Authorities. This is confirmed by the ongoing problems with the South Worcestershire Development Plan [SWDP] where on re-examination by a senior Inspector the 3 Districts within the SWDP need nearly 5000 more homes than what was set out in the Core Strategies as being sufficient. A "Call for Sites" has recently had to be issued by the SWDP.

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)

It is submitted that land in the Ditton Priors district and which is clearly in the hinterland of Bridgnorth should urgently and immediately be brought in to the Local Plan process; where the landowner is willing to consider allowing up to 75% of mixture of Intermediate Housing and Live/Work units into the development. The incorporation of one with the other makes it economical to develop and starts to address the shortfall of employment and housing land. This will then immediately start to address the shortfall of all types of home and provision of employment land in order to comply with the NPPF.

It is also submitted that a new way of looking at how to overcome these shortfalls is desperately needed. Reliance upon development taking place only within allocated and restricted development/settlement boundaries is now outdated and unless some well designed sporadic development is allowed without hindrance; the shortfalls will not be ever

satisfactorily addressed. Development in the open countryside should not be restricted to affordable homes or rural workers. Where opportunities exist as proposed herewith, these should be vigorously supported.

Our clients have approximately 4.00 hectares of developable land at Upper Netchwood Ditton Priors *that is immediately available* and ought to accommodate 100 houses of varying types including Live/Work Units and is not far from Ditton Priors. This assists the shortfall.

Ditton Priors Site OS Ref: SO61164 91620

Importantly our clients confirm that this land is available for development in the immediate future; unlike some of the sites allocated in the Local Plan. This will 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 above; and expand the 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	<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.