



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:	Stuart Field
Organisation (if applicable):	Barton Willmore LLP
Address:	Regent House, Prince's Gate, 4 Homer Road, Solihull, B91 3QQ
Email:	stuart.field@bartonwillmore.co.uk
Telephone:	0121 711 5151

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

Name:	
Organisation (if applicable):	Gallagher Estates and Taylor Wimpey UK Ltd
Address:	c/o Agent
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:

Schedule S15.1b: Employment Sites

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 checked="" 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 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).

We object to the proposed allocation of Land between Lawton Road and Lamledge Lane (SHI004/c) for 2 hectares of employment land (use class B1 and B2 as suggested by the Development Guidelines).

Our representations to the Revised Preferred Options SAMDev in July 2013 highlighted the need to ensure a comprehensive masterplanned approach to this site:

"Given the aspirations to secure a mixed use development in

the SAMDev, which is reflected in the proposals for the northern parcel (SHI004) it is important that this site, and adjacent land in the control of another developer, be comprehensively masterplanned to ensure that the 'town centre' uses are in areas which are the closest to the town centre whilst the employment uses relate to existing employment development."

Detailed planning permission was granted in March 2014 on land south of Aston Road (SHI004a – planning application reference: 13/03055/FUL) for 115 dwellings only which was previously proposed as part of a wider mixed use draft allocation in the Revised Preferred Options SAMDev (July 2013).

The Council's decision to allow this application effectively removed the opportunity to prepare a comprehensive approach to masterplanning for this area of Shifnal. As this application was for entirely residential, with no employment proposed.

A live outline application is currently being considered by the Council for land between Lawton Road and Stanton Road (application reference: 13/05136/OUT), which proposes a mixed use residential development of up to 100 dwellings and a care home (Use Class C2) (the latter being an employment generator). A quality development providing a C2 use such as an extra care facility could provide a continuum of care currently missing from the area as part of the SAMDev allocation as well as providing much needed local employment opportunities. It is considered that the proposed care home facility will create a minimum of 22 new full time jobs. It is for these reasons we consider that the provision of this extra care development provides local employment. Furthermore, we are aware that the 1 hectare of windfall development within Shifnal is apparently the care home development on this site, we therefore fail to see how the C2 development can be classed as employment for the purposes of windfall development and yet counted against the draft employment allocation. We consider this approach is wholly inconsistent.

Paragraph 158 of the NPPF states that each local authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence. Local planning authorities should ensure that their assessment of and strategies for employment and housing are integrated, and that they take full account of relevant market and economic signals. There appears to be no robust evidence prepared by Shropshire Council that underpins the decision to allocate 2 hectares of B1 and B2 employment land on this site, as proposed in Schedule S15.1.b. We therefore consider this policy approach is not consistent with the NPPF.

We have reviewed the Council's Employment Land Review (ELR) which has

been produced as an evidence base document and highlight that this contains no justification for allocation of additional employment land in Shifnal and certainly no analysis of demand. The sole justification appears to be a perceived lack of employment opportunities at the current time. However within the document there is reference back to the former Bridgnorth Employment Land Review and a note regarding a lack of demand for employment provision. Furthermore, Table 46 of the current ELR highlights that a local agent has indicated no demand for further employment provision in Shifnal.

We therefore consider that when set alongside our objections to the 'housing sites' policy and the housing target for Shifnal in general; there is a clear need for housing (and demand, as Phase 1 of the Taylor Wimpey Shifnal development has sold well) but no case whatsoever for employment provision.

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)

Delete land between Lawton Road and Lamledge Lane for development for offices or general industrial (use classes B1 and B2) and allocate the site as a whole for housing.

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:

Taylor Wimpey and Gallagher Estates are jointly responsible for delivering two strategic sites in Shifnal. They have also made multiple submissions to the SAMDev.

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

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.