

25th April 2014

By post and email

Planning Policy Team
Shropshire Council
Shirehall
Abbey Foregate
SHREWSBURY
Shropshire
SY2 6ND

Dear Sirs,

SITE ALLOCATIONS AND MANAGEMENT OF DEVELOPMENT PLAN (SAMDEV): RESPONSE ON BEHALF OF RICHBOROUGH ESTATES RELATING TO: LAND AT FOLDGATE LANE, LUDLOW

We are writing to you as the planning consultants acting on behalf of Richborough Estates (the developer) who are promoting land at Foldgate Lane, Ludlow (refer to enclosed Site Location Plan) on behalf of the 'Small' family who own the land.

Background

You previously received a submission in July 2012 prepared jointly prepared by consultants, DEFINE, DTA, Halcrow and GVA acting on behalf of the 'Small' family for this site. The scheme was presented under the heading of 'Foldgate' and it put forward draft proposals and a tentative Masterplan for the development of the land. Please let me know if you wish to see a further copy.

We are now looking at the site afresh and will be presenting further ideas to Shropshire Council in due course. We will also be re-consulting Ludford Parish Council (in which the site lies) and Ludlow Town Council.

We are now submitting representations to the Council's 'Site Allocations and Management of Development Plan' (SAMDEV) document which has been published for pre-submission consultation. Currently the 'Foldgate' site is not identified as a residential allocation despite having all the appropriate credentials as a sustainable site for inclusion in the Plan for development. We believe it should be.

Strategic Policy

The Shropshire Core Strategy (2011) provides the policy background for the Ludlow area setting out the broad scale and distribution of development required in and around the market town of Ludlow. Core Strategy Policy 3 identifies Ludlow as a 'focus for growth' and paragraph 3.5 states that '*the market towns, including Ludlow, will have pre-eminent roles in containing Shropshire's growth, with housing which is focused on sustainable locations*'. This signals the importance of concentrating growth close to major market towns where there is a range of good quality facilities including transport links and where there is already a genuine sense of place and a range of employment and activities.

9 Colmore Row
Birmingham, B3 2BJ
T 0121 233 0902 turley.co.uk

Ludlow is the obvious location for new growth in southern Shropshire where one can build on the existing 'critical mass' of the town. The key issue is therefore to select new sites which are well related to the existing urban form and are sensitive to the historical and landscape characteristics of the town.

But the Shropshire Core Strategy was conceived, prepared, tested and adopted in the context of the then West Midlands Regional Spatial Strategy (which has since been revoked). This was prior to the publication of the National Planning Policy Framework (issued in March 2012) so the new Site Allocations Plan also needs to reflect the policy climate within the NPPF (and the more recent Planning Practice Guidance). We acknowledge that a PAS NPPF check was undertaken on the Plan after the publication of NPPF, but clearly a full 'objective assessment' of needs has not been undertaken.

The NPPF is clear that in order to be sound and legally compliant, Local Plans need to be positively prepared, fully justified, effective and consistent with national policy. They also need to be supported by up an up-to-date evidence base. In terms of housing in particular, Local Plans need to demonstrate that they are based on 'objectively assessed housing needs' and that there is a 5 year supply of housing land. Clearly the Shropshire Core Strategy housing requirements are now somewhat out of date and also recent appeal decisions tend to indicate that outside Shrewsbury, Shropshire currently lacks a 5 year housing land supply. Our representations highlight these shortcomings in the current policy position.

The Foldgate Site – sustainability characteristics

The SAMDEV Plan should be seeking the optimal strategic locations for development within Shropshire principally the market towns and the larger settlements and then the most sustainable sites within those settlements. The 'Foldgate' site offers the most logical and sustainable site within the Ludlow area.

Put simply:-

- The site is positioned within the eastern by-pass line which potentially therefore forms part of the urban structure of Ludlow. Those potential sites (including the suggested allocation at Rocks Green) which are outside the by-pass line are more remote, cut off from facilities and run the risk of setting a dangerous precedent in terms of their landscape impact, and lack of connectivity.
- The site is well-enclosed, with clear boundaries drawn by the railway line to the west, the A49 Ludlow by-pass to the east and the existing urban edge to the north and therefore it would not lead to the coalescence of Ludlow with other nearby settlements. It effectively rounds-off the urban extent of Ludlow without having an undue impact on either the local landscape or near neighbours, as a result of its low visibility from elsewhere and enclosed characteristics.
- The site is extremely well located with regard to services and facilities, with shops, pub, primary school and other services, including public transport (and the new park and ride) with a combined 15 minute bus service) being easily accessible. It is also well positioned in relation to local jobs within the nearby Eco Business park, industrial estate and to the town centre – which is within walking and cycling distance.
- The site has strong assets, including its attractive west facing views and outlook over the town which make it an ideal potential residential location. The south-west facing aspect is ideal in terms of sunlight, energy conservation and sustainability. This together with its ecological assets, such as mature hedgerows and the cluster of listed buildings and close proximity of the Steventon Conservation Area can enhance the new development without necessarily harming the historical and conservation assets, if handled sensitively.

- There are no critical constraints such as noise, archaeology, ecology, flood risk, air quality, access to utilities, traffic etc which could preclude development from coming forward on the site.
- The site offers a natural extension to the new development including a hotel, pub/restaurant, petrol filling station, care home and local services which lie at the junction of the A49 by pass to the north. The pattern of change has been established which leaves the Foldgate Lane land as an obvious next step for development, where the two complement each other.

The broad sustainability objectives (SO1 – SO18) within the Core Strategy provide a valuable backdrop for looking at Local Plan sustainability, but arguably they aren't sufficiently fine-grained to assist in the actual selection of individual sites.

Achievability and Deliverability

Not only is the Foldgate site highly suitable and sustainable, it is also both deliverable and achievable. The key to ensuring that a site will come forward and be delivered, if the site is allocated, is that it is free from constraints – whether legal, technical or ecological and that it is within the control of a developer who will be under an obligation to produce the best scheme for the site, to promote the land through the planning process in consultation with the local community and then use all reasonable endeavours to release the land for housing. There is also an established consultancy team already in place.

In this instance, the consultancy team have sufficient evidence for the site to show that it does not have any fundamental technical or physical constraints, it is accessible, any sensitivity in terms of landscape and historic character can be readily overcome through good design and the topographical features of the site can be used to full advantage. Richborough Estates are working with the landowners to bring forward the site through the current SAMDEV Plan and we are not aware of any other constraints which could hold back development on the land.

The Opportunity for Ludlow

The Foldgate site offers a genuine opportunity to expand Ludlow in a sustainable and sensitive way. The townscape character of the Ludlow urban core is unique and precious. This site offers the chance to bring some genuinely high quality development into the town which can assist in accommodating local people as well as attracting people who need and/or choose to live locally.

The features of the site, including the barrier of the railway line, will enable the site to be developed attractively without damaging its surroundings. The size of the site and its characteristics provide scope to create attractive new public spaces and landscaping on-site which will offer facilities for the new residents and the wider community with spectacular views across the town.

The **'Foldgate'** site will provide scope to deliver around 300 new homes for the community which will bring financial and economic benefits to the town and link with local jobs as well as providing a source of housing for people anxious to re-settle or retire in a new home.

We are in the process of reviewing the principles of development on the site to decide if they remain relevant before our Master planners, *Pegasus*, move forward to draw up a shape and a structure to the scheme in the form of a recommended Master Plan. This will require open consultation with interested parties and consultees including yourselves as officers.

Meanwhile we urge your Council to identify this site at '*Foldgate*' as a residential allocation for inclusion in the Submitted Local Plan (SAMDEV).

Yours sincerely



John Acres
Director

Turley

Land at Foldgate Lane, Ludlow
Site Location Plan

