



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 Taylor
Organisation (if applicable):	Les Stephan Planning Ltd
Address:	9, Sweetlake Business Village, Longden Road, Shrewsbury, SY3 9EW
Email:	stuart@lesstephanplanning.co.uk
Telephone:	01743 231040

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

Name:	Steve Pummell
Organisation (if applicable):	Morris Property
Address:	Welsh Bridge, Shrewsbury, SY3 8LH
Email:	stevepummell@morrisproperty.co.uk
Telephone:	01743 232005

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:

S5 Church Stretton

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

Support	Yes	<input type="checkbox"/>	No	<input checked="" 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 checked="" 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	x
Justified	x
Effective	x
Consistent with National Policy	x

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).

See separate document

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 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.

x

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 provide evidence to the examining inspector that the choice of sites for development in Church Stretton within the SAMDev has not followed the guidelines for plan making in para 182 of the NPPF and is therefore unsound.

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	x
When the Inspector's Report is published	x
When the SAMDev Plan is adopted	x

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.

COMMENTS ON SAMDev CONSULTATION

28.04.14

PRE-SUBMISSION DRAFT FINAL PLAN

CONSULTATION 17.03.14 – 28.04.14

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1.0 INTRODUCTION

- 1.1 Les Stephan Planning Ltd has submitted, under separate cover, an objection in relation to the SAMDev as a whole which refers to the four tests of soundness in para 182 of the NPPF. It uses the example of Church Stretton to indicate how the choice of sites has not been “objectively assessed”.

2.0 REASONS FOR THE OBJECTION

- 2.1 This lack of objective assessment has manifested itself in the decision making process in relation to the progress of the SAMDev towards pre-examination submission where decisions to include or exclude potential development sites in Church Stretton have been based on political or community pressure.
- 2.2 The allocation of the New House Farm/Cwms Lane land (CSTR027) for residential and employment development in Church Stretton in the SAMDev Revised Preferred Options July 2013 was objectively and correctly assessed in relation to its suitability and deliverability by professional Planning Officers.
- 2.3 In addition to this, as the overall proposals for CSTR027 provided the best opportunity for appropriate growth and economic development in the town, an additional area was included at the request of the professional officers to provide a specific employment site, again, entirely in accordance with the requirements of para 128 of the NPPF.
- 2.4 *“The overall package offers valuable social and community benefits, broadens the employment base of the town and supports the locally important visitor economy”.* (Revised Preferred Options July 2013, page 4).
- 2.5 However, despite this **positive** approach and **objective assessment** of the site it was removed from the final plan by the Shropshire Cabinet and Council Members following pressure from the Town Council and local residents.
- 2.6 There is no provision for this course of action in the NPPF, the Localism Act or the plan making section of the Planning and Compulsory Purchase Act 2004.

- 2.7 On the contrary, Shropshire Council should have advised communities such as Church Stretton to engage in the planning process via the production of a Neighbourhood Plan instead of, in this case, allowing a misguided and uninformed pressure group (Church Stretton Town Council) to influence the elected Members of the Council to remove a well-planned and deliverable site from the SAMDev at the last minute.
- 2.8 Looking at Church Stretton as a whole, and referring to the delivery rates of housing in the Revised Preferred Options, page 3, and the Pre Submission Draft, page 112, there is no justification for reducing the annual delivery of housing to 13 per year, particularly as there has been a consistent under delivery of housing in this, and other settlements.
- 2.9 This proposed significant reduction in annual delivery rates from 28.4 (2002 – 2012) down to 13 (2006 – 2026) is completely contrary to the requirements of the NPPF to “*deliver a wide choice of high quality homes*” (para 47), “*without delay*” (Ministerial Introduction page [i]) and “*to ensure choice and competition in the market for land*” (para 47).
- 2.10 This is particularly important where there has been a consistent under-delivery of housing as in Shropshire (SHMA, page 122) and there is little prospect in the foreseeable future of Shropshire achieving a 5-year supply of deliverable housing sites.
- 2.11 The removal of the New House Farm/Cwms Lane site from the SAMDev Pre Submission Draft undermines Shropshire Council’s objective of enabling up to 500 houses to be delivered in Church Stretton in the plan period up to 2026. This is exacerbated by the under allocation of development sites in the town leading to an unacceptably low proposed annual delivery rate of 13 dwellings per year.
- 2.12 Shropshire Council’s reliance on windfall development in Church Stretton in an attempt to make up this shortfall in housing delivery in the town does not take into account the fact that the majority of market dwellings built in Church Stretton since 2006 have occurred on residential garden sites of which there are very few left and are now precluded from development by paragraph 48 of the NPPF.
- 2.13 In addition to this, the 201 dwellings built or committed between 2006 and 2013 have consisted mainly of affordable dwellings approved on exception sites (Swains Meadow, Lawley Close, Cwms Lane). There have been no allocated market residential

development sites in Church Stretton since 1994 which has led to the current serious shortage of intermediate value housing which the Town Council has identified in the Place Plan.

3.0 [CONCLUSIONS](#)

3.1 In conclusion it is clear that ALL the sites CSTR027, CSTR018 and CSTR019 (the latter two subject to further evidence of deliverability) identified in the SAMDev pre submission draft and revised preferred options should be included in the final SAMDev plan to ensure that Shropshire Council:-

- Complies with its own the adopted Core Strategy in relation to the delivery of up to 500 houses in the plan period.
- Gets closer to achieving a 5 year supply of deliverable housing sites.
- Avoids the possibility of the SAMDev plan being returned by the examining Inspector due to housing land under allocation
- Addresses the serious shortfall in housing delivery identified in the SHMA.

4.0 [RECOMMENDATIONS](#)

4.1 The opportunity exists during this consultation period and prior to the final plan being submitted to the examining Inspector for Shropshire Council to address the concerns expressed above, revisit the SAMDev plan for Church Stretton, reinstate the CSTR027 site and allocate sufficient housing land for the town to comply with Core Strategy figures and the requirements for housing growth and economic development in the NPPF.