



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](http://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](http://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 - S6 [Cleobury Mortimer Area] - S6.1 & S6.1(1) - S6.2 (ii) - S6.2 (iii)

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*):

<b>Positively prepared</b>	<input checked="" type="checkbox"/>
<b>Justified</b>	<input checked="" type="checkbox"/>
<b>Effective</b>	<input checked="" type="checkbox"/>
<b>Consistent with National Policy</b>	<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 Cleobury Mortimer and its hinterland to meet the housing requirement of the 5 year period as defined in the NPPF - nor beyond that period.

It is submitted that Policy S6.1 confirms that Cleobury Mortimer needs 350 new homes.

It states "As a key centre, Cleobury Mortimer will continue to provide facilities and services for its rural hinterland. To support this role, around 350 additional dwellings and a minimum of 0.7 hectares of employment land will be delivered over the Plan period 2006-2026".

The figures provided by SC at S6.1 (a) demonstrate that it appears that the sites available can accommodate 12 & 7 houses which is shortfall of 331 houses and so it is submitted that the 5 years supply is not met and therefore the plan is unsound and not effective. 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 above submissions confirm that this is not being met in any manner or form.

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 that 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 at Farlow and Hopton which are clearly in the hinterland of Cleobury Mortimer should urgently and immediately be brought in to the Local Plan process; where the landowner is willing to consider allowing up to 50% of Affordable and Intermediate Housing into the development. The incorporation of one with the other makes it economical to develop and is in accordance with Case Law of 2001 at Lymm Lancashire. This will then immediately start to address the shortfall of all types of home in order to comply with the NPPF.

Our clients have approximately 0.4 hectares of developable land at Hopton and 1.18 hectares at Farlow *that is immediately available* and ought to accommodate 12 and 30 houses respectively [and adjoins or is close by to a main A road]. This assists the shortfall.

Hopton Site OS Ref: SO62425 77254.

Farlow Site OS Ref: SO63295 78904

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](mailto: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.