



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:	Tom Armfield
Organisation (if applicable):	Barton Willmore LLP
Address:	Regent House, Prince's Gate, 4 Homer Road, Solihull, B91 3QQ
Email:	<a href="mailto:tom.armfield@bartonwillmore.co.uk">tom.armfield@bartonwillmore.co.uk</a>
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):	Bovis Homes
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:

Policy MD1 Scale and Distribution of Development  
Policy S1.1 Albrighton Development Strategy

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

**Support**                      **Yes** ☐                      **No** ☐

**Object**                      **Yes** ☒                      **No** ☐

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**                      **Yes** ☐                      **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 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).

### **Policy MD1**

This Policy relates to the scale and distribution of development in Shropshire, setting out that sufficient land will be made available to deliver the development planned in the Core Strategy (as outlined in Policy CS1 of the adopted Core Strategy). The settlement hierarchy is set out in Policy CS1 of the Core Strategy, identifying that 25% of Shropshire's residential development will be focused on Shrewsbury given its role as a sub-regional centre and Shropshire's growth point, with 40% of housing directed to the Market Towns and other Key Centres, and 35% to the more sustainable Rural Areas. The settlement hierarchy reinforces the suitability of

Market Towns and other Key Centres to accommodate new housing.

Policy MD1 establishes that sustainable development will be supported in Market Towns and Key Centres, which includes Albrighton. Table MD1.1 (page 12 of the SAMDev Pre-Submission draft) illustrates the proportional split of the planned housing provision within Shropshire, allocating 40% to Market Towns and Key Centres, and 35% to the Rural Areas, in accordance with the settlement hierarchy described above.

There is concern that this approach potentially undermines the objective of prioritising sustainable development, should significant proposals be made in the Rural Areas. New development in the Rural Areas will not be as sustainable as development located in or on the edge of the Market Towns and Key Centres development boundaries, given access to facilities.

We therefore consider that the proportional split for housing provision in Shropshire should be altered to favour sites in and around Market Towns and Key Centres, such as Albrighton, rather than support less sustainable development in the Rural Areas.

### **Policy S1.1**

This policy sets out the Development Strategy for Albrighton. We object to the housing target of 'around 250' dwellings in Albrighton, which is to be delivered within the Plan Period of 2006-2026. The target is considered to be too low given the size of Albrighton and its sustainability, including access to a range of facilities. With the Core Strategy being adopted in February 2011, the length of time taken to prepare the SAMDev document means that the housing target against which it is proposing to plan is now out-of-date, having been agreed prior to the publication of the National Planning Policy Framework and now the Planning Policy Guidance.

We note the Planning Policy Team commented, in response to the Outline Planning Application for up to 58 dwellings at Highley (approved 12<sup>th</sup> March 2014 at Planning Committee), that in light of the Council's five year supply position, "limited 'weight' be given to the Council's Core Strategy/Local Plan policies concerning housing supply". The Officer's Committee Report states, at paragraph 6.1.5, that the five year supply assessment "shows that at 1<sup>st</sup> April 2013, there was a 4.95 year supply of housing land. The Council is now 10 months on from that calculation and the under delivery of housing in recent years is not being made up. The shortfall of housing delivery continues to increase every month meaning that the Core Strategy target for the provision of new homes (an annual target of 1,390 homes, equating to 116 homes built per month) is not being met". This shortfall is also recognised in the draft Shropshire Strategic Housing Market Assessment (SHMA) 2014 Update document, which identifies at page 122, that the cumulative shortfall will "continue to grow until housing delivery exceeds 1,390 dwellings per annum". Indeed, the SHMA Update notes that the shortfall is likely to increase until around 2017 if the number of homes built in Shropshire matches with the projected figures contained in the SHMA Update. The housing trajectory contained within the SHMA Update at page 122 identifies that the current shortfall is in excess of 1,800 dwellings. The SHMA Update therefore concludes that "a substantial and sustained increase in housing delivery is required to meet the Shropshire's housing requirements".

The adopted Shropshire Core Strategy sets out a housing target of up to 3,025 – 3,575 dwellings for the Eastern sub-area (Policy CS1 of the Core Strategy), which includes the settlement of Albrighton. It is our view that the target of 'around 250' dwellings for Albrighton is out-of-date, but also does not reflect the suitability of the centre to accommodate additional housing provision. We consider that the SAMDev

document should, as a minimum, aim to meet the aspirations of the Core Strategy and to achieve this there is a need to increase the amount of residential development planned for the Eastern sub-area through the identification of additional sites.

Two sites have been proposed for allocation within Albrighton to accommodate the 250 dwelling requirement. The site proposed for allocation on land east of Shaw Lane (SAMDev reference ALB002) for up to 180 dwellings includes a parcel of land which was previously subject to an Outline Planning Application (reference: 08/0907). The application was approved on 8<sup>th</sup> December 2011 and comprised the southern section of site ALB002, which immediately abuts Kingswood Road to the north. Access to the development was proposed off Kingswood Road. It is considered that this site is not deliverable given the length of time that has elapsed since the application received Planning Permission.

We therefore object to the inclusion of site ALB002 in the SAMDev document on the basis that it clearly undeliverable.

Given the Council's housing requirement is out of date, the low housing number proposed to be allocated in Albrighton and that we do not consider the site ALB002 is deliverable, it is considered that an assessment should be carried out of alternative sites, which should include a Green Belt Review, as support by the Framework. This assessment would inform the site selection process for the SAMDev document. With no Green Belt Review undertaken, it is considered that the SAMDev document is not justified or in accordance with the Framework, in particular paragraph 47.

Given the above, it is our view that the SAMDev document has not been positively prepared, nor is it justified or consistent with the NPPF.

**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)

### **MD1**

Policy MD1 should be revised to apportion additional housing to the Market Towns and Key Centres, such as Albrighton, and accommodate less growth in the Rural Areas to ensure the proposed strategy for distributing housing directs new development to the more sustainable locations, ensuring that development is directed to the most sustainable locations. Furthermore, by prioritising the allocation and development of sites in and on the edge of Market Towns and Key Centres, a sufficient housing land supply could be made available in order for the Council to proactively plan for the future growth of the Market Towns and Key Centres within Shropshire. We suggest that a split of 60% to Market Towns and Key Centres, and 15% to the Rural Areas would better reflect the aspirations of the Core Strategy and sustainability principles.

### **S1.1**

It is considered that in order for the SAMDev document to be considered as being

justified and positively prepared, and consistent with national planning policy, it must look to meet not only the housing requirement set out in the Core Strategy, but also the under delivered housing, identified within the housing trajectory contained in the Council's SHMA document. The SAMDev document should therefore look to go beyond the provision of housing proposed in the Pre-Submission draft. To do otherwise, would run contrary to the advice in the Framework.

Notwithstanding the need to increase the distribution of housing provision to suitable Market Towns and Key Centres, site ALB002, which is proposed to accommodate up to 180 homes of Albrighton's 250 dwelling requirement, is not considered deliverable; especially given the time that has elapsed since permission was granted for the land comprising the southern section of the site ALB002. As such site ALB002 should not be included in the SAMDev document, and instead sufficient land, as a minimum, should be included to meet the resulting shortfall of 180 dwellings.

To accommodate this shortfall of housing in Albrighton, it is proposed that the site to the west of Rectory Road (identified as ALB008 in the Draft Strategic Housing Land Availability Assessment (SHLAA) Update March 2014), previously promoted by MTC Planning and Design, is included in the SAMDev document for allocation and the development boundary for Albrighton is changed accordingly.

As identified in previous representations, the site is well located to the centre, being within walking distance of the existing day to day facilities. It is also well related to the existing settlement at Albrighton, and higher order services nearby. The site is located to the south of the railway line, which provides a defensible boundary, containing the site. Indeed, the draft SHLAA Update identifies that the site has long term potential for residential development (copy attached for ease of reference).

The site is in the ownership of a single owner and is subject to an Option Agreement with a national house builder, therefore the site is deliverable. As such, the site could contribute now, to the provision of housing in this sustainable Key Centre, ensuring as a minimum, that sufficient land is provided to meet Albrighton's housing requirement of 250 homes, in accordance with the guidance in paragraph 47 of 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:

The site to the west of Rectory Road should be included as a site allocation with the SAMDev document to meet the shortfall of housing in Albrighton given Site ALB002 is not deliverable, as well as to meet the identified under-delivery of housing across Shropshire.

**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](mailto:Planning.policy@shropshire.gov.uk)

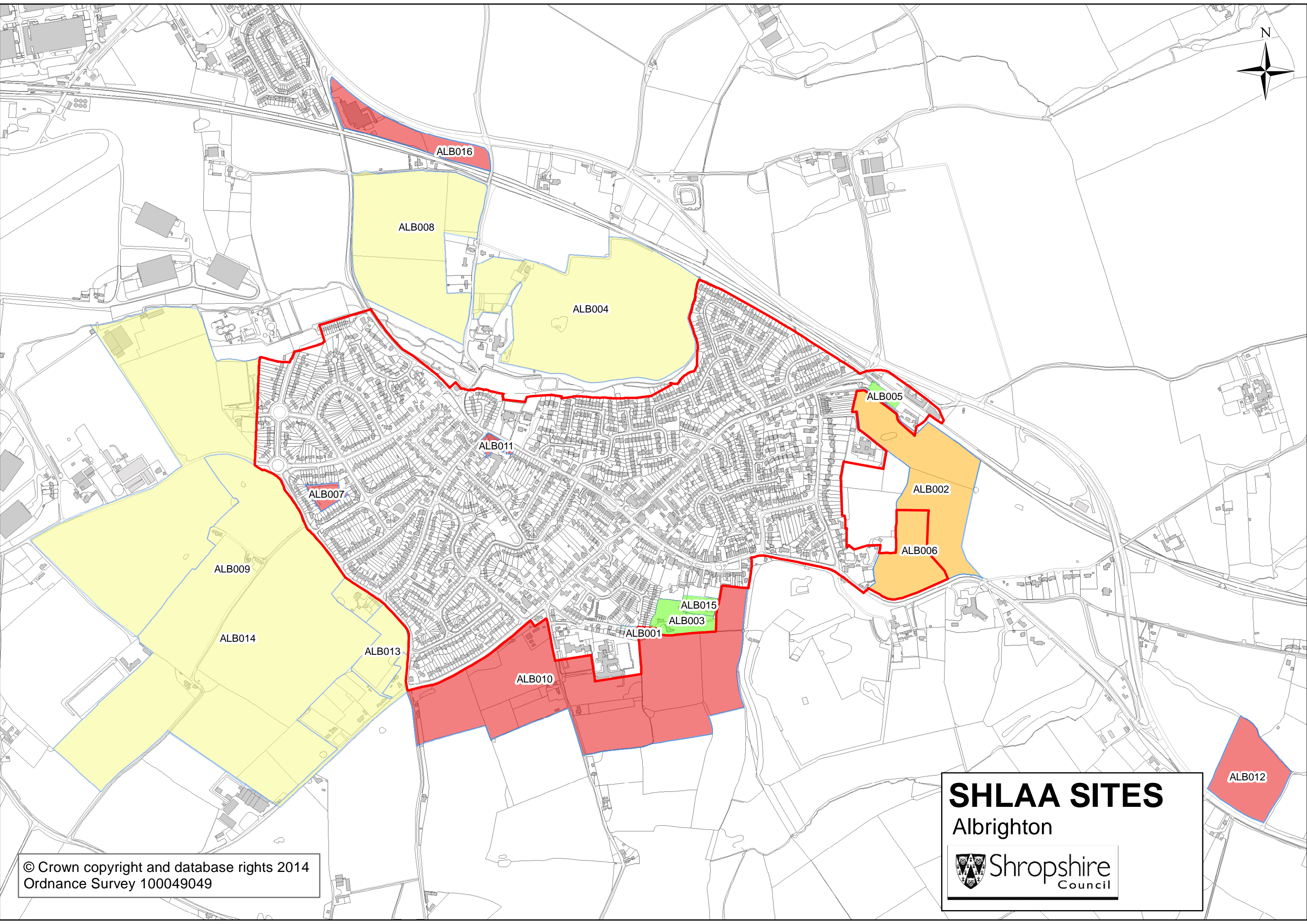
**Or return it to:** Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

**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.





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# SHLAA SITES

Albrighton

Shropshire  
Council