

SOUTHERN PLANNING COMMITTEE		
SCHEDULE OF ADDITIONAL LETTERS		
Date: 25 TH NOVEMBER 2025		
NOTE: This schedule reports only additional letters received before 5pm on the day before committee. Any items received on the day of Committee will be reported verbally to the meeting		
Item No.	Application No.	Originator:
1	25/02795/FUL	Agent
Agent's representation in black: "Representations in response to Officer's Committee Report. 1) The Officer refers to the proposal as a cross subsidy scheme and has indicated that the description has been changed, the application is for "Erection of 5No. open market and 5No. affordable bungalows, garages and a new access road" and was validated as such by SC on the 6th August 2025. No agreement given by the applicant to change the description and the proposal should be considered as submitted and validated. LPA response: The change in description was made at the request of the Chair of the Southern Planning Committee and the Interim Planning and Development Services Manager at the agenda setting meeting held on 25th September 2025. The agent was advised of this change in description on 30th September 2025 when they agreed to an extension of time to allow the application's determination by committee. The scheme is not considered to be cross-subsidy for the reasons outlined in the report. Some of the bungalows are proposed are two storey houses, hence the revised description to more accurately reflect the nature of the proposal. 2) With regards to the locational sustainability and the site being within the settlement of Cruckton, SC South Planning Committee's minutes in relation to the approval of application 23/04167/FULL, an earlier scheme for 6 "affordable" and 4 open market dwellings confirmed and stated "Members agreed that the development fell within the settlement of Cruckton and that the harm caused by the open market housing was outweighed by the provision of the affordable housing". (from minutes of meeting). LPA response: 23/04167/FUL was a different scheme considered on its own merits by the then members of the Southern Planning Committee, contrary to officer advice. The application currently under consideration by the members of the Southern Planning Committee must likewise be determined on its own merits. The Hierarchy of Settlements document of the Local Plan evidence base (a material consideration that was not considered under 23/04167/FUL) does not consider Cruckton to be a settlement that is sustainable, or capable of accommodating additional residential development, regardless. 3) The previous approved scheme 23/04167/FULL included 6 affordable dwellings for sale to qualifying purchasers in accordance with SC eligibility criteria at a 20% of market value in perpetuity, these dwellings have been built, sold and are now occupied as affordable housing and will remain so in perpetuity. LPA response: Application 23/04167/FUL is not under consideration as part of the current application.		

Members voted to approve that scheme contrary to the case officer's recommendation to refused it, where the Council's affordable housing consultee had responded, on 27th October 2023 as follows:

"The guidance which supports CS5 and CS11 is outlined in the Type and Affordability of Housing Supplementary Planning Document (SPD). Chapter 5 of the SPD title 'Affordable homes for local people: exception sites' stipulates at paragraph 5.1 'Exception sites are in locations that would not normally obtain planning permission for new housing development. The exception is made because it is development of affordable housing for local people '

The SPD at Appendix G references the Types of affordable dwellings, one such type is referenced at paragraph (8) as Cross Subsidised Affordable Housing for Rent on Exception Sites. The commentary states that 'One of the big challenges facing rural affordable housing, is how to bring forward local needs rented homes on exception sites with either no or limited public subsidy. The guidance criteria: -

'That a proportion (no more than 50%) of the housing on the exception site to be form of low cost home ownership sufficient value to the developer to allow them to 'cross subsidise' and develop on that same site, a proportion (no less than 50%) of local needs rented housing or other such affordable tenure as the Housing Enabling & Development Officer agrees in writing'.

The proposal in this instance seeks to provide 4 full open market dwellings and 6 discounted sale dwellings. The cross-subsidy mechanism supports affordable rented tenure and not discounted sale tenure as currently proposed. Additionally, the cross-subsidy mechanism does not allow full market value properties.

The guidance also supports 'That the properties for rental on the exception site will normally be owned and managed by a Registered Provider and be intended to meet local housing needs. They will be subject to occupancy restrictions and will be let in accordance with the Council's Housing Allocations Policy and Scheme using our preferred Choice Based Lettings system.' The proposed affordable housing (6 discounted sale dwellings) does not comprise the required 'rented' tenure. There would also be an expectation that a scheme would be tenure blind i.e. inability to differentiate between the tenures, which is clearly not the case in this instance.

A further requirement is 'that the sale value of the properties required to generate the necessary cross subsidy must not exceed 90% of their Open Market Value as determined by an average of no less than two written 'off plan' valuations'. There is no evidence to suggest that this is a cross-subsidy scheme.

Exception sites can be supported where there is evidence of local housing need. The application site falls within the Parish of Pontesbury whereby, Mount Close and an exception site comprising 18 houses is under construction with a view to complete and release of homes next year. This provision will satisfy an element of evidenced house need, which weighs heavily towards the need for rented tenure. There is a need for affordable homes, but these need to be in appropriate locations and not on isolated sites such as proposed in this instance.

This fails to meet spatial policy requirements in the first instance, given its isolation and lack of relationship with a settlement. There is no evidence to support this proposal as a subsidised exception site scheme. There would be an expectation that the affordable dwellings being subsidised would be 'affordable' rented and not discounted sale as proposal in this instance. This scheme is not supported."

- 4) The tenure proposed (20% discounted in perpetuity) is complicit with the NPPF designation of “affordable housing”, whilst there is commentary in the report regarding SC Affordable Housing policies which carry only limited weight as they are out of date due to SC not being able to demonstrate a 5 year land supply which triggers Paragraph 11 of the NPPF and they are not compliant with the current NPPF.

LPA response:

The NPPF at Paragraph 11d is clear that the provision of affordable housing must be weighed in the tilted balance when determining planning applications, with less weight applied to SC policies due to them being out of date as a result of the lack of a five year housing land supply. The proposal would not provide affordable housing, and instead proposed discounted market sale dwellings that would not be affordable to the majority of the occupants of the parish of Pontesbury.

The LPAs policy's are not 'non-compliant' with the NPPF. The remain in place and are instead out of date. Affordable housing therefore remains a key consideration of the submission. The LPA considers that the application does not provide dwellings that meet the criteria required for them to be considered affordable. Even if the dwellings were affordable, the submission does not demonstrate how the proposal is a cross-subsidy scheme, given it is a market sale scheme in an unsustainable location. It is therefore considered that the proposal does not include any genuinely affordable dwellings that would meet identified local needs or incomes.

Additionally, the application fails to refer to the full definition of Discounted Market Sale from the National Planning Policy Framework glossary which states as a requirement that they are marketed at 'at least 20% below local market value'. Not '20% discounted'.

- 5) The previous approved scheme 23/04167/FULL was considered sustainable by SC highways consultee and the location is justified, the Parish Council consider the site to have good connectivity whilst rural in nature.

Future occupiers of the development would be required to traverse ROWs across fields or walk for almost half a kilometre along an unlit 60pmh road with no streetlighting in order to catch a bus. There are no pedestrian footways serving either this site or the adjacent development that was approved under 23/04167/FUL. Sustainability relates to the right dwellings in the right places. The application currently under consideration is not considered to do either of these things.

Furthermore, the Parish Council recently found an application along the same stretch of road to be 'unsustainable', therefore implying that this short stretch of the B4386, between the Cruckton / Ford crossroads to the west and the A5 bypass to the east is both sustainable and unsustainable at the same time, which is contrary.

- 6) We set out below a small section of our consultants response to the highways consultees' comments which we note does not appear in the Officer's report. "Having also noted the Parish Council comments they have recognised the rural setting and have advised how the site fits into the relevant policies of NPPF and Shropshire Council Local Plan. The Parish Council further comment on how the additional development will make an important contribution to the area with

additional benefit to local facilities such as public house and shops. There is a relatively short 20-minute walk from the site along a footpath/quiet lane which gives access to more extensive bus services in Cruckmeole/Hanwood. On balance, therefore the development is considered to meet the criteria of sustainability” “In summary, therefore facilities are available for residents to arrange for buses to stop at the development and there will be greater importance for a larger overall development than from just a few dwellings. Pedestrian facilities and short walks are available as identified by the Parish Council to give access to Cruckmeole/Hanwood where further buses are available. The nature of the development will provide and meet identified need within the Local Plan and will ultimately provide support to local businesses, shops and public houses, where rural locations without further development stagnate and any local shops tend to close due to lack of footfall. This then inevitably results in a greater number of car journeys. The access arrangements are consistent with guidance and this phase of development will join an existing approved and constructed access”.

LPA response:

An officers report would not typically reproduce sections of consultants reports which can be viewed on Public Access. Shropshire Highways Authority nonetheless provided the following full response to the highways comments above as follows (also visible on Public Access):

“The highway authority carried out a desktop review of the location as no supporting documentation had been provided by the applicant. The position of the highway authority is made as follows:

Para 110 of the NPPF states that 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making'

- It is for the decision maker to determine if the scale of development proposed is significant.
- The proposal does not maximise or make any intent to maximise sustainable transport solutions in this location.
- There are no viable footway routes to local facilities that could support future pedestrian trips from the site.
- There is no evidence to suggest that the B4386 is suitably laid out to support cycling as a genuine travel choice for all future residents - taking Figure 4.1 from LTN 1/20 on cycle infrastructure.
- The additional comments have recognised an existing bus service but have taken no opportunity to ensure that future residents find this service to be accessible and a genuine choice.
- Despite the comments added that Shropshire is a rural county and that manual streets design principles are primarily aimed at urban areas, there is nothing that states that the outcome of rurality should be an absence of choice with a reliance

on on the private car.

- I am mindful, in the absence of any other consultee responses to adjust my position that all education needs would require escort by car or that each and every future young person would require school travel arrangements to be accommodated.
- A lack of genuine choice is an issue in this location and additional development will generate a disproportionately high level of car trips compared to any location where genuine choice exists.
- If there is a scale of development, based on car reliance that is acceptable in a location such as this, then it must be viewed as being permitted with that awareness. Without a position on sustainability being made there would be no reason to consider the limited scale of development that could be supported in transport terms in a location such as this.
- Having reviewed the additional comments, there is nothing to dissuade me from the recommendation that the site lacks genuine choice and does not meet the requirements of Para 110 of the NPPF.
- Looking to the planning statement and the house types I can see that the affordable three bedroom bungalows and the market housing three bedroom bungalows are provided with different levels of parking. On what basis? Car ownership isn't any more or less necessary in this location due to individual circumstances. We can establish that affordable premises are less likely to be car owners or multiple car owners. This reinforces the concern that those affordable families reliance on school transport will be even greater due circumstance.
- Policy CS6 of the core strategy states 'Requiring proposals likely to generate significant levels of traffic to be located in accessible locations where opportunities for walking, cycling and use of public transport can be maximised and the need for car based travel to be reduced'
- In this location the significance is of a development proposal that lacks safe and suitable facilities for trips by any mode other than the private car.
- It is difficult to establish where exactly a pedestrian should stand on the B4386 to wave down a bus or compel it stop when passing the other way.
- The site is unsafe and unsuitable for onward travel by any mode other than the private car as a genuine choice to support essential living needs.
- The technical matters relating to access, internal arrangement including streets and parking would be private areas that would not be supported for adoption by the local authority.
- The highway authority has a responsibility to the safe and suitable opportunity to access facilities by all modes regardless of whether a location is rural or urban. This site only seeks to rely on vehicle movements to and from it and that is not considered to be sustainable in transport terms.

7) The scheme has evolved with discussions with the Parish Council and has been designed to accommodate the need for Bungalows and Dormer Bungalows, the

reference to a study can be used as a bedroom is incorrect any forthcoming approval will list the plans which specifically designate the study as a study. The comment regarding the potential for the single garages to be used as accommodation is not a consideration but should officers be concerned a condition can be imposed that the garages are used for that purpose only.

LPA response:

It is disingenuous to label a large upstairs room with a window that is of a sufficient size to accommodate a double bed solely as a study and expect to be used solely for that purpose. Furthermore, there is no condition that could be imposed to compel future occupiers to use these rooms solely as studies. It is reasonable to expect that future occupiers would use them primarily as bedrooms with office furniture for study use being a likely secondary consideration. Merely labelling these rooms as 'studies' does not make them so in practice.

It remains the LPA's opinion that the plans as presented depict a variety of single and two storey dwellings with rooms that can be used as bedrooms and where Nationally Described Space Standards would not be met. There are no 'dormer bungalows' or one and a half storey dwellings proposed in the submission, where a dormer bungalow (also known as a chalet bungalow or a one-and-a-half-storey home), is a type of dwelling that features living spaces on the ground floor along with additional living space in the eaves. Rather, two storey dwellings featuring dormer windows have been presented instead.

- 8) The officer's comments regarding the garage sizes is misleading as SC do not have any policy requirements for internal measurements and the garages as proposed are adequate for the parking of vehicles as intended.

LPA response:

The LPA guidance for garage sizes is provided in the SC document entitled 'Local Highway Authority Standing Advice for Minor Planning Applications September 2023 which also refers to Manual for Streets. Paragraph 4.7.3 of this documents states the following for parking spaces surrounded by walls or solid features: "Figure 5 below shows minimum internal dimensions required where parking spaces are surrounded by or are adjacent to walls or other such solid features" where Figure 5 gives the internal dimensions as 3.3m wide for one vehicle and 5.8m wide for two vehicles, with 6m depth for both. It also notes that dimensions will need to be increased if the parking spaces(s) are required for disabled persons.

The Council's draft 'Design of New Dwellings' SPD currently under consultation (and therefore afforded limited weight in the determination of the development) requires at paragraph 8.48 that:

"f. Single garages should have minimum internal dimensions of 3,000mm width by 7,000mm length to allow easy access to the vehicle and sufficient storage for a bicycle to the rear.

g. Double garages should have minimum internal dimensions of 5,500mm width by 7,000mm length to allow easy access to the vehicles and sufficient storage for a bicycle to the rear.

This references <https://shropshire.gov.uk/media/21393/tn9-car-parking-guide-june-2021.pdf>

The garages are therefore not of an adequate size internally.

- 9) Due to SC not having an up to date Local Plan we set out below relevant NPPF paragraphs which support the scheme now before you:-

“(a) Mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (Para 71). Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly ... Planning Authorities should ‘support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes’ (Para 73).

(b) Paragraph 83 advised that ‘to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby”

LPA response:

These paragraphs are noted but do not override consideration of the policies most relevant for determining the sustainability of proposals, as required by the tilted balance under Paragraph 11d and noted in the committee report. The location of the development site, in the open countryside, where occupiers would be entirely reliant on vehicle use is not sustainable, and Cruckton has been screened out in the Hierarchy of Settlements document as being an appropriate location for new residential development.

Other sustainable local villages such as Hanwood and Ford are more appropriate locations for affordable dwellings, and a recent planning submission has been made for a wholly affordable development of 102 affordable dwellings in Ford (25/04301/FUL), around 4 km from the site, and in Hanwood (25/03550/FUL - where 8 of the 44 dwellings proposed would be required to be affordable) around 3.8km from the site, both in recognisably sustainable locations.

10) The provision of bungalows goes towards satisfying the needs of the community and for reference NHBC has reported that in 2024 only 1% of new build registrations were bungalows compared to 11% in 1994, the scheme before you is 100% bungalows.”

LPA response:

The scheme is not 100% bungalows. Only 50% of the proposed development is for bungalows. The type of dwellings proposed is only one consideration amongst many in the determination of the application, and where bungalows are proposed it would not be unreasonable to anticipate that the occupiers of them might be less mobile and/or older. The location of the development in such an inaccessible and unsustainable location, not within reasonable walking distance of services, would hinder any such occupier’s ability to get around, especially if they were not a car owner or driver, and this would contribute to potential isolation as a consequence.

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