



Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan

Main Modifications consultation

1 June 2015 – 13 July 2015

For Shropshire
Council use

Respondent
no:

Main Modifications Consultation Form

The SAMDev Plan Schedule of Main Modifications includes a series of changes to the published SAMDev Plan. These suggested changes are being consulted on for a period of six weeks. For advice on how to respond to the consultation, and how to fill in this form please see the guidance notes on the Council's SAMDev Plan website at: <http://shropshire.gov.uk/planning-policy/samdev-examination/main-modifications-consultation/>.

Submitting comments:

Please fill in this form and return:

- Via email to: Programme.Officer@shropshire.gov.uk
- By posting to: Daphne Woof - Programme Officer
c/o Planning Policy Team
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND
- Comments must be received by 5pm on 13 July 2015. **Comments received after this time will not be accepted and will not be considered by the Inspector.**
- Please fill a separate for each Main Modification you are commenting on.
- Please clearly identify which Main Modification your comments refer to using the reference (i.e. MM1, MM2 etc) in the SAMDev Plan Schedule of Main modifications.
- Please do not repeat your previous comments as these have already been considered by the Planning Inspector. **Comments will only be considered that refer to a change as shown in the SAMDev Plan Schedule of Main Modifications.**

Shropshire Council SAMDev Plan Main Modifications Response Form

- All comments received on the proposed changes within the time period will be considered by the Planning Inspector as part of the examination of the SAMDev Plan. The Inspector may wish to contact you to discuss your comments and concerns, prior to concluding the formal examination into the Plan.
- The personal information will only be used for purposes related to the consultation and the SAMDev Plan examination. 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. However other information will be shared with the Planning Inspector.
- The information relating to your comments on the Main Modification (Part B) will be published on the Shropshire Council SAMDev Plan examination webpage.

A) Your details:

1) Who is making this representation?

| | |
|-------------------------------|---------------|
| Name: | Clive Roberts |
| Organisation (if applicable): | Kembertons |
| Address: | |
| Email: | |
| Telephone: | |

Client's details (only applicable if you are acting as agent on behalf of another person or business)

| | |
|-------------------------------|---|
| Name: | Mr A Ratcliffe, Mr R Young, Mrs W Crabb, Mr R Bailey, Mr M Thompson, Mr R Beddoes, Galliers Homes Ltd |
| Organisation (if applicable): | |
| Address: | |

| | |
|------------|--|
| | |
| Email: | |
| Telephone: | |

B) Your representations: What do you wish to object to/support?

Please use a separate form for each Main Modification you wish to comment on. Only comments relating to a proposed Main Modification will be considered.

1) Please give the Main Modification reference your comment relates to.

| |
|------------------------------------|
| Main Modification reference - MM15 |
|------------------------------------|

2) Do you consider the proposed Main Modification addresses the following issues in relation to the policies concerned?

| | Yes | No |
|---------------------------------|-------------------------------------|-------------------------------------|
| Legally compliant | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Positively prepared | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Justified | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Effective | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Consistent with national policy | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3) If you have answered 'no' to any of the above please specify your reason for objecting below. You should make clear why the Main Modification is either not legally compliant and/or unsound having regard to whether the modification is not: positively prepared; justified; effective; or, not consistent with national policy. Please see guidance notes for explanation of these terms:

It appears that the proposed Main Modification to Policy MD3 – Delivery of Housing, is intended to provide flexibility and to ensure that windfall development, which is a major component of housing supply in the County, is not hindered by the notion that development might only take place on sites allocated for development in the SAMDev. It is suggested, however, that the proposed modification needs further clarity. The modification will not be effective in achieving their purpose if there is scope for misunderstanding or misinterpretation.

“Other sustainable housing development” appears to be taken by the Council as meaning only “other development within development boundaries.” This statement needs to echo the wording of policy MD3 Delivering Housing and policy MD3 – Settlement Housing Guidelines, (Main Modifications MM14) both of which might need further modification, such that the importance of windfall development is clear and acceptable.

“Countryside” is regarded as everything outside of town or village development boundaries. Policy MD7a lists a very restricted number of types of housing development that will be permissible in “countryside.” These are not likely to add significantly to the windfall figure. **CONTINUED ON SEPARATE SHEET**

Continue on a separate sheet if necessary

- 4) Please set out what change(s) you consider necessary to make the SAMDev Main Modification legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

To be effective Policies need to be clear and not open to misinterpretation. Whilst the Main Modifications MM14 and MM15, as they stand, appear to be aimed at supporting further sustainable development, it is clear that the Council does not regard them in that fashion.

It is suggested that the policies/paragraphs referred to could be revised to make it clear that development boundaries and settlement housing guidelines are just that – guidelines – but that they do not exclude non-specialised development in the countryside, outside development boundaries, where sustainable development is concerned.

It is suggested that consideration could be given to

- i) including the words “whether within or outside development boundaries” after the words “..... sustainable housing development.....” in the proposed modification to MD3 Delivering housing.
- ii) Including the word “proposed” before the word “....development...” in the second line of MM14 (2) Settlement Housing Guidelines, and the words “either within or outside development boundaries” after the word.....”guideline....” in the fourth line of MM14 (s) Settlement Housing Guideline.
- iii) In MM15 making it clear in the proposed modification that
 - a) “windfall development” does not just mean specialised housing (ie exceptions sites or sites for agricultural workers, but includes market housing as well,
 - b) “...within settlements...” means within the development boundaries of settlements and
 - c) “....in the countryside....” includes all land that lies outside development boundaries.

Policy MD7a also continues the idea that only specialised housing is to be permitted in “countryside” and that policy should also be considered with a view to building in the flexibility that is now suggested.

THIS COMMENT IS REPRODUCED IN RELATION TO MM14 AS THE TWO ISSUES ARE VERY MUCH CONNECTED.

Continue on a separate sheet if necessary.

Please note you should cover all the information, evidence and supporting information necessary to justify the representation and the suggested change. After this stage, further submissions will only be accepted at the request of the Inspector.

You must return this form by 5pm on Monday 13 July 2015.

You can e-mail it to:

Programme.officer@shropshire.gov.uk

Or return by post to: Daphne Woof - Programme Officer, c/o Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

The Programme Officer will acknowledge receipt of comments submitted by e-mail.