

Hand delivered 23rd April 2014



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

25 APR 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:	DAVID KILBY
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

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

Name:	
Organisation (if applicable):	
Address:	
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:

All the plan - but specifically that relating to:-
(sussue) (Shrewsbury Place Plan) Bickton area

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 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	
Justified	
Effective	
Consistent with National Policy	<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).

See separate sheets (10 attached).

17. - planning should be genuinely plan-led empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive future vision for the future of the area. Plans should be up-to-date and be based on joint working and co-operation to address larger than local issues.

* This is not the case within this plan. *

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)

In accordance with Paragraph 213 of NPPF:
This plan needs to be revised to take into account all the policies outlined in the representation script pertaining to localism and neighbourhood plans.
This should be progressed as quickly as possible by preparing a new plan where necessary and through a partial review where sound evidence of localism occurring is provided.

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:

To provide a local perspective from the grass roots. -
- to demonstrate collaborative working - at all levels.

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

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.

SAMDev representation – David Kilby – Resident of Shropshire – Honeysuckle Cottage Calcott Lane, Bickton, Shrewsbury - 01743-850943 davidkilby@tiscali.co.uk

Objection

I strongly object to the soundness of the SAMDev Plan on the grounds that those elements of the plan involving Shrewsbury and Bickton area and specifically the Shrewsbury West Sustainable Urban Extension are not **consistent with national policy** – my understanding is that the plan should enable the delivery of sustainable development in accordance with the policies in the framework which clearly states:

17. Planning should be genuinely plan-led, **empowering local people** to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, **and be based on joint working and co-operation to address larger than local issues.** – **‘this has not been the case’.**

69. The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. **Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see.** To support this, local planning authorities should aim to **involve all sections** of the community in the development of Local Plans and in planning decisions, and **should facilitate neighbourhood planning.** – **‘there is no evidence that shows this has been done’**

It is my view that the soundness of the SAMDev should be questioned as it **fails** to provide any tangible evidence to demonstrate either of these two requirements as stated in the National planning policy framework, have been applied to what is happening in the Shrewsbury and Bickton areas of Shropshire.

It is also my view that Shropshire Council has demonstrated a lack of desire to embrace localism and has failed to **facilitate** the implementation of neighbourhood plans into our communities. A factor that I believe has been compounded in those cases, (the SWSUE being one of those instances), where Shropshire Council themselves have a 50% interest as landowners in the project, and are seemingly unable to separate their role as landowner and local planning authority.

It is notable that the piece of land in question (the SWSUE) relates to the Oxon Link Road’ which is intended as the first leg of Shropshire Council’s ‘aspiration’ for a North West Relief Road which currently sits outside the current SAMDev policy document.

*Pg192;5.164 of the SAMDev says: In relation to highways and transport, the provision of the Shrewsbury North West Relief Road remains a **Council ambition**, although it is recognised that there is little prospect of the delivery of the road in the immediate future and so **it is not shown** on the Policies Map.*

Given this, is only a ‘Shropshire councils aspiration’ whoever that may represent, it begs the question why should opportunities for the whole communities aspirations be of secondary importance to those views of a few elite politicians and officers representing the so called Shropshire Council aspirations? – **How can this approach be considered in line with the localism act and the NPPF?**

An argument that could be put forward as a reason why this approach has been chosen is that in Shropshire Council’s role as landowner and speculative developer, their position is best served by the old ‘plan led’ approach pre-localism to planning and that the introduction of localism and neighbourhood plans is being perceived as posing a real threat and risk to Shropshire Councils own landowner aspirations for an Oxon Link Road and North West Relief Road. – **This view point**

obviously conflicts with their main role as local planning authority and facilitator of the NPPF and the neighbourhood plans it details should be done.

Hence a possible reason I put forward why Shropshire Council and Shrewsbury Town Council may have been so reluctant to facilitate Neighbourhood Plans in the Shrewsbury and Bickton Parish area in recent months.

SAMDev Plan Claims

In its opening rhetoric the SAMDev plan says;

1.7. Added value comes particularly at the local level; the draft policies fully support the development and importance of Community Led Plans.

It goes on.....

2.3 The SAMDev element of the Local Plan therefore has a vital role in delivering community led aspirations for sustainable development and in particular providing the opportunity for new development to contribute to locally identified infrastructure needs.

2.6 The Localism Act 2011 emphasised the importance of community led planning, in the form of Neighbourhood Plans, Parish and Town Plans and Village Design Statements. A significant number of Shropshire's communities have either recently completed or are in the process of preparing a community led plan for their area. The draft policies in this document acknowledge the key role played by such plans by cross referring to, and where appropriate requiring proposals to take account of the local requirements set out in these plans.

Despite saying all the right things, it should be noted that no Neighbourhood plans are currently being carried out in Shrewsbury and there is no intention to do one in the future.

A ward plan is near completion for the Monkmoor/Abbey area, this was one of the government's wave 4 pilot neighbourhood plan initiatives, but was for some unstated reason downgraded to a ward plan, as were 3 of the other 4 attempted around the County, the one in Oswestry being labelled a town plan – only the one at Much Wenlock surviving as a neighbourhood plan.

A point worthy of note and one that needs to be remedied immediately is Shropshire Councils decision to mix the use of terms, relating to the term 'community led plan' which has caused a great deal of confusion between local residents, this dual use of the term by Shropshire Council has been mis-leading to many.

Place plans

Throughout reading the SAMDev plan it becomes abundantly clear that rather than facilitate neighbourhood plans, Shropshire Council have continued to implement what they were doing prior to the localism act in the name of 'place plans', a concept that runs throughout the plan script.

Described in 2.7 which says.....

2.7 'Shropshire Council's Place Plans summarise the infrastructure and investment requirements needed to deliver the community vision and aspirations for the Market Towns/Key Centres and Community Hubs and

Clusters in a Place Plan area'. The 18 Place Plans play a key role in realising, through the planning of new development, the infrastructure aspirations of local communities. The priorities and resources identified in the Place Plans will be used as material considerations in decision making alongside the SAMDev Development Management policies to assist the provision of new development helping to deliver the necessary infrastructure for places to become more sustainable and resilient. The SAMDev policies recognise the critical role of the Place Plans and where appropriate cross refer or draw attention to refer to infrastructure requirements identified through these Plans.

It were as if Shropshire Council has decided to ignore the use of neighbourhood plans and instead hold up Place Plans as the acceptable alternative, taking the word consultation to be the acceptable alternative to collaborative working. This in my opinion is not acceptable

Collaborative working through neighbourhood plans is what should have happened

What actually happened was the imposition of place plans followed by consultation – they are totally different concepts that result in very different outcomes.

Arrogance springs to mind when considering this 'place plan' driven approach being facilitated by Shropshire Council, displaying a total disregard for the rights and aspirations of local communities as required in the National Planning Policy Framework and through the localism act.

It is clear that from the resistance the residents of West Shrewsbury have experienced towards their request for their right for localism to be a part of the planning process, that in reality this has little chance of happening if this report is adopted as being sound.

National planning policy Framework

The National Planning Policy Framework says:

'Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives. This should be a collective enterprise'.

'It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities'.



The National Planning Policy Framework (NPPF) was published in March 2012 and sets the national policy context for local plan policies and proposals.

The Shrewsbury section of SAMDev provides no evidence to support the plans claims that it has embraced localism, with regards preparation towards the Shrewsbury Place Plan including the Shrewsbury West Sustainable Urban Extension which by the Councils own admission is a 'Council led plan' delivering 'Shropshire Council aspirations' not a community led plan delivering local community aspirations.

Indeed there is considerable available evidence to show that where proactive attempts have been made by residents from the West Side of Shrewsbury and Parish of Bickton to introduce localism through neighbourhood

plans these attempts have met with considerable resistance from Shropshire Council members, officers and Shrewsbury Town Council members and officers.

A recent headline in the local newspaper 'Shropshire Star' reported that:

Proposed idea to map out town's growth is turned down (8TH April 2014 Shropshire Star)

Councillors have rejected the idea of conducting a neighbourhood plan to help guide future developments in Shrewsbury over fears it could cost in the region of £250,000

The article continues reporting members to have said..... 'Members of the town council's finance and general purposes committee said conducting a neighbourhood plan for the whole of Shrewsbury would be difficult, costly and ineffective'.

Councillor Alan Moseley, leader of Shrewsbury Town Council said; 'It is a massive task that will inevitably take up large amounts of officer time and is expensive and I also question the usefulness of neighbourhood plans'.

Councillor Miles Kenny, leader of the Liberal Democrat group said Government policy on the importance of neighbourhood plans may change by the time a Shrewsbury-wide one was completed'.

Councillor Peter Nutting leader of the Conservative group said; 'he was also unwilling to support the idea over fears it would cost in the region of £250,000 including £100,000 to carry out the referendum part of the process'.

All three town councillors are also long serving members on Shropshire Council.

Reports like this are just the tip of the iceberg but reflect well the resistance and negative attitudes the residents of West Shrewsbury and Bicton have been subjected to in their bid for a neighbourhood plan.

I am very willing to provide more detailed examples of the perceived resistance I have experienced first-hand and been aware of during the period July 2013 – May 2014 inclusive and which is still on-going, if the Inspector chooses to listen to this evidence.

Types of perceived resistance I have felt in my bid to bring localism to Shropshire include:

Deliberately slowing up the process, ignoring correspondence, failing to carry out basic admin requirements:

Sending mixed and misleading messages to communities:

Undermining and bullying proactive members of the communities:

Spreading fear and misunderstanding amongst local communities:

Exerting pressure on stakeholder groups, holding private behind closed door meetings to discuss proposed neighbourhood plans, telephone calls, actively pressurising parish councils not to support neighbourhood plans.



Consultation v Collaboration

The Shrewsbury Place Plan demonstrates plenty of examples of selective consultations being carried out throughout the SAMDev process, but provides very little evidence of any engagement or collaborative planning going on at the pre-design stages between local residents, developers and local planning authorities as required by the National planning policy Framework.

Paragraph 16 and 17 says:

16. The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:

> develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;

17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

> be genuinely plan-led, **empowering local people** to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, **and be based on joint working and co-operation to address larger than local issues.**

- Planning should not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- take account of the needs of the residential and business communities;

In Shropshire Council's proposed SAMDEV consultation document it says:

3.3 Community consultation and the idea of 'localism' has been a key part of the SAMDev Plan's preparation. The Council's approach to community engagement has far exceeded the level required by national regulations and has allowed the Council to better reflect local community visions and priorities.

3.5 As well as the specific periods of consultation and representation shown in table 3.1 the Council has been keen to maintain meaningful and continuous engagement with local communities and developers throughout the plan preparation period.

4.2 The Issues and Options document was extensive, covering the whole Shropshire unitary Council area. A single document was prepared for Shrewsbury which encompassed all the town's LJC areas.

The public consultation was carried out between April and June 2010 for a period of 12 weeks.

- Letters were mailed to everyone on the LDF Consultee Database, which at this stage represented around 4000 organisations and individuals.
- Copies of relevant documents were sent to all Parish and Town Councils
- Copies of all documents held at each main Council Office and Libraries in the County;

4.9 Shropshire Council holds an extensive consultee database which includes the full list of Specific, General and Other Consultation bodies totalling around 4,000 individuals and organisations. A significant number of the non-statutory consultees held on the 4,000 database had been included as a result of commenting on previous planning policy consultations.

4.10 In line with the Council's SCI and Localism agenda, the involvement of Parish and Town Council's from this early stage was particularly important.



Evidence

In my opinion these words do not reflect accurately what has been happening on the ground in our local communities which is clearly wrong and misleading to the reader who may not know better, the word accountability springs to mind, who is responsible for the approach that has been adopted?

To support this statement I point to:

- i) A petition presented to Shropshire Council in September 2013, signed by **over 1,000 local residents**; it registered the dissatisfaction of those people living near to the SWSUE area, and the disappointment that they were not aware of the scheme until July 2013 when it made the front page of the local newspaper.
- ii) The selection of an urban extension site is not a voting process, but **if better consultation had taken place**, then officers would have had to reflect on the views of those 1,000+ local residents that signed a petition in September 2013. If they had been engaged during the Issues and Options stage in 2009, then matters may have been raised that would have prevented the current SWSUE being progressed, and **alternative proposals could have been suggested**. Alternatively, there may have been support for the scheme if the community had been engaged and consulted effectively at an early stage and worked collaboratively with the developers, landowners, and the Councils to bring forward a SUE that meets the aspirations of the local community as well as Shropshire Council as recommended in the NPPF.
- iii) During the public consultation period for the application (14/00246/OUT) the following comments were submitted by Bicton Parish Council (BPC) on the 17th February 2014 as part of the site is within their parish:

"Bicton Parish Council (BPC) was not made aware of the SWSUE development until it was already in the Core Strategy. When BPC then objected to the whole idea of a SWSUE it was told that it is in the Core Strategy and therefore it is too late to object. BPC was further told that it would be consulted as to the details of the development; which it has been to the extent of being involved in the decisions about Calcott Lane and Shepherd's Lane and whether they should be connected to the Oxon Link Road or made in to cul-de-sacs.

It has been made plain to BPC that this development WILL go ahead because of (1) the Core Strategy, (2) NPPF, (3) the desire of the landowners to sell, (4) Shropshire Council has made promises to the developer and if these are not met there will be penalties, (5) the Oxon relief road will eventually facilitate the building of the North West Relief Road.

*Given the above BPC **feels bullied** in to not objecting to this application."*

- iii) Locality: The Supporting Communities and Neighbourhoods in Planning Programme administrator's helps local groups develop neighbourhood plans. The government has created a £10.5m fund, plus a programme of support to help communities produce neighbourhood plans that 'locality' are currently administering.

On enquiring from them the current number of Neighbourhood areas applying for a grant to help with the costs of implementing a neighbourhood plan they said that 442 grant applications had already been approved from 426 groups amounting to £2,489,178.50 being awarded.

They also provided a breakdown of all 426 groups that had applied which clearly showed they had not received a single application from the Shropshire area.

- iv) *In the Bicton Parish Minutes taken in February 2011 a presentation given by Dave Wallace explained to members policy CS2, Shrewsbury West, Sustainable Urban Extension. (The SWSUE is already part of the core strategy, it is a separate thing to hubs and clusters **and will go ahead anyway.**) This will be centred on Bicton Heath and Churncote Island. It is envisaged that there will be 700 houses, 10 hectares of industrial land, a care village, the park and ride will be moved further out, an Oxon Link Road (the first bit of the North West Relief Road) will be built, but only from developer contributions. All this could benefit Bicton by increasing the yield of the precept.*

These words 'will go ahead anyway' are strong persuasive words that have been applied to this development proposal on several public occasions since, clearly demonstrating a lack of intention to apply the localism act to this initiative as has proved so to-date.

- v) It is difficult to point to further evidence regards Shropshire Council 'embracing and facilitating' localism quite simply because there is no evidence in Shrewsbury area and very little across Shropshire as a whole, other than the Much Wenlock Plan, the rest where they have occurred are non-statutory attempts at town plans like the one done at Oswestry which started with the intention of being a neighbourhood plan but was down-graded with very little benefit to the community for doing so.



Consultation not localism

Even the extensive attempts made at consultation seem somewhat flawed:

The SAMDev consultation document submitted says:

4.17 Almost 4,000 responses were received to the SAMDev Issues and Options consultation from local residents, parish and town councils, businesses and other organisations.

4.19 The localism agenda meant that this 'bottom up' approach to plan making was given significant weight in emerging plan making, alongside the need to ensure the plan delivered the strategic growth target and broad distribution of development identified in the Core Strategy. The Preferred Options document was extensive, covering the whole Shropshire unitary Council area. This stage introduced 'Place Plan' areas as a means of consultation.

5.4 A key purpose of this stage was to consult on preferred site allocations for future residential and employment development. These 'preferred' options had been selected through a technical site assessment process and as a result of consultation responses at the Issues and Option stage.

The document then informs us that those invited to the consultation process included all those that were on the LDF Consultation Database which was made up of all those 'who have expressed a past interest in planning policy issues previously'.

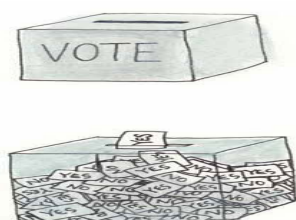
Hardly an inclusive criteria for inviting local people to a consultation event, as those fortunate enough to receive written notification of the event was heavily weighted to include predominantly landowners, property developers, town and parish councils, agents, but **not** local residents.

This was shown very clearly in APPENDIX D: PREFERRED OPTIONS 2012 CONSULTATION: of the Consultation document submitted as part of this SAMDev process which said;

Pg141 Question 4: Do you agree with the extent and broad arrangement of land uses proposed for Shrewsbury West Sustainable Urban Extension (sites SHREW002, 035, 083, and 128/ELR64, 67, and 68)?

Of the 125 respondents who answered this question 66% agreed with the target and 34% disagreed, with the remainder not indicating their overall view (6).

Respondents that disagreed with the proposal commented that the development was too large for the area, that



On closer scrutiny of those that attended the consultation event hosted at the Guildhall by the Shrewsbury Town Council, it was clear to see from the list of attendees that none stated they were just local residents, instead the list of attendees read like a who's who of local Shropshire developers, agents and landowners hardly representative of the bottom up approach claimed in the report. The list was as follows;

SAMDEV Preferred Options 2012 held at the Guildhall – list of responders on the day that stated their organisation others attended but did not indicate who they were representing.

	Name	Organisation		Name	Organisation
1	R Booth	Leith Planning Ltd	36	B Morris	Greek Orthodox Church
2	S. Briggs	Smiths Gore	37	A Morris	Halls, on behalf of
3	A Chalkley	Bayston Hill Parish Council	38	J Murphy	RPS Planning on behalf of Crest
4	J Clayton	C Roberts, on behalf of	39	S Nicholls	Leith Planning Ltd, on behalf of Perrybank properties
5	M Davies	Environment Agency	40	F Oldaker	Shrewsbury Friends of the Earth
6	C Davis	Belvidere Medical Practice	41	J Owen	Savills, on behalf of SCAT
7	S Dolben	Valuation office agency	42	D Parker	David Parker Planning Associates
8	K Douglas	Uffington Parish Council	43	A Peters	Les Stephan
9	M Ellis	Shire Valley Ltd	44	A Pullen Jones	MOD
10	R Freeman	Great Ness Parish Council	45	C Plant	Eco Tech Ecological Consultancy
11	P Fenwick	Berry Bros	46	L. Roberts	Halls
12	G Fergus	FCC Environment	47	C Roberts	On behalf of Galliers Homes Ltd
13	R Groome	Albepury with Cardeston Parish	48	C Roberts	On behalf of Morris Property
14	S Hackett	Conover Parish Council	49	C Roberts	On behalf of Shropshire Land and Property
15	M Haffenden	Nuffield Health	50	C Roberts	On behalf of Kembertons
16	K Harvey	Highways Agency	51	S Roberts	Halls on behalf of
17	C Higgins	Ford Parish Council	52	M Robson	Cerda Planning Ltd
18	J Hitchcock	Bayston Hill Action Group	53	A Ross	Broadway Malyan
19	W Hodges	Ramblers Association	54	M Sackett	RPS, on behalf of Mosaic Estates
20	D Holdstock	AMEC on behalf of National Grid	55	M Sackett	RPS Planning and Development
21	J Hollyman	Harris Lamb Ltd	56	K Sanderson	Clerk – Pontesbury Parish Council
22	S Horton	Bomere Heath District Parish	57	A Smith	English Heritage
23	A Howls	Baschurch Parish Council	58	M Seedhouse	Berry Bros
24	I Hutchinson	Montford Parish Council	59	A Snook	Persimmon Homes North West
25	J Jagger	Haston Reynolds Chartered Surveyors	60	D Stentiford	Pegasus behalf Doncasters

26	G Jones	Tyler Parkes	61	L Stephan	Les Stephan Planning Ltd
27	Mr Jones	N Blackie, FBC Manby Bowdler LLP, on behalf of	62	P Stephan	Les Stephan Planning Ltd
28	S Jones	Halls	63	C Sussums	Carter Jonas LLP
29	Mrs Kenny	UMACC	64	K Swanson	Balfours
30	J Kenyon	Shropshire Council	65	J Tait	Planning prospects
31	S Locke	Berrys	66	S Taylor	On behalf of Les Stephan
32	R Lomas	Escape Urbanists	67	B Williams	Persimmion Homes North West
33	R Mager	Shropshire Wild life Trust	68	J Williams	Harris Lamb property
34	A Mcteer	Mcteer Associates, on behalf of Morris Homes	69	K Williams	BNP Paribas Real Estates
35	A Morgan	West Mercia Police	70	N Williams	Berrys

It is not hard to see why 66% agreed when asked about the extent and broad arrangement of land uses proposed for Shrewsbury West Sustainable Urban Extension, as many of those asked actually stood to benefit directly from the proposal, (highlighted in yellow) most notable RPS, Balfours and Shropshire Council themselves, whilst many others on the list would profit indirectly. Clearly the views of local communities were not being heard on a proportional basis at this stage of the SAMDev process despite the report giving the impression they had been.

Conclusion

The National Planning Policy Framework provides ample rhetoric throughout to demonstrate the importance it attaches towards localism, the dialogue is well presented, easy to understand and simplistic in its message and approach yet Shropshire Council along with its partners Shrewsbury Town Council for whatever reason have chosen not to implement what the framework has asked them to do:

They provide no evidence other than with Much Wenlock (referendum held 24/3/14) towards facilitating neighbourhood plans across the whole of Shropshire, preferring to opt for the down - graded non-statutory town or as they misleadingly call them 'community led plans'.

When asked to facilitate localism by local communities, there appears to be no appetite from the local planning authority to do so, thereby denying local people the opportunity to play their part in the planning system process as required.

Shropshire Council preferring it would seem as clearly evidenced in the SWSUE Masterplan to work collaboratively with landowners and developers rather than extending this collaborative working to include local communities.

Thereby ignoring the NPPF which clearly says;

155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect **a collective** vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

What to be done?

The National Planning Policy Framework is clear about the right course of action that should be taken, It clearly says:

213. Plans may, therefore, need to be revised to take into account the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan.

It would seem very clear in my opinion that paragraph 213 of the National Planning Policy Framework needs to be applied to the SAMDev – by ‘preparing a brand new plan’ where localism has not been applied!

Representation submitted by: David Kilby – local resident of Shropshire, Honeysuckle Cottage, Calcott Lane, Bickton, Shrewsbury 01743-850943 - davidkilby@tiscali.co.uk

Footnote: Included below are additional paragraphs relevant to localism and neighbourhood plans as outlined in the national planning policy framework – that need to be applied to the new Shropshire Council Local plans.

58. Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.

Planning policies and decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and are visually attractive as a result of good architecture and appropriate landscaping.

183. Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:

- set planning policies through neighbourhood plans to determine decisions on planning applications; and

184. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community.

The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders **should not promote less development** than set out in the Local Plan or undermine its strategic policies.

185. Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.

188. Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

209. The National Planning Policy Framework aims to strengthen local decision making and reinforce the importance of up-to-date plans.

Remember: Failing to plan in accordance with the national planning policy framework is in subsequence planning to fail
Submitted by hand at the Shirehall Shrewsbury: 23RD April 2014