

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

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 <a href="https://www.shropshire.gov.uk/samdev">www.shropshire.gov.uk/samdev</a>.

Your details: Who is making this representation?

Name: Selby	Martin
Organisation (if applicable):	Campaign to Protect Rural England
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

# <u>Please note, you must use a separate form for each representation you wish to make.</u>

(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 – Scale and Distribution of Development						
Is your representation in s	upport or objec	ction? (please tick as appropriate)				
Support Yes Object Yes	No 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 Sound	Yes	No X				

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	No
Justified	
Effective	
Consistent with National Policy	No

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).

The proposals in the Shropshire St rategic Land Av ailability Assessment (SHLAA) were drawn up without regard to "policy cons traints", which wou ld have included policies protecting areas of landscape or wildlife sensitivity. Shropshire Council planners will have taken these constraints into account when selecting sites for SAMDev allocations. Owing to the failure to demonstrate a 5-year land supply, a number of speculative applications on sensitives ites not included in SAMDev have come forward and been approved on the bas is of the provisions in NPPF paragraph 49, overriding Core Strategy policies. Local communities have not been encouraged, nor publicity given to NPPF paragraphs 73 to 77 whereby communities can apply

to designate Local Green Spac es in their neighbourhood. Unless Local Green Spaces are established, areas of green land important to local communities will continue to be eroded, particularly if there is a shortfall in the 5-year housing land provision. The maps accompanying SAMDev do not show play ing fields, nor other areas of amenity importance previously included in district plans. In the case of Shrewsbury they take no account of surveys commissioned to asses s the landscape value of areas in and round the town. SAMDev p olicies MD8 and MD12 provide for protection but how can this be done if such areas are not identified?

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)

- 1. The introduction to the SAMDev Pre-Submission Draft (final plan) should include a reference to the importance of green infrastructure and promote the designation of Local Green Spaces in accordance with NPPF.
- 2. It should be stated that in considering planning applications the council will take account of recreational, leisure and wildlife designations in the former district plans in conjunction with relevant policies of the Core Strategy (e.g. CS17).
- 3. When SAMDev maps come up for revision, they should include playing fields and other environmental designations for the guidance of developers and the public.
- 4. SAMDev should link up with Place Plans which include green corridors, recreational facilities and allotments.

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.	Yes	No, I wish to pursue my representations through this written representation.	
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If you wish to attend the examination, please explain why you think this is necessary in the box below:

I would wish to convince the inspector of the need for SAMDev to pay heed to policy constraints in order to protect the environment.

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 examinati	on
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

**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.