



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 www.shropshire.gov.uk/samdev.

Your details: Who is making this representation?

Name:	Paul Field-Williams
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:

SAMDev Schedule S17.1a: Housing Sites – Land at Tilley (WEM012)

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 checked="" 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	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input checked="" type="checkbox"/>
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).

I would like to **object** to the proposal to build or develop, in any way, on the land to the south of Sun Grove, Roden Grove and Brook Drive, registered as the SAMDev plan **Site WEM012** in Wem.

This location is not suitable for development. There have been numerous attempts by the land owner to apply for planning permission to build in this field over a number of years and permission has always been denied. The site has been reviewed as part of the Local Plan but was considered unsuitable for development because of the flooding/infrastructure issues and also the desire to maintain the distinction between Wem and the village of Tilley. The circumstances have not changed and therefore original reasoning and decisions should be sustained. Why is this parcel of land now considered suitable?

My understanding of the principles behind SAMDev is to meet Shropshire Council's

Core Strategy expectations by building affordable housing to assist in the growth and regeneration of local hubs, communities and market towns. The proposals to build at Site WEM012 will do nothing to achieve this but will have an unwelcome and unnecessarily detrimental impact on the surrounding properties in that area.

The site in question, for many years, has been prone to flooding. The River Roden runs less than 200m from the site and according to the Environment Agency (EA) web site the area is currently at risk of flooding from the river. The EA also state that the land adjacent to the proposed site is prone to flooding from surface water as the water table is high.

Surface water on the field, especially during the winter months, sits on the ground until it dissipates or it runs off into the adjacent properties. On a number of occasions over the years, and especially more recently with high levels of rain fall, residents have had their gardens flooded with 6 to 12 inches of water which has remained for many days after. (Photo evidence is available). On a number of occasions Shropshire Council has had to provide sand bags to help protect properties adjacent to the field along Sun Grove. Any additional properties constructed in the fields opposite could only make matters worse and force the surface water towards the existing properties.

The existing drainage infrastructure in the adjacent estate roads are almost 50 years old. They do not cope with the current levels of surface and foul water drainage and on numerous occasions Severn Trent have had to come to the area to assist the outflow and also repair the deteriorating system when water and other drainage contents began 'backing up' into the road.

A development on Site WEM012 will bring extra foul and surface water that would have to connect to the existing, inadequate system. This can only increase the existing problems and have a significant, detrimental affect on the local properties.

The original SAMdev consultation document stated about the area that: '*There are critical infrastructure capacity issues concerning wastewater treatment and access capacity constraints.*' A recent report regarding the working capability of Wem Town Sewage Works included the following statement:

'while the system is coping with the catchments and areas to the east of the railway line there are known internal flooding problems to the south of the river Roden.

Site WEM012 was discussed in detail at a 'special' Wem Town Council meeting on 12th July 2012 and requests to reject the site were supported by a number of Shropshire and Wem Town Councillors. A 376 signature petition objecting to the development was presented and at the meeting the Town Council agreed that the site should not be built upon and dropped from the SAMDev proposal. I have included some excerpts from the minutes of the meeting:

Resolved:- that Shropshire Council be advised that this Council would not support a housing development on land off Roden Grove because of the flooding issues.

Resolved:- that Shropshire Council be advised that this Council has strong concerns about the capacity of the infrastructure and road system to cope with the proposed number of dwellings and that this Council does not support the housing development on land off Roden Grove.

The original SAMDev application was to build 32 houses on the site. I note that the current proposal is now to build 10. I do not believe that this is a true and honest aspiration of the land owner and I believe that this is a 'veiled' attempt to introduce a 'softer' option that would attract less interest from locals and subsequent objections and, if pursued, I believe would create a new precedence for future desires to increase the development size and build even more buildings. Such development would have a significant and severe affect on the surrounding area and would be difficult to control.

The site is landlocked on three sides by the river, the railway and the recently planted wood at Tiley. The only available access to the site is via the estate road serving Roden Grove.

Any proposed development will increase traffic volume, speed and noise pollution to the area. This will introduce a greater number of car journeys along a road that was designed using 1960's design standards to accommodate far less volumes of traffic.

The governments planning guidance PPG13 sets out a requirement for new developments to promote sustainable transport links such as the provision of cycle lanes. The road widths along Roden Grove could not accommodate such facilities and therefore any new development would generally be accessed by car. This goes against local and national policies for developing areas with green transport links to access them. Roden Grove could not sustain the extra traffic nor accommodate improvements to provide alternative 'greener' facilities.

Further traffic will also bring road safety problems to the area and will impact on the living conditions of the young and elderly families that already live there. This problem would increase considerably if the site is expanded in the future. Greater traffic volumes will also create an extra burden on the busy Roden Grove junction with Mill Street. This will give rise to further queuing, congestion and road safety issues at this junction especially at the busy pedestrian desire line along Mill Street.

Any new drainage and utilities system for the 10 properties would have to be connected to the town's existing systems via Roden Grove, Sun Grove and Brook Drive. They could not by-pass the existing, ageing and already over burdened system. I refer again to the SAMDev document statement '*There are critical infrastructure capacity issues concerning wastewater treatment and access capacity constraints.*'

This clearly demonstrates that Shropshire and Wem Town Councils already have concerns about the capacity for drainage in this part of the town. Any additional affect on capacity will only bring greater and expensive maintenance problems to area. It will also create long term and significant financial burdens to the local authority that will have to provide on-going financial commitments that can only be drawn upon from the dwindling local authority budgets and resources in the future. This is not sustainable.

It is clear that developing on Site WEM012 is totally impractical and would create many un-manageable problems and costly maintenance burdens for Shropshire Council for many years to come. There are numerous, more suitable, practical and realistic sites available elsewhere in the town that could be developed with minimal

impact to Wem businesses, residents and local services. This development cannot be allowed to go ahead and I urge Shropshire Council to remove the proposed site from the SAMDev proposal and prevent any future attempts to introduce any other form of development on or near this field.

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)

The principal SAMDev site for the Wem development, Site WEM003, proposes 100 properties to the north west of the town. If this is considered the most suitable location for such a significant number of dwellings and therefore a more suitable location for the town's future growth plans and, if it is the council's desire is to build a total 110 new dwellings, why not introduce all 110 properties at site WEM003 and not pursue the 10 properties at WEM012?

Strategically, compared to 100 new properties, a nominal 10 properties to south of the town would not have an impact on the towns future growth and core strategy. Why create such a sizable disruption to the detriment of the existing infrastructure and local residents for the sake of 10 houses?

Why go to the expense and disruption of introducing new and additional services at two separate sites? Why create such a burden on the existing drainage, gas and electricity supplies on the area to the south of the town for the sake of 10 houses?

The cost and disruption of providing the additional services would not be proportional to the number of houses built. The cost and disruption would be the same for each site. This is not practical and not an effective use of public funds.

Why reduce the capacity of an already over-burdened system and create significant and un-sustainable maintenance problems for the future for the sake of 10 dwellings?

If 110 new dwellings are required then the SAMDev proposals should be changed to introduce the full 110 properties allocation at Site WEM003 and remove the proposal for any development at Site WEM012.

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:

I can supply photographic evidence of flooding and drainage issues.

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.