



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](http://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](http://www.shropshire.gov.uk/samdev).

#### **Your details: Who is making this representation?**

Name: Cliv	e Roberts
Organisation (if applicable):	Kembertons
Address:	71 Court Street, Madeley, Telford, Shropshire TF7 5EP
Email: kembertons@aol.com	
Telephone:	01952 585020

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

Name:	Mr R Young
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:

17.2 Wem Hubs and Clusters

Is your representation in support or objection? (please tick as appropriate)

<b>Support</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Object</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

<b>Legally compliant</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Sound</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<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*):

<b>Positively prepared</b>	<b>YES</b>
<b>Justified YES</b>	
<b>Effective YES</b>	
<b>Consistent with National Policy</b>	<b>YES</b>

**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 principles expressed in Policy MD1, that is, that the rural area should become more sustainable and that development should take place in Community Hubs and Clusters, are supported.

However, it is considered that the policy,

1. Has not been prepared positively, in that the policy does not appear to have been wholly based on a strategy to meet objectively assessed development and infrastructure requirements.
2. The strategy for allocating housing sites and numbers may not be the most appropriate,

3. The strategy may not be effective and deliver an appropriate amount of development over the plan period.
4. May not be consistent with National Policy as it may not deliver sustainable development in certain instances, and may not ease the passage for planning applications and decisions.

The expressed intention of the SAMDev document is said in para 1.2 to “set out further detailed policies for the management of new development across Shropshire to compliment the policies already adopted in the Core Strategy and provide a greater level of detail on a number of planning issues.”

The additional detail that is provided in this policy and its subsequent explanation is to name those settlements that will be regarded as Community Hubs or Community Clusters. The remainder of the policy appears to do little more than refer to the Core Strategy.

Of particular concern is,

1. The manner in which
  - a) housing land in the rural area of the County is allocated, and
  - b) future planning permissions in the rural area will be considered for approval,
2. Giving Parish Councils total control over the amount of land to be allocated for development or the number of dwellings to be permitted is likely to,
  - a) lead to a situation where the rural area does NOT become more sustainable, as required by the Core Strategy,
  - b) mean the overall target for housing in the rural area of 10,000 houses in the plan period is unlikely to be achieved,
  - c) mean the target for affordable housing in the County expressed in the Core Strategy is unlikely to be achieved,

To explain:

- A. The distribution of housing in the rural area, both in terms of allocated sites and the number of dwellings that might be permitted, has followed the expressed aspirations of Parish Councils. In some cases the expressed aspiration has been that no development should be permitted.

This had lead to a situation where

- a) some settlements that have no local facilities or bus service (including in association with others in a Cluster) have been indicated as being permitted various numbers of dwellings. This will be likely to make the

rural area LESS sustainable, and

- b) some settlements that have good levels of local facilities and bus services have chosen either have accept NO development or a very low level of development. This does not make good use of existing resources and will lead to the rural area becoming LESS sustainable. An example of this is Weston Rhyn, Rhoswiel, Wern and Chirk Bank, which together have a good level of services and facilities but are only being proposed for a very low level of new housing development.
- B. Policy MD1 does not explain how the distribution of dwellings proposed will accord with the targets for the spatial zones identified in the Core Strategy.
- C. Policy MD1 does not explain the manner in which the distribution of housing proposed in the Community Hubs and Community Clusters will meet the desired infrastructure targets expressed in the various Place Plans.

**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. It is considered that Policy MD1 should explain the manner in which the proposed levels and distribution of housing expressed to be desired in the settlements identified in the list of Community Hubs and Clusters will,
  - a) Make the rural area more sustainable,
  - b) Deliver the housing target for the rural area,
  - c) Deliver the target for the provision of affordable housing,
  - d) Deliver the targets expressed in the Core Strategy for the various spatial zones,
  - e) Deliver the necessary infrastructure provisions expressed in the Place Plans.
2. If these matters cannot be satisfactorily justified then further sites, and/or numbers should be added to the distribution currently proposed, with particular emphasis on ensuring that already-sustainable settlements accept appropriate levels of housing.

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.

If you wish to attend the examination, please explain why you think this is necessary in the box below:

**It is necessary to explain the differences between the settlements that are, and will continue to be, sustainable settlements and which are to be permitted further development, and those which are currently and/or have the potential to be sustainable settlements but which are not to be permitted any, or only a limited amount of, further development.**

**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	YES
When the Inspector's Report is published	YES
When the SAMDev Plan is adopted	YES

**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

[Planning.policy@shropshire.gov.uk](mailto: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.



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Name:	Mr R Young
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## Your Representations

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(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:

MD2 Sustainable Design

Is your representation in support or objection? (please tick as appropriate)

<b>Support</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Object</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<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:

<b>Legally compliant</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Sound</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<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*):

<b>Positively prepared</b>	<b>YES</b>
<b>Justified YES</b>	
<b>Effective YES</b>	
<b>Consistent with National Policy</b>	<b>YES</b>

**In the box below please specify your reason for supporting or objecting.**

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The essential policy of supporting sustainable development expressed in Policy MD2 is, of course, accepted.

However, Policy MD2 appears to set the foundation for applicants seeking planning permission to have to demonstrate the manner in which each proposal will meet the various aspects set out in MD2.

Consideration needs to be given to the amount of information that is to be required when submitting a planning application. They are already very expensive undertakings, and the cost of an application is prohibitive for some small developers or landowners. The need to demonstrate that each proposal is sustainable without any indication in the Policy on exactly what information will be required by the Council to prove the issue, will not help bring land forward for development.

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The policy should make clear whether this is a requirement over and above a design and access statement and what should happen in the event that a design and access statement is not required for a particular development. If it is over and above the differences should be explained. What should happen in the event of there being no locally expressed design aspirations, should also be explained.

The Policy should be simplified by removing sentences that simply indicate that compliance with a Core Strategy Policy is necessary.

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**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.

If you wish to attend the examination, please explain why you think this is necessary in the box below:

**The issues that are objected to need to be explored with a wide range of other interested parties having a wide range of opinions both in terms of the problems themselves and the possible solutions.**

**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	YES
When the Inspector's Report is published	YES
When the SAMDev Plan is adopted	YES



**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

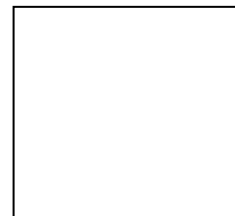
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S14.2(xi) Weston Rhyn Hubs and Clusters

Is your representation in support or objection? (please tick as appropriate)

<b>Support</b>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
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The concept of identifying Community Hubs and Clusters is supported.

The identification of Weston Rhyn as a settlement that operates as a Community Cluster with Rhoswiol, Wern and Chirk Bank is also supported.

However, Weston Rhyn, by itself, is a sustainable settlement with a primary school shop and regular bus service. With its neighbours there is a population getting towards 3,000 people. The number of dwellings that are considered to be acceptable for the Cluster is just 78 dwellings. This figure is an expressed wish of the Parish Council but it is not the result of any sort of systematic or objective assessment of the capacity of the villages in the Cluster to accept further development.

It is considered that Weston Rhyn has capacity to cater for considerably more properties than the 25 allocated in the drafts SAMDev DPD. This would make better and more efficient use of existing service, and would make the settlement and the locality more sustainable.

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Weston Rhyn should be objectively assessed with a view to accepting a greater level of housing provision. This will make the rural area more sustainable.

In particular the proposed site to the north of the village off High Street should be allocated for development thus ensuring a choice of location and housing types for potential occupiers and reducing the risk that no development will take place within the plan period. It will make the rural area more sustainable.

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