



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: 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:	
Organisation (if applicable):	Galliers Homes
Address:	Old Bank Chambers, Bellstone, Shrewsbury, Shropshire
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:

MD1

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

Support	Yes	☒	No	☐
Object	Yes	☐	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	Yes	☐	No	☒
Sound	Yes	☒	No	☐

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	YES
Justified	YES
Effective	YES
Consistent with National Policy	YES

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 is not justified as it may not be the most appropriate,

3. The strategy may not be effective and deliver the 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 Community

Clusters and are thus being permitted of 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. Examples of this are, Bicton, Baytson Hill, Hadnall, West Felton,
- 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. In particular housing should be permitted in the sustainable settlements of Bicton, Bayston Hill, West Felton and Hadnall.

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:

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:

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.