



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: Frances	Phelps
Organisation (if applicable):	
Email: -	
Telephone: -	

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

Name: n/a	
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:

S2.2 (iv)
5.2
5.2i

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 checked="" 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	<input checked="" type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with National Policy	<input 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).

S2.2 (iv) Lydbury North Development Policy

My objection is related to three areas of this policy development:

- (i) lack of evidence leading to loss in confidence in the validity of the survey used as a basis for the plan with no apparent allowance for the high probability of bias in the responses
- (ii) continued lack of direct access to information about the plan

Neither of these could be classified as illegal but the research basis of these plans could be defined as non-representative and skewed against those directly involved. The lack of information means that those who are directly involved have not had access to decisions made by the Parish Council.

(i) From the outset there has been a consistent lack of accurate information re results of the surveys used as the cornerstone of community consultation. This information was requested from Shropshire Council at the consultation Parish Council meetings and in responses to Shropshire Council surveys.

Background: There are approximately 250+ households across the whole parish of Lydbury North, known to be one the parishes with the largest hectarage in Shropshire. The proposal is to build 20 houses, i.e. an increase of almost 10%. The proposed plan does not spell out that these four sites are very close together on one side of Lydbury North village, thus directly affecting only 13 households. SC reported at the Parish Council meeting that the majority of the parish were for this development. When requested both at the meeting and prior to this, no actual figures were reported only percentages with no baseline data for each area.

Objection: There can be no confidence in data reported without baseline figures. Secondly it is statistically highly likely that the majority of the responses would be positive since a) the majority of households in the parish are not affected by the chosen site developments' traffic or infrastructure; b) the figures given for the eastern sites were aggregated and c) the low numbers of responses and any quoted differences are known to be likely to be statistically invalid.

Hence the lack of confidence in the analysis and reporting processes of the community consultation for this development, and hence the basis for it.

(ii) Objection: The Parish Council's process for ensuring the parish householders are informed regularly with accurate and up to date information on this process in my view is inadequate.

I have heard today (Friday 25th April) from a neighbour for the first time that there is a plan to develop 16 houses near our house. My last piece of information I had last summer was that there were to be 20 houses across the village but that some sites were under further consideration. Considering these developments are to take place near our home, should not the Parish Council have been proactive in publishing its agendas and minutes more widely. The agendas apparently are posted on the village noticeboard – the minutes can no longer be accessed as there is no village website. There has been no publication to my knowledge of further developments since last May at the Community Shop, the Church, the school or in the Community Newsletter etc. Whilst I accept Parish Council meetings are advertised in the Community Newsletter which is circulated to every household, the agenda is not included and there has not been a monthly update.

5.2 and 5.2i

Alongside the road on which these houses are to be built runs a stream which flows into the River Kemp and Onny. This feeds into the Special Area of Conservation (SAC) for the Freshwater Pearl Mussel.

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)

I believe, and hope the reader will find, the suggested amendments in blue are self explanatory on the reading of the above.

5.2 and 5.2i

Amend the paragraph:

Development will respect the character of the village and its heritage assets particularly within the central Conservation Area and will also respect the setting of the village within the Area of Outstanding Natural Beauty (AONB).

to:

Development will respect the character of the village and its heritage assets particularly within the central Conservation Area, **the Special Area of Conservation (SAC)** and will also respect the setting of the village within the Area of Outstanding Natural Beauty (AONB).

S2.2 (iv)

Amend the paragraph:

‘Proposals will form part of an emerging Community led plan providing additional guidance and helping to inform planning decisions in the parish.’

to:

‘Proposals will form part of an emerging Community led plan **developed in regular consultation with the villagers, particularly those directly affected by the developments, which can be accessed easily and scrutinised** providing additional guidance **so villagers and other parishioners can best help** inform planning decisions in the parish.’

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:

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	
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.