



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:	Ian Lings
Organisation (if applicable):	Woodland Trust
Address:	Kempton Way, Grantham, Lincolnshire, NG31 6LL.
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:

Development Management Policy MD12 The Natural Environment
--

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

Support	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Object	Yes	<input 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 type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input 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	
Justified	
Effective	
Consistent with National Policy	

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).

Policy MD12 does seek to enhance and restore Shropshire natural assets, such as geographical and biodiversity features, but currently it does not acknowledge the fact that in allocating sites they should be the most suitable in terms of impacts that cannot be adequately addressed and mitigated on the landscape character, and which leads to the loss of locally important green infrastructure unless adequately replaced elsewhere.

Whilst your Draft Plan is accompanied by a Sustainability Appraisal further consideration of sites should be subject to a Strategic Environmental Assessment as well, as this may affect the delivery of a site. For example, would development in a location be detrimental to the local landscape and character of the settlement.

Conserving existing trees is taken into account both with Policy MD12 and development guidelines, but whilst in some circumstances it may be necessary to remove trees for operational or visual amenity reasons appropriate replacement planning should take place to mitigate such action. Therefore, this should also be acknowledged with Policy MD12.

Delivery and Monitoring of Policy MD12 is also taken into account so that maintaining a high quality natural environment is defined as being a measurable objective with indicators to monitor the policy and this is welcomed and supported. However, currently there is no indicator of biodiversity proposed, or any other environmental targets such as open space with woods and trees. Local Planning Authorities should identify suitable indicators for monitoring the plan, but 'net gain' is not identified as something that should be measured. Therefore, measuring the area of local BAP habitat proposed, created, restored or managed as a result of local planning decision, against the area of habitat lost, damaged or declining as result of a planning decision, should also be taken into account with your Local Plan Annual Monitoring Reports.

Although ancient woodland is taken into account this is only with the explanation of MD12. Therefore, Policy MD12 should also acknowledge this or veteran trees and a reference should also be made to the enhancement or expansion of existing habitats.

The layout of any proposed development should respect the topography and character of the site and the surrounding area and sensitively incorporate natural and historic features such as trees, hedges, ponds and historic built environment features within the site.

We would like to see new woodland creation promoted as a positive green infrastructure requirement for development schemes. This very much fits with current Government policy: the **National Planning Policy Framework** (NPPF) supports the need for more habitat creation by stating that: *'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'*, (DCLG, March 2012, para 114). Also para 117 states that: *'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'*.

We would like to see new woodland creation promoted in this Plan as a positive green infrastructure requirement for development schemes.

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 Woodland Trust generally supports Policy MD12, but we consider that it fails to recognise the need to address the impact of development, through design, on the landscape. Therefore, three changes are suggested.

The application of criterion to policies should be put in place more effectively because currently this hardly taken into account. Therefore, criterion should be included to read as follows:

- 1) "The layout of the proposed development would respect the topography and

character of the site and its landscape setting. Natural features such as woods and trees, hedges and ponds should be sensitively incorporated within the site, and important views into and out of the site should be retained”

- 2) “The proposal would not result in the loss of buildings, open spaces or green infrastructure that would have an unacceptable impact on the character of the area, and that important views through the site should be retained.”

- 3) Amend criterion e) to read as follows:

“The proposal would incorporate within the design opportunities for increasing biodiversity potential and enhancing landscape character, and for retaining and enhancing Green Infrastructure features including the provision of sustainable drainage systems. Proposals that affect a site’s existing biodiversity, landscape character and setting and Green Infrastructure should be designed in a way that avoids or mitigates any potential harm.”

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.