



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:	George Nash
Organisation (if applicable):	

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:

Oswestry Samdev OSW004

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

Support	Yes	<input type="checkbox"/>	No	<input 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 strongly object to the SAMdev proposals for OSW004 on a number of issues:

- Setting issues between Old Oswestry Hillfort (OOH) and the proposed development;
- The LPA, Planning Committee appear to have little or no regard for cultural heritage, in particular the southern and eastern flanks of OOH, Wat's Dyke and the multi-period landscape in between;
- This ignorance is in light of English Heritage's guidance on setting;
- The LPA/Planning Committee are using documents that do not comply with standard archaeological/cultural heritage practice;

- The archaeological/cultural heritage reports of 2009 and, in particular 2013 do not comply with national (IfA) criteria; this fact has been raised by RESCUE, The Prehistoric Society, English Heritage and a Heritage Statement produced by myself. The setting issues from the di Figueiredo report (2013) are inaccurate and do not comply with national (English Heritage) criteria on setting – see *The Setting of Heritage Assets* (2011). Unfortunately, the di Figueiredo report was adopted by the LPA and issued as an official report; again little redress from the LPA when challenged.
- I am concerned that the LPA/Planning Committee are being somewhat undemocratic in the general processes of the schemes as a whole. There should be greater accountability given to local communities to reject or support this and other proposed developments. Oswestry Town Council and neighbouring parish councils have democratically rejected this scheme and so have over 8000 people, the Council, do not appear to be listening.

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 SAMdev Plan should reconsider those areas (including OSW004) that have potential impacts between development and cultural heritage (as well as other disciplines). The archaeological and cultural heritage resources around OOH are a limited resource and development such as that proposed by Shropshire Council's LPA/Planning Committee will have a detrimental effect on these areas; affecting character, setting and undisturbed in situ subsurface archaeology (based on the 2007 geophysical survey report). A more considered approach is required where all interests are taken into consideration (including ecology and geology). To date, the proposed development – OSW004 is unsound, unpopular and contravenes most of the planning guidance within NPPF and other non-statutory and statutory guidance and legislation.

Should this scheme be approved, the public will want to see complete and utter transparency (something that has been missing so far from the LPA/Planning Committee) and the full staged-approach undertaken including a full assessment of the area (based on the geophysical survey undertaken in 2007). Furthermore, I would expect an EIA that covers other issues such as viability, sustainability and supportive disciplines (such as ecology and geology) to be involved. Failing this, a full public enquiry in order that the LPA are held to account for their decision to potentially harm a significant later prehistoric hinterland *scape*. Moreover, the LPA need to be held into account with the way this scheme has been handled. I am concerned that there has been deliberate attempts to hold back vital information (which should be in the public domain) and to manipulate an outcome suitable for their own gain.

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:

There appears to have been no balanced-approach towards national guidelines concerning the guidance on cultural heritage setting. It also appears that much of the opposition to this and other sites where cultural heritage is an issue is being ignored or bypassed – without due and proper consultation. Moreover, there appears to be a lack of support from the LPA archaeology section – this is scandalous; their willingness not to speak has dented public opinion on the role of this section of the Council.

Furthermore, and important to this particular development proposal is that the OOH hinterlands are multi-phased, contains a history of at 6000 years. In the recent past both the hillfort and the lands to the south and east were used by service men and women of the Canadian and British regiments as practice areas during World War I. Surely, their legacy and the archaeology contained within this area (including OSW0004) deserves better.

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,