



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:	
Organisation (if applicable):	GREGORY GRAY ASSOCIATES
Address:	VICTORIA HOUSE, 18 – 22 ALBERT STREET, FLEET, HAMPSHIRE, GU51 3RJ
Email:	info@ggassociates.co.uk
Telephone:	01252 624004

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

Name:	
Organisation (if applicable):	THE GARDEN CENTRE GROUP
Address:	C/O AGENT
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:

Policy S1 Albrighton Area

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**

**Sound**

**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*):

<b>Positively prepared</b>	
<b>Justified</b>	<input checked="" type="checkbox"/>
<b>Effective</b>	
<b>Consistent with National Policy</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 Plan is not 'unsound' since it is not 'justified' for the reasons set out in the attached letter.

**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)

Revise Policy S1 to include Albrighton Garden Centre as an employment allocation as set out in the attached letter

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](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.

# Gregory Gray Associates

## CHARTERED TOWN PLANNING CONSULTANTS

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Planning Policy Team,  
Shropshire Council,  
Shirehall,  
Abbey Foregate,  
Shrewsbury,  
Shropshire,  
SY2 6ND.

25th April 2014

Dear Sir/Madam

### **SAMDev PRE-SUBMISSION DRAFT CONSULTATION**

Gregory Gray Associates is instructed to write on behalf of our client, The Garden Centre Group, in response to the above consultation.

The Garden Centre Group own Albrighton Garden Centre, a 2.5 ha brownfield site located to the north of the settlement of Albrighton. As the Council will be aware from our previous correspondence dated 25<sup>th</sup> April 2012, 25<sup>th</sup> February 2013 and 26<sup>th</sup> July 2013, our client proposed their site as a future employment allocation within the emerging Site Allocations and Management of Development Plan (SAMDev).

The site lies within the Green Belt, however due to its highly developed nature could be re-developed for alternative employment purposes in a manner entirely compliant with para. 89 of the NPPF. Its allocation was intended to address the lack of future employment provision within the Albrighton Area as identified within the Albrighton Place Plan and the Council's 2011 Employment Land Review.

Both of these documents recognised the constraints to identifying suitable, new employment land within the Albrighton area, provided by the Green Belt and environmental issues such as flooding. Within this context, Albrighton Garden Centre provides an ideal opportunity to provide new employment land, without detriment to the purposes of the Green Belt and in a location which is well served by public transport and benefitting from a skilled labour pool as a result of existing significant employers within the area e.g. RAF Cosford, DCAE and the nearby Jaguar/Land Rover facility.

The adopted Albrighton Neighbourhood Plan (Albrighton Plan) considers it appropriate to reflect a positive approach to long term growth needs (post-2020) i.e. beyond the period of the Shropshire Site Allocations and Management of Development Plan such that *"future expansion in employment floorspace should be planned"*. Yet the Submission Version of the SAMDev fails to make any such provision.

Director: G.W.R. Gray MSc. Dip.TP MRTPI ACI.Arb Secretary: C.J. Gray

Associate: A.J. Ayles BA(Hons.) BTP MRTPI

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Accordingly, our client objects to Settlement Policy S1 Albrighton Area on the basis that Schedule S1b does not include any employment allocations for the Albrighton Area. Since the SAMDev Plan is intended to cover the period up until 2026, it should make provision for identified future employment needs across the whole Plan period.

Failure to do so renders the Plan *'unsound'* on the basis that it is *'unjustified'*. For the SAMDev Plan to be justified it needs to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence which includes evidence provided following participation by the local community, such as the preparation and adopted of a Neighbourhood Plan.

Whilst the Albrighton Plan refers to the potential to provide new employment land to the east of Albrighton village along the A41, our client's site constitutes previously developed land, use of which should be prioritised over the release of greenfield alternatives in accordance with one of the Core Planning Principles identified in para. 17 of the NPPF.

Accordingly, it is requested that Policy S1 be amended to include Albrighton Garden Centre as an employment allocation in order to meet the long-term employment needs of the local area as identified within the adopted Neighbourhood Plan.

I would be grateful if the above comments could be placed before the Inspector. Should you require any additional information, please do not hesitate to contact me.

Yours faithfully

Joanna Male  
cc. Client