



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:	Sibdon Carwood Parish Meeting
Organisation (if applicable):	
Address:	
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:

S7.1a Craven Arms Housing Allocations

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

Support	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Object	Yes	<input type="checkbox"/>	No	<input checked="" 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	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 concept of identifying Market Towns and Key Centres and Community Hubs and Clusters is supported.

The concept of providing affordable housing is supported.

However, it is essential that, if affordable housing is to be provided, and especially as an 'exceptions site,' the development can be fully justified by a local needs survey carried out within the Parish concerned.

In the case of proposed allocated site S7.1a Land off Watling Street for 25 dwellings no such need exists, and no such housing has been requested by the Parish Council concerned. There should be no provision for local needs affordable housing in Sibdon Carwood.

It has been suggested that the level of affordable housing that is to be provided in Craven Arms Parish is to be reduced because of the foregone conclusion that permission for the development proposed in Sibdon will be permitted. If this is the case then there is clearly not the need for affordable housing that everyone has been led to believe. Affordable housing should be provided where and when it is needed and shouldn't be constructed on a site where it is not wanted and at a time when there is no need.

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)

Policy S7.1a should be reviewed and the allocation of land that is intended to provide affordable housing for persons living in Craven Arms should be reallocated to land within Craven Arms Parish. The allocated exceptions site at 'Land off Watling Street' for 25 dwellings should be removed from the plan. The provision of affordable housing for those living in Craven Arms will not suffer as there will be sufficient affordable housing provided through the development of open market housing within the Craven Arms Parish boundary.

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.

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.



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Your Representations

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(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 Scale and Distribution of Development

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

Support	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Object	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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Positively prepared	YES
Justified	YES
Effective	YES
Consistent with National Policy	YES

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The concept of identifying Market Towns, Key Centres, and Community Hubs and Clusters is supported.

Craven Arms has been identified as a Market Town or Key Centre. Sibdon has not been identified as a Community Hub or Cluster, and so will be regarded, as far as the SAMDev DPD is concerned, as open countryside. Both of these designations are supported.

Great emphasis has been placed on the fact that the responsibility for determining how much development should be allowed in the Market Towns, Hubs and Clusters, and where that development should be located, has been given to local Parish or Town Councils. Each has been made responsible for development in its own administrative area.

Craven Arms has an existing population of around 3,000 people, and has been earmarked for development extending to 500 new dwellings in the plan period. Sites for some 325 are specifically allocated within the Craven Arms Parish in the SAMDev DPD.

The target for the provision of affordable housing in the South Shropshire Area is 20% of all new housing sites. However, in Craven Arms the target rate for affordable housing is only 10% indicating that the need for this type of housing is not as critical as elsewhere in the South Shropshire Area. At 10% it will be clear that only 50 affordable houses will be necessary to satisfy the currently assessed demand in Craven Arms. It will also be abundantly clear that there will be sufficient land available to provide the market houses and affordable houses that are believed to be necessary.

By contrast no development is anticipated in Sibdon Carwood Parish. It is designated entirely as open countryside, and, apart from housing required for agricultural workers or those other exceptions indicated in Policies MD7a and b, no further development is anticipated. There is no indication that any affordable housing is necessary in the Parish.

The draft SAMDev DPD, however, includes an 'allocation' for an exceptions site for some 25 affordable houses in Sibdon Carwood Parish. The Parish Meeting and several individuals have consistently objected to this proposal. There is no need for this development in Sibdon Carwood Parish. There is no need for the development because of need for affordable houses generated by Craven Arms as there will be sufficient affordable houses provided to meet its needs from the development of allocated and other sites within Craven Arms Parish.

The continued attempt to allocate the site in Sibdon Carwood Parish for affordable housing when none is required runs directly contrary to the idea of local Councils being able to determine their own destiny in terms of the provision of housing, and is contrary to the ideas expressed in the Localism Act 2011.

Policy CS11 of the Core Strategy says that 'exceptions sites for local needs affordable housing on suitable sites' may be permissible where under normal circumstances development would not be permitted. But this assumes that a 'local need' for affordable housing exists and, in the case of Sibdon no such need does exist. The proposal to include the site of at Watling Street, then, apart from being visually intrusive, is contrary to Core Strategy policy, and is not justifiable in terms of the provision of housing in the Parish in which it is situated, and is probably not justifiable in terms of the adjacent Parish either. It is most unusual for one Parish to expect its neighbour to provide housing land to satisfy its housing needs when there are perfectly good and available sites within its own Parish area.

The proposal then,

- a) has not been prepared positively in that it is not based on a strategy that seeks to meet objectively assessed development and

infrastructure requirements,

- b) is not justified inasmuch as it is not the most appropriate strategy and there are perfectly reasonable, and perhaps better alternatives,
- c) is not effective inasmuch as it is not based on joint working and cross boundary strategies, and
- d) is not consistent with National Policy which emphasises the important role that local aspirations and desires should have.

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 wording of the policy should be reviewed to make it clear that proposed developments that are required by one Parish should take place within that Parish unless agreement can be reached with a neighbouring Parish that the development will be accepted. This would represent a sustainable approach to the provision of housing in the open countryside.

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.

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