



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: Mark	Trafford
Organisation (if applicable):	
Address:	

**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:

Policy Map S7-INSET1 SAMDev CRAV002

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** ☐      **No** ☐

**Sound**      **Yes** ☐      **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>Not positively prepared</b>
<b>Justified Not</b>	<b>justified</b>
<b>Effective Not</b>	<b>effective</b>
<b>Consistent with National Policy</b>	<b>Not consistent</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).

If you agree to CRAV002 You are agreeing to place a Social Housing Development site and its families at the furthest point available from Craven Arms. (also outside of town border) Furthest point from train station, community centre, shopping centre, schools etc. HOW CAN THIS BE SUSTAINABLE? You are also planning for the children to have to cross and negotiate the A49 to get to school (busiest arterial route in area) The walking distance to schools is also outside of the recommended and acceptable distance guidelines published by Shropshire Council. **I cannot quite work out if this is planning to fail or failing to plan.**

The Council's assessment of need does not seem to be based on an accurate survey of Craven Arms. The fact that CRAV002 belongs to a Housing Association and is therefore deliverable does not demonstrate a need allowing its allocation for development. The extent of housing development proposed for Craven Arms will produce a significant amount of affordable housing under normal planning rules.

The scheme does open up a significant new area of development and is not well related to the developed area of Craven Arms; paragraph 3.15. It is worth noting that the outline application that has now been made for CRAV002 has been accompanied by a further application for adjacent land for unrestricted housing.

**Reuse derelict sites such as the Temperance Hall, ex labour club, railway sidings and under utilised sites. Make buildings fit in with their surroundings. This would make Craven Arms more attractive and SUSTAINABLE.**

**i) Petition for Amendment of National Planning Policy Framework –** The Town Clerk reported that the Council had been requested to sign a petition to amend the National Planning Policy Framework, she outlined that in particular rural areas were feeling unsupported by the NPPF. Members declared that they also shared similar concerns regarding the relaxing of Planning Laws.**(EXTRACT FROM SHROPSHIRE COUNCIL PLANNING MEETING)**

If you agree to CRAV002 You are agreeing to place a Social Housing Development site and its families at the furthest point available (also outside of town border) away from train station, community centre, shoppingcentre, schools etc. HOW CAN THIS BE SUSTAINABLE.

**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)

Ref

**Shropshire Site Allocations and Management of Development (SAMDev) Plan**

## **Pre-Submission Draft (Final Plan)**

### **March 2014 Consultation Statement**

This is the final statement from the 2013 survey.

Re Question 11. Planning has been submitted for a 1.2 hectares site not 0.8, **Again they have their numbers mixed up and in this final round they pitch the question at 20 houses yet planning has gone in for 25 houses very misleading.**

Shropshire councils own supporting survey itself evidences the grounds of Craven Arms strong objection and in no way justifies the proposed development.

The development of this site would not be compatible with the NPPF, the Shropshire Council's Core Strategy and totally 100% against the wishes of the parishioners of Sibdon Carwood. It should be firmly rejected in favour of smaller more sustainable, available, suitable and deliverable brown sites within Craven Arms town borders.

It is also appropriate to note the purchase price of this land as paid by Shropshire Housing Association in 2005, together with the costs of planning and design work, mean that the plot price will be significantly in excess of £10,000 per plot which do not meet the requirements for affordable housing on exception sites.

#### **Foreword**

**Shropshire council is committed to enabling community led planning in all Shropshire communities. I urge all communities to take advantage of the support available to enable a consultation or update consultation with their community and to really understand and have a firm mandate to deliver the needs and aspirations of their places. Please contact your local elected member or representative from the community action**

**Cllr Gwilym Butler, Shropshire Council Portfolio Holder for Flourishing Shropshire Communities. ( QUOTE FROM SHROPSHIRE COMMUNITY LED PLANNING GUIDE)**

Sibdon Carwood Parish took guidance from the attached document and consulted with its parishioners the results were:

1. Held a parish meeting on Wednesday 14<sup>th</sup> August which was attended by an unprecedented 64 parishioners.
2. 100% voted unanimously against mass 25 affordable homes development (CRAV002)
3. Attended by Liam Cowden ( Senior Policy Officer Shropshire council)who to date has never publicly acknowledged the results of this meeting
4. Many letters hand written and sent to council never acknowledged.

Community led planning only seems to be listened to if the community want the same as the council.

Argument: By granting Exception site status the council have admitted and confirmed that CRAV002 WOULD NOT BE GRANTED PLANNING PERMISSION.

**ARGUMENT: Exception site "A location where development would not otherwise be granted planning permission under normal circumstances" (Glossary of words Shropshire Council)**

By this very definition planning permission would normally not be granted. Q: What event took place that decided it could be classed as an exception site.ie what criteria are applied

to determine exception site status?

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.

**X 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:

REF DOCUMENT <http://shropshire.gov.uk/media/832408/craven-arms-and-surrounding-area-place-plan-2013-2014-v2-reduced.pdf> THIS PLAN STATES "Sibdon Carwood Parish Council The Parish Council have begun preparing an Parish Action Plan,with questionnaires being distributed, further updates will provided in due course." NO MENTION OF OUR PARISH PLAN / MEETING RESULTS EVEN THOUGH THIS DOCUMENT IS UPDATED 2013/ 14 it is as though we have just been ignored.

We wish to attend because we have no confidence that our opinion is listened to. In good time Sibdon submitted our consultation results to Shirehall on 23<sup>rd</sup> August 2013. The submission contained information relating to community responses to the proposed allocation of CRAV002 in the form of:

- The results of a QuickTapSurvey around 14 questions about development in Craven Arms and the allocation of CRAV002 which describes the purpose and strength of the objections
- Responses by letter and on SAMDev consultation response forms from residents of Sibdon Carwood Parish, Roman Downs (situated opposite CRAV002) and others in Craven Arms.
- The names and addresses of attendees at a meeting of Sibdon Carwood Parish Meeting on 14th August 2013 attended by Liam Cowden.
- And copies of a number of letters from Robert Holden.

This submission was never acknowledged, seemingly lost in the planning black hole. It was only when continually pressed that Andy Mortimer ( policy and environment manager)acknowledged receipt on 4<sup>th</sup> March 2014 some 7 months later. You can understand why we don't believe our parishioners concerns are taken seriously and why we would like to attend the examination.

**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](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.