

Shropshire Council
Development Services
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

BY EMAIL: PLANNING.POLICY@SHROPSHIRE.GOV.UK

28th April 2014

20486/A3/CC/JR

Dear Sir or Madam

**REPRESENTATIONS TO SHROPSHIRE COUNCIL SAMDEV PRE-SUBMISSION PLAN:
BROSELEY PLACE PLAN**

Barton Willmore are appointed on behalf of The Church Commissioners of England (hereafter referred to as "the Commissioners") to make representations to the Pre-Submission for the Site Allocations and Management of Development (SAMDEV) Plan. Our Client has land interests west of Bridge Road, Broseley. Our Clients have previously promoted their land interests through the Shropshire Council Local Development Framework process, including the Core Strategy, the Strategic Housing Land Availability Assessment and the SAMDEV Plan Preferred Options in July 2012 and Revised Preferred Options in August 2013.

In the past, we have also spoken with Planning Officers at Shropshire Council and Cllr Milner Whiteman regarding our desire to progress development on the site. We approached the Parish Council alongside preparing reps to the last SAMDEV Plan, seeking engagement with them, to discuss how bringing forward this site could deliver other objectives within the Place Plan, however Members were not amenable to a meeting.

Representations were previously made to Shropshire Council in respect of the original SAMDEV Plan Revised Preferred Options. These representations remain relevant as they refer to the policies that were proposed in the Plan, and which we understand have not been altered as part of this Pre-Submission. A copy is enclosed for your reference. We would ask that this letter of representation is read in conjunction with the earlier representations made.

We note that representations are not being accepted on the Place Plans that were previously consulted on as part of the Revised Preferred Options Consultation. On this basis, our representations on the Broseley Place Plan remain relevant and we would ask that these are considered alongside our previous comments to the Place Plan.

Background

The site covers approximately 10 hectares and is adjacent to the western edge of the urban area of Broseley, to the north east of Benthall. A site plan is enclosed. To the north of the site lies a number of residential dwellings and to the west of the site is situated a farm with associated buildings. The site is within easy walking distance of Broseley town centre, which provides a good range of everyday amenities.

Access to the site is gained via Bridge Road, which leads to Benthall Lane and then onto the B4373, which links directly to Bridgnorth. Two bus routes pass along Benthall Lane to the south of the site. Route 39 provides connections to Much Wenlock in the west and Ironbridge and Telford to the north.

In terms of its development potential, the site is deliverable within the short term and is in a highly sustainable location, close to existing transport links and amenities. You will note that the site size offers the potential for a diverse range development uses and an opportunity to deliver additional community benefits and reflect the Place Plan, which identifies the local priorities and infrastructure requirements for each of Shropshire's communities. There is also the potential for smaller parcels of land to come forward, if preferential, in order to provide shorter-term development opportunities for the area. Furthermore, any development would benefit from extensive landscaping in order to maintain the appearance and character of the Conservation Area.

The Commissioners are the sole owners of the land holding, and as such there would be no land ownership constraints, including any ransom strips preventing direct access to the highway.

Representations to the SAMDEV Plan: Pre-Submission

We set out below our comments on the proposed Development Management Policies that are considered relevant to the interests of the Commissioners', and the proposals specific to Broseley given the proximity of the Commissioners' site to the built up area.

MD1 - Scale and Distribution of Development

Policy MD1 relates to the scale and distribution of development, setting out that sufficient land will be made available to deliver the development planned in the Core Strategy (as outlined in Core Strategy policy CS1). The policy states that sustainable development will be supported in the Market Towns and Key Centres, of which Broseley is designated.

Table MD1.1 demonstrates the proportional split of the planned housing provision within Shropshire, allocating 40% to Market Towns and Key Centres, and 35% to rural areas.

There is a concern that this approach could potentially undermine the objective of prioritising sustainable development should significant proposals be made in the rural areas. Rural areas will be less sustainable than sites located in or on the edge of development boundaries, due to the likely need to access facilities and services by private car as opposed to more sustainable modes of transport. We therefore consider that the proportional split for residential development in Shropshire should be altered to favour sites in and around Market Towns and Key Centres rather than support less sustainable development in the rural areas.

Furthermore, paragraph 4.2 of the SAMDEV Plan sets out that the level of housing development being provided is sufficient to enable the Core Strategy target to be met. Given that Shropshire Council does not have a 5 year housing land supply, with recent figures suggesting a supply of less than 4.95 years, we consider that this approach is contrary to paragraph 47 of the National Planning Policy Framework (NPPF) which seeks to encourage Local Authorities to take measures to significantly boost their supply of housing land. Therefore, we do not consider that the SAMDEV Plan is compliant with the NPPF.

Paragraph 52 of the NPPF goes on to state that the supply of new homes can sometimes be best achieved through planning for larger scale development such as extensions to existing villages and towns. It is clear that such an approach has not been considered in respect of the future for Broseley and by choosing not to allocate land for any residential development within Broseley, there is a concern that a lack of investment and without improvements or contributions to existing infrastructure will lead to a decline of the quality of Broseley, and a loss of services and facilities as it is unlikely that they could be sustained without growth of population.

Paragraph 55 of the NPPF relates to sustainable development in rural areas, stating that housing should be located where it will enhance or maintain the vitality of rural communities. Shropshire, by its very nature, is predominantly rural. We therefore consider that Broseley is a prime location for residential development given its facilities and services within the village and access to public transport.

Paragraph 55 also states that new isolated homes in the countryside should be avoided. There is a concern that the strategy to deliver housing through the SAMDEV Plan could be over-reliant on the delivery of isolated homes in the countryside. We consider that policy MD1 should therefore be amended to take account of this risk.

MD3 - Managing Housing Development

Policy MD3 concerns delivery of housing predominantly. Furthermore, the policy also refers to the settlement housing guideline as a significant policy consideration, noting that where the settlement housing guideline is unlikely to be met, additional sites beyond the development boundary may be acceptable subject to the criteria noted below:

- i) The degree by which the requirement is exceeded; and
- ii) The likelihood of delivery of the outstanding permissions; and
- iii) Evidence of community support; and
- iv) The benefits arising from the development; and
- v) The presumption in favour of sustainable development.

We support this element of policy MD3 and consider that this provides an opportunity to achieve a sufficient housing land supply and plan for the future needs of Shropshire. Given that a five year housing land supply cannot be demonstrated at present, we consider that this approach should be explored further now.

In order to ensure that the Councils avoid the situation of not achieving the settlement housing guideline in the first instance, we recommend that further appropriate land allocations for residential development are identified in order to achieve the housing requirement for the County.

S4 - Broseley Area

Residential Development

The Broseley Development Strategy is set out at S4.1 and states that over the plan period, around 200 dwellings and 2 hectares of employment land are proposed for Broseley. This has not changed from that which was proposed in the Revised Preferred Options, despite our previous representations. The Development Strategy does not include a residential allocation and relies on a combination of the delivery of committed residential development and the development of windfall sites for up to 24 dwellings.

The absence of an allocation for residential development within Broseley could have a considerable impact on the future deliverability of development in Broseley which subsequently could severely restrict the opportunities for younger people to continue living in the town as they become adults. The proposed approach of relying on the delivery of committed residential development through planning permissions and a windfall of approximately 24 properties is not considered to be robust and is unlikely to deliver residential development to support the growth of the town. Equally, by not allocating sites suitable for residential development, the local authority could be subjected to speculative planning applications for residential development in future.

As set out in response to Policy MD1 above, we consider that the SAMDEV Plan in its current form is contrary to the NPPF, and is therefore not legally compliant. Given that there is a need for Shropshire to demonstrate a five year housing supply, and significantly boost the supply of housing land, it is imperative that appropriate residential allocations are made.

The Commissioners' site is closely linked to the market town of Broseley. The site is on the edge of the existing development boundary of Broseley and we consider that our Client's site could make a

positive contribution towards the long term growth of Broseley. The site has good access to the town centre and is bounded to the north, east and south west by residential development.

There is also a possibility that affordable housing would not be deliverable on any of the windfall sites as they will be too small to trigger the requirement to deliver affordable housing. Policy CS11 of the adopted Shropshire Core Strategy sets out that only sites of 5 or more dwellings would be required to provide affordable housing onsite. Smaller sites will require a contribution to be made to the off-site delivery of affordable housing however this situation could lead to no affordable housing being made available in Broseley because of the omission of residential sites. As a larger site our Client's landholding could potentially contribute a proportion of affordable housing should residential development be permitted on site, unlike windfall developments which would be unlikely to deliver the level of development that triggers the requirement for affordable housing.

Development Boundary

We maintain our objection to the development boundary of Broseley. This was altered as part of the Revised Preferred Options consultation, removing a significant portion of the urban area to the west from what is considered to be the built up area of Broseley. This consequently removed a number of undeveloped sites that could make a positive contribution towards the future of Broseley and the surrounding area. The Council's commitment to the altered boundary of Broseley is concerning in respect of their ambition to achieve the residential and employment targets set out in respect of the for the whole of Shropshire to the extent of 27,500 dwellings and to take account of the future requirements, particularly in terms of the need to demonstrate a sufficient five year housing land supply and beyond.

Employment

The proposed employment area promoted through the previous SAMDEV plan has been reduced from an allocation of 2 hectares to an allocation of 1.25 hectares. As it was previously concluded that 2 hectares of employment would be required to contribute towards the growth and the sustainability of the town, there is a concern that this allocation will significantly undermine the future success of Broseley.

We therefore consider that there is a need to assess the employment requirements further, particularly in and around Broseley, and increase the allocation to 2 hectares. This could be delivered on our Client's land as part of an appropriate mixed use development which has good access to the centre of Broseley.

Conclusion

As set out throughout these representations, we consider that the SAMDEV Plan in its current form is contrary to the NPPF as the Plan does not seek to significantly boost the supply of housing land. Policy MD3 sets out that there may be opportunities for unallocated development to come forward that meets the relevant criteria should the housing requirement not being met, or a five year housing land supply not being demonstrated. This approach is reasonably positive however should be explored further on the basis that Shropshire Council cannot demonstrate a five year housing land supply at present.

If further allocations were to be identified in the SAMDEV Plan, this could contribute to significantly boosting the supply of housing land, in accordance with the guidance in paragraph 47 of the NPPF.

We consider that by prioritising the allocation and development of sites in and on the edge of Market Towns and Key Centres, a sufficient housing land supply could be made available in order for the Council to proactively plan for the future growth of the Market Towns and Key Centres within Shropshire.

We therefore request that our Client's site is considered for a residential allocation within Broseley. The site is well located to the town centre, is within walking distance to the town and could accommodate a significant portion of development. The development of the site would not have a

detrimental impact on neighbouring sites, and would contribute towards the existing residential nature of the area.

We trust that you take our representation into consideration and we would be pleased to meet with Officers and Members of the District or Parish Councils to identify the opportunities that our Client's land could deliver as part of a comprehensively planned development, and how that site could be brought forward as part of the SAMDEV Plan.

I look forward to receiving confirmation of receipt of these representations and please do not hesitate to contact me if I can be of further assistance.

Yours sincerely,

CLAUDIA CLEMENTE
Senior Planner

Shropshire Council
Development Services
Shirehall
Abbey Foregate
Shrewsbury
Shropshire
SY2 6ND

BY EMAIL

23rd August 2013

20486/A3/CC/JR/sw

Dear Sir or Madam

**REPRESENTATIONS TO SHROPSHIRE COUNCIL SAMDEV REVISED PREFERRED OPTIONS:
BROSELEY PLACE PLAN**

Barton Willmore are appointed on behalf of The Church Commissioners to make representations to the Revised Preferred Options for the Site Allocations and Management of Development (SAMDEV) Plan. Our Clients have land interests west of Bridge Road, Broseley. Our Clients have previously promoted their land interests through the Shropshire Council Local Development Framework process, including the Core Strategy, the Strategic Housing Land Availability Assessment and the SAMDEV Plan Preferred Options in July 2012.

In the past, we have also spoken with planning officers at Shropshire Council and Cllr Milner Whiteman regarding our desire to progress development on the site. We approached the Parish Council alongside preparing reps to the last SAMDEV Plan, seeking engagement with them, to discuss how bringing forward this site could deliver other objectives within the Place Plan, however a meeting was not forthcoming from Members.

Representations were previously made to Shropshire Council in respect of the original SAMDEV Plan Preferred Options. These representations remain relevant as they refer to the policies that were proposed in the Plan, and which we understand have not been altered as part of this Revised Preferred Options. A copy is enclosed for your reference. We would ask that this letter of representation is read in the context of earlier representations made. We understand that this consultation relates only to changes to the settlement strategies and preferred options for new development.

Background

The site covers approximately 10 hectares and is located to the western edge of the urban area of Broseley, to the north east of Benthall. A site plan is enclosed. To the north of the site lies a number of residential dwellings and to the west of the site is situated a farm with associated buildings. It is within easy walking distance of Broseley town centre, which provides a good range of everyday amenities.

Access to the site is gained via Bridge Road, which leads to Benthall Lane and then onto the B4373, which links directly into Bridgnorth. Two bus routes pass along Benthall Lane to the south of the

site. Route 39 provides connections to Much Wenlock in the west and Ironbridge and Telford to the north.

In terms of its development potential, the site is deliverable within the short term and is in a highly sustainable location, close to existing transport links and amenities. You will note that the site size offers the potential for a diverse range development uses and an opportunity to deliver additional community benefits and reflect the Place Plan, which identifies the local priorities and infrastructure requirements for each of Shropshire's communities. There is also the potential for smaller parcels of land to come forward, if preferential, in order to provide shorter-term development opportunities for the area. Furthermore, any development would benefit from extensive landscaping in order to maintain the appearance and character of the Conservation Area.

The Church Commissioners are in sole ownership of the land holding, and as such there would be no land ownership constraints, including any ransom strips preventing direct access to the highway.

SAMDEV Revised Preferred Options Place Plans

Our Client's site is located within the Much Wenlock Place Plan area however we consider that the location of the site is outside of any area of influence that the site could have upon Much Wenlock. The site is however very closely linked to the market town of Broseley. The site is on the edge of the existing development boundary of Broseley and we are of the opinion that our Client's site could make a positive contribution towards the long term growth of Broseley. The site has good access to the town centre and is bounded to the north, east and south west by residential development.

We therefore make comments on the Broseley and Surrounding Area Place Plan, which we believe reflects the importance of cross boundary working which is consistent with the objectives of the National Planning Policy Framework (NPPF).

Housing and Sustainable Development

The Broseley and Surrounding Area Place Plan sets out the proposals for the market town of Broseley over the course of the Development Plan period (up until 2026). The Place Plan previously suggested that the market town would not be able to accommodate any residential development within the town. Alongside this, no community hubs or community clusters are proposed within Broseley and the surrounding area. This is clearly contrary to the objectives of the NPPF, and we are concerned that this would go against the principles of sustainable development.

Despite a number of representations against this approach, it appears that the Place Plan is proceeding with this cessation on residential development within Broseley, and no proposals for community development. The lack of an allocation for residential development within Broseley will have a considerable impact on the future of Broseley and will severely restrict the opportunities for young people to remain in the town as they become adults. The proposed approach of relying on the delivery of committed residential development through planning permissions and a windfall of approximately 35 properties is not considered to be robust and is unlikely to yield a guaranteed delivery of residential development to support the growth of the town. Equally, by not allocating sites suitable for residential development, this removes a degree of control that the local authority would have benefitted from previously, in respect of assessing and allocating suitable, available and deliverable sites.

There is also a possibility that affordable housing would not be deliverable on any of the windfall sites as they will be too small to trigger the requirement to deliver affordable housing. Policy CS11 of the adopted Shropshire Core Strategy sets out that only sites of 5 or more dwellings would be required to provide affordable housing onsite. Smaller sites will require a contribution to be made to the off-site delivery of affordable housing however this situation could lead to no affordable housing being made available in Broseley because of the omission of residential sites.

We therefore request that further consideration is made in respect of the identification of a residential site allocation within Broseley. Our Client's site is well located in the context of the town centre of Broseley, within walking distance to the town and could accommodate a significant portion

of development. The development of the site would not have a detrimental impact on neighbouring sites, and would contribute towards the existing residential nature of the area.

Employment

The proposed employment area promoted through the previous SAMDEV plan has been considerably reduced from an allocation of 2 hectares to an allocation of 1.25 hectares. As it was previously concluded that 2 hectares of employment would be required to contribute towards the growth and the sustainability of the town, there is a concern that this allocation will significantly undermine the future success of Broseley.

Development Boundary

We object to the proposed alteration of the development boundary of Broseley. The alteration of the development boundary to the east removes a significant portion of the urban area from what is considered to be the built up area of Broseley. This therefore also removes a number of undeveloped sites that could make a positive contribution towards the future of Broseley and the surrounding area. These sites are in walking distance to Broseley town centre and would make a positive contribution towards the sustainable long term growth of the area.

Our Client's land currently shares a boundary with the urban area. Altering the development boundary of Broseley will sever such a link. In turn, this will limit opportunities for land currently adjoining the north west of the town to come forward in future years and meet potential development needs. This includes our Client's land.

Furthermore, there appears to be no robust evidence base that underpins the decision to alter the development boundary of the town from Spout Lane to Bridge Road, and removes land that is already developed from Spout Lane to Bridge Road from the urban area.

The extension of the development boundary towards Jackfield appears to be a strategic extension, potentially opening up neighbouring sites to be suitable for development. This location is a further distance from the town centre and would be less sustainable as there would be a dependence on the private car to access the town of Broseley and surrounding areas. We therefore consider that the development boundary should be taken forward as existing.

We trust that this letter of representation is helpful. We would be pleased to meet with officers and members of the District or Parish Councils to identify the opportunities that our Client's land could deliver as part of a comprehensively planned development, and how that site could be brought forward as part of the SAMDEV Plan.

I look forward to receiving confirmation of these representations and please do not hesitate to contact me if I can be of further assistance.

Yours sincerely,

JOANNE RUSSELL
Associate



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:	
Organisation (if applicable):	The Church Commissioners of England
Address:	C/O Agent
Email:	
Telephone:	

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

Name:	Claudia Clemente
Organisation (if applicable):	Barton Willmore
Address:	Regent House, Prince's Gate, 4 Homer Road, Solihull, B91 3QQ
Email:	
Telephone:	0121 711 5151

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:



MD1 - Scale and Distribution of Development

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

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

Please review the enclosed letter of representation.

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)

Please review the enclosed letter of representation.

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:

Please review the enclosed letter of representation.

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, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.

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:	
Organisation (if applicable):	The Church Commissioners of England
Address:	C/O Agent
Email:	
Telephone:	

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

Name:	Claudia Clemente
Organisation (if applicable):	Barton Willmore
Address:	Regent House, Prince's Gate, 4 Homer Road, Solihull, B91 3QQ
Email:	
	0121 711 5151

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:

S4 - Broseley

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

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

Please review the enclosed letter of representation.

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)

Please review the enclosed letter of representation.

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:

Please review the enclosed letter of representation.

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, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.

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:	
Organisation (if applicable):	The Church Commissioners of England
Address:	C/O Agent
Email:	
Telephone:	

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

Name:	Claudia Clemente
Organisation (if applicable):	Barton Willmore
Address:	Regent House, Prince's Gate, 4 Homer Road, Solihull, B91 3QQ
Email:	
	0121 711 5151

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:

MD1 - Scale and Distribution of Development

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

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

Please review the enclosed letter of representation.

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)

Please review the enclosed letter of representation.

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:

Please review the enclosed letter of representation.

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, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.