



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:	Dr. Christopher Jephcott
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

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:

S3 Bridgnorth Area S3.1:2.

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

Support
Object

No
Yes

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant
Sound

No
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*):

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

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 consider the plan is not positively prepared in that the assessed development and infrastructure requirements differ too greatly from the figures which logically derive from the previous stages and results of the consultation process. This process, starting from the 2010 Issues and Options Consultation, 'Planning for a Flourishing Shropshire', achieved in a positive manner what appeared to be a logical and reasonable scenario for the future expansion of Bridgnorth up to 2026. During the process the inadvisability of allowing development to cross the A458, instead siting additional employment and residential facilities to the north of the bypass, retaining the maximum figure of 1.000 new homes, as also in line with the Core Plan indicative figure, became clear. This obviated the need for the additional ELR011/a and b site across the bypass. The figure of 1,400 new homes appearing in Policy CS2.1:2, a considerable increase on any figure previously mentioned, has little positive justification, merely that the SAMDev has firmed up the levels of development having regard to inter alia the consultation responses.

I do not consider the Plan was justified, again because of the disjunction between the consultation responses and the final decisions. Also there is no assessment of the landscape sensitivity associated with relocating the livestock market and providing additional employment land across the bypass, to comply with para. 170 of the NPPF. Policy 159 of the NPPF requires a Strategic Market Housing Assessment. On page 25 of the draft Plan Housing Assessments for 2008 and 2014 are cited as key evidence. The 2008 Assessment I have previously seen but I am unable to track one for 2014. (The Bridgnorth Civic Society requested an up to date assessment two years ago.) Also there is a lack of emphasis on the need of affordable housing which is cause for concern.

I also question whether the employment land allocation is appropriate, given the level of unused employment land at Chartwell Business Park, laid out with full facilities, and the Stanmore Industrial Estate.

I also consider the Plan not effective for the same reason that the planned infrastructure delivery is not sustainable and therefore not sound. I do not think that the proposed removal of the Livestock Market to a more landscape sensitive site across the bypass together with a new traffic roundabout is sustainable. The bypass is a psychological as well as physical barrier and once broken development southwards is likely to be incremental.

Para. 57 of the NPPF states the need to plan positively for the achievement of high quality and inclusive design for all developments. The uncorroborated statement merely that an approach that enables good design and quality standards becomes more feasible at higher standards of development (Sustainability Appraisal Bridgnorth Supplement) is not sufficient. So I think the Plan is not fully consistent with National Policy.

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 the Plan to be closer to the Core Policy indicative figures and the clearly stated consultee preferences. Delete ELR011/ a and b. Expand the BRID001 sites to accommodate all fully justified and sustainable housing and employment land allocation

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

No, I wish to pursue my representations through this written representation.

Yes

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	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.