



Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan

Main Modifications consultation

1 June 2015 – 13 July 2015

For Shropshire
Council use

Respondent
no:

Main Modifications Consultation Form

The SAMDev Plan Schedule of Main Modifications includes a series of changes to the published SAMDev Plan. These suggested changes are being consulted on for a period of six weeks. For advice on how to respond to the consultation, and how to fill in this form please see the guidance notes on the Council's SAMDev Plan website at: <http://shropshire.gov.uk/planning-policy/samdev-examination/main-modifications-consultation/>.

Submitting comments:

Please fill in this form and return:

- Via email to: Programme.Officer@shropshire.gov.uk
- By posting to: Daphne Woof - Programme Officer
c/o Planning Policy Team
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND
- Comments must be received by 5pm on 13 July 2015. **Comments received after this time will not be accepted and will not be considered by the Inspector.**
- Please fill a separate for each Main Modification you are commenting on.
- Please clearly identify which Main Modification your comments refer to using the reference (i.e. MM1, MM2 etc) in the SAMDev Plan Schedule of Main modifications.
- Please do not repeat your previous comments as these have already been considered by the Planning Inspector. **Comments will only be considered that refer to a change as shown in the SAMDev Plan Schedule of Main Modifications.**

Shropshire Council SAMDev Plan Main Modifications Response Form

- All comments received on the proposed changes within the time period will be considered by the Planning Inspector as part of the examination of the SAMDev Plan. The Inspector may wish to contact you to discuss your comments and concerns, prior to concluding the formal examination into the Plan.
- The personal information will only be used for purposes related to the consultation and the SAMDev Plan examination. 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. However other information will be shared with the Planning Inspector.
- The information relating to your comments on the Main Modification (Part B) will be published on the Shropshire Council SAMDev Plan examination webpage.

A) Your details:

1) Who is making this representation?

Name:	
Organisation (if applicable):	Les Stephan Planning Ltd
Address:	
Email:	
Telephone:	

Client's details (only applicable if you are acting as agent on behalf of another person or business)

Name:	
Organisation (if applicable):	
Address:	
Email:	
Telephone:	

B) Your representations: What do you wish to object to/support?

Please use a separate form for each Main Modification you wish to comment on. Only comments relating to a proposed Main Modification will be considered.

1) Please give the Main Modification reference your comment relates to.

Main Modification reference - MM3

2) Do you consider the proposed Main Modification addresses the following issues in relation to the policies concerned?

	Yes	No
Legally compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Positively prepared	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consistent with national policy	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3) If you have answered 'no' to any of the above please specify your reason for objecting below. You should make clear why the Main Modification is either not legally compliant and/or unsound having regard to whether the modification is not: positively prepared; justified; effective; or, not consistent with national policy. Please see guidance notes for explanation of these terms:

This objection to the wording of MD1(3) returns to the heart of the test of soundness of the designation of settlements within the SAMDev.

Quite simply, it should not be left to local communities to "choose" whether or not a particular settlement should be designated as a Hub or be part of a Cluster **without an objective process.**

Para 4.3:

We also have concerns regarding the 'opt in' process and how this will be achieved. It is suggested that this can only be formalised through a Local Plan Review.

Continue on a separate sheet if necessary

4) Please set out what change(s) you consider necessary to make the SAMDev Main Modification legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This process should have been undertaken by Shropshire Council on the basis of an objective assessment of the sustainability (as defined within the NPPF) of each of the settlements in Shropshire.

In this regard, the Inspector is referred to the emerging Herefordshire Core Strategy (Policy RA2) which identifies settlements in terms of a hierarchy of suitability for additional development based on sustainability criteria and not on the “choice” of a local community to resist development which pertains at the moment in Shropshire.

The SAMDev should be drafted in such a way that it achieves the delivery of the 35% of housing in Shropshire which the Core Strategy states will be provided in the rural areas without the need for an unnecessary Local Plan review. Currently the SAMDev only facilitates the delivery of around 15% of the Core Strategy figure.

Policy MD1 should be identifying and designating the settlements which can enable Shropshire Council to comply with its own adopted policy within the Core Strategy (CS1) which requires around 9,625 houses to be delivered in the rural areas.

Delegating the “choice” of settlements to achieve this to local communities compounded by the inevitable delays and resistance to development in any future review of the Local Plan means that the MM3 modification does not comply with current Planning Practice Guidance on Rural Housing, Paragraph 001, or the principle requirement of the NPPF to bring forward sustainable development without delay.

On this basis, the proposed amendments to Policy MD1(3), and the designation of settlements in the whole of the SAMDev for that matter (one of our fundamental objections raised previously), are inconsistent with national policy and the tests of “soundness” in para 182 of the NPPF.

To ensure compliance with the third bullet of PPG paragraph 001 Shropshire Council should be preparing its SAMDev so that it can effectively perform the function of a Local Plan.

Further delays and prevarication as proposed in MM3 are completely unnecessary as Shropshire Council already has in place the mechanism for delivering housing in the rural areas in the SAMDev.

Instead of ‘tinkering’ with the wording of MD1 in an attempt to make the plan “sound” Shropshire Council should be instructed by the examining Inspector to revisit the whole basis of the SAMDev in relation to the designation of settlements and the delivery of housing in the rural areas in the same way that Herefordshire Council was required to do.

Para 4.3:

Our suggestion would be that this opt-in process would be best achieved through a Supplementary Planning Document (SPD) based on the delays that has been experienced with this latest Local Plan Review.

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Continue on a separate sheet if necessary.

Please note you should cover all the information, evidence and supporting information necessary to justify the representation and the suggested change. After this stage, further submissions will only be accepted at the request of the Inspector.

You must return this form by 5pm on Monday 13 July 2015.

You can e-mail it to:

Programme.officer@shropshire.gov.uk

Or return by post to: Daphne Woof - Programme Officer, c/o Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

The Programme Officer will acknowledge receipt of comments submitted by e-mail.