



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: Kathy	Else
Organisation (if applicable):	Barton Willmore
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):	J Ross Developments Ltd
Address: c/o	Agent
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 - MM: 17

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 type="checkbox"/>
Positively prepared	<input type="checkbox"/>	<input type="checkbox"/>
Justified	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>	<input 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:

The inclusion of text to clarify the approach to settlement housing guidelines and settlement development boundaries is considered to be too restrictive. Although it is acknowledged that a future Local Plan Review will allow for settlement boundaries to be reviewed and local needs to be identified, inappropriate delays to this process could stifle the growth of communities and economic investment. Accordingly, if the merits of a housing scheme, in compliance with national advice upon sustainable development, demonstrate that a proposal is acceptable despite exceeding a settlement's housing threshold; then planning permission should not be resisted.

Investment within local infrastructure and services can only be delivered alongside development and therefore any resistance of schemes on these grounds alone must be technically justified. Such considerations do not require identification through planning policy such as this. Furthermore, the added references to '*community goodwill*' and '*breaking point*' are considered to be inappropriate and apply an onerous prioritisation to public opinion. The restriction that the added text implies is considered to contradict the objective of the Core Strategy to meet local needs and government advice in the National Planning Policy Framework to support sustainable locations. Indeed the Framework provides no advice that public opinion alone should determine the strategic growth of a settlement and such an approach would conflict with the presumption in favour of sustainable development [NPPF Paras.196 and 197]

- 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.**

It is recommended that the introduced wording be amended through the removal of reference to 'community goodwill' as this is a subjective parameter, especially when taking into account the way in which such community opinion is normally demonstrated through the application consultation process via the submission of objection letters. Furthermore the reference to 'breaking point' should be removed as this is an emotive reference that should be replaced by infrastructure capacity terms instead.

Failure to make such amendments to the text will result in a Plan Strategy that is reliant upon public opinion and unmeasured infrastructure requirements, instead of a sound policy basis. As such, the plan will not be policy led and will be ineffective in delivering sustainable development.

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.