



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.**

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- 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:	Robin Mager
Organisation (if applicable):	Shropshire Wildlife Trust
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 - MM: 71

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 type="checkbox"/>
Effective	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Consistent with national policy	<input type="checkbox"/>	<input 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 original measures for delivery and monitoring may have been challenging but they did address the effects of policy on the county's natural assets. To be meaningful monitoring needs to include impacts on designated sites, priority habitats and priority species (how else can you measure performance against the requirements of the NPPF and national Biodiversity strategies?).

The proposed modifications are a significant change as they do not provide any measure of ecological impact resulting from the policy.

- The number of applications on or adjacent to core areas gives no indication of the quality or nature of impacts (positive or negative).
- TPOs are not fundamentally an ecological designation and does not provide a measure of the success of the policy, more the work of Tree Officers.
- Important hedgerows (presumably as defined by the Hedgerow Regs) are only one limited example of habitat / natural assets. At the very least this indicator should include priority habitat hedgerows (as per NERC Act Section 41)
- Woodland as an indicator – again there should be reference to priority habitats otherwise negative impacts (e.g. non native, conifers, etc.) could be counted as positives.

The proposed indicators provide no coverage for the majority of priority habitats, or natural assets of the county, and therefore do not demonstrate a 'regard' for biodiversity and so are contrary to the NERC Act. Habitats such as grasslands and wetlands also need inclusion as do significant populations of priority species.

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 policy will be delivered by:

- The development management process including Habitat Regulation Assessment of proposals
- Preparation of a Natural Environment Supplementary Planning Document
- Preparation of a Tree, Woodland and Hedgerow strategy
- Undertaking research to identify and quantify the existing tree resource within Shropshire's built environment, in order to inform and guide future sustainable management
- Production of guidance notes for developers
- Design and Access Statements to support planning applications
- Promoting the preparation and use of Town and Village Design Statements and Parish Plans
- The LDF Implementation Plan
- Regularly updating the environmental assets/LDF evidence base
- The Shropshire Hills AONB Management Plan
- Utilising developer contributions to provide enhancements to natural assets

The following indicators will be used to monitor the effectiveness of the policy:

- Total area and type of designated sites, local sites and priority habitats lost or potentially gained through development;
- Predicted changes to numbers and extent of protected and priority species as a result of development;
- The State of the AONB Report;
- Progress against programmes and projects identified in the Implementation Plan, including developer contributions.
- Progress against programmes and projects of the Nature Improvement Area.

Continue on a separate sheet if necessary.

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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.