



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](http://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](http://www.shropshire.gov.uk/samdev).

#### Your details: Who is making this representation?

Name: Roger	Pitt
Organisation (if applicable):	
Address:	

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:

Policy Map S17 Inset 1 Wem: Site WEM 012 Tilley

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

**Support**      Yes       No   
**Object**      Yes       No

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       No   
**Sound**      Yes       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*):

<b>Positively prepared</b>	
<b>Justified</b>	
<b>Effective</b>	✓
<b>Consistent with National Policy</b>	

**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).

The Shropshire SAMDev Plan, as now drafted, lacks soundness, in my view, because the proposal for allocation of ten dwellings on the Land at Tilley site in Wem (Site WEM012) would not be effective, as will now be explained.

The reduction in the current draft of the SAMDev Plan of the proposed allocation of dwellings for this site from thirty-two to ten bears witness to the merit of objections already raised. These objections referenced hydrological problems at the Tilley site and inadequate sewer service to the area. Moreover, planning permission has previously been refused for this site. (Mike Williams email Comments on SAMDev 18 March 2014.)

In addition, the Tilley site scores negatively for access to Primary Schools. (Shropshire SAMDev Plan Sustainability Appraisal Report p. 235, Wem Place Plan, Site ref. WEM012.)

Further, a majority of consultation respondents, including the Wem Town Council considered the site inappropriate for development on any scale, due to flooding, traffic and sewerage issues. (SAMDev Plan Pre-Submission Draft March 2014: Consultation Statement, Wem Place Plan Area, Q3 response.) In response to these issues, agents for the landowner argued that development would deliver positive drainage benefits. (Q3 response, supra.) However, the SAMDev Plan appears to lack any description of how these alleged benefits could be delivered. To the contrary, replacement of the currently existing grassland with nonporous dwelling surfaces (roofing, tarmac, etc.) would apparently generate runoff that could aggravate site drainage problems.

That a ten-dwelling development might support the flood-control/drainage and sewerage infrastructure needed for the Tilley site, in an economical manner, does not appear credible. Proceeding with this development might open the door in the future to requests for a larger development to enable the necessary infrastructure work to be implemented, or completed.

To conclude, the proposed Tilley development has documented problems with sewage, drainage, flood risk and primary school access. Therefore, I believe this proposed development would not be effective and that the SAMDev Plan is therefore unsound.

**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)

I believe the reference to "Land at Tilley (WEM012)" on page 203 of the Plan and the accompanying Development Guidelines and Provision number, (10), should be deleted. This deletion would remove the unsoundness in the plan, in my view.

If ten such dwellings are truly needed for the Wem Town Development Strategy they could be included in the proposal for Land off Pym's Road (WEM003), also on page 203 of the Plan, by increasing the provision figure for this site from 100 to 110.

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:

**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	
When the Inspector's Report is published	✓
When the SAMDev Plan is adopted	✓

**Please return this form by 5pm on Monday 28 April 2014**

**You can e-mail it to:**

[Planning.policy@shropshire.gov.uk](mailto: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.