



COMPLETE

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PAGE 1

Q1: Your details:

Name: david baldock
 Address:

Q2: Are you acting on behalf of anyone? No

PAGE 2

Q3: Who are you acting on behalf of: *Respondent skipped this question*

PAGE 3: Representation details

Q4: Please give the policy/paragraph/policies map details for your first representation relates to: S5.3

Q5: Is your representation in support or objection? Object

Q6: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.

Legally compliant No

Sound No

Q7: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply) Not justified, Not effective,
 Not consistent with the National Planning Policy Framework

Q8: 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.

It is important that this policy is intended to apply in an area of which some 70% is within an AONB. The AONB is to be given special protection both in the NPPF and the adopted Core Strategy (CS). Policies in the CS set out the approach to employment development, with a clear distinction between market towns (here Church Stretton), community hubs/clusters, and the countryside. These are policies CS3, CS4 and CS5. It is not completely clear what the proposed policy means but it is a reasonable interpretation that it creates a presumption in favour of windfall development above and beyond the limitations which are in the CS. That may not be the intention, but it is a likely outcome. The limitations in the three CS policies are intended to distinguish what is suitable in each location. It is unreasonable to introduce a policy which supports development of 2 ha without any clear indication of where this is to be achieved and how suitability is to be judged. Furthermore, experience with the application of the CS policies gives no reasonable grounds to expect 2 ha of suitable windfall development in the area covered by the policy. The Council's Annual Monitoring Report claims there was 0.4 ha of Class B completions in Church Stretton in the period 2006-13. This is said to have occurred in 2011 [0.2 ha B1(a), 0.2 ha B2]. I do not accept that this figure correctly represents new employment land in Church Stretton. I am investigating these statistics but it seems more likely this was either an allocation or land already in employment use. In these circumstances this statistic is not grounds to project windfall employment development of 2 ha to 2026. Redevelopment is not the objective of this part of the policy. Hence there is not evidence which gives reasonable grounds to expect total windfall development of 2 ha applying current policies in the adopted CS. This is a further reason why the vagueness in the policy about the tests to be applied to determine the suitability of windfall proposals is so unsatisfactory. In the absence of reasonable grounds to expect the 2 ha target to be met within existing policy constraints, failure to meet the target would be cited as grounds to permit proposals inconsistent with the CS and NPPF. It is also of concern that the provisions of the plan are not based on evidence of local economic activity and employment, which would enable an understanding of the need for jobs locally and the type of employment development (if any) that would be appropriate. The presence of vacant B1 premises suggests there is little demand for that kind of development.

The policy is not legally compliant because it is not consistent with the CS but seeks to undermine it by encouraging employment development outside its terms. It is not justified because there is not evidence to support the policy. It is not effective because the provision is so vague as to be potentially undeliverable. Finally, it is not consistent with national policy. It fails to follow paragraph 115 of the NPPF in so far as it gives no protection to the landscape and scenic beauty of the AONB. It is also vague and leads to uncertainty, thereby conflicting with paragraph 154 of the NPPF which states that "– only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan."

Q9: 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.

The policy should be deleted. If this objection is not accepted and the policy is to be retained the reference to "around 2 ha" should be removed because it is unsubstantiated and could create false expectations. Alternative wording should be substituted so that the policy reads

"Windfall opportunities to develop suitable small scale employment uses within the Church Stretton development boundary and other appropriate rural locations, including Community Hubs and Clusters, will be permitted in accordance with CS3, CS4 and CS5. Opportunities for the regeneration of existing employment sites in this wider area will also be encouraged, where appropriate, in accordance with Policy MD9."

Q10: Do you wish to make another representation? No

PAGE 4: Representation details 2

Q11: Please give the policy/paragraph/policies map details for your first representation relates to: *Respondent skipped this question*

Q12: Is your representation in support or objection? *Respondent skipped this question*

Q13: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'. *Respondent skipped this question*

Q14: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply) *Respondent skipped this question*

Q15: 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. *Respondent skipped this question*

SAMdev consultation 2014

Q16: 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.

Respondent skipped this question

Q17: Do you wish to make another representation?

Respondent skipped this question

PAGE 5: Representation details 3

Q18: Please give the policy/paragraph/policies map details for your first representation relates to:

Respondent skipped this question

Q19: Is your representation in support or objection?

Respondent skipped this question

Q20: In respect of your representation on the policy, paragraph or section of the policies map do you consider that the SAMdev is: See guidance notes sections 1 and 2 for the meanings of 'legally compliant' and 'sound'.

Respondent skipped this question

Q21: If your representation considers the SAMDev plan is not sound, please say whether this is because it is: (tick as many as apply)

Respondent skipped this question

Q22: 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.

Respondent skipped this question

Q23: 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.

Respondent skipped this question

PAGE 6: Finally...

Q24: 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

PAGE 7

Q25: If you wish to attend the examination please explain why you think this is necessary.

To challenge the Council's evidence and support the objection.

Q26: Do you wish to be notified of any of the following: (we will contact you using the details you have provided)

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