



Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Mr J. & Mrs F. Davies
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph: Policy: Site: Policies Map:

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | |
|--|--|---|
| A. Legally compliant | Yes: <input checked="" type="checkbox"/> | No: <input type="checkbox"/> |
| B. Sound | Yes: <input type="checkbox"/> | No: <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: <input checked="" type="checkbox"/> | No: <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see overleaf

(Please continue on a separate sheet if necessary)

Shropshire Local Plan – Regulation 19 consultation

Settlement Policy S16.2 in relation to Baschurch and Allocation BNP024

Mr and Mrs Davies agree that the Plan is 'sound' in relation to the allocation of site BNP024 for residential development, however the proposed guideline of 35 dwellings does not meet the '*justified*' or '*consistent with national policy*' tests of soundness.

Principle of development on site BNP024

Allocation BNP024 is suitable for development for the following reasons:

- i. The site forms a natural extension of the recent development by Galliers' Homes on the adjoining site to the east;
- ii. It has ready vehicular access through the existing Galliers Homes' development on SAMDev Plan allocation BAS017 onto Shrewsbury Road;
- iii. Site BNP024 is highly accessible being within short walking distance of all village facilities, with the primary school, secondary school, village hall, mini-supermarket, post office, doctors' surgery, local employment and bus stops all within easy reach;
- iv. Site BNP024 scores 'Good' in the site sustainability assessment within the Council's Site Assessments report (December 2020);
- v. Development will contribute to the vitality of the village, extending the range and choice of housing available and supporting local services including the new medical practice on adjoining land;
- vi. It will provide generous amounts of public open space that will enable residents to appreciate views westwards from the public open space and provide an attractive, landscaped buffer on this approach to the village.

The proposed guideline of 35 dwellings

The guideline for this site does not meet the '*justified*' or '*consistent with national policy*' tests of soundness.

The proposed guideline of 35 dwellings on a 3.07 hectare site equates to only 11.7 dwellings per hectare. This density is unjustifiably low, contrary to 4 Local Plan policies as well as the Framework, namely:

- Policy SP1: The Shropshire Test requires in section 1f that development, "*Makes efficient use of land*".
- Policy SP3: Climate Change requires in section 1b that carbon emissions are reduced by, "*Supporting the principle of delivering higher density development on the most accessible urban sites*."

- Policy SP5: High Quality Design requires in section 3k, "*making efficient and effective use of land and topography.*"
- Policy DP1: Residential Mix sets a default housing mix of 25% 2 bed or smaller and 25% 3 bed or smaller. In combination with the proposed low housing guideline, this greatly limits the residential floorspace that can be delivered, making inefficient use of a highly sustainable site.
- Paragraph 122 of the National Planning Policy Framework which requires that, "*Planning policies and decisions should support development that makes efficient use of land*".

The proposed guideline of 35 dwellings at a density of 11.7 dwellings per hectare is not supported by the Council's evidence base. The Council's site assessment for BNP024 gives an indicative capacity for this site of 92 dwellings (page 286 of the Shrewsbury Place Plan Area Site Assessments, December 2020).

The proposed density is even lower than the relatively low density on the adjoining Galliers Homes development to the east of allocation BNP024 which delivered 34 dwellings on 1.94 hectares of land, including 0.42ha of public open space, equivalent to a density of 17.5 dwellings per hectare, including a generous amount of public open space.

Furthermore, the adjoining Galliers Homes development had a mix of larger houses comprising 0% two-beds, 44% three-beds, 50% four-beds and 6% five-bedroomed dwellings. The new Local Plan requires at least 25% of dwellings to be two-bedroomed and at least a further 25% to be three-bedroomed. Due to this policy requirement for small properties, the residential floorspace of 35 dwellings under the new Local Plan will be significantly lower than the residential floorspace on adjoining sites. This creates ultra-low densities by combining the limit on numbers with a limit on size.

Figure 1. Comparison with adjoining site

Mix	BAS017 (Galliers Homes development)	BNP024 Applying Policy DP1
2 bed	0 (0%)	9 (25%)
3 bed	15 (44%)	9 (25%)
4 bed	17 (50%)	9 (25%)
5 bed	2 (6%)	8 (25%)
Total	34 dwellings on 1.94ha	35 dwellings on 3.07ha
Density	17.5 dwellings per hectare	11.7 dwellings per hectare

A more appropriate minimum density for this 3.07 hectare site would be at least 20 dwellings per hectare, resulting in a housing guideline figure of at least 60 dwellings.

Modifications necessary to make the Plan sound

To ensure the development guidelines are consistent with the evidence base, the Plan's policies DP1, SP1, SP3 and SP5 and the National Planning Policy Framework, the housing guideline for this site should be increased from 35 to 60 dwellings as shown in the extract from the Plan below.

Schedule S16.2(i). Site Allocations: Community Hubs in the Shrewsbury Place Plan Area		
Site Allocation	Development Guidelines	Provision
Baschurch Community Hub		
Land west of Shrewsbury Road, Baschurch (BNP024)	<p>Appropriate pedestrian, cycle and vehicular access will be provided to the site via the vehicular access through the recently developed site off Shrewsbury Road (14/01123/OUT). All necessary highway improvements, including to the main access junction onto Shrewsbury Road will be undertaken.</p> <p>Site to be developed at a low-density and to include significant open space to reflect the character of its 'edge of village' location.</p> <p>Subject to ongoing discussions with the Clinical Commissioning Group (CCG) development to provide appropriate financial contributions towards the provision of a replacement medical centre on land adjacent to the site currently dedicated for that purpose through the delivery of planning application 14/01123/OUT.</p> <p>The development will reflect and respect the sites heritage and heritage assets within the wider area.</p> <p>Mature trees, hedgerows and priority habitats will be retained, forming part of the green infrastructure network.</p>	35 60 dwellings

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant 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.

Please see previous page.

(Please continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)
(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Mr & Mrs Davies wish to reserve the right to attend a hearing on Baschurch.

(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature: Date:

Office Use Only	Part A Reference:
	Part B Reference: