

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:	Benedict Jephcott
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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:	Page 22,	Policy:	Appendix Q: Shrewsbury Place Plan Area Site Assessments SA Site Assessment Process - Cover and Summary	Site:	SHR173	Policies Map:	s16b-shrewsbury-town-inset
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

A. Legally compliant Yes: No:

B. Sound Yes: No:

C. Compliant with the Duty to Co-operate Yes: No:

(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.

I refer specifically to Site SHR173. The criteria given on Page 22 of Appendix Q, Shrewsbury Place Plan Area Site Assessments document is incorrect. This site is within 500 meters of the Old River Bed SSSI - in fact the northeastern part of the site is just across the road from it (30 yards or so).

The Old River Bed SSSI is one of the most important nature conservation areas in Shropshire and the area of river bed just to the west of Ellesmere Road, to the north of SHR173 is of similar character. I submit that the draft local plan has failed to properly assess its relationship to the SSSI or to other parts of the old river bed to the north or to correctly record the landscape as being of exceptionally high character. Some housing which meets local needs might be desirable at this location but the size of SHR173 is clearly far too large and needs to be redrawn taking better account of the local environment, amenity value, wildlife corridors including protected bat colonies at Hencote to the north, transport capacity and impact on CO2 emissions.

I also note that the site is indicated as going forward for development if the NWRR road is built. The plans for this road have still not been published as this deadline passes. This is another reason why this pre-submission draft is not legally compliant, as consultees cannot assess whether the local plan can meet its climate change obligations as the full details of the NWRR including its environmental, traffic and carbon impact have not been made available.

(Please continue on a separate sheet if necessary)

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.

Page 22 of the document (Appendix Q) and the criteria relating to site SHR173 need to be changed to reflect that the site is within 500 meters of the Old River Bed SSSI and additionally very near landscape of high amenity value, a noted wildlife corridor with protected bat colonies in the trees to the north of the old river bed at Hencote, as recognised both by the Council in conditions set for development at Hencote and by Historic England in terms of the car park adjacent to the FlaxMill Maltings, where extensive efforts have been made to protect bat roosts and protect their route to the Old River Bed.

To be compliant and sound, site SHR 173 needs to be redrawn on a much smaller scale, to more closely reflect the proximity of the SSSI, wildlife corridors and amenity value of the land to the north and north east of the site. Alternatively, the site should be removed altogether.

(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:

It is plain from the inaccurate way the criteria relating to site SHR173 have been presented that the Council has failed to adequately assess or take account of the SSSI nearby or the wildlife and amenity value of this site, so close to the Old River Bed. As such the site cannot be considered sound, or legal.

(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: <input type="text"/>	Date: <input type="text" value="26-2-2021"/>
<input type="text"/>	Part A Reference: <input type="text"/>
Office Use Only	Part B Reference: <input type="text"/>