

# **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:	Name and Organisation: Sarah Richards, Chair, Baschurch Parish Council				
Q1. To which document	does this representation relate?				
Regulation 19: Pre-Sub	omission Draft of the Shropshire Local Plan				
Sustainability Appraisal Local Plan	l of the Regulation 19: Pre-Submission Draft of the Shropshire				
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: 1.c.iii P	Policy: DP5 Site: Policies Map:				
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	v 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 he 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.

The corresponding paragraphs in DP4 and DP6 have been changed to "Another settlement with a school or the ability to access a school by public transport."

This change has not been made to DP5 which still states "Another settlement with a school or appropriate access to a school by sustainable modes of transport."

We suspect that this is a typo.

We agree with the change to public transport as this ensures that families without access to private cars can live in these affordable houses.

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.

Change the wording to match that in DP4 and DP6 as follows:

"Another settlement with a school or the ability to access a school by public transport."

(Please continue on a separate sheet if necessary)

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#### 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:

(Please continue on a separate sheet if necessary)

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Signature:		Date:	26/02/2021
	Office Llee Only	Part A Reference	ce:
	Office Use Only	Part B Reference	ce:



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Name an	Name and Organisation: Sarah Richards, Chair, Baschurch Parish Council						
Q1. To wh	ich document	does t	this repres	entatio	n relate?		
Regul	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
L Shrop	Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)						
Q2. To wh	ich part of the	docu	ment does	this re	presentatio	n relate?	?
Paragraph:	Paragraph: 5.230 Policy: S16.2 Site: Policies Map:						
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:							
A. Legally compliant Yes: No:							
B. Sound	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.

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The Baschurch Parish Council Regulation 18 Submission requested the addition of details of the priorities of the Parish Council to be inserted. We believe that unless these priorities are highlighted within the plan, there will be no requirement by developers, planning officers and the Planning Committee to consider and support these priorities and to prevent development hindering their realisation.

The three priorities that need to be included are as follows:

- a. New Medical Centre To support the increase in population within Baschurch and the catchment area of the current Surgery from current and planned development
- b. Station Road to Eyton Lane Link Road To alleviate the congestion and safety issues adjacent to the schools in Eyton Lane
- c. Reinstatement of the Railway Station To provide access to the rail network through a local station and to provide a sustainable public transport link direct to Shrewsbury Town Centre

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The provision of a new Medical Centre is a priority for the residents of Baschurch and the catchment area of the existing Surgery due to the significant existing and planned development within the catchment area. Land has already been allocated through a 106 Agreement to support a new Medical Practice which is to be further supported by the requirement to allocate additional land to this project from the adjacent allocated site.

A link road, suitable for use by coaches, between Station Road and Eyton Lane is a priority for Baschurch Parish Council to alleviate the traffic and safety concerns adjacent to the schools in Eyton Lane. Any future development in adjacent sites will need to contribute towards this.

The re-instatement of a railway station is a priority for Baschurch Parish Council. Any development in the area of the old railway station shall not preclude this aim and shall provide infrastructure to support the aim as appropriate.

(Please continue on a separate sheet if necessary)

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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 important that the priorities identified by the Parish Council are included in the plan to ensure that, as a minimum, development does not affect these priorities and that community benefit from developers is directed to provide support for the realisation of the projects. These are all positive projects that provide infrastructure to provide local services, safe routes to schools and a sustainable public transport link and Baschurch Parish Council want to ensure that they are included.

(Please continue on a separate sheet if necessary)

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Office Use Only	Part B Reference:	

Signature:

Date: 26/02/2021

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Office Ose Offiy	Part B Reference:



# **Representation Form**

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### **Part B: Representation**

	Name and Organisation: Sarah Richards, Chair, Baschurch Parish Council					
Q	1. To which document	does this repre	sentation relation	te?		
V	Regulation 19: Pre-Su	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)					
Q	2. To which part of the	e document does	s this represer	ntation relate?		
Pa	Paragraph: 1 Policy: SP1 Site: Policies Map:					
_	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.

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The Shropshire Test fails to ensure that where plans are adopted for certain areas, the impacts on other local communities are not reviewed and where necessary, addressed. For example, the Shrewsbury Big Town Plan seeks to remove a considerable amount of bus traffic from the town centre by closing the bus station and requiring buses to terminate at the existing park and ride locations. This makes use of public transport to access Shrewsbury Town Centre more difficult as two buses will be required from Baschurch. To access the hospital, 4 buses will be required. This will make the use of buses less attractive, that will then further reduce their sustainability and will led to further services being cut.

Whilst the aim of reducing pollution and congestion in the centre of Shresbury is to be applauded, these policies must not be Shrewsbury centric and must provide a wider solution that supports the whole of the Shropshire community.

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Add the following sub-paragraph to Paragraph 1:

h. Ensures all communities are not adversely affected by changes in primary infrastructure, services, facilities or transport

(Please continue on a separate sheet if necessary)

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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:

To ensure that the plan protects the rural community from strategic changes undertaken in urban areas, even when these are with the best intentions.

(Please continue on a separate sheet if necessary)

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Signature:		Date:	26/02/2021
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	Office Use Only	Part B Reference	ce:



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	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. T	o which part of t	he document doe	s this repr	esentation re	late?
Parag	raph: 4. a	Policy: SP10	Site:		Policies Map:
-	Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:				
A. Legally compliant Yes: No:					
В. 9	B. Sound Yes: No: 🗹				
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The Baschurch Council Regulation 18 submission reflected concerns about the ability of developers to use exception sites that would be unsustainable for those requiring affordable housing and that where a settlement included a school, or had access to a school via sustainable transport modes (a very subjective criteria), that these could be targeted for multiple sites that could adversely change their character and not be supported by local services.

The suggested changes to reduce the above risks highlighted within the submissions have not been implemented sufficiently to reduce these risks. The comments detailed within the Regulation 18 Submission from Baschurch Parish Council for SP9 (now SP10) and the associated DP3, DP4, DP5, DP6 and DP7 have not been adequately addressed in the Regulation 19 Draft to ensure a good mix of housing in an area, sustainable and viable access to schools, services and employment for those without their own cars, change in character from multiple and adjacent sites and erosion of gaps between settlements.

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Change the paragraphs that currently state "reasonable access to local services by walking, cycling or public transport" to "reasonable access to local services, schools and employment by walking, cycling or public transport that can be shown to be safe and viable" in DP3, DP4, DP5 and DP7.

In DP3, remove the word "appropriately" which is subjective from Para 1.h so that it reads" Ensuring that affordable housing is distributed within the site...."

In DP4, DP5 and DP7, change 1.a.iii from "Another settlement with a school or the ability to access a school by public transport" to "Another settlement with access to both primary and secondary schooling by safe and viable means for those without their own transport."

In DP6, change Para 1.b from" The site is within and well related to the built form of a settlement and has permanent and substantial buildings on at least one side;" to "The site is within and well related to the built form of a settlement, has permanent and substantial buildings on at least one side and cannot be built next to another exception site approved within the plan period, unless it is genuine in-fill or can demonstrate support from the relevant town or parish council;".

(Please continue on a separate sheet if necessary)

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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:

To have the opportunity to present the Council's concerns regarding exception sites and affordable housing so that it is developed in a viable way for the use of those that require affordable housing and that it does not adversely affect the character of rural communities, particularly those currently with schools. Shropshire is a very diversely developed county and what works in one settlement may not work in another.

	Office Use Only	Part A Reference:
		Part B Reference:

(Please continue on a separate sheet if necessary)

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Signature:

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Office Llee Only	Part A Reference:
Office Use Only	Part B Reference: