

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:	LICHFIELD DIOCESAN BOARD OF FINANCE
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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:	<input type="text"/>	Policy:	S16.2	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input 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 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.

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<p>The draft Local Plan should allocate additional land to meet the settlement housing guideline of 200 dwellings.</p> <p>Further land to the North of the proposed allocation BAY039 (shown on the attached plan) is available, suitable and viable for residential development.</p>

(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.

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Land to the north of allocated site BAY039 should be allocated for residential development.

(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)?

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No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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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:

Michael Watney

Date:

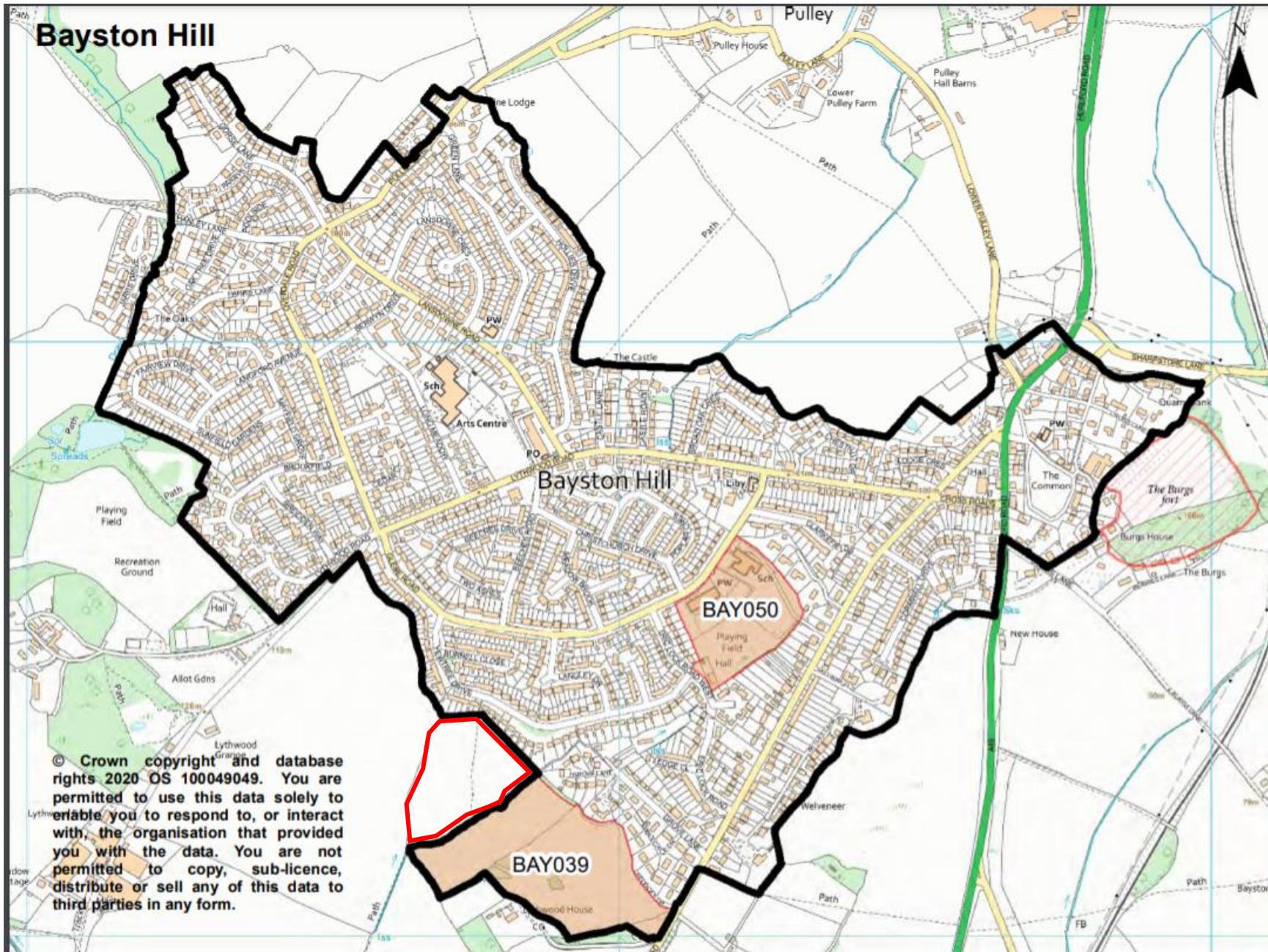
26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Land North of Lythwood House, Bayston Hill



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Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SP2(6) & Schedule SP2.2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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PLEASE SEE ATTACHED STATEMENT

(Please continue on a separate sheet if necessary)

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TO DISCUSS THE SCORE FOR MYDDLE IN THE 2020 HIERARCHY OF SETTLEMENTS ASSESSMENT

(Please continue on a separate sheet if necessary)

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Office Use Only	Part A Reference:
	Part B Reference:

Signature:

Justin Stevenson

Date:

26/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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Signature: Justin Stevenson

Date: 26/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Regulation 19 Pre-Submission Draft of the Shropshire Local Plan
**Representation Regarding Policy SP2(6), Schedule SP2.2 & Policy S17.2,
and Land to the rear of Glebelands, Myddle, Shropshire**



on behalf of The Lichfield Diocesan Board of Finance

February 2021

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Introduction

The Council has invited comments on the Regulation 19 Pre-Submission Draft Shropshire Local Plan ('draft SLP').

Balfours LLP respond on behalf of The Lichfield Diocesan Board of Finance (LDBF).

LDBF are seeking the designation of Myddle as a Community Hub, within the Wem Place Plan Area, under draft SLP Policies. We have previously submitted representations to the 'Strategic Sites Consultation' (2019), 'Preferred Sites Consultation' (2019), and Regulation 18 pre-submission stages, in relation to the Local Plan Review process. It is submitted that our Client's site is suitable for meeting the housing needs of Myddle and contributing to the wider needs of the County in the Plan period, and should be identified as a residential allocation in the Shropshire Local Plan.

It is anticipated that the Local Plan will be adopted in 2022, subject to independent examination.

Policy SP2(6) & Schedule SP2.2

Policy SP2 sets out the draft Local Plan strategic approach to development in the County over the plan period.

Policy SP2 criterion 6 states:

"Recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, growth in urban areas will be complemented by appropriate new development within Community Hubs, identified in Schedule SP2.2, which are considered significant rural service centres..."

Schedule SP2.2 lists the Community Hubs designated in the Wem Place Plan Area, including Clive, Hadnall and Shawbury, but excluding the settlement of Myddle.

Designation of Community Hubs was determined through a series of three "Hierarchy of Settlements Assessments" (HoS), between 2017 and 2020. The HoS undertook an assessment of the level of services, facilities and employment within recognised settlements, whereby settlements were awarded a 'score' for the presence of various facilities, services, public transport and employment.

Those settlements which achieved a combined score of 48 points were considered to be significant rural service centres, and were designated as 'Community Hubs'. Within the rural area, these Community Hubs would accommodate larger-scale housing and employment development, where appropriate.

The 2017 HoS assessment produced a score of 52 for Myddle village. Consequently, in the 2017 Local Plan Review consultation document on the 'Preferred Scale & Distribution of

Development' (paragraph 6.8, Table 3), Myddle was identified as a proposed Community Hub.

In November 2018, the Council published an updated HoS report. Here, the settlement score for Myddle was reduced to 47, thus making it one point short of the required 48 points for designation as a Hub. The amended score arose for two reasons:

- The Myddle village shop had closed since the 2017 HoS. This meant a reduction of 4 points to 48 points; This is accepted.
- In the 2017 HoS, Myddle had scored 4 points under the category of 'Children's Playground'. This was made up of 3 points for having such a facility, and a further 1 point for 'multiple provision' (ie. more than one), in line with the scoring system in Table 4 of paragraph 5.16 of the 2017 HoS. For some unexplained reason, the 2018 HoS removed the additional point scored for multiple provision of children's playground, making the total score for the village now 47.

It is also noted that the settlement scored 0 for 'Outdoor Sports Facility', in both the 2017 and 2018 HoS.

In November 2018, the Council carried out a consultation on Preferred Sites. Paragraph 20.13 identified Clive, Hadnall and Shawbury as Hubs, with Myddle now excluded, owing to the reduced score of 47 described above.

Despite representations made by LDBF on the Preferred Sites Consultation, the settlement score in the third version of the HoS (August 2020) remains at 47 points. Consequently, the Regulation 19 Draft Local Plan maintains the exclusion of Myddle as a Community Hub, within Schedule SP2.2 and Policy SP2.

Grounds of Representation

The National Planning Policy Framework (NPPF) sets out the key plan-making framework and 'tests of soundness' for Local Plans (Paragraph 35). The National Planning Practice Guidance (NPPG) provides further advice on how these tests can be met, for instance in terms of evidence-base gathering.

It is noted that this current framework for the preparation and examination of Local Plans is subject to a future review, as detailed in the recently published 'Planning for the Future' White Paper (August 2020). As per the government's consultation proposals, the current tests of soundness would be replaced with a 'sustainable development test'.

It is understood that Shropshire Council intends to submit the SLP for examination in early 2021. Should this occur then the current NPPF and tests of soundness will still be applicable.

We consider that the draft SLP is currently unsound, as the failure to designate Myddle as a Community Hub in Policy SP2, Schedule SP2.2 and Policy S17.2 it is not justified by evidence.

The 2020 HoS Settlement Score for Myddle

Below is an aerial photograph of the village recreation area, known as Myddle Park, extending to just over 2 acres.



The park includes a fenced Children's Playground, designed for younger children:



Within separate areas of Myddle Park there are also other play facilities for different age groups, comprising:

An area of swings and climbing apparatus for older children:



A hard-surfaced playground with an adjoining shelter:



A five-a-side grass football pitch and a set of full-sized football posts



It is submitted that:

- The different components for children's play within Myddle Park represent multiple provision of Children's Playgrounds;
- Consequently, the additional point scored in the 2017 HoS for multiple provision of Children's Playground should not have been removed;
- The provision of the five-a-side pitch and hard surfaced area represent outdoor sports facilities, thus attracting a further score of 3 points;
- The total settlement score for Myddle should have been 51, thus qualifying the village for designation as a Community Hub.

We further submit that :-

- Appropriate consideration needs to be given to the allocation of a site or sites for residential development in the village, in line with the approach in other Community Hubs;
- A suitable site for residential development, in the ownership of LDBF, is available and suitable for such designation, to the rear of Glebelands, Myddle.

The proposed site to the rear of Glebelands is available, suitable, and viable for residential development. A concept sketch plan of the site is provided below.

Land to the rear of Glebelands, Myddle – Sketch Plan



The proposed site :-

- Has a suitable and safe highway access on to the main road;
- Is in the centre of the village, immediately adjoining the existing built-up area;
- Can provide a total of 47 dwellings, including 7 affordable;
- Can provide new public open space;
- Would retain undeveloped an area of land at the rear of the site, subject to flood risk;

Summary of Suggested Changes and Conclusions

Policy SP2 (Schedule SP2.2) of the draft Shropshire Local Plan should be amended to designate Myddle Village as a Community Hub.

Land should be allocated in the draft Local Plan policy S17.2 for new housing development in the village, including all or part of the land in the ownership of LDBF.

David Parker, Planning Consultant, Balfours LLP,

On behalf of the Lichfield Diocesan Board of Finance

16th February 2021