

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:	Hadnall Parish Council
------------------------	------------------------

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:	<input type="text"/>	Site:	Hadnall	Policies Map:	s17-wem-place-plan-area-inset-maps
------------	----------------------	---------	----------------------	-------	---------	---------------	------------------------------------

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 type="checkbox"/> | No: | <input checked="" 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.

The original iterations of plans and a village development boundary for Hadnall demonstrated a degree of granularity taking full account of areas and sites within the village that would sit outside of the development Boundary.

Plans presented in the Pre-submission Regulation 18 and subsequent Pre-submission Regulation 19 Drafts of the Shropshire Local Plan provide no such protection and leaves unnecessary ambiguity in areas where further development would be inappropriate. The plans presented at these stages do not resemble the plans presented to the public throughout the various consultation phases prior to the Reg 18 and 19 stages. No explanation has been provided to why plans were changed at such a late stage of the development of the Local Plan.

Shropshire Council declared Hadnall a Hub using the Hierarchy of Settlements methodology. Shropshire Council also **stated that Hadnall was** "in the third quarter of the list of 43 community hubs". The third quarter by Shropshire Councils definitions aims for 25% less development than the average 112 dwellings required in each rural area identified as a Hub. Using Shropshire Councils own figures and methodology the plan could be challenged as unsound as Hadnall should have been allocated 25% of 112 and therefore 84 dwellings not the current 125 allocated. Following this logic Hadnall would be required to build a further 11 dwellings to meet their own narrative which can be met by Windfall/infill/conversion.

Shropshire Council have paid no heed to local concerns in regards of their preferred site submitted throughout the consultation process. In particular that development to the south of the village accessed off the A49 is not the preferred site locally. Alternative sites to the east and west of the village with established access already in place, that do not experience similar levels of flooding allow for more sympathetic, practical and planned growth of the village.

The main objections put forward were:

1. **Development 'to the south' of the village and outside of the current development boundary.**
2. Significant historical Flooding Risk.
3. Access to the A49.

1. Development to the South of the village

The proposed site was subject to a planning application in 2014 which was refused by SC. A subsequent appeal to the Planning Inspectorate in 2015 led to that appeal being dismissed on a number of well documented policy grounds. The Inspectors report stated that in her view **"the site reads clearly in the street scene as the beginning of the countryside beyond the southern perimeter of Hadnall village"** and that **"the development would inevitably and irrevocably change the character and appearance of the countryside, simply by extending the spread of built development"** She went on to say that **"this in itself would be harmful to the rural sense of place"**. The PC shares these documented views and believe that some three years on they remain equally valid.

The Inspector went on to say that "the site and its immediate environment perform a transitional function between village and countryside, moving southward from the compact, domestic environment of Wedgefield Close and Old Farm Lane to a more rural landscape with little built form and an abundance of open fields interspersed with copses of trees and native hedgerows". Non-fulfilment of this role weighed heavily on that assessment and against the proposal. "In common with many settlements, Hadnall's highest density is at its centre, with building coverage dropping off as one heads towards the open countryside".

In addition the inspector had reservations about the visual impact of the proposed access arrangements. Existing views on entering and leaving the village along the A49 Shrewsbury Road, are dominated by hedging and grassed verges, giving the road a very rural character. **"Even if mitigation could be sought at reserved matters stage through the submission of a landscaping scheme, the gap created for the new road and the associated visibility splays and footpath would disrupt the continuity of the hedgerow, reducing its contribution to the rural character and appearance on this approach to the village". The development proposed was then and still is outside the defined settlement boundary for Hadnall and she concluded**

Office Use Only

Part A Reference:

Part B Reference:

would....” have a significant adverse effect on the open landscape character of the area and its intrinsic rural character”.

2. Significant historical Flooding Risk

The PC wish to highlight the concerns of local residents in regard to flooding across this site. Concerns and photographic evidence is well documented in comments submitted during the previous submission 14/04559/OUT during 2014. Whilst SC’s planning officers reports ‘suggests’ that drainage details, plan and calculations could be conditioned and submitted for approval at the reserved matters stage if outline planning permission were to be granted but that as the scheme is greater than 1 hectare, a Flood Risk Assessment (FRA) would need to be produced.

3. Access to the A49

The site access is onto the A49 and the PC notes the proposal to extend the 30mph further to the South. There are still grave concerns about the speed and volume of traffic passing through the village. The previous planning decision report for this site made reference to traffic surveys and accident data. The PC would welcome updated analysis of both these factors as there have been at least two serious accidents in recent months on this stretch of the A49 and the volume and speed of traffic remains a real concern to residents.

As detailed in our response to 59a above, the PC believe that this is not the most appropriate site for sympathetic, practical and planned growth of our village. Again we point to SC Planning Officers report from 2014 stating “The village shop and post office are some distance away from the development and the village hall even further. Walking or cycling along a narrow pavement on A49 is very daunting and likely the residents would resort to motorised vehicular traffic to use local amenities, church, village hall, shop rather than on foot or bicycle”. The PC supports this comment and believes it remains valid.

Initial discussions with Shropshire Council during the early stages of consultation indicated that an even longer term strategic intent for the future direction of growth beyond the life of the plan could be developed (as indicated in the Local Plan 2016-38 Key shown on page 2 of the Wem-place-plan-area-inset-maps).

Despite this initial early consultation and objections to SC’s preferred site no changes to the preferred site or inclusion of strategic intent has been forthcoming.

(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.

Office Use Only	Part A Reference:
	Part B Reference:

Reinstate the development boundary and plans the public were initially consulted upon, giving key areas of the village protection from future development.

Address the issue and provide a response on the anomaly that, using Shropshire Councils own Hierarchy of Settlements methodology, Hadnall being in the third quarter of the list of 43 community hubs definitions has had proposed more than the 25% less development than the average 112 dwellings required in each rural area identified as a Hub.

Provide an explanation as to why after such a wide reaching Local Plan review no longer term strategic intent for the 'future direction of growth' **has been included despite** being an option indicated in the Local Plan 2016-38 Key (see page 2 of the Wem-place-plan-area-inset-maps).

(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:

Provide a local perspective on the issues raised

(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:

Jim Slater Chair HPC

Date:

12/01/2021

Office Use Only

Part A Reference:

Part B Reference: