Shropshire Council: Shropshire Local Plan

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:	Adele Dray

Q1. To which document does this representation relate?

- [x] 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:	CLV012/018	Policies Map:	

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

	Yes:	No:
A. Legally compliant	✔	
B. Sound		✔
C. Compliant with the Duty to Co-operate	✔	

(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.

Objectively plots CLV012/018 provide fewer benefits to the village than plot CLV010.

Therefore the plan is not sound because it is contrary to NPFF test, section 35 b):

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

See continuation sheet for details:

(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.

Modification to change preferred plot to CLV010.

(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.

- [x] 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)

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: Adele Dray

Date: 09/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

CLV010 was originally proposed by Shropshire Council. This was changed to CLV012/18 after the initial consultation based on

i) proximity to the A49,
ii) because of a more central location closer to village
iii) car parking facilities to serve the school and other amenities

<u>All three of these reasons are either factually incorrect or not of significant benefit as follows (*maps and analysis are included in my response to the Reg 18 consultation attached):*</u>

i) proximity to the A49 of CLV012/18 would not reduce traffic through the village compared to CLV010 because the A528 (which is much closer to CLV010) is the quicker and more logical route to access more destinations, including Shrewsbury (and links to the A49 via the Battlefield Link Road for East and South destinations). There is actually a small benefit for reduction in traffic from developing CLV010.

This reason for choosing CLV012/018 is not in the Reg 19 draft plan, but the plot remains.

ii) CLV010 is not further from the village amenities as a whole, being slightly closer to the centre of the village, with the village hall, play field, church and hub in both distance and walking time and with better footpath connectivity proposed to allow walking off-road.

This reason has been replaced in the Reg 19 draft plan, with the wording now acknowledging that CLV012/018 is an "edge of village location."

iii) Car parking facilities to serve the school at CLV012/018 would be redundant due to the location being approximately 700m via the proposed footpath to the school, or over 100m on road without a pavement, back to the existing on-road parking. Therefore, it will not "reduce the level of on-street parking" as stated in the Reg 19 draft plan.

Parents living outside of the village, as the main intended users of the car park were not informed or consulted by Clive Parish Council as they felt that was a matter "for planning permission stage only", despite it being cited as one of the main reasons for choosing the plot. Usefulness for any other amenities is even more ridiculous, as a glance at a map of the village will show.

This reason remains in the Reg 19 draft plan, but the wording has been amended to remove any mention of the proposed footpath via the bridleway and been replaced with a commitment to "enhance pedestrian linkages between the site and the existing facilities on the High Street and with Clive Primary School along Holly Close."

The only way of doing this would be by i) putting in over 100m one-way section along High St, with traffic lights to create enough space for a pavement, or ii) cutting an all-weather footpath directly West across a field owned by two separate landowners or through a wooded area owned by a third. This commitment does not appear achievable at present, but should be made a condition of planning permission for the site because it is being cited as a principle benefit for choosing the plot over CLV010. Without the pedestrian link, it would be a redundant car park that may attract antisocial behaviour or at best encourage more

traffic through the village as dog walkers might use it in preference to the Corbet Wood car park, which is slightly further to walk to the main viewpoint at the top of the hill.

The majority of village residents favour CLV012/018 for development over CLV010, because the bulk of existing housing is in the vicinity of CLV010. However, this is not a sound basis for plot selection, which should be based on the overall evidence-based benefits to the village.

Benefits of CLV010

Significant benefits offered by developing CLV010 are

i) improved pedestrian access to the centre of the village by connecting the back of CLV010 to the existing footpath running from Back Lane to Yorkton Station benefiting new residents as well as the existing residents of Station Road

ii) an s106 agreement to transfer land adjacent to the school to allow it to build a canteen, early years learning space and a school hall for assemblies or sports. With its historic building and unique location of the village school on top of the hill, the physical constraints of the building are a major challenge to its future sustainability. Acquiring land adjacent to the school would be a huge benefit help to secure the future of the school for generations to come.

The plot selection may reflect the weight of sentiment of consultation responses, but does not reflect evidence-based decision making and is therefore not 'Justified' in line with the National Planning Policy Framework. The plot should be changed back to CLV010, which provides far greater benefit to the village.