



Consultation Form

Name of the Local Plan Consolation:	Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
Please return to:	Planningpolicy@Shropshire.gov.uk or Shropshire Council, Planning Policy & Strategy Team, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND
Please return by:	5:00pm on Wednesday 30th September 2020

This Consultation Form consists of two parts:

Part A Consultation Form: *Personal details – this part (need only be completed once).*

Part B Consultation Form: *Your Response(s) (please fill in a separate Part B Consultation Form for each comment you wish to make, relating it to the relevant paragraph, policy (including its explanation) or site).*

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
	<small>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) in column 1 but complete the full contact details of the agent in column 2.</small>	
Title	Ms	
First Name	Marian	
Last Name	Giles	
Job Title (where relevant)	Parish Clerk	
Organisation (where relevant)	Kinnerley Parish Council	
Address Line 1	61 Willow Street	
Address Line 2		
Address Line 3		
Address Line 4		
Post Code	SY11 1AQ	
Post Town	Oswestry	
Telephone Number	01691-679171	
E-mail Address (where relevant)	kinnerleyparishcouncil@gmail.com	

*Please Note: We cannot accept anonymous responses. You must provide your name and contact details. Your personal data will be processed in line with our [Planning Policy Privacy Notice](#). Please complete a separate **Part B Consultation Form** for each comment you wish to make, relating it to the relevant paragraph, policy (including its explanation) or site.*

Office Use Only	Part A Reference:
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Consultation Form

Part B Consultation Form: Your Response(s) – this part (please fill in a separate Part B Consultation Form for each comment you wish to make, relating it to the relevant paragraph, policy (including its explanation) or site).

Please ensure that you also complete one **Part A Consultation Form** and submit this alongside you Part B Consultation Form(s).

We have also published a separate **Guidance Note** to assist in making effective representations.

Part B: Response

Name:	Ms Marian Giles, Parish Clerk
Organisation (if relevant):	Kinnerley Parish Council

Q1. To which document does this response relate?

- Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this response relate?

Paragraph:	<input type="text"/>	Policy:	S14.2 insofar as it relates to Kinnerley (also policy SP7)
Site:	<input type="text"/>	Policy Map:	<input type="text"/>

Please note: Responses to this Regulation 18: Consultation can address any of the Supporting Documents and Evidence by relating them to the resulting paragraph, policy (including its explanation) or site in the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

- Agree
- Disagree
- Don't know / no opinion

(Please tick one box)

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2:

See attached detail

Please succinctly provide all evidence and supporting information necessary to support your response. Please continue on a separate sheet if necessary.

Completed Consultation Forms can be submitted by emailing:

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*If submitting your own response, please enter your last name in the subject field of the email;
If submitting a response on behalf of a client, please enter their last name in the subject field of the email.*

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Office Use Only	Part A Reference:
	Part B Reference:

Kinnerley Parish Council
Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
Form B additional comments

Policy S14.2. Community Hubs: Oswestry Place Plan Area (page 233) insofar as it relates to Kinnerley (and Policy SP7 Managing Development in Community Hubs)

1. Residential Guideline of around 60 dwellings for Kinnerley Community Hub

Appendix 5 (page 329) of the Consultation document sets out the figures for Kinnerley as follows:

Schedule A5(ii): Residential Guidelines and Residential Supply within the Community Hubs							
Settlement	Place Plan Area	Residential Development Guidelines	Total Residential Completions (2016/17, 2017/18 and 2018/19)	Total Residential Commitments			Windfall Allowance
				Sites with Planning Permission or Prior Approval (as at 31st March 2019)	Saved SAMDev Plan Allocations without Planning Permission (as at 31st March 2018)	Local Plan Allocations	
Kinnerley	Oswestry	60	7	32	0	0	21

This proposed residential guideline of 60 dwellings is unchanged from that proposed at the Preferred Sites stage of consultation. Our submission as below in January 2019 to that consultation, to which we have never had any response, gave a detailed argument for a lower figure:

- The SAMDev guideline for our whole Cluster was for only 50 new houses throughout the Parish. The Kinnerley Parish Neighbourhood Plan (page 7) had a guideline of 54 new houses for the whole Parish, but only 23 of these were for Kinnerley village itself. Kinnerley village (the proposed Hub) has only 149 dwellings according to our records. By any reckoning, a guideline increase of 40% (60 versus 149) is out of all proportion.
- You are proposing only an average increase of about 25% over the 20-year plan period for the towns and key centres, based on their size and services available. Proportionately, the guideline should therefore be about 37 dwellings (25%) for the Hub of Kinnerley village.
- It is not acceptable to require Kinnerley village to have yet more houses just because it is already committed to increase in size. Furthermore, 23 new houses have already been built since the development section of the Kinnerley Parish Neighbourhood Plan was adopted by Shropshire Council in November 2012. Your proposed guideline of 60 would therefore entail the building, between 2013 and 2036, of 83 new houses in Kinnerley village. That would be an increase of 66% (83 versus 126) in 23 years, without any further supporting infrastructure. We consider that such an increase is unacceptable.

These comments apply even more so at this current stage of the draft plan.

The Appendix below sets out our understanding of the derivation of the above figures from Appendix 5, and we have also shown in the Appendix the above-mentioned 23 further completions since the adoption of the KPNP.

We repeat that you are proposing an increase of 66% in the size of Kinnerley Village, now within 25 years, compared to much lower proposed increases in most other settlements, including most urban settlements. The average increase for Hubs in the Oswestry Place Plan area is about 29% and you have supplied no justification why you are proposing that Kinnerley should be increased proportionately more than other Hubs. This is not *“appropriate development in rural areas”* (paragraph 3.46), given that *“the strategic approach to the distribution of development which underpins this Local Plan is one of urban focus”* (paragraph 3.45).

We suggest that, in order for this aspect of the plan to be deemed sound, the new residential guideline for Kinnerley as a Community Hub, should be no more than 50 dwellings, not the proposed figure of 60 dwellings.

Our hope is that we can receive some input from the Right Homes Right Place team to assist in identifying a possible community led development on a suitable site, to deliver some truly affordable homes in the village. Once the existing further commitments of 32 dwellings have been completed, there would be 188 dwellings in the village, of which only 30, or 16%, will be affordable, which is a low percentage.

2. Policies Inset map for Policy S14.2

We endorse the inset map for Kinnerley village, showing the revised development boundary.

3. Key Evidence for Policy S14.2 and for paragraph 1.i of policy SP7 Managing development in Community Hubs

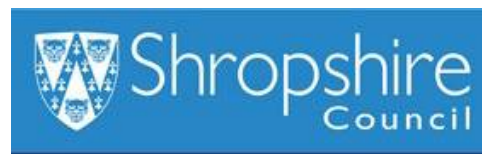
Appendix 4 lists items of Key Evidence for the Settlement Policies S1 – S18 (page 314), which includes item 16, Shropshire Landscape and Visual Sensitivity Study (2018). That includes LVSS 39KNY for Kinnerley.

We would also remind you of the excellent and unique 2007 Design Statement and Landscape Character Assessment for the Parish of Kinnerley, and request that this document be added to the evidence base, with specific reference to Kinnerley. It has already been adopted by Shropshire Council as part of the Kinnerley Parish Neighbourhood Plan. This document is also of importance in supporting the design criteria aspect of paragraph 1.i of policy SP7 Managing Development in Community Hubs.

4. Hierarchy of Settlements scores for Kinnerley

The Hierarchy of Settlements scores for Kinnerley should now be re-amended following the successful re-opening of the Cross Keys Inn in Kinnerley.

Kinnerley Village - residential completions 2016/17 -2018/19 and commitments as at 31st March 2019					
Planning Application					
Planning Application	Address	Date of Decision	Net Dwellings	Net Completions	Net Outstanding
16/00902/REM	Land Including Storage Buildings/Offices, Argoed Road, Kinnerley, Oswestry, Shropshire, SY10 8DH	17/06/2016	18	6	12
16/04719/FUL	Proposed Residential Development Opposite School, Kinnerley, Shropshire	14/03/2019	18	0	18
18/00519/OUT	1 Mayfields, Bankfields Lane, Kinnerley, SY10 8DF	17/07/2018	2	0	2
Total as Five-year housing supply to 31 March 2019			38	6	32
14/01281/FUL	Skylarks (Hall Farm Nursery Cottage)			1	
Sub-total				7	
Other completions since adoption of KPNP in November 2012					
13/00615/FUL	Coly Anchor phase 2			12	
14/05774/FUL	Centenary Close			11	
Total				30	



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Please ensure that you also complete one **Part A Consultation Form** and submit this alongside you Part B Consultation Form(s).

We have also published a separate **Guidance Note** to assist in making effective representations.

Part B: Response

Name:	Ms Marian Giles, Parish Clerk
Organisation (if relevant):	Kinnerley Parish Council

Q1. To which document does this response relate?

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- Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this response relate?

Paragraph:			Policy:	S14.3 insofar as it relates to Kinnerley (also policy SP8)
Site:		Policy Map:		

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Form B additional comments

Policy S14.3. Community Clusters: Oswestry Place Plan Area (page 238) insofar as it relates to Kinnerley (and Policy SP8 Managing Development in Community Clusters).

Policy S14.3 proposes that Maesbrook, Dovaston and Knockin Heath be designated as a Community Cluster. We have previously reserved judgment on this designation, pending the release of further detail on policies and their application.

We believe that the modest levels of appropriate development mentioned in paragraph 3.60 of policy SP8 (page 30) have already occurred in these settlements in combination, as evidenced in the Appendix below.

This Appendix demonstrates that, with completions and commitments, the three settlements combined will have increased by 25 new dwellings, compared with an increase of 62 dwellings for Kinnerley village. The expectation in the Kinnerley Parish Neighbourhood Plan was that these settlements should have only 24 new dwellings. They are therefore already subject to more development than expected.

We are also conscious of the policy within the Type and Affordability of Housing Supplementary Planning Document (SPD) of September 2012 (paragraph 5.8, page 25) that states:

Where the [local needs exception] site is in a settlement which forms part of a Community Cluster, housing need arising in all parishes included in that Community Cluster may also be included.

Now that we are being encouraged by Shropshire Council to regard the village of Kinnerley as our Development Hub, we consider it inappropriate that local needs that are best met by sites close to Kinnerley village might be met in these outlying villages, which are not sustainable in the same way as Kinnerley village.

In the absence of any updated and differently worded Type and Affordability of Housing SPD, we therefore wish to opt out of having Maesbrook, Dovaston and Knockin Heath designated as a Community Cluster, subject to the two sites in Maesbrook remaining as allocated sites.

Maesbrook, Dovaston and Knockin Heath – Completions and commitments

Extract from Five Year Housing Land Supply Statement (data to: 31st March 2019, published: 16th March 2020)

Settlement	Place Plan	Completions (2011/12 - 2018/19)	Commitments	
			Sites with Planning Permission or Prior Approval (as at 31st March 2019)	Allocations without Planning Permission (as at 31st March 2019)
Kinnerley, Maesbrook, Dovaston and Knockin Heath	Oswestry	43	41	9

Kinnerley Parish Council's assessment

Summary of commitments and completions			
Category	Maesbrook, Dovaston and Knockin Heath	Kinnerley village	Other sites in Kinnerley Parish
Appendix A: Sites with Planning Permission as at 31st March 2019	9	32	2
Appendix C: Sites with Prior Approval	0	0	1
Appendix E: Sites allocated for development within the Development Plan	9	0	0
Sub-totals	18	32	3
Completions since 2011/12	7	30	8
Totals	25	62	11

Appendix A: Sites with Planning Permission as at 31st March 2019					
Planning Application					
Planning Application	Address	Date of Decision	Net Dwellings	Net Completions	Net Outstanding
12/03866/FUL	The Hollies, Dovaston, Kinnerley, Oswestry, Shropshire, SY10 8DS	19/01/2017	0	0	0
14/05018/REM	Briarsfield, Chapel Lane, Knockin Heath, Shropshire, SY10 8ED (Cronk Bag, now completed)	08/06/2015	1	1	0
16/02740/FUL	Rushey Leasowes, Pentre, Shrewsbury, Shropshire, SY4 1BS	14/02/2017	1	0	1
17/00117/FUL	Proposed Affordable Dwelling To The North Of Maesbrook, Shropshire	14/08/2017	1	0	1
17/03446/FUL	Land (Plot 1) South Of Chapel Lane, Knockin Heath, Oswestry, Shropshire	16/07/2018	1	0	1
17/03447/FUL	Land (Plot 2) South Of Chapel Lane, Knockin Heath, Oswestry, Shropshire	16/07/2018	1	0	1
17/03448/FUL	Land (Plot 3) South Of Chapel Lane, Knockin Heath, Oswestry, Shropshire	16/07/2018	1	0	1
17/04337/OUT	Proposed Dwelling East Of Sandstone Cottages, Chapel Lane, Knockin Heath, Shropshire	21/11/2017	1	0	1
17/04401/FUL	Land South East Of Rosedale, Maesbrook, Oswestry, Shropshire, SY10 8QN	17/05/2018	1	0	1
17/05019/FUL	Proposed Barn Conversions At Greenfields, Maesbrook, Shropshire	23/01/2018	2	0	2
17/05248/FUL	Proposed Barn Conversion At Grange Farm, Edgerley, Kinnerley, Shropshire	24/04/2018	1	0	1
18/05137/OUT	Severn Moorhens, Edgerley, Oswestry, Shropshire, SY10 8ES	15/02/2019	0	0	0
05/04/13533/FUL	Wernlas, Maesbrook, Oswestry	31/03/2005	1	0	1
Totals for Maesbrook, Dovaston and Knockin Heath			12	1	11
Kinnerley village					
16/00902/REM	Land Including Storage Buildings/Offices, Argoed Road, Kinnerley, Oswestry, Shropshire, SY10 8DH	17/06/2016	18	6	12
16/04719/FUL	Proposed Residential Development Opposite School, Kinnerley, Shropshire	14/03/2019	18	0	18
18/00519/OUT	1 Mayfields, Bankfields Lane, Kinnerley, SY10 8DF	17/07/2018	2	0	2
Totals for Kinnerley Parish			50	7	43

Appendix C: Sites with Prior Approval as at 31st March 2019					
Prior Approval					
Prior Approval	Address	Date of Decision	Net Dwellings	Net Completions	Net Outstanding
18/04750/PMBPA	Oakleigh Farm, Edgerley, Kinnerley, Oswestry, Shropshire, SY10 8EP	21/11/2018	1	0	1

Appendix E: Sites allocated for development within the Development Plan									
Allocation		Availability Assessment							
Allocation Reference	Address	Suitability	Availability	Achievability	Viability	Summary	Net Dwellings	Net Completions	Net Outstanding
MBK001	Land at Greenfields Farm, Maesbrook	Allocated site.	Site promoted through the site allocation process. Site in single ownership. No known impediments to the availability of the site.	Site promoted through the site allocation process.	No known viability concerns.	Straightforward small greenfield site with no fundamental planning issues and Parish Council support. Likely to be delivered.	4	0	4
MBK009	Land adj. to The Smithy, Maesbrook	Allocated site.	Site promoted through the site allocation process. Site in single ownership. No known impediments to the availability of the site.	Site promoted through the site allocation process.	No known viability concerns.	Straightforward small greenfield site with no fundamental planning issues and Parish Council support. Likely to be delivered.	5	0	5
Total							9	0	9

Completions since adoption of KPNP in November 2012		
Planning Application		
Planning Application	Address	Net Completions
12/00380/FUL	18/2 Treginford Barn, Kynaston	2
12/02976/FUL	Affordable houses x 2, S of Quarry Cottage, Vinegar Hill, Knockin Heath (Chosen View & Idle Hours)	2
12/04771/FUL	Wood View, Kynaston	1
13/01209/REM	Stonethwaite, Dovaston	1
13/03231/FUL	Greenfields, Edgerley	1
13/03843/FUL	Wood Lodge (affordable), Chapel Lane, Knockin Heath	1
13/04959/FUL	Severn Way House (conversion from pub), Pentre	1
14/01834/FUL	Little Acorns (affordable house, Green Bank, Dovaston)	1
14/05018/REM	Cronk Beg (plot east of Briarfields), Knockin Heath	1
14/05758/FUL	Treginford Granary, Kynaston	1
15/01942/FUL	The Poplars, Argoed, holiday accommodation	1
15/02090/REM	Glenwood, Knockin Heath	1
16/05437/FUL	Jubilee Chapel, Edgerley/Pentre	1
Total		15