

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:	Mrs S. Evans & Mrs D. Phillips
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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:	<input type="text" value="S14.2"/>	Site:	<input type="text" value="SMH037"/>	Policies Map:	<input type="text" value="St Martins"/>
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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.

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.

Settlement Policy S14.2 St Martins - housing guideline figure

Policy S14.2 identifies St Martins as a Community Hub with a residential guideline figure of around 355 dwellings. For the reasons set out below, this fails the 'justified' and 'effective' tests of soundness.

The Council's 'Local Plan Deliverability & Viability Study' (July 2020) identifies significant viability issues, particularly in the north of the county. These are summarised on page 299 of the study, replicated overleaf. The Benchmark Land Value (BLV) represents the price at which a willing landowner is likely to sell their land for development. For almost all the typologies, the residual land value of development is either negative (highlighted red) or lower than the BLV (highlighted orange). This

indicates major viability problems for sites in the north of the county and real difficulties in the Plan passing the 'effective' test of soundness.

Table 12.6d Residential Development, – Residual Value v BLV Full Range of Policy Options. NORTH					
			EUV	BLV	Residual Value
Site 1	Green 250	North	25,000	425,000	-279,396
Site 2	Green 120	North	25,000	425,000	-370,052
Site 3	Green 80	North	25,000	425,000	-451,236
Site 4	Green 60	North	25,000	425,000	-473,097
Site 5	Green 30	North	25,000	425,000	-478,613
Site 6	Green 20	North	25,000	425,000	-536,735
Site 7	Green 12	North	100,000	500,000	-516,054
Site 8	Green 9	North	100,000	500,000	593,468
Site 9	Green 6	North	100,000	500,000	473,954
Site 10	Green 3	North	100,000	500,000	883,270
Site 11	Green Plot	North	100,000	500,000	362,741
Site 12	Urban 300	North	500,000	600,000	-723,231
Site 13	Urban 100	North	500,000	600,000	-876,413
Site 14	Urban 60	North	500,000	600,000	-1,075,593
Site 15	Urban 25 HD	North	500,000	600,000	-1,619,513
Site 16	Urban 25	North	500,000	600,000	-1,099,026
Site 17	Urban 16 HD	North	500,000	600,000	-1,550,378
Site 18	Urban 16	North	500,000	600,000	-750,513
Site 19	Urban 8 HD	North	500,000	600,000	-1,585,467
Site 20	Urban 8	North	500,000	600,000	-356,693
Site 21	Urban 5	North	500,000	600,000	-754,542
Site 22	Urban 3	North	500,000	600,000	-1,423,720
Site 23	Urban Plot	North	500,000	600,000	-2,848,888
Site 24	PRS 25	North	500,000	600,000	-1,841,163
Site 25	PRS 60	North	500,000	600,000	-1,826,480

Source: HDH (June 2020)

To address these deliverability problems, it is essential for the Plan to focus development in locations where developers wish to go.

St Martins has proved capable of delivering significant amounts of housing in recent years. Schedule A5(ii) on page 330 of the Plan records that St Martins had 123 houses built over 2016/17-2018/19, equivalent to a rate of 41 dwellings per annum. If this rate were extrapolated over the 22 year plan period 2016-2038, St Martins would be capable of delivering 902 dwellings over the plan period. While we do not suggest the same level of delivery throughout the plan period, a higher residential guideline would let St Martins "pull its weight" and enable the Plan to deliver its housing requirements.

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St. Martins has one of the highest scores of any Community Hub in the Council's 'Hierarchy of Settlements' Paper, being the 4th highest scoring village of the 42 Community Hub settlements. Its score of 77 points reflects the fact that St Martins has more services and facilities than all other villages in the Oswestry area. As the most sustainable village in the north-west of Shropshire, it should have a significantly higher residential guideline than other villages like Gobowen (guideline of 360 dwellings). St. Martin's residential guideline of 'around 355 dwellings' is unjustifiably low.

Policy S14.2 limits development in this highly sustainable location that is capable of delivering significant development, because Policy SP8 (Managing Development in Community Hubs) requires in section (f) that, "*the granting of permission would not result in the settlement's residential guideline being exceeded.*" Due to this constraint, the Plan fails the 'effective' test of soundness in relation to delivering enough housing in the north of the county and fails the 'justified' test of soundness in relation to delivering development in sustainable locations, based on the evidence base.

Settlement Policy S14.2 St Martins - allocations

As evidenced above, St Martins has proved in the past that it can successfully deliver housing. However across the north of Shropshire the Council's 'Local Plan Delivery & Viability Study' shows many sites will have marginal viability at best. This will result in a higher proportion of committed sites across the county not being delivered, with worrying implications for the Plan as a whole.

One way of overcoming this is to assume a 25% non-delivery rate across the county as a whole and allocate 125% of the land needed in order to deliver 100% of housing needs. This requires allocating another site in most settlements, to make the Plan as a whole more robust and able to meet the Framework's 'effective' test of soundness.

The Local Plan currently proposes only two allocations for this highly sustainable village, Land east of Moors Bank (SMH031) for 60 dwellings and the former Ifton Heath Primary School (SMH038) for 35 dwellings¹. A third allocation for around 65 dwellings at Cottage Lane (SMH037) will help the Plan address the problem identified by the Council's 'Local Plan Delivery and Viability' Study.

The Council's previous concerns about access have been resolved by the recent development of 10 dwellings opposite in 2016/17 (15/00566/REM) which widened Cottage Lane to a point opposite site SMH037 shown in figure 1 overleaf.

¹ In addition 123 dwellings have been built over 2016 and there is outstanding planning consent for a further 101 dwellings. The Plan assumes 36 dwellings windfall.

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	Part B Reference:

Fig 1. Development opposite site SMH037 and potential access points



The second suitable access would be through the parking court owned by the Council's housing arm, Star Housing, shown in figure 2. Replacement parking can be provided on site SMH037.

Figure 2. Site SMH037 is the field beyond the parking area, owned by Star Housing



Site SMH037 has acceptable access and is suitable for allocation. It is no further from the secondary school and services at the western end of the village than allocation SMH038 (former Ifton Heath Primary School) and is within a 15 minute walk of all the village's services and facilities.

The site is lower than the surrounding houses at Cottage Lane and contained within the landscape by mature hedges. The recent development of 10 dwellings on the north side of Cottage Lane opposite the site has already introduced urban development to the north-west of the site. The situation, topography and surrounding

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	Part B Reference:

trees means development would nestle within the village and fit well with its character.

In summary, the Plan fails the 'justified' and 'effective' tests of soundness. To address this, site SMH037 should be allocated for development for the following reasons:

- i. It provides a mix of housing adjoining the Cottage Lane social housing estate and provides an opportunity to enhance the local environment;
- ii. Suitable access can be provided from Cottage Lane, either opposite the recent development or through Council-owned land;
- iii. The site infills between existing dwellings and the mature tree belt on the site's eastern edge;
- iv. It is a highly sustainable location, with all services and facilities within walking distance and with access to regular bus services nearby;
- v. The site has no technical or environmental constraints;
- vi. It will ensure that St Martins meets its housing guideline figure in a planned manner.

(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.

To make the Plan 'sound', St Martins housing guideline should be increased as shown below:

Community Hub Settlement	Residential Guideline
St Martins	Around 355 450 dwellings

To deliver enough housing, site SMH037 should be allocated with the following suggested development guidelines:

St Martins Community Hub		
<u>Land at Cottage Lane, St. Martins</u>	<u>Suitable access off Cottage Lane will be provided.</u> <u>The housing mix will help meet local needs and contribute to widening the range and variety of housing in the neighbourhood.</u> <u>Mature tree and hedgerows will be retained and enhanced with new planting.</u>	<u>60 dwellings</u>

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Part A Reference:

Part B Reference:

The Policies Map should be amended from the existing (purple line) to include recent development and site SMH037 (blue line) as shown below:

Figure 3. Amended development boundary



(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:

Office Use Only	Part A Reference:
	Part B Reference:

Mrs Evans and Mrs Phillips wish to have the option of attending the hearing regarding St. Martins.

(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: H. Howie

Date: 21/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Mrs S. Evans & Mrs D. Phillips
------------------------	--------------------------------

Q1. To which document does this representation relate?

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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. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	DP2 (& SP10)	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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Development Management Policy DP2 Self-Build and Custom-Build Housing

Policy DP2 provides no real support for self-build on *small* plots and therefore fails the 'effective' test of soundness.

The first section of policy DP2 adds nothing concrete to other policies in the Plan. The rest of the policy deals only with larger sites. This is a major omission in a county where there is strong market demand for self-build on small sites. Indeed, the bulk of self-build homes in Shropshire to date have been built on sites of 1-3 plots.

Paragraph 4.46 estimates that around 9% of the local housing need is for self-build and custom-build plots, amounting to around 2,400 dwellings. In our experience, rural areas are capable of delivering a high proportion of this need as they have a powerful

combination of strong market demand and suitable sites. The Plan will be more able to deliver this level of self-build housing if it enables the market to deliver in locations where market demand is strongest.

To make policy DP2 effective, real measures that support delivery should be added to section 1 of the policy and to the explanatory text. For consistency, this should also be reflected in policy DP10 Countryside.

Not all countryside is equal and sites adjoining a settlement development boundary are clearly different to isolated rural locations. Paragraph 78 of the Framework which recognises that sites adjoining villages can contribute to sustainable rural development and are different from deep countryside, stating, "*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*" It is consistent with the Framework to allow small-scale self-build and custom-build adjoining Community Hubs and policy DP2 should reflect this in order to be effective in supporting self-build and custom-build.

(Please continue on a separate sheet if necessary)

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The first section of the policy promises "*support*" but is not explicit as to how this will translate into decision making, failing the 'effective' test of soundness. To address this, the following should be added to section 1 of the policy:

"Shropshire Council will support appropriately located Self-Build and Custom-Build housing developments where they comply with all relevant policies of this Local Plan and small-scale self-build and custom-build of up to 3 dwellings on sustainable sites adjoining settlement development boundaries.

An additional paragraph should be added to the explanatory text below Policy DP2 as follows:

In its decision-making, the Council will consider the provision of self-build plots as a positive benefit of development in the planning balance when applying policy SP7 (Managing Housing Development).

The changes to make the Plan 'effective' should be accompanied by the addition of self-build to the types of development allowed under section 3 of **Policy SP10** Managing Development in the Countryside as follows:

g. Self-build and custom-build housing on suitable sites adjoining Community Hub settlements.

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

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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)

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(Please continue on a separate sheet if necessary)

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Signature:

H. Howie

Date:

21/01/2021

Office Use Only

Part A Reference:

Part B Reference:

Representation Form

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Part B: Representation

Name and Organisation:	Mrs S. Evans & Mrs D. Phillips
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Q1. To which document does this representation relate?

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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. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="DP7"/>	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"/> |
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Development Management Policy DP7 Cross-Subsidy Exception Sites

Policy DP7 in its current wording fails the 'effective' and 'consistent with national policy' tests of soundness for the reasons set out below.

Only a very limited number of exception sites are coming forward as evidenced by the low delivery of exception sites in Shropshire in the past few years. To increase delivery requires a significant change to the current situation and that means providing landowners with more incentive to make land available for affordable housing and housing associations more incentive to build.

Our clients' land adjoins an existing estate of affordable housing, around which the development boundary has been tightly drawn. In locations like these, some market housing would help contribute to a mixed and balanced community.

Housing associations have expressed interest in building further affordable housing adjoining the existing affordable estate, as a cross-subsidy exception site. To both parties, a deal only makes sense with a mix of housing.

Policy DP7 offers great potential to deliver mixed communities but is fatally undermined by the requirement in section 1a of the policy to prove that a 100% affordable scheme is "*unviable*". The explanatory text does not elaborate how this will be judged.

To be effective, it is vital that the policy makes it clear on what basis it will judge that an exception site is 'unviable'. If it is intended to apply only to sites with abnormal costs then this policy will not increase the amount of affordable housing, as there are plenty of sites without abnormal costs. The heart of the issue is not abnormal costs but land value. 'Viability' does not capture the key issue, which is the willingness of landowners to make land available at a suitable price.

The Shropshire Local Plan Delivery and Viability Study (July 2020) notes in paragraph 6.25 that, "*a housing association commented that they purchase land for 'exception sites' (ie. 100% affordable housing) at about £15,000/unit.*" A landowner would therefore be paid around £75,000 for land for 5 affordable dwellings or £150,000 for 10 affordable dwellings. Cross-subsidy exception sites that enable market housing to be sold for £40,000 - £100,000 per plot provides a very significant incentive for landowners to enable affordable housing to come forward if it provides even just one or two market plots to incentivise the land sale. However Policy DP7 as currently worded does not enable this, if 'viability' is interpreted to assume land values of £15,000/plot.

This requirement undermines the whole point of cross-subsidy exception sites. Paragraph 77 of the Framework states that,

*"Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help **facilitate** this."* (my emphasis).

The purpose of cross-subsidy with market housing is to enable more exception sites to come forward by making them more attractive to housing associations and landowners alike, not to make them viable. In this respect policy DP7 fails the 'consistent with national policy' test of soundness.

Only a very limited number of exception sites are coming forward as evidenced by the low delivery of exception sites in Shropshire in the past few years. To increase delivery requires a significant change to the current situation and that means providing landowners with more incentive to make land available for affordable housing.

The current policy wording will not unlock sites and fails the 'effective' test of soundness.

(Please continue on a separate sheet if necessary)

Office Use Only	Part A Reference:
	Part B Reference:

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To make Policy DP7 effective, section 1a of the policy should be modified as follows:

"Cross-subsidy exception schemes are developments consisting of a proportion of open market housing to facilitate the delivery of a significant proportion of local needs affordable housing. Development of cross-subsidy exception schemes that are of suitable scale, design, tenure and include appropriate prioritisation of local people for the affordable housing provided will be positively considered where all of the following are satisfied:

- a. It is demonstrated that no public grant is available. ~~and that an affordable exception scheme is unviable.~~"*

(Please continue on a separate sheet if necessary)

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

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SP8"/>	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:

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| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
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| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
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Strategic Policy SP8 Managing Development in Community Hubs

Mrs Evans and Mrs Phillips consider section 1f of Policy SP8 to fail the 'justified', 'positively prepared', 'effective' and 'consistent with national policy' tests of soundness.

Not justified

The first line of the policy confirms that, "*Community Hubs are considered significant rural service centres and the focus for development within the rural area.*" However section 1f turns them from sustainable settlements in which development is appropriate, into locations where development is refused if the residential guideline is exceeded. There is inadequate evidence and no justification as to why successful and

sustainable villages should tip from a positive approach to development to a negative approach, simply because they have exceeded the guideline figure. This section of the policy fails the 'justified' test of soundness.

The Council has provided no clear evidence or justification for the settlement residential guideline for each Community Hub. We understand the Council may have inconsistently applied a proportionate level of growth based on the Shropshire-wide growth rate, however there is no clear justification for the inconsistencies between different Community Hubs.

The Council have not considered the reasonable alternative of simply considering whether development is appropriate and sustainable, as they do for Community Clusters, which have no limiting settlement residential guideline. For these reasons the requirement in section 1f to, "*not result in the settlement's residential guideline being exceeded*" fails the 'justified' test of soundness.

Not positively prepared

The Office of National Statistics household projections forecast an additional 36,424 households in Shropshire over 2016-2038, equivalent to growth of 1.22% per annum. This level of growth should be the minimum for each Community Hub if they are to genuinely be the focus for rural development but almost all guideline figures are well below this rate and Policy SP8 therefore fails the 'positively prepared' test of soundness.

Not effective

Policy SP8 puts a brake on delivery in those villages that meet their residential guidelines, disproportionately affecting those villages that are most successful in delivering housing. By limiting development in the most successful locations, policy SP8 puts extra pressure to deliver in less favourable locations, where development viability is far weaker.

The Council's 'Local Plan Delivery and Viability Study' identifies some parts of Shropshire as having lower viability than other parts, highlighting potential deliverability problems. Due to the limit imposed by policy SP8, the Plan is more dependent than it would otherwise be on delivery in less viable locations. This increases the risk that Shropshire will fail to meet its housing needs overall and causes the Plan to fail the 'effective' test of soundness in relation to delivering Shropshire's housing requirements.

As settlement residential guidelines constrain development in "*significant rural service centres*", the most successful Community Hubs will be held back from development that will improve their social and economic sustainability. The policy therefore also fails the 'effective' test of soundness in relation to improving the county's sustainability.

Not consistent with national policy

Section 1f of the policy restricts development in Community Hubs to that which will, "*not result in the settlement's residential guideline being exceeded*". This makes the guideline a ceiling figure, running counter to the National Planning Policy Framework's consistent use of housing numbers as *minimums* rather than *maximums*. It is contrary to the Government's key objective of, "*significantly boosting the supply of homes*" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It therefore fails the 'consistent with national policy' test of soundness.

Office Use Only	Part A Reference:
	Part B Reference:

Unnecessary

Furthermore, section 1f is unnecessary repetition of Policy SP7: Managing Housing Development.

(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.

To make the Plan sound, section 1f should be deleted in its entirety as shown below:

~~f. The granting of permission would not result in the settlement's residential guideline being exceeded, taking into consideration completions since the start of the plan period and outstanding commitments (including site allocations). If it does, regard will be given to policy requirements identified within Paragraph 3 of Policy SP6 and any other relevant policies of this Local Plan.~~

If settlement residential guidelines are retained, we suggest that each Settlement Policy refers to them as the minimum figure with all settlement policies modified as follows:

Residential Guideline
Around <u>At least</u> x dwellings

(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.

Office Use Only	Part A Reference:
	Part B Reference:

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:

H. Howie

Date:

21/01/2021

Office Use Only	Part A Reference:
	Part B Reference: