

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

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| Name and Organisation: | Victoria Gemmell |
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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: | 6 | Policy: | SP2 strategic approach | Site: | | Policies Map: | |
|------------|---|---------|------------------------|-------|--|---------------|--|

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.

I believe regulation 19 is unsound because it is based on the hierarchy of settlements which is fundamentally unsound. In paragraph 5.41 it relaxes the full requirements for Hubs to have both significant employment and peak time public transport. This is surely contrary to to the council's adopted Climate Change Emergency policies. Making people live further from employment causes additional travel particularly when no appropriate public transport is available. Indeed the council's proposed SP3 Climate Change and SO5,6 and 12 Sustainability Objectives in the draft plan are specifically aimed at reducing emissions and minimising car travel. Creating a Hub without employment or peak time public transport is therefore unsound. There is also a problem with the objective comparison between settlements which is a an aim of the Heirarchy of Settlements methodology because the additional wording 'a larger range' of services and facilities which might mitigate the lack of employment or transport is vague and not defined. This makes the decision subjective which the process wished to avoid. I don't think that a children's playground, outdoor sport facilities and one stop a fortnight from the library bus can possibly compensate for a lack of employment and public transport. In 2017 a score of 48 was set for hub status using flawed and inaccurate scoring. This is true for the current table 10. It is not an appropriate and robust assessment. Since SP2 strategic approach para 6 and schedule SP2.2 rely on the hierarchy of settlements as an evidence base, it must therefore be unsound.

(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.

The hierarchy of settlements should be amended.
It should be in line with the spatial vision, SP1 Shropshire test, SP3 climate change and sustainability objectives SO 5,6,12 minimising car travel.
In para5.41 remove the relaxation wording 'a larger range of services' to compensate for employment and public transport.
The full hub criteria requiring 'significant employment opportunities' and 'peak time public transport' must both be met.
The list of settlements must then be reviewed to confirm compliance with the full hub criteria and the draft plan settlement development status and allocations amended accordingly.

(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:

(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*

I have found this form extremely difficult to download and fill in. I didn't want to send an actual letter in these difficult times. So I apologise for the format of the response. I would like to add to the answer for question 4:

Trefonen is the only proposed hub settlement with neither significant employment opportunities or peak time public transport. Making it a hub would be contrary to Shropshire's climate change and sustainability objectives and so the decision to make Trefonen a hub is unsound.

Please may I add to question 5:

Trefonen should be removed from the community hub settlements in policy S14.2 communities hubs - Oswestry place plan area and schedule SP2.2: community hubs.

I believe that sufficient housing to meet the needs of local people over the plan period can be met by 'affordable exception' and 'rural exception'. I am not against all building but believe Trefonen should be in rural settlements with a school and the type and size of housing should be small scale and respond to requirements for starter, intermediate, downsize and accessible houses or bungalows. Any development should conform to the village design statement. I think we should guard against the cumulative impact of phased or adjacent developments by the additional wording within the affordable exception policies DP4,5,6 and 7.