

## 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:	DAVID PARKER (ON BEHALF OF YAREAL LLANFORDA LTD.)
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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="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"/>            |
- (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.

PLEASE SEE ATTACHED LETTER
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*(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.*

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*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:

To discuss amending this policy so that greater flexibility is built in to respond to **Shropshire's diverse range and type of settlements to ensure the delivery of local** needs affordable housing

*(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:

David Parker

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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- (Please tick one box)*

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

Paragraph:	<input type="text"/>	Policy:	S14.2	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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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)*

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

TO DISCUSS THE IDENTIFICATION OF A SUITABLE HOUSING ALLOCATION IN TREFONEN

*(Please continue on a separate sheet if necessary)*

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Signature: David Parker

Date: 25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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- (Please tick one box)*

#### 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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| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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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)*

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To discuss the lack of evidence to justify the approach taken in Trefonen, and the exclusion of any housing allocations in the village.

*(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:

David Parker

Date:

25/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Shropshire Council  
Planning Policy and Strategy Team  
Shirehall  
Abbey Foregate  
Shrewsbury  
Shropshire  
SY2 6ND

**SUBMITTED VIA EMAIL ONLY**

25<sup>th</sup> February 2021

Dear Sir/Madam,

**SHROPSHIRE LOCAL PLAN REVIEW- REGULATION 19 PRE-SUBMISSION DRAFT LOCAL PLAN  
LAND TO THE NORTH OF TREFONEN**

Thank you for inviting comments on the Regulation 19 Pre-Submission Draft Shropshire Local Plan ('draft SLP'). We respond on behalf of Yareal Llandforda Limited (our Client) who are promoting land to the north of Trefonen (the 'site') for residential development. We have previously submitted representations to the 'Strategic Sites Consultation' (2019), 'Preferred Sites Consultation' (2019), and Regulation 18 pre-submission stages, in relation to the Local Plan Review process. It is submitted that our Client's site is suitable for meeting the housing needs of Trefonen and the wider County in the Plan period and should be identified as a residential allocation in the Shropshire Local Plan.

It is noted that the current Development Plan in Shropshire consists of the Core Strategy (2011) and the Site Allocations and Management of Development (SAMDev) Plan (2015) which provide a framework for managing development in the County up to 2026. Upon adoption, the policies of the Shropshire Local Plan 2016 to 2038 will replace the policies of the Core Strategy and SAMDev Plan, except for the SAMDev site allocations which have yet to be delivered, which will be 'saved' and therefore continue to form part of the Development

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Plan. It is anticipated that the Local Plan will be adopted in 2022, subject to independent examination.

The National Planning Policy Framework (NPPF) sets out the key plan-making framework and ‘tests of soundness’ for Local Plans (Paragraph 35). The National Planning Practice Guidance (NPPG) provides further advice on how these tests can be met, for instance in terms of evidence base gathering and working collaboratively with other relevant bodies on strategic planning matters. It is noted that this current framework for the preparation and examination of Local Plans is subject to a future review, as detailed in the recently published ‘Planning for the Future’ White Paper (August 2020) which is the subject of public consultation until the end of October. As per the government’s consultation proposals, the current tests of soundness would be replaced with a ‘sustainable development test’, with further consideration to be given to how strategic cross-boundary issues can be addressed.

It is understood that Shropshire Council intends to submit the SLP for examination in early 2021. Should this occur then the current NPPF and tests of soundness will still be applicable based upon this indicative timetable, although we recommend the position is kept under review. Our comments are submitted with both the current and emerging national policy framework considerations in mind. Our comments on specific elements of the draft SLP are set out below in chronological order. A conclusion of the key matters and changes to be considered is then provided.

## **Draft SLP Policy and Supporting Text Specific Comments**

### Draft Policy SP7 Managing Housing Development

The draft Policy states **“Additional market housing development outside the settlement development boundaries shown on the Policies Map will be strictly controlled in line with Policy SP10, and will only be considered potentially acceptable where there is clear evidence that the residential development guideline for the settlement appears unlikely to be met over the plan period, or where there are specific considerations set out in the**



**Settlement Policies.”** Whilst this monitoring-led approach to the delivery of the housing strategy is **supported**, the Council should ensure in the first instance that sufficient flexibility for housing land supply is provided in the draft SLP in a way that supports housing delivery in line with the spatial strategy.

#### Draft Policy SP8 Managing Development in Community Hubs

Whilst we are supportive of the identification of Community Hubs, we consider that the draft SLP approach under draft Policy SP8 is unsound as it is not effective or consistent with national planning policy.

Draft Policy SP8 identifies Community Hubs as significant rural service centres and as such they form the focus of development in rural areas. This is to be provided through appropriate allocations and other sustainable sites within the settlement boundary. Shropshire is a very rural authority and therefore it is important that the long term sustainability of rural communities is supported alongside their urban focused development strategy by directing new development to these locations. The identification and distribution of new development to Community Hubs is therefore welcomed.

Schedule SP2.2 of the draft Local Plan identifies a total of 41 Community Hubs across the County. Within all but one of these 41 settlements, the Pre-Submission draft either identifies committed sites for open market housing development (from the previous Local Plan), or identifies new allocated housing sites. In some Community Hubs, both committed and new allocations are identified.

However, Trefonen is the only Community Hub in the County where no sites are allocated for open market housing development. This approach is wholly inconsistent with the approach taken in the 40 other Community Hubs and there is no evidence to justify a lack of potentially suitable sites for housing.

The Oswestry Place Plan Area Sustainability Appraisal (SA) Site Assessment (December 2020) considers 16 sites in and around Trefonen. Out of the 10 sites that made it to the final

assessment stage, all of these were discounted on the basis of there being a much greater need for affordable and/or low cost market housing. The justification for this is based on the Parish Council's Rural Housing Needs Survey (2018), yet this found, *"that the housing needs of the Parish are for a limited number of "Affordable Homes" for Parishioners with identified local connections and needs"*. This hardly illustrates evidence of excessive need for affordable housing in Trefonen, nor has any evidence been provided to demonstrate a lack of demand for open market housing that might justify the departure away from the approach the Council has taken in relation to all the other Community Hubs.

Furthermore, it would seem that the Parish Council's conclusions differ from the actual survey results. For instance, the responses to Question 5 (If you need Alternative Tenure, what do you need?) were as follows:

<i>Open market buy</i>	74
<i>Open market rent</i>	4
<i>Affordable buy</i>	30
<i>Affordable rent</i>	15
<i>Self-build</i>	13
<b>Total</b>	<b>136</b>

Therefore, out of a total of 136 respondents who needed alternative tenure housing in the parish :-

- 91 (or 67%) need open market housing to buy or rent, or to self-build;
- 45 (or 33%) need affordable housing to buy or rent.

This clearly demonstrates a much greater need for open market housing and self-build, rather than affordable tenures as recommended by the Parish Council. We are therefore of the view that there is no evidence to justify the policy response of restricting development predominantly to affordable housing.

#### **Recommended changes to Draft Policy SP8 Managing Development in Community Hubs**

In order for the draft SLP to be effective and consistent with national planning policy we suggest the following changes are necessary:

- Allocated housing sites should be identified in Trefonen and shown on the Policies Map to ensure delivery of the residential guidelines.

#### Draft Policy S14 Oswestry Place Plan Area

Whilst we are supportive of Trefonen being identified as a Community Hub, we consider that the draft SLP is currently unsound as it is not justified, effective or consistent. We consider that the residential development requirement should be met through appropriate housing allocations to ensure the housing requirement is delivered.

This draft Policy identifies the specific development requirements and locations for future development within the Oswestry Place Area. At Policy S14.2 it identifies a number of Community Hub settlements along with their residential development guidelines. Trefonen is identified as one of 11 Community Hubs for this area and has a residential guideline of 55 dwellings. However, Policy S14.2(i) fails to allocate any sites within Trefonen to meet the settlement guideline of 55 dwellings.

Paragraph 5.198 also states:

*“Development in the proposed Community Hubs responds to the scale and character of each area, as well as the availability of suitable development options. Where it has been appropriate to allocate land to deliver the local housing guideline the development guidelines reflect this in Schedule S14.2. **There are no allocations identified for Kinnerley or Trefonen, and instead the development of suitable infill development along with affordable exception and cross-subsidy sites in appropriate locations outside of the development boundary, will be supported where they help deliver housing which meets identified local needs.**” (our emphasis)*

As previously stated in our earlier comments in relation to draft Policy SP7, this approach is inconsistent with the approach taken in the other Community Hubs. No evidence has been

presented by the Council to demonstrate that the scale and character of the village would be unduly harmed to a greater degree than other Community Hubs. The Oswestry Place Plan Area Sustainability Appraisal (SA) Site Assessment (December 2020) identifies 16 sites in and around Trefonen. When these were assessed in more detail in the second stage, 10 of the sites were 'available' but their future 'suitability' was dismissed in the final stage due to the conclusions of the Parish Council's Rural Housing Needs Survey, suggesting a greater need for affordable and low cost housing. Not only do we question the degree to which this has been 'justified' by the Council but we also question the accuracy of the reported findings, which the Council are relying upon heavily in determining whether to allocate new sites for housing in Trefonen.

### Alternatives for Trefonen

Our Client's site provides an alternative option for providing the necessary housing for Trefonen. The SA Site Assessment identifies our Client's site as site reference TRF014. It is noted in the 'Reasoning' commentary that the site ***'has good access but is slightly far out but is still in proximity to the main services of the village.'*** Similarly, the scoring process scored the site as 'Good' whilst also achieving the best overall score out of the 16 sites that were assessed.

Our Client's site comprises agricultural land and is situated to the north of the settlement, immediately adjoining the village playing fields and existing residential properties along School Lane. There is an existing public footpath running close to the southern boundary. A direct and safe footpath link can be provided from the site to the Village Hall and Primary School, some 200 metres away on School Lane. Similarly, the village shop and public house are less than 500 metres safe walking distance from the site, along existing footpaths, and via a formal pedestrian crossing on the main road.

Unlike many of the other potential sites in the village, the site does not sit in an elevated or exposed position. It is situated in the lower-lying part of the settlement, and is surrounded by mature hedgerows which will provide natural screening from adjoining areas.

Parts of the site to the south are identified as being at risk from surface water flooding. However, the Landowners Flood Risk Assessment has concluded that these pose a low flood risk to the site, and can be incorporated into the required areas of public open space. Development of the site will therefore not increase the flood risk elsewhere.

Conceptual plans have been prepared for the site. A very good range of house types including affordable housing and self-build plots can be accommodated. Overall, the site would deliver a sustainable development in an appropriate and sustainable location.

It therefore represents a suitable site allocation and should be identified within the draft Schedule S14.2 (i) for Trefonen, in order to secure future housing delivery in the Community Hubs as opposed to a reliance upon affordable exception and cross-subsidy sites outside the development boundary.

#### **Recommended changes to Draft Policy S14 Oswestry Place Plan Area**

In order for the draft SLP to be justified, effective and consistent we suggest the following changes are necessary:

- We consider that housing allocations should be identified for Trefonen to ensure delivery of the residential development requirement.
- Our Client's site should be considered as a site allocation to secure delivery of the housing requirement for Trefonen and key objectives for the area.

#### **Draft Policy DP7 (Cross-Subsidy Exception Schemes)**

Whilst we are supportive of the principle of the policy to address the specific local housing needs of Shropshire, we consider that the policy as drafted is unsound as it is not fully justified, effective or consistent with national planning policy.

This draft Policy deals with cross-subsidy exception schemes whereby a proportion of open market housing facilitates the delivery of a significant amount of local needs affordable housing. The Council's current 'cross-subsidy' policy allows the development of such sites for 33% social rented affordable housing, 33% intermediate affordable housing, and 33% open

market housing. However, not one single site in Shropshire has come forward for development under this policy since its adoption.

Draft Policy DP7 now introduces a maximum site size of 'normally 10 dwellings', and an increased percentage of affordable housing (from 66% to 70%). With these more onerous additions to the draft policy, it is difficult to comprehend how the development it is seeking to encourage will be delivered, when the current policy which is less restrictive failed to generate new development of this nature.

Furthermore, this policy is not supported by any evidence to demonstrate that these improvements will lead to the delivery of local needs affordable housing across the county, thereby undermining its ability to ensure there is adequate housing opportunities for households with a local connection.

The proposed housing guidelines of 55 new dwellings for Trefonen rely entirely on new development proposals satisfying this policy. Given the lack of development being delivered under the current 'cross-subsidy' policy, we strongly question whether a more onerous policy as currently drafted will lead to the delivery of 55 new homes in the village.

### **Recommended changes to Draft Policy DP7 Cross-Subsidy Exceptions Schemes**

In order for the draft SLP to be justified, effective and consistent with national planning policy we suggest the following changes are necessary:

- Reduce the percentage of 70% to less than 66% to ensure greater flexibility is built in respond to Shropshire's diverse range and type of settlements and to ensure cross subsidy exception sites come forward over the course of the Local Plan period.
- Any percentage should be fully justified by the evidence base to ensure its effectiveness.

### **Summary of Suggested Changes and Conclusions**

We have set out a number of recommended changes to the draft SLP relating to the spatial strategy, settlement and site specific policies and other development management policies to ensure it complies with the NPPF and its tests of soundness.

Our Client supports the Council's aims of delivering economic growth through the provision of housing above and beyond the current standard method minimum requirement. Whilst we are supportive of the Council identifying Trefonen as a Community Hub within the settlement hierarchy we have a number of concerns about its approach and the shortage of evidence to justify the lack of any housing allocations in Trefonen. Our Client's site, Land to the North of Trefonen provides a suitable and available option which could secure housing delivery in Trefonen as well as supporting the provision of local affordable housing.

We would be grateful for confirmation that these representations have been received and registered as duly made. We trust this submission is helpful, but should you have any questions in relation to the above or attached, then please do not hesitate to contact me.

Yours sincerely,

**David Parker**

**David Parker Planning Associates**