



## 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:	Julian Francis
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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:	Schedule SP2.2: Community Hubs	Policy:	SP2 – Strategic Approach and S14.2 Community Hubs – Oswestry Place Plan Area	Site:		Policies Map:	
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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.*

**Policy SP2 – Strategic Approach - Schedule SP2.2: Community Hubs - Trefonen**  
**Policy S14.2 Community Hubs – Oswestry Place Plan Area**

It is evident that the village of Trefonen does **NOT** have any “*significant employment opportunities*” or “*peak time public transport*”. It is the **only** proposed Hub settlement with **neither of these** key requirements. By allocating it as having these requirements would be contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12. I therefore strongly believe that this makes it 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.*

I firmly believe that **Trefonen should be removed from the Community Hub settlements listing in Policy S14.2 Community Hubs – Oswestry Place Plan Area and Schedule SP2.2: Community Hubs.**

Furthermore, no Housing Guideline should be allocated for a Rural Settlement. I believe that sufficient housing to meet the needs of local people over the Plan period for Trefonen can be met by the “*Affordable Exception*” and “*Rural Exception*” Housing policies set out in the Draft Plan for rural settlements such as ours with a school. This would include the type and size of housing that is identified to be required, whether it be a starter home, intermediate size, for downsizing, or “accessible” housing.

I believe that the above should be small-scale developments of 10 houses or less, not wholly open market and that the cumulative impact of phased or adjacent developments which settlements such as ours in the countryside are susceptible to must be guarded against by the additional wording within the Affordable Exception Policies DP4, DP5, DP6 & DP7.

Any development should conform to our published Village Design Statement.

I also recommend that a reference to compliance with our Village Design Statement should be added into **SP5 High Quality Design**. This will assist in a progression for better development standards that are suited to retaining the character of our village through any new housing in the future.

*(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.*

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	Part B Reference:

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 examination.*

Signature:

Date: 24/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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### Part B: Representation

Name and Organisation:	Julian Francis
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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" value="6"/>	Policy:	<input type="text" value="SP2 Strategic Approach"/>	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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#### Policy SP2 – Strategic Approach Para 6

This section relies on the so-called “Hierarchy of Settlements”. This Hierarchy which determines Hub status is flawed and is therefore unsound because of what is included in paragraph 5.41. This is because it relaxes the full requirement for Hubs to have BOTH “*significant employment*” AND “*peak time public transport*”.

The relaxation of this requirement to have BOTH “*significant employment*” AND “*peak time public transport*” is

- contrary to Shropshire Council’s adopted Climate Change Emergency policies and
- contrary to the proposed **SP3 Climate Change** and **Sustainability Objectives SO5, SO6, & SO12** in the Draft Plan.

These seek to minimise car travel and to maximise trips made by sustainable travel, both of which will reduce carbon emissions.

I believe that this makes the Pre-Submission Draft UNSOUND.

The additional text saying that “*a larger range*” of services and facilities compensate for the lack of these fundamental criteria isn’t defined, and introduces a subjective element of assessment. This is contrary to the aims to the Hierarchy of Settlements Methodology which sets out to obtain an objective comparison between settlements. As I have explained in my previous correspondence to Shropshire Council, I do not believe that facilities such as childrens playgrounds, visits by a fortnightly mobile library, green space and outdoor sport facilities can possibly compensate for lack of employment and/or public transport. I find this incredulous!

As I have also explained to the Council previously in their consultation, the threshold that was set for Hub Status of a score of 48 points was derived from flawed and inaccurate scoring in the original 2017 Table 10, which was brought to the Council’s attention but has not been changed since. The current 2020 version of Table 10 is still inaccurate. Therefore, it clearly cannot be deemed to be an “*appropriate and robust assessment*” and the whole outcome of Table 10 and the Hierarchy of Settlements is flawed. This is why I hold that the Hierarchy of Settlements is UNSOUND.

Since it is clear from the documentation that Policy SP2 – “Strategic Approach” (Paragraph 6) and Schedule SP2.2: “Community Hubs” rely on the Hierarchy of Settlements as the basis for its evidence, then it must also be UNSOUND.

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

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1) The Hierarchy of Settlements **MUST** be amended. This must be changed to correspond with and support the following:

- Spatial Vision,
- SP1 Shropshire Test,
- SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12.

These seek to minimise car travel and maximise trips by sustainable travel and to reduce carbon emissions.

The “relaxation” wording in Para 5.41 **MUST** be removed. I would recommend removing the existing text: “*In circumstances where there is no regular public transport service; and/or high speed broadband; and/or multiple significant employment opportunities, a larger range of services and facilities would be necessary to compensate to enable a settlement to achieve the specified point’s threshold*”.

The **full** Hub criteria set out in Para 1.16 Table 2 and Para 5.35 in Table 6 must be used to determine Settlement status through an *objective* assessment. Critically the requirement to have **BOTH** “*significant employment opportunities*” **AND** “*peak time public transport*” for Hub status to prevail **MUST** be met;

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Part A Reference:

Part B Reference:

- 2) The list of Settlements must then be reviewed to confirm compliance with the full Hub criteria;
- 3) The Draft Plan settlement development status and allocations should then be amended accordingly.

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

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- Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

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Date:

24/02/2021

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Part B Reference: