

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:	Landor Planning Consultants Limited
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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="3.63-3.70"/>	Policy:	<input type="text" value="SP9"/>	Site:	<input type="text" value="Edstaston etc"/>	Policies Map:	<input type="text" value="Wem"/>
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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 checked="" 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 checked="" 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 SP9.1. defines community clusters as consisting of *"...of individual or groups of small rural settlements of varying function but with aspirations to maintain or enhance their sustainability through modest levels of appropriate development"*.

The reference to modest levels of appropriate development is defined in Draft Policy SP8.2.c that refers to:

"suitable small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings".

We consider the criterion and reference to infill sites of less than 0.1 hectares and up to a maximum of 3 dwellings to be too prescriptive. It is likely that such restrictions may not provide sufficient scope for meeting local housing needs or enough opportunity sites to genuinely sustain rural communities in accordance with the policy objective expressed in paragraph 3.23.

Moreover, Community clusters are typically 'villages' characterised by a variety of settlement forms – some compact, some linear and some dispersed. For this reason, the reference to infill sites is likely preclude many candidate sites. Greater weight should be given to such issues as sustainability, connection to services, footpaths and avoidance of flood risk.

(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.

Modify Policy SP9.2.c to refer to sites capable of accommodating between 5-10 dwellings. The reference to a maximum of 3 dwellings is far too restrictive and would preclude, for example, a courtyard scheme, which may be far more appropriate in some rural location than 3 detached dwellings, a more likely outcome, as worded in the Policy.

Policy SP9. 2.c ought to be modified in order that sites can come forward for consideration that will genuinely sustain rural communities in accordance with Policy SP9. As written Policy SP9.2.c is unsound. It is in conflict with the Council's Strategic Approach to ensuring sustainable development as expressed in Policy SP2 and with paragraph 3.23 of the Regulation 19 Draft Local Plan. It allows for appropriate levels of development within rural areas, to enhance the longer-term sustainability of rural communities. This includes Community Clusters described as "*....settlements with aspirations to enhance their sustainability..... the focus for rural development*". This aspiration can be achieved by modifying Policy SP9.2.c as proposed. As written Policy SP9.2.c is in conflict with NPPF paragraph 77 and 78 which identifies that Local plans should identify opportunities to for villages to grow and thrive especially where this will support local services.

(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)?

Office Use Only	Part A Reference:
	Part B Reference:

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:

The modification proposed has implications with regard to development strategy as expressed in Policy SP2 and has wider impacts in terms of local housing need, housing choice and housing delivery in rural areas of Shropshire.

(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:

23/02/2021

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Part A Reference:

Part B Reference: