

## 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:	Kembertons on behalf of Mr E Maiden
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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="SP13"/>	Site:	<input type="text" value="HKW014"/>	Policies Map:	<input type="text" value="Hinstock"/>
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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 SP13 says the Council will deliver around 300 ha. of employment development within the Plan period. It is clear that the Council does not intend to produce any employment development of any consequence in the rural area of the County. Indeed Policy SP13.6.d says that windfall Class B development will be supported where it is "for development of a suitable scale located within a Community Hub, Community Cluster or in the Countryside that satisfies Policy No's SP12, SP8, SP9 or SP10".

Meanwhile the Council is intending that some 8,470 dwellings (27.5% of the total new housing to be provided in the County in the Plan period) will be accommodated in the rural area of the County. The employment provision to cater for this level of housing appears, however, to rely on windfall development, preferably on existing employment areas and certainly within specified village development boundaries.

(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 text of Policy SP13 should be revised to indicate that employment development that includes planned employment development on sites that may lie just outside the development boundaries of Community Hubs will be considered seriously, and that planned development on such sites will be encouraged. It should be confirmed that

Site HKW014 should be identified on the Inset Map for Hinstock for employment development that could include Class B, E, C2 and C2A and sui generis uses.

*(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:**

Rural employment is seldom discussed at any length. Local Authorities persist in the idea that rural areas should be the preserve of 'rural' employment. However, at the same time, they continue to allocate more housing to rural areas which are then occupied by persons, both locally but also from urban areas. However, no thought is given to how these people will be employed. Someone should be bringing this issue forward at any Examination that takes place.

*(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:

Part A Reference:

Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Kembertons on behalf of Mr E Maiden
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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="SP12"/>	Site:	<input type="text" value="HKW014"/>	Policies Map:	<input type="text" value="Hinstock"/>
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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.

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Policy SP12 and the following explanatory paragraphs talk of Shropshire needing a 'step change' in the provision of employment opportunities. It appears that the step change is only likely to occur in areas that are already heavily developed.

Policy SP12.3 says, in relation to economic development, that economic growth and investment will be supported in (amongst other places) Community Hubs on saved allocations or windfall development on established employment areas or suitable sites or buildings for small scale employment generating uses.

Policy SP12.4.f says that economic development proposals will be supported where they deliver employment development through (amongst other things) rural economic enterprises through agriculture, horticulture, forestry, food production and processing, rural diversification, tourism and leisure, and opportunities created by improving connectivity for home working or to re-use previously developed land.

This does not sound as though it is likely to bring about the step change in economic activity that the Council wishes to see, or that the Council has any concrete ideas about how these examples can bring about that step change or even, for that matter, cater for the existing situation.

It is clear that this policy has not been positively prepared and there is little evidence available in the Plan that would suggest a positive direction of travel. Nevertheless, more houses are to be constructed in Hinstock, and more commuting will have to take place. This makes the Plan 'unsound'. The policy should be producing concrete proposals which will result in a greater variety of employment opportunities than exist at present.

*(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 text of Policy SP12 should be revised to indicate that employment development that includes planned employment development on sites that lie just outside the development boundaries of Community Hubs will be considered seriously, and that planned development on such sites will be encouraged.

Site HKW014 should be identified on the Inset Map for Hinstock for employment development that could include Class B, E, C2 and C2A and sui generis uses.

*(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.

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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)?**

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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:**

Office Use Only	Part A Reference:
	Part B Reference:

**Rural employment is seldom discussed at any length. Local Authorities persist in the idea that rural areas should be the preserve of 'rural' employment. However, at the same time, they continue to allocate more housing to rural areas which are then occupied by persons, both locally but also from urban areas. However, no thought is given to how these people will be employed. Someone should be bringing this issue forward at any Examination that takes place.**

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

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Date:

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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="S11.2"/>	Site:	<input type="text" value="HKW014"/>	Policies Map:	<input type="text" value="Hinstock"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

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Policy S11.2 relates to three villages that have been identified in Table 7 of the Hierarchy of Settlements document (December 2020) as Community Hubs in the Market Drayton Place Plan area.

Hinstock is the largest of these settlements. According to Table 9: Population and Dwelling Estimates for Recognisable Named Settlements in the Hierarchy of Settlements Document, Hinstock has a population of 887 residents.

Hinstock has long been regarded as a village to which other smaller settlements look for local services and community facilities. It was classified as a Main Service Village in the North Shropshire District Local Plan 2000 – 2011 (adopted in December 2005), North Shropshire District Council being the Planning Authority at that time). It was allocated some 30 houses in addition to 5 that were already permitted, and an unspecified number of windfall houses.

In the current Local Plan comprising the Core Strategy/Site Allocations and Management of Development Plan 2006 – 2026, Hinstock is classified as a Community Hub and sites totalling 60 dwellings were allocated for development in the village.

The current Local Plan Review again recognises Hinstock as a Community Hub and has allocated housing sites with a residential guideline of 155 dwellings.

Hinstock has clearly been growing over the past twenty years. It is an attractive village with a good level of community facilities and is located just off, but with ready access to, the A41 trunk road, giving access to Market Drayton, Telford and Wolverhampton.

However, it has very few local employment opportunities, and relies on residents travelling to Telford or Market Drayton or beyond to find work. No provision was made in the North Shropshire Local Plan or the Core Strategy/SAMDev Plan for employment development in the village.

Despite the now-proposed considerable increase in housing numbers there is still no planned provision for employment development in the village. Policy S11.2.3 says that “new employment development will be delivered through appropriate small-scale windfall development within the settlements development boundary”. Clearly no consideration has been given to the provision of employment development in or on the edge of these villages. Sites for such development within the development boundary set for Hinstock are few and far between, and would be likely to bring about adverse comments from nearby residential property owners.

It is clear that the Plan is simply going to leave the provision of employment to chance with no coherent policy guidance. This indicates that the Plan has not been positively prepared, and the lack of attention given to employment uses indicates that the allocated development will in fact be in conflict with those policies in the Plan that seek to improve sustainability, reduce pollution and reduce private car travel. The proposed policy of waiting for something to happen is simply going to create a large commuter settlement. On this basis the Plan for the Market Drayton Place Plan area cannot be considered ‘sound’.

Site HKW014 (shown on the employment sites SLAA) could easily provide a small employment development. It is well screened from view from all directions, and there are few residential properties in the immediate vicinity. Vehicles using the site could readily access the A 41 to get to Telford, Wolverhampton and Market Drayton, all without having to travel through the village itself.

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

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Office Use Only	Part A Reference:
	Part B Reference:

The text of Policy S11.2 should be revised to indicate that employment development on sites that lie just outside the development boundaries of Community Hubs will be considered seriously, and that planned development on such sites will be encouraged.

Site HKW014 could be identified on the Inset Map for Hinstock for employment development that could include Class B, E, C2 and C2A and sui generis uses.

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Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference: