

## 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:	R Homden c/o Clive Roberts of Kembertons
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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:	SP9	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Click or tap here to enter text.

#### 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.

Policy SP9 is the policy that is intended to prescribe the manner in which development in Community Clusters will be provided. However, those settlements included in the list of Community Clusters from Schedule SP2.3 vary enormously in size, character and levels of community infrastructure. Cockshutt, for instance, has a population of some 859 (according to Table 9 which follows para A2.7 in the hierarchy of Settlements evidence document) while villages such as Wheathill, Shelderton and Llyclys have populations of just 20 people. The nature of these villages including the manner in which the buildings within them are distributed and have spatial relationships one with another can be equally different.

The requirements set out in Policy SP9 may be appropriate in some villages – infill sites of a maximum of 0.1 ha with a limit of three dwellings per site might well suit certain villages, but many of the villages listed in Schedule SP2.3 will have difficulty finding sites that will meet the Council's definition of "infill" let alone size and 'ability to accommodate' requirements.

It is important that those villages listed are capable of accommodating new residential development; if they are not, then the housing required by way of windfall development will not be delivered, and the overall housing strategy will fail. It does not appear that the Council has undertaken a capacity study to estimate how many dwellings could be constructed in the villages listed in Schedule SP2.3 whilst complying with all the criteria listed in Policy SP9. Without such information it cannot be assumed that Policy SP9 will produce the number of houses necessary, and thus the Policy cannot be claimed to be justified or evidenced. If it is not evidenced it cannot be regarded as being sound.

It is suggested that greater emphasis should be placed on any proposed development site being appropriate to, or reflective of, the character and setting of the village in which the site is located rather than having arbitrary sizes and standardised. In particular, the requirement for a site to be “infill” within a definition set out in Policy SP9 may suit many situations but is felt to be unnecessary and, in certain circumstances, potentially more harmful than the development it might or might not permit.

Many villages have loose-knit relationships between buildings and insisting on infill development might well force people to build on the ‘gaps’ between buildings. These may be recognised as infill plots given the description in Policy SP9 but, if developed, could significantly alter the character and appearance of the village. Infill development might well be appropriate in some situations but in others the space between buildings is an important element of the character of the settlement, and should be preserved, reduced or modified when considering the location of new development. Policy SP9.2.c should be modified to allow development that is “infill or which would be appropriate to, or reflective of, the character of the settlement in which it is situated”.

It is difficult to imagine how the requirement, set out at Policy SP9.4.e, that any residential development “provides an appropriate mix of dwelling types, tenure and affordability in accordance with relevant policies in the Local Plan”, is to be put into effect when the development is to be restricted to three dwellings or less. If a particular mix of dwelling types, tenure or affordability is considered essential in any particular village then it should be spelled out in the Local Plan, or there could be a reference to any particular form of development meeting requirements set out in Community-Led Plans. It does not appear that the Council has undertaken any study that would give an indication in relation to any village in the list of Schedule SP2.3 that a certain mix, tenure or affordability is necessary, and thus this element of the Policy should be deleted, as it is not justified or evidenced.

*(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.*

Office Use Only	Part A Reference:
	Part B Reference:

Policy SP9.2.c should be modified to read:

"On suitable small-scale infill sites of 0.1ha or less, or which would be appropriate to, or reflective of, the character of the settlement in which it is situated."

(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:**

**It is highly likely that development in Community Clusters, being the smallest settlements identified as being suitable for development, may be overlooked in terms of the contribution they make to the character of the rural area of the County. Infilling development will be important to many of these villages but other forms of development may be more appropriate in certain cases. Local people will appreciate this more than anyone and it is important that those people living or owning land within those settlements have chance to express their views.**

(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:

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:	SP2	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Click or tap here to enter text.

#### 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 SP2.2 indicates that around 30,800 new dwellings will be delivered between 2016 and 2038. Policy SP2.6 says that, recognising the rurality of much of Shropshire, growth in urban areas will be complimented by appropriate new development in Community Hubs and Community Clusters. 2.7.5% of the total new houses to be delivered in the County, that is 8,470 houses, are to be constructed in the rural area.

27.5% is a big reduction in the amount of housing to be constructed in the rural area of the County – in the current Local Plan (i.e. a combination of the Shropshire Core Strategy and the site Allocations and Management of Development (SAMDev) Plan), the target figure for the rural area was 35% of the required housing for the County.



Some 42 settlements have been designated Community Hubs, and, if all the housing allocated for development in these settlements were to be constructed some 5,932 houses will be completed, That leaves a shortfall of 2,538 to be achieved in the Community Clusters through windfall development.

There are, generally, no allocations in Community Clusters. So, around 30% of the overall allowance for the rural area will have to come forward as windfalls.

Some 99 villages are listed in Schedule SP2.3 to Policy SP2 as being settlements identified as being elements in a total of 32 Community Clusters.

The identification of Aston as an element within a Community Cluster which also includes Edstaston, Quina Brook, Northwood, Newtown, and Tilly, is supported.

Whilst the identification of Community Clusters is welcomed, it is of concern that these will not, given the restrictions on development contained in Policy SP9, produce the development necessary to deliver the number of houses required from this source.

There is no estimate given in the Local Plan Review of the numbers of houses to be delivered in the villages named within the 32 Community Clusters, or whether they have the capacity either in terms of available land or level of infrastructure, to produce the housing needed.

Unless such estimates are, indeed, produced and found to be sensible and reasonable, the development to be constructed in Clusters must remain a guess at best. The delivery of the number of houses necessary therefore makes Policy SP2 unsound, as it is neither justified nor evidenced, and delivery cannot be assured.

*(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.**

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Policy SP2 and others that relate to development in Community Clusters should be modified to provide estimates of potential numbers of dwellings to be constructed in the Clusters. Appropriate evidence of the likely availability of land to meet these estimates should be made available if it exists. By so doing it will become clear whether or not the contribution to the overall housing supply in the Council that will be made by Community Clusters will be sufficient to meet the overall housing delivery target.

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

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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)?**

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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:**

**Community Clusters are the lowest level of designation that is accepted as being suitable for some development. It is easy to ignore these settlements when set against the much larger developments proposed in Strategic, Principal and Key centres and Community Hubs, and, generally speaking, they are not promoted by developers of significant standing. Nevertheless, they produce housing that is important on a local scale, and the voices of small developers and landowners should be heard in public, if the rurality of the County is to be maintained.**

*(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:

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	Part B Reference: