

## 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:	The Apley Estate
------------------------	------------------

#### 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:	SP15 – Whole Estate Plans	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
------------	----------------------	---------	------------------------------------	-------	----------------------	------------------	----------------------

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.

The Apley Estate is supportive of the aim of the policy and fully endorses the benefits a Council endorsed Whole Estate Plan can have for the future of those living and working within the rural areas of Shropshire.

However, the Apley Estate has some concern over how the requirement for public consultation is addressed within the policy and explanatory text. It should be noted that the Apley Estate supports the need for public consultation on Whole Estate Plans, without which, the degree of weight they could attract in the planning process would be limited.

It is considered that as it stands, criterion c) of Policy SP15 is open to interpretation as to what **"meaningful public consultation means"** and **no guidance is provided** within the explanatory text.

The policy should recognise that not all Whole Estate Plans will be equal in terms of scope, detail and nature of the strategy proposed. For example, some Plans may put forward aspirations for new, large residential developments whereas others may focus more upon sustainable management of the existing built environment and countryside. The Apley Estate consider that the level of public consultation any Whole Estate Plan should go through, should reflect and be proportionate to the nature of the plan and the level of detail contained therein. Whilst consultation with the residents on land owned by the Estate is reasonable it is not considered wider public consultation would be reasonable or appropriate. As such, the policy should be amended and further guidance provided within the explanatory text.

*(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.*

For the reasons set out above, the requirement for public consultation on Whole Estate Plans needs to be reasonable and proportionate to the nature and level of detail contained within the plan. Therefore, we consider that criterion c) should be amended as follows:

c) it has been subject to an appropriate level of public consultation, to be agreed with the Local Planning Authority.

To provide clarity, we consider the policy explanation should be updated to reflect this change:

With regard to public consultation, it is recognised that not all plans will contain equivalent levels of detail and may focus upon different aspects of setting out and delivering their long-term vision. As such, the nature and scope of any public consultation should be tailored to reflect the nature of the Whole Estate Plan. This should be agreed with the Local Planning Authority prior to the consultation taking place.

*(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:

(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:

26/02/2021

Office Use Only	Part A Reference:
	Part B Reference: