



26 February 2021

Shropshire Council
Planning Policy
Shirehall
Shrewsbury

Dear Sirs

Response to Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038

Trefonen

Oswestry Rural Parish Council (the "Council") wishes to restate its earlier view that the settlement of Trefonen cannot reasonably be considered as meeting the requirements of "Hub" status and that an additional 50 houses during the Plan period would constitute over-development.

Notwithstanding the arguments, set out below, based directly upon the methodology followed in the "Hierarchy of Settlements", the Council considers that a fundamental reason why Trefonen should not be a Hub is that it's in the wrong place.

If the village were to be a Hub, there would potentially be pressure for significant development in due course. Apart from those who have retired, people who buy houses need work: there are effectively no work opportunities in the village. Furthermore, current plans, particularly the proposed "enterprise park" near the new Mile End "dumbbell" roundabout, make it clear that the main job opportunities for the Oswestry area will be that side of the town. That and the other main job locations that are further afield (Wrexham, Shrewsbury, Chester, etc.) would all involve people living in Trefonen going through or round (particularly via Weston Road, Morda) the town to get to work - almost all as just a single person in a vehicle. The road (unclassified) through the village is already a main route from the Tanat Valley towards Oswestry and beyond to the north and north-east. Heavy vehicle traffic has recently been increasing.

It simply makes no sense to create a development hub that will inevitably significantly increase existing traffic problems in and around Oswestry at peak hours.

Specific objections to Hub status

The Council considers that the methodology used, and conclusions reached in the “Hierarchy of Settlements” as applied to Trefonen are fundamentally wrong. The village falls well short of fulfilling several of the criteria required for “Hub” status.

Previously, to qualify for Hub status, a community was required to have both “significant employment” and “peak time public transport”. Para: 5.4.1 now relaxes this. Whilst it may also be argued that the relaxation undermines other proposals relating to Climate Change and Sustainability, our argument against Hub status is supported, among other things, by the fact Trefonen has neither any “significant employment opportunities” nor “peak time public transport”. “Public” transport at peak times is limited to dedicated school buses. The village is the only proposed Hub settlement with neither of these key requirements.

Other factors demonstrate that the Hub determination criteria for Trefonen have been incorrectly or improperly applied. For example:

- Trefonen has only a fortnightly short visit from the mobile library; this cannot be counted as a full library service. Furthermore, in the Sites in Stage 2 of the Assessment TRF001 to TRF017 show a minus score for a library while in the Hub scoring system it is counted as 3. So, two different assessments have been clearly used making the scoring systems unsound.
- A “convenience store” is shown as 4 points. Trefonen does not have a convenience store; it has a very small shop which has a Post Office counter within it.
- Whilst there is a primary school, it is understood that there is little or no capacity for a significant number of additional pupils.

The Council believes that it is manifestly demonstrable that Trefonen does not meet the full criteria for Hub settlement status. Designation of Trefonen as a Hub would contradict SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 set out in “Regulation 19: Pre-Submission Draft of the Shropshire Local Plan 2016 to 2038”. Accordingly, the Council considers that Trefonen must be removed from Policy S14.2. Community Hubs – Oswestry Place Plan Area and designated under the heading of “*Other rural settlements in the Countryside*”.

It is noted that the relaxation under Para. 5.4.1 may be said to have introduced a somewhat “subjective”, as opposed to “objective”, element into the development of the “Hierarchy of Settlements”, thus leading to the conclusion some aspects of assessment of the settlements under consideration are bound to be basically unsound.

Housing needs

The Council firmly believes an additional 50 houses cannot be considered to be modest growth in the context of the built community of Trefonen (as shown in SL 14.2). The Council has consistently said it wishes to remain Countryside status which allows for small scale Rural Exception Housing development with 100% Affordable housing for identified local needs. This reflects the Trefonen, Treflach and Nantmawr VDS (2016) and the Council’s 2018 Housing Needs Survey.

It should also be noted that the Council considers that several of the sites in Trefonen (including but not necessarily limited to, sites TRF 001,006, 008, 009, 010, 015 & 017) indicated as “Long Term Potential SLAA Residential Sites” in 2018 are entirely unsuitable for residential development. The reasons for rejection of these sites include location, difficulty of access, traffic problems, flooding and drainage problems, geological (and consequent geomorphological influences) and historical factors, and preservation of the rural environment, landscape character and ecology.

Yours faithfully

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Clerk
For and on behalf of Oswestry Rural Parish Council