

## 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:	Mervyn Eyles - Ruyton Xi Towns Parish Council
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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:  Policy:  Site:  Policies Map:

#### 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.

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Local Plan SP2.3 states that 25% of the housing requirement is for 'Affordable Housing'. New developments on SAMDev sites in North Shropshire are only required to have a 10% Affordable Housing content. This leaves the majority of affordable housing to be delivered by Exception Sites. SP2.6 states that outside of Community Hubs and Community Clusters 'new development in the wider rural area will consist of affordable housing where there is evidenced local needs and appropriate rural employment and economic diversification'. There is the implication that housing in the wider rural area is required to support rural employment. This is in spite of the fact that nationwide employment in agriculture has been declining (from 447 thousand in 2003 to 428 thousand in 2019). Policy DP4 seeks to protect the open countryside from inappropriate development and DP4 1b rules against developments in an 'Isolated Location' However DP4 1a iii suggests that a development anywhere with the ability to access a school via public transport is allowed. Shropshire has done a good job in retaining its public transport infrastructure in rural areas. This means that buses travel through a many areas of open countryside. So DP4 1a iii might be used to justify developments in open countryside. This should not be allowed as Affordable Housing meets integration, cost and low-carbon objectives if it is situated close to existing settlements and services. Positioning in open country means everything is a bus ride (or most likely a car ride) away.

(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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Ideally DP4 1a iii would be deleted. If it were felt appropriate to keep this sub-clause then DP4 should be made consistent with DP5. The wording of DP5 b 'The site is no more than 1 hectare in size and the number of dwellings provided does not exceed the evidenced need and at most consists of no more than 5% of the number of homes in the existing settlement, based on the most recent data available from the Council' should be incorporated as a new clause in DP4. So if no homes are on the site as an existing settlement then the development is not allowed.

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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)*

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

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Signature:

Date: 25/02/2021

Part A Reference:

Part B Reference:



Shropshire Council:  
Shropshire Local Plan  
Representation Form



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**Part B: Representation**

Name and Organisation:	Mervyn Eyles - Ruyton Xi Towns Parish Council <i>LYDIA DARDSEY</i>
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**Q1. To which document does this representation relate?**

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SP3 and DP11.1 seem to acknowledge the Climate Emergency and indicate support for Zero-Carbon developments. However, there is no content in the plan which considers how they will be implemented. In particular the implementation of Ground Source heating and Community Heat Networks will mean that some development land will need to be allocated to Heat Pumps and Heat Network Infrastructure. This land allocation plus infrastructure costs will make this type of development less attractive to developers. The benefits will accrue to the home-owners through lower running costs and to society through lower carbon emissions. DP11.4 gives the developers the the opportunity to opt out of Low-Carbon developments by demonstrating that they are less profitable (possibly unprofitable) compared to traditional developments. If this is allowed to happen Shropshire could end up with Affordable Housing which is low-cost from a financial perspective but very expensive in Carbon output. In a Zero-Carbon economy we are already seeing that the financial model for car ownership is changing. The financial model for home ownership (and the definition of Affordable housing) also needs adaptation.

(Please continue on a separate sheet if necessary)

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- Ideally DP11.4 would be removed. If it is to be retained the following changes are suggested
- 1) Any developer submission must include all Government Grants which are available to offset capital costs of Low-Carbon projects.
  - 2) Developer submissions must show a 10-year cost-of-ownership model (It is expected that initial costs will be higher but running costs lower)
  - 3) Selling prices in the submission should be those of similar low-carbon homes (not of traditional fossil fuel based residences)
  - 4) The annual Carbon emissions of the two alternative developments must be presented.

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Office Use Only

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Name and Organisation:	Mervyn Eyles - Ruyton Xi Towns Parish Council <i>LYDIA BARDSLEY</i>
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This paragraph cites the SHMA that 'an estimated 799 households per year will require Affordable Housing' Is this an additional 799 households per year? SP2.3 gives the target for new Affordable Housing as 350 houses per year. The Local Plan does not reconcile these two. The term 'Affordable Housing' is not used consistently throughout the Local Plan, it is defined as an umbrella term in 4,53 'the affordable tenures are defined within Annex 2 of the NPPF (2019) as being: affordable housing for rent; starter homes; discounted market sales housing and other affordable routes to home ownership' (This definition may now be inaccurate as starter homes are being super-ceded by entry-level homes) It is then unclear whether DP3 and DP4 cover all Affordable Housing just or just Affordable Housing to rent. The situation is further confused by DP5.1 which indicates that this Policy also covers rental properties. This objection is not merely about semantics. Paragraph 4,52 states 'Approximately 70% of households on the Councils Choice based housing register are unable to afford home ownership and will continue to require rented affordable homes.' There is not only an Affordable Housing target but also, within that, an Affordable rental target which is not quantified within the Local Plan. DP1.2 indicates that the Residential Mix for open market dwellings should follow SHMA estimates. There is no corresponding policy for Affordable dwellings.

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This comment covers the structure of the Local Plan and some inconsistencies within it. It is therefore not possible to recommend the correct structure and which are the correct interpretations.

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