

## 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 A Dawes
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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:  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.

Relaxing the requirement for Hubs to have both 'significant employment' and 'peak time public transport' makes the Hierarchy of settlements unsound. This is also contrary to the proposed Climate Change and Sustainability Objectives SO5, SO6 and SO12 which seek to reduce carbon emissions by reducing travel by private vehicles making it unsound.

The adding of the vague and undefined phrase 'a larger range' of services and facilities to compensate for the lack of these facilities is subjective. This is contrary to the Hierarchy of Settlements attempt at objective comparison between settlements.

The scoring system used in Table 10 is flawed and inaccurate making the threshold dubious. It is not an appropriate or robust assessment which makes it unsound. As the SP2 Strategic Approach para 6 relies on this it is therefore also unsound.

(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 Hierarchy of Settlements needs to be amended to fulfil the SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12 to minimise car travel and reduce carbon emissions.

The vague wording used to relax the original criteria in Para 5.41 needs to be removed and the original requirement to have both significant employment and peak time public transport must be reinstated.

The Hierarchy of Settlements then needs to be reviewed using this criteria and the draft plan development status and allocations amended as appropriate.

*(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:**

*(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: R A Dawes

Date: 19/02/2021

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" value="SP2.2"/>	Policy:	<input type="text" value="SP2 S14.2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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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.

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SP2.2 Community Hubs. Trefonen is the only proposed Hub that does not have significant employment and peak time public transport. It would be contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12 if it was allocated hub status. This would be unsound.

(Please continue on a separate sheet if necessary)

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Trefonen should be removed from the Community Hub settlements in Policy S14.2 Community Hubs – Oswestry Place Plan Area and schedule SP2.2

Trefonen should be allocated as a Rural Settlement. Affordable Exception and Rural Exception would provide for the needs of local people in small scale development. The culmulative impact of these should be controlled by additional wording in the Affordable Exception Policies DP4, DP5, DP6 and DP7.

Any development should conform to the Village Design Statement and this should be written into SP5 High Quality Design.

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

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Signature:

R A Dawes

Date:

19/02/2021

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Part B Reference: