Shropshire Council:
Regulation 18: Pre-Submission Draft
of the Shropshire Local Plan

Consultation Form

Part B Consultation Form: *Your Response(s) – this part (please fill in a separate Part B Consultation Form for each comment you wish to make, relating it to the relevant paragraph, policy (including its explanation) or site).*

Please ensure that you also complete one ***Part A Consultation Form*** *and submit this alongside you Part B Consultation Form(s).*

We have also published a separate ***Guidance Note*** *to assist in making effective representations.*

Part B: Response

Name:	TREFONEN RURAL PROTECTION GROUP
Organisation (if relevant):	

Q1. To which document does this response relate?

☑ Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

☐ Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

☐ Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this response relate?

Paragraph:		Policy:	S.14.2. Community Hubs
Site:	TREFONEN	Policy Map:	S.14 Oswestry Place Plan Area - Trefonen

Please note: Responses to this Regulation 18: Consultation can address any of the Supporting Documents and Evidence by relating them to the resulting paragraph, policy (including its explanation) or site in the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

☐ *Agree*

☑ *Disagree*

☐ *Don't know / no opinion*

(Please tick one box)

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2:

2)b) Hierarchy of Settlements 2020 - Para 5.41 cont/

The travel routes to employment and services involve passing through Oswestry town centre with additional traffic adding to congestion with its inherent safety and health issues outside schools on Upper Brook Street & Trefonen Road; or through Morda & Weston with impact on those settlements which already suffer excess traffic problems. Contrary to Sustainability Objectives SO11 & SO12.

Therefore the status of Trefonen as a "Community Hub" is contrary to existing and proposed policies, and it should be designated "Other Rural" settlement, for which it meets the full criteria.

3) Appendix 5: Residential Development Guidelines and Residential Supply
Page 330 Trefonen Development Guideline 55 dwellings / Windfall Allowance 50 additional dwellings

That is a build rate of 3 per year and a 15% expansion of the village of 324 existing dwellings.
This is not "similar" to the recent rate and cannot be considered to be a "modest amount".

From our local knowledge and check of the SC planning portal, the build rate 2006- 2016 was 1per year (not 2per year stated in previous consultation), so the proposed 3per year is not a similar rate of growth.

Using the terminology of the Council, 15% is considered to be "highly ambitious" High Growth, whereas 5% is Moderate Growth.

The proposed growth would be excessive for the scale, layout, topography, historical assets and character of Trefonen. It would also increase the risk of future pressures from developers for Open Market housing should there be a shortfall of Housing Supply during the Plan period, which would not provide Affordable Housing for local people as intended.

Multiple "small" developments to reach a "guideline" of 50 additional dwellings would have a cumulative impact amounting to the same, or arguably greater impact, as a large development over the course of time. We do not believe that this is the intention of NPPF in allowing Rural Exceptions outside rural settlements.

Therefore, the guideline should be reduced to that required to meet "identified local needs" for truly "Affordable Homes" for local people – at a guide rate of 1per year – Guideline 18 Windfall Affordable Homes.

We are also concerned that the proposal for 50 additional dwellings is only a "guideline" and not a definitive limit, and that future pressures from developers for housing above that "guideline" would be approved under the "presumption in favour of sustainable development" adjacent to Trefonen if allocated Hub status.

The core aim of "Rural Exception" policies is to deliver the "identified local needs" for Affordable Housing. This can equally be provided under "Other Rural – Countryside" status, which minimises this risk.
We believe that Trefonen should retain its current "Other Rural – Countryside" status

Please succinctly provide all evidence and supporting information necessary to support your response. Please continue on a separate sheet if necessary.

Completed Consultation Forms can be submitted by emailing:
Planningpolicy@Shropshire.gov.uk

If submitting your own response, please enter your last name in the subject field of the email; If submitting a response on behalf of a client, please enter their last name in the subject field of the email.

Completed Consultation Forms can also be submitted by post to:
Shropshire Council, Planning Policy & Strategy Team, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Office Use Only	Part A Reference:
	Part B Reference: