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:	DP7 Cross Subsidy Exceptions
Site:		Policy Map:	

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:

DP7 Cross Subsidy Exceptions

We do not consider this specific policy is required as the NPPF Para 77 allows for viability discretion on 100% Affordable Housing Rural Exception developments, which are allowed in 'Countryside' outside existing settlements.

A key factor in viability of 100% Affordable Exception schemes is land value. If landowners can foresee higher land value via a Cross-subsidy Exception scheme that will be what they will hold out for. By introducing this specific policy it could reduce the percentage Affordable Homes provided.

Without prejudice to the above, if this Policy is to be included then we disagree with the minimum 70% Affordable Homes requirement in DP7.1(f)

We consider it should mirror the Open Market development Affordable Homes requirements for its location within the county
i.e. it should be in North 90%AH / 10%OM and in South 80%AH / 20%OM to reflect identified local needs.

Para DP7.1(a) refers to viability of schemes – how will this be determined?
Without public grant, viability is synonymous with profitability. It is inherent that Developers are profit led, and therefore they will seek to build the maximum Open Market housing within any development to maximise profit. Clearly, every development will differ in terms of land values and build costs related to site factors, and saleability of Open Market housing.
No indication is given of what might be deemed an acceptable profitability level on a scheme for the developer; nor how this would be assessed and determined within the Planning Application process (indeed is a it legally a consideration under the Planning Act?).

DP7.1(l) and (n). Neither refer to access to employment.
Sustainable travel to work by walking, wheeling, cycling, or public transport are key for the sustainability of settlements and meeting Climate Emergency aims and Policy SP3 Climate Change.

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: