Shropshire Council: Shropshire Local Plan

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:	**TREFONEN RURAL PROTECTION GROUP**

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:	Click or tap here to enter text.	Policy:	DP4 Affordable Exception Sites	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.

DP4 Affordable Exception Sites

DP4.1(c) limits development to that required by Identified Local Needs survey

However, the Policy does not include a definition of scale, which is only set out in the Explanation para 4.57 saying there is an "expectation" that will not exceed 25dwellings adjacent to Strategic, Principal & Key Centres.

That is very open to interpretation and not binding, so gives no confidence to local residents.

For Community Hubs & Clusters and other rural settlements there is no limitation to scale of development.

As 'Affordable Exception' developments are predominately intended to be built adjacent to those rural settlements, any development could be large in relative terms.

There is also no cumulative impact limitation on multiple developments adjacent to settlements.

In Policy DP5 Entry Level Exception Sites DP5.1(b) includes limitations of scale within policy wording
In Policy DP7 Cross Subsidy Exceptions DP7.1(e) includes guide of scale within policy wording

We believe that Policy DP4 Affordable Exception Sites must define limits of scale and cumulative impact adjacent to Community Hubs & Clusters and other rural settlements (as well as limited to Identified Local Needs) within Policy.

(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.

Add limitations of scale into Policy DP4

Adjacent to Strategic, Principal or Key Centres the scale of the development will solely be dictated by the evidence of local affordable housing need, but will not normally exceed 25 dwellings.
Adjacent to Community Hub or Community Cluster or other Settlements the scale of the development will solely be dictated by the evidence of local affordable housing need, but will not normally exceed 10 dwellings.

Add wording to address culmative impact from multiple "small" Affordable Exception developments – particularly relevant to smaller settlements where this would have a greater impact if different landowners promote development on adjoining fields.

(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.

Office Use Only	Part A Reference:
	Part B Reference:

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:

To represent our member's views on the status of their village for current and future generations

(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:	Chair Trefonen Rural Protection Group	Date:	25/02/2021

Office Use Only	Part A Reference:
	Part B Reference: