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:	Schedule SP2.2 and S14.2.1	Policy:	SP2 and S14.2 Community Hubs – Oswestry Place Plan Area	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.

Without prejudice to our overarching amendment to the HofS and review of all Settlement statuses, we would specifically raise that **Trefonen does <u>not</u> have any** "*significant employment opportunities"* **or** "*peak time public transport".* It is the **<u>only</u>** proposed Hub settlement with **neither of these** key requirements.

1) Therefore, Trefonen **<u>does not meet</u>** the criteria for **Hub** settlement status, and allocating it as such would be contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12 which seek to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions.

Trefonen should be designated "*Other Rural"* settlement, for which it meets the full criteria,

Housing provision required to meet "*identified local needs"* for truly "*Affordable Homes"* for local people ascertained by application to Home Point Housing Waiting List or by Right Homes Right Places or local Housing Needs Survey during the period of the Plan can be met by Rural Affordable Exceptions Policies DP4 – DP7 – and contribute as 'Windfall' to the overall Housing Target.

2) We are very concerned that multiple "*small*" developments to reach the currently proposed *"guideline"* of 50 additional dwellings would have a **cumulative impact** amounting to the same, or arguably greater, impact as a large development on our village over the course of time. We do **not** believe that is the intention of NPPF in allowing *Rural Exception* developments in and around rural settlements.

(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.

1) Trefonen should be designated "*Other Rural"* settlement, for which it meets the full criteria, and **<u>deleted</u>** from **Policy S14.2.Community Hubs** – Oswestry Place Plan Area **<u>and</u>** from **Appendix 5 Schedule A5(ii)** Residential Guidelines and Supply within Community Hubs.

No housing guideline should be allocated, excepting the principle of Windfall for housing provision required to meet "*identified local needs"* for truly "*Affordable Homes"* for local people to be met by Rural Exceptions Policies, which are allowed in '*Countryside*' outside existing settlements with schools, under policies **DP4, DP5, & DP7** to meet local needs established by Housing Needs Survey during the Period of the Plan

2) **Limitations** on cumulative *"Exception Site"* developments adjacent to individual settlements **must be** included within policies **DP4, DP5, & DP7**

(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: