

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:	Susan Christian
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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:	Schedule SP2.2: Community Hubs	Policy:	SP2 – Strategic Approach & S14.2 Community Hubs – Oswestry Place Plan Area	Site:		Policies Map:	
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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 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.

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.

**Policy SP2 – Strategic Approach - Schedule SP2.2: Community Hubs - Trefonen
Policy S14.2 Community Hubs – Oswestry Place Plan Area**

Trefonen does **not** have any “*significant employment opportunities*” or “*peak time public transport*”. It is the **only** proposed Hub settlement with **neither of these** key requirements, and allocating it as such would be contrary to SP3 Climate Change and Sustainability Objectives SO5, SO6, & SO12.

I believe this makes it “*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.

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

No Housing Guideline should be allocated as a Rural Settlement.

I believe that sufficient housing to meet the needs of local people over the Plan period can be met by “*Affordable Exception*” and “*Rural Exception*” Housing policies set out in the Draft Plan for rural settlements with a school, including the type & size of housing that is identified to be required (starter, intermediate, downsize, accessible - houses or bungalow).

I believe that these should be small-scale developments of 10 houses or less, and that the cumulative impact of phased or adjacent developments must be guarded against by the additional wording within the Affordable Exception Policies DP4, DP5, DP6 & DP7

Any development should conform to the Village Design Statement.

Reference to compliance with VDS should be added into **SP5 High Quality Design**

(Please continue on a separate sheet if necessary)

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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)

Office Use Only	Part A Reference:
	Part B Reference:

(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)

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Signature:

Date:

Office Use Only	Part A Reference:
	Part B Reference:

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Part B: Representation

Name and Organisation:	Susan Christian
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- 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:	<input type="text" value="6"/>	Policy:	<input type="text" value="SP-2 Strategic Approach"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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Policy SP2 – Strategic Approach Para 6 relies on the **Hierarchy of Settlements**

The **Hierarchy of Settlements** that determines Hub status is flawed and “*unsound*” due to the wording of **Para 5.41** which relaxes the full requirement for Hubs to have **both** “*significant employment*” and “*peak time public transport*”.

The relaxation of requirement to have **both** “*significant employment*” and “*peak time public transport*” is contrary to the Council’s adopted Climate Change Emergency policies and the proposed **SP3 Climate Change** and **Sustainability Objectives SO5, SO6, & SO12** in the Draft Plan which seek to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions. I believe this makes it “*unsound*”.

The additional wording “*a larger range*” of services and facilities to compensate for the lack of these fundamental criteria is **not defined**, and introduces an element of **subjective** assessment, which is contrary to the aims to the Hierarchy of Settlements Methodology for **objective** comparison between settlements.

I do not believe that facilities such as fortnightly mobile library visits, children’s playgrounds, outdoor sport facilities & green space can possibly compensate for lack of employment and/or public transport.

Additionally the **Threshold score of 48 points for Hub** status was set using flawed and inaccurate scoring in the original 2017 Table 10 and has not been changed since. The current 2020 Table 10 is still inaccurate. Therefore it is not an “*appropriate and robust assessment*” and the whole outcome of Table 10 and the Hierarchy of Settlements is flawed

I believe this makes the Hierarchy of Settlements “**unsound**”.

As **Policy SP2 – Strategic Approach Para 6** & Schedule SP2.2: Community Hubs relies on the Hierarchy of Settlements as its Evidence Base it must also be “**unsound**”.

(Please continue on a separate sheet if necessary)

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1) The Hierarchy of Settlements must be amended.

It must correspond with and supports the Spatial Vision, SP1 Shropshire Test, **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.

In **Para 5.41** the relaxation wording **must be removed**

Remove “*In circumstances where there is no regular public transport service; and/or high speed broadband; and/or multiple significant employment opportunities, a larger range of services and facilities would be necessary to compensate to enable a settlement to achieve the specified point’s threshold*”

The **full** Hub criteria set out in **Para 1.16 Table 2** and **Para 5.35 Table 6** must be used to determine Settlement status by **objective** assessment. Critically the requirement to have **both** “*significant employment opportunities*” **and** “*peak time public transport*” for Hub status must be met.

2) The list of Settlements must then be reviewed to confirm compliance with the full Hub criteria, and;

3) The Draft Plan settlement development status & allocations amended accordingly.

(Please continue on a separate sheet if necessary)

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