



# Trefonen Rural Protection Group

The Chairman

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## SHROPSHIRE COUNCIL - LOCAL PLAN REVIEW

### EXAMINATION STAGE

### STAGE 1 HEARINGS

31<sup>st</sup> MAY 2022

## RESPONDENT A0627      STATEMENT on Inspectors' Stage 1 Matters and Issues

### Matter 3 Question 14

*Is Policy SP7 positively prepared, justified, effective and consistent with national policy?  
How have the residential guidelines been derived?  
Do these policies duplicate parts of other policies?*

Without Prejudice to our submitted Response A0627 regarding flaws in the *Hierarchy of Settlements* and that Trefonen should not be designated as a *Community Hub*, but should be *Other Rural – Countryside*, and therefore should not have a Housing Guideline at all under Policies SP2, SP7, SP9 and SP10; which we understand will be a matter to be discussed at Stage 2 of the examination.

#### How did the Council set their Housing Guidelines?

We would make comment by reference to the '*Housing Guideline*' proposed for Trefonen, but believe that the principle applies to numerous rural settlements across the county.

Under the Nov 2018 '*Consultation on Preferred Sites*' we queried how the proposed 55 dwelling '*Housing Guideline*' for Trefonen had been arrived at.

Para 17.59 of that document set out that it was just a pro-rata rate based on "*average completion*" numbers for the previous period 2006 – 2016, and that that the proposed rate of 2.75 per year for the Plan period was "*similar to*" that completion rate of 2.0 per year for 2006 – 2016.

In our Consultation Response 17/02/2019 we contested that that is not a similar rate and from our knowledge of our village we also contested their previous completions, and set out our case (attached) for a figure of 1.0 per year for the Plan Period i.e.20 for period 2016-2026 [22 total for period 2016-2038]. Despite our representations, the '*Guideline*' figure of 55 remained unchanged in the Reg19 Consultation.

Whilst Para 17.59 also refers to the Council's Housing Register and the Parish Council's Housing Needs Survey suggesting an unmet need for various types & tenures of housing no details were given; and we would query if the ORPC HNS does identify such a *need* or just a desire to live here. [www.oswestryrural-pc.gov.uk/housing-needs-survey-2018](http://www.oswestryrural-pc.gov.uk/housing-needs-survey-2018).

It appears that the Council have just determined the '*Housing Guideline*' by a nominal share of their overall county target of 30,800; not upon any sound evidential needs.

That overall target comes from the Council's '*High Growth*' ambition of 15% growth above FOAHN, which they appear to have pre-determined as their option to be pursued from the outset of the Review, despite it not being supported by majority of respondents at initial '*Issues & Strategic Options*' consultation. The majority supported '*Moderate Growth*' 5% above FOAHN.

The thrust of the Plan is '*Urban Focus*' for housing but, in the case of Trefonen, the '*Housing Guideline*' of 55 would be a 15% increase on a small rural village, which clearly is not the correct focus and cannot be sustainable, especially considering employment, public transport and Climate Change issues.



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We understand from other responses and correspondence that many villages believe their '*Housing Guidelines*' are also excessive, and by reference to Nov 2018 '*Consultation on Preferred Sites*' it is clear that many were also set in excess of the Council's noted previous completion rates for those settlements e.g. Longden 50 dwellings is not pro-rata of the stated previous rate of 2.0 per year x 20years = 40.

## Modifications necessary for Soundness

- a) An adjustment of the overall Housing Target to '*Moderate Growth*' 5% above FOAHN.
- b) An adjustment of all Housing Guidelines to reflect the lower overall Target.
- c) A review and adjustment of pro-rata rates to truly reflect actual previous completions.
- d) A review of final guideline figures for rural settlements against existing settlement size to ensure growth is not in excess of 5% to ensure '*Urban Focus*' for housing achieved.

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With specific reference to the *Housing Guideline* of 55 dwellings for Trefonen and the Council's proposed modification of a reduction from 55 to 35 dwellings for the Plan Period.

**MiM150** and **MiM204** but now listed under Main Modifications **MaM049** and **MaM085**

W.P. We support the proposed modification for a reduction from 55 to 35, but believe it should be set at 22 (1per year / approx 6% growth) or, as per our Response 0627, not have one at all as *Other Rural – Countryside*, with identified local housing needs met by '*Rural Exception Affordable Housing*'.

END

**Appendix 1 - TRPG Trefonen - Completions build rates 2006-16 31.01.2019**