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:	Peter Gregory Day

Q1. To which document does this representation relate?

- [x] 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:	6	Policy:	SP2 Stratergic Approach	Site:		Policies Map:	

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

	Yes:	No:
A. Legally compliant	☐	☐
B. Sound	☐	☑
C. Compliant with the Duty to Co-operate	☐	☐

(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.

The Shropshire Councol has produced a Local Plan Review which includes a "Hierarchy of Settlements" which is flawed, unsound. This hierarchy has allocated points to a selection of criteria for the selection of "Hub" status for setttlements. Two of the criteria are "significant employment" and "peak time public transport". Hub status given to settlements must have both "signifcant employment" and "peak time public transport", This has not been achevied in this policy. It is unsound. Indeed this policy seems to contravene the councils own adoped policy on climate change and substainabilty objectives. I beleive this is covered in the adopted "Climate Change Emergency" policy proposed SP3 Climate Change and Sutainability Objectives SO5/6&12. The objective of which is to reduce car travel to reduce carbon emissions. Indeed the way allocation of points to indicate what should be a "Hub settlement" seems in itself unsound. Why should points be awarded for children's playground in a village green space with a football field be used to ameliorate for lack of points for peak time public transport?
Why 48 points to gain the title of "Hub" status. Why not 42 which it is written to be the answer to everything. Indeed the composition of this points table is flawed making the "Hierarchy of Settlements" unsound.
As Policy SP2 - Strategic Approach Para 6 and SP2.2 Community Hubs relies on the Hierachy of Settlements as its Evidence Base it must also be 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.

The "Hierarchy of Settlements has to be changed. It has to take proper account of the council's Spatial Vision SP3 Climate Change and Sustainability Objectives SO5,6, & 12. That is to reduce carbon emissions by reducing car travel and encourage other substainable journeys. To do this the wording in Para 5.41 "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 facilites would be necessary to enable a settlement to achieve thespecified point's threshold" and "peak time public transport" for "Hub status" in Para 1.16 Table 2 and Para 5.35 Table 6.
This list of settlements will have to be reviewed with the updated requirments. This will then require the Draft Plan settlement status andallocations changed.

(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.

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.

- [x] 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:

(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: Date:

Office Use Only	Part A Reference:
	Part B Reference: