

## 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:	Gill Buckeridge
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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:	<input type="text" value="6"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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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 checked="" 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 relies on the Hierarchy of Settlements determination of Hub status. This is flawed and therefore unsound, since it ignores the requirement for a Hub to have both significant employment and peak-time public transport (Trefonen has neither); it therefore goes against the Council's Climate Change Policy (SP3 Climate Change, and Sustainability Objectives SO5, SO6 and SO12, in the Draft Plan). The suggestion that other services and facilities may compensate for this flawed alteration is vague and undefined, relying on subjective opinion rather than objective comparison of settlements. Facilities such as a fortnightly 2hr library van or a children's playground cannot compensate for lack of employment and public transport. The Threshold score of 48 points for Hub status has been set using inaccurate scoring in both the 2017 Table 10 and the 2020 Table 10. It is therefore neither appropriate nor robust, thus rendering the Hierarchy of Settlements 'unsound'. Since Policy SP2 Para 6 and SP2.2. Community Huibs relies on this Hierarchy Of Settlements as its evidence base, it must also be deemed '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 Settlement needs to be amended to comply with the Spatial Vision SP1 Shropshire Test and SP3 Climate Change and Sustainability Objectives SO5, SO6 and SO12, which seek to reduce carbon emissions by using sustainable travel rather than private car transport. I am also very concerned about Trefonen's rising water table and further proposals to build on flood planes

The relaxation of criteria for Hub Status must be overturned and the full Hub Criteria as set out in Para 1.6 Table 2 and Para 5.35 Table 6 must be applied as an objective assessment. The requirements to have both 'significant employment opportunities' and 'peak time public transport' for Hub Status must be met. We have neither and very little else to compensate. In turn, the list settlements must be reviewed to confirm full compliance; and the Draft Plan for settlement development status must be amended accordingly.

Trefonen must be removed from Community Hub Status and classified as a Rural Settlement. Any small-scale appropriate housing development, meeting the needs of local people, should conform to the excellent Village Design Statement.

*(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.*

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:

G. M. Buckeridge

Date:

26/02/2021

Office Use Only

Part A Reference:

Part B Reference: