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:	Adele Dray

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:	Appendix: Heirarchy of Set	Policy:		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.

Hierarchy of settlements methodology is having a detrimental effect on sustainability of rural villages by incentivising service closure.

Hierarchy of settlements methodology does not meet the test of soundness as follows:
“ Consistent with national policy – enabling the delivery of sustainable development ” [National Planning Policy Framework 35 d).

Furthermore it is not in line with the requirement, 83 d of the NPFF that “ Planning policies and decisions should enable…
…d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

In direct opposition to the retention of community facilities, before the plan has even been adopted, it has led to the loss of community facilities and created an impediment to new ones in some rural Shropshire villages.

See continuation sheet for detailed evidence:

(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.

There is no way to undo the damage already done to villages where an amenity has already been voluntarily lost in the consultation stages of the plan.

If not entirely rejected, the plan should be modified to remove the explicit link between the scale of development and services. This would at least avoid further damage to villages near the points boundaries, which without the modification will continue to resist any new service opportunities, or intentionally plan the loss of services prior to the ongoing 5 yearly review.

(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: Adele Dray

Date: 09/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

The hierarchy of settlements policy, which sets a target level of 47 point for hub status, has created an incentive for rural communities to close services, in order to avoid larger scale development. This was acknowledged at the very start of the process by the Principal Planner Eddie West, in a meeting in my village of Clive, where he "cautioned that the idea of voluntarily losing a facility in order to be saved from development was an unhealthy attitude to take" [1]. A policy that knowingly incentivises behaviour contrary to the aims of sustainability of rural communities, with the only mitigation being asking people not to do it, is based on wishful thinking, not sound principles.

In Clive, the policy has *already resulted in residents calling to shut existing services.* A group of residents surveyed the entire village with a voting form asking whether villagers would be **"**prepared to lose an amenity". The group suggested on the form that the Post Office was the easiest to 'lose' [2]. This approach was legitimised by the Parish Council, by discussing the approach and the results at length at an extraordinary meeting of the Parish Council [3].

This created an environment where the owner of the village shop, closing it and applying for a change of use to residential, has been enthusiastically supported by the Parish Council and has been seen as a positive by many in the village. [4]

How profitable the shop ***was*** as a commercial enterprise, or its potential as a non-profit community-run shop is now irrelevant, as its connection to hub status now makes it unviable. What tenant would take on a business, when there is detailed evidence in the local government minutes, that the local sentiment is in favour of the shop remaining closed, in order to game the planning system?

It is also clear that no new service (that attracts points) can now ever be introduced into the village, as it would similarly be unsupported by villagers because of the effect on the 5 yearly Local Plan Review.

This is a direct consequence of the Local Plan Review methodology. The local plan should be rejected as it is contrary to the aims of the National Planning Policy Framework.

[1]Minutes of meeting initial village meeting about the Local Plan Review, attended by Principal Planner Eddie West 03.01.2019
http://www.cliveparishcouncil.org/shared/attachments.asp?f=461b9a66%2D2f2d%2D4c0c%2Db49c%2D80e13b596fa1%2Epdf&o=Parish%2DMeeting%2DMinutes%2D03%2E01%2E19%2Epdf

[2] Paper survey responses are in the custody of Clive Parish Council, who wished to audit and review them. I have asked for a blank copy of the survey to be uploaded to the Clive Parish Council website alongside the minutes and results presentation that have already been uploaded (see [3] below), but at the time of this submission this has not been done.

[3] Minutes of extraordinary meeting 24.09.20
http://www.cliveparishcouncil.org/shared/attachments.asp?f=3299690d%2D40be%2D4a66%2D96d7%2D5fbb9ff29903%2Epdf&o=Extra%2DOrdinary%2DMinutes%2D24%2E09%2E2020%2Epdf
Appendix: Independent Community survey results presentation results on whether the village were prepared to lose an amenity
http://www.cliveparishcouncil.org/shared/attachments.asp?f=91184ccc%2Dcf43%2D4470%2Daa48%2D17796e2cb1e2%2Epdf&o=Independent%2Dparish%2Dsurvey%2Dresults%2Epdf

[4] Planning application: 21/00048/FUL | Conversion of former shop to residential annex
See Parish Council supportive response to the application, as well as a number of residents' supportive comments, including the three authors of the village poll asking residents if they were 'prepared to lose an amenity'
https://pa.shropshire.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=QMH680TDJQU00