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:	EMMA HUGHES

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	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.

Policy SP2 – Strategic Approach Para 6 relies on the Hierarchy of Settlements to decide Hub status for villages. That is flawed 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”. That 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. We 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; and mobile library visits, children’s playgrounds, outdoor sport facilities & green space cannot possibly compensate for lack of employment and/or public transport. The Hub Threshold score 48points was set using flawed and inaccurate scoring in the original 2017 Table 10, but has been kept. The current 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 and “unsound”. Policy SP2 – Strategic Approach Para 6 & Schedule SP2.2: Community Hubs relies on the Hierarchy of Settlements as its Evidence Base so 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.

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)

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: 26/02/21

Office Use Only	Part A Reference:
	Part B Reference: