

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:	Dr Maggie Hill, Ramblers' Association Shropshire Area
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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"/>	Policy:	<input type="text" value="DP15 5"/>	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 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 DP15. Open Space and Recreation. DP15 gives very limited recognition of the value of open space for informal recreation such as walking. We recognise that this can be provide by green infrastructure under DP14 policies. However, where green infrastructure provision is not possible (Policy DP15 5), it is important that some of the open space should include areas suitable for informal recreation such as walking.

(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.

Policy DP15. 5 Relating to where green infrastructure provision cannot be achieved. This should be amended to state that “open space provision should aim to include areas of natural greenspace for informal recreation such as walking and should be located appropriately within the site in order to offer the best opportunity for access to all residents”

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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:

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Office Use Only	Part A Reference:
	Part B Reference:

Signature: [

[

Date: 25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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The Plan lacks a coherent policy for protecting and improving walking routes and promoting walking, within and between communities and in the wider countryside. The way the policies are written does not give a clear policy framework for pedestrian travel and the infrastructure it needs. In particular it lacks clarity with respect to existing as opposed to new developments and travel between centres and hubs. The Plan has missed the opportunity to give a clear steer that investment in walking routes throughout Shropshire is needed to ensure sustainable development and a zero carbon economy and to ensure that the amount of active travel through walking increases.

SP3 1d. (Active travel/Walking and cycling links). This policy relates only to new developments and to links from new to existing developments. Therefore it is inadequate to deliver transition to a zero-carbon economy across Shropshire. It does not specifically mention active travel in existing neighbourhoods nor between strategic/principal centres and community hubs.

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Policy SP3 1d should be extended to cover active travel in existing neighbourhoods, and between strategic/principal centres and community hubs and therefore fit with policy DP28 3b.

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	Part B Reference:

Signature:

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The Plan lacks a coherent policy for protecting and improving walking routes and promoting walking, within and between communities and in the wider countryside. The way the policies are written does not give a clear policy framework for walking for health and leisure and the infrastructure it needs. Policies lack clarity in their application and do not recognise that the local footpath network is a key part of community infrastructure to achieve active and healthy lifestyles. The Plan has missed the opportunity to give a clear steer that walking is a key element in achieving active lifestyles.

Policy SP6. Health and Wellbeing. The only policy in SP6 relating to walking or walking routes is Policy SP6 7 (NB the numbering is incorrect in the consultation draft, this is the first No 7) relating to "safe and well-lit high quality walking and cycling routes". The policy needs clarifying – does it just apply to routes within (?new) settlements or possibly just to destinations?

Despite the fact that local footpath routes are a very important part of community infrastructure that promotes healthy and active lifestyles (SP6 5a) they are not mentioned within SP6 5a which only relates to “facilities”.

There is no policy relating to protecting, improving and promoting footpath infrastructure and Rights of Way in the countryside.

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An additional policy is needed in SP6 to protect and improve the footpath network to connect the countryside with settlements and to promote walking for active lifestyles.

Alternatively the Policy SP6 5a relating to community infrastructure should be expanded to include local footpath networks.

Policy SP6 first7 needs to be amended to clarify what it applies to.

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