Shropshire Council:
Regulation 18: Pre-Submission Draft
of the Shropshire Local Plan

Consultation Form

Part B Consultation Form: *Your Response(s) – this part (please fill in a separate Part B Consultation Form for each comment you wish to make, relating it to the relevant paragraph, policy (including its explanation) or site).*

Please ensure that you also complete one ***Part A Consultation Form*** *and submit this alongside you Part B Consultation Form(s).*

We have also published a separate ***Guidance Note*** *to assist in making effective representations.*

Part B: Response

Name:	TREFONEN RURAL PROTECTION GROUP
Organisation (if relevant):	

Q1. To which document does this response relate?

☑ Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

☐ Sustainability Appraisal of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

☐ Habitats Regulations Assessment of the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this response relate?

Paragraph:	Para 2.4 and Para 4.1 Table 10	Policy:	Hierarchy of Settlements 2020
Site:		Policy Map:	

Please note: Responses to this Regulation 18: Consultation can address any of the Supporting Documents and Evidence by relating them to the resulting paragraph, policy (including its explanation) or site in the Regulation 18: Pre-Submission Draft of the Shropshire Local Plan.

Q3. Do you agree or disagree with the paragraph, policy, site or policies map you have identified in Q2?

☐ *Agree*

☑ *Disagree*

☐ *Don't know / no opinion*

(Please tick one box)

Q4. Please use this space to make any comments on the paragraph, policy, site or policies map you have identified in Q2:

continued

5) Hierarchy of Settlements 2020 - Para 2.4 and Para 4.1
Para2.4 "The assessment methodology, assessment results and its application have been informed by public consultation and have been approved by the Shropshire Council Cabinet."
Para4.1 "The updated methodology was approved by Shropshire Council Cabinet on 18th October 2017"

We would contest the "approval" by Cabinet as the original 2017 document was voted 'on the nod' by Cabinet simultaneously with the Preferred Options "for consultation" document without due presentation, consideration & debate of its content or status at meeting on 18th October 2017.

When this fact is considered along with the inaccuracies and flaws identified in that document which have been repeated into the 2018 and current 2020 versions, we believe that make this document "unsound" for its purpose as a "robust methodology".

6) Hierarchy of Settlements 2020 - Table10 scores - inaccuracies
We believe that there are still numerous incorrect scoring for employment, services and facilities for several settlements (additions and omissions), including some identified by ourselves in our Preferred Options response Dec 2017 and in January 2019. This makes the assessment "unsound".

We believe that if the scoring is to be used as the initial stage in making an objective criterion based determination of settlement status then the information must be 100% correct.

The HofS Para 2.8 disclaimer "Note" that "it is not intended to represent a comprehensive assessment of all every services or facilities" just compounds the inaccuracy.

This assessment underpins the decisions on the development status of settlements and their development guidelines; and therefore it is critical that it is 100% accurate.
As it is not, the whole outcome is flawed and "unsound".

END

Please succinctly provide all evidence and supporting information necessary to support your response. Please continue on a separate sheet if necessary.

Completed Consultation Forms can be submitted by emailing:
Planningpolicy@Shropshire.gov.uk

If submitting your own response, please enter your last name in the subject field of the email; If submitting a response on behalf of a client, please enter their last name in the subject field of the email.

Completed Consultation Forms can also be submitted by post to:
Shropshire Council, Planning Policy & Strategy Team, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Office Use Only	Part A Reference:
	Part B Reference: