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:	Paras 1.3, 2.6, 5.32; Tables 1, 4, 5, Para 5.13; Para 5.41	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:

1) Hierarchy of Settlements 2020 - Para 1.3, Para 2.6, Para 5.32
"The lower threshold for Community Hub status has remained unchanged"

By reference to the first HofS 2017 Para 5.40 this threshold was set by a "3point gap" in the original Table 10 settlement scoring. As previously raised, this gap never existed; and just removing written reference to that factor determining the threshold does not correct the mistake.

The Threshold must be determined by the full Hub criteria, and not by the wording introduced to support the inaccurate scoring results i.e. outcomes must be set by the policy and not the policy re-written to fit the results. We consider that is "unsound".

2) Hierarchy of Settlements 2020 - Table 1, Table 4, Table 5, and para 5.13
Library – a mobile library visiting fortnightly does not give the same community benefit to a settlement as a full or part time library premises, and therefore should not carry full 3points value

Chemist/Pharmacy – a Dispensary is a legally different service, which is only provided to registered patients of a Surgery and cannot be a 'walk-in' service to the general public. Therefore it does not give the same community benefit as a chemist or pharmacy, and therefore should not carry full 3points value

Post Office - a part time or mobile service does not give the same community benefit to a settlement as a permanent full hours service, and therefore should not carry full 4points value.
Also, this service is noted as having a higher 'day-to-day' ranking in a rural settlement due to its "special importance" from providing "banking, convenience and comparison shopping: and often acts as a community hub".
When the Post Office service is purely a counter within the only village shop, it does not give additional "convenience and comparison shopping", nor provide a "community hub" over and above that provided by the shop. Therefore it does not give that higher "special importance" community benefit to a settlement that a separate and independent provision would, and therefore should not carry full 4points value

These affect the true comparison of settlements by objective assessment.

3) Hierarchy of Settlements 2020 - Para 5.34
"Shropshire Council officers then used this information to identify similarities and groupings of settlements, which in turn informed decisions on specific categories of settlement"

By reference to the first HofS 2017 the threshold was set by a "3point gap" in the original Table 10 settlement scoring. That threshold remains unchanged. As previously raised, this gap never existed; and just removing written reference to that factor determining the threshold does not correct the mistake.

There are clear differences between settlements proposed by the officers as Community Hubs in the HofS 2020, as opposed to similarities, which calls into question their "informed decisions".

The fundamental issue is that of officer's subjective assessment and decision making in determining settlement status, rather than it being based on the objective Methodology outcomes. cont/

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: