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:		Policy:	S.14.2. Community Hubs
Site:	TREFONEN	Policy Map:	S.14 Oswestry Place Plan Area - Trefonen

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) Trefonen does not meet the full Hub Definition for "Community Hub" status as set out in Hierarchy of Settlements Tables 2 & 6

The full definition requires Hub settlements to have a combination of services and facilities; and have "significant employment opportunities; and public transport with a "regular service at peak time" (employment businesses with more than 5 employees – Classes B, A2 Sui-Generis) (peak time buses between 06.00-09.00 and 15.00-18.00 Mon-Fri all year).

Trefonen has no "significant employment opportunities; or "peak time public transport"
It is the only proposed Hub settlement with neither of these key requirements.

Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.

2)a) Hierarchy of Settlements 2020 - Para 5.41. SP2.2 Strategic Approach & SP.2.2:Community Hubs
This still includes a relaxation of these key criteria for "Community Hub" status requiring "significant employment opportunities; and "peak time public transport"; as well as a combination of services & facilities.

The suggestion in Para 5.41 that a "larger range" of services and facilities would compensate for the lack of these fundamental criteria is clearly wrong. It is obvious that facilities such as playgrounds, outdoor sports facilities & amenity green space cannot possibly compensate in any way for lack of employment and/or public transport. Additionally that "larger range" is not defined, and is purely subjective.

This relaxation makes the Hierarchy of Settlements assessment & Hub designation "unsound" and should be removed.

2)b) Hierarchy of Settlements 2020 - Para 5.41
Additionally, without either employment or peak time travel it is certain that daily car travel will be increased by additional housing in Trefonen.

Other forms of Sustainable Travel are not safe or practical on a daily basis throughout the year.
i) Walking – whilst there is a pavement on the main road to Oswestry this is narrow and impeded by hedges for the majority of the year forcing pedestrians onto the carriageway. There is no street lighting.
ii) Wheeling – the width of the pavement would not accommodate wheeling
iii) Cycling – is possible but the route involves steep hill with crests & corners with double white lines. At peak times the road is busy with commuting & school traffic and school, and used by agricultural and delivery vehicles of all sizes. There is no street lighting
iv) Buses – there is a no daily peak time service and very limited public service at other times (only 1 mid-morning outward – 1 early-afternoon return daily)

That is contrary to Shropshire Council's Climate Emergency Policy, to NPPF, and to Government's Zero Carbon aims. It is contrary to the "Spatial Vision" and 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. continues/

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: