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:

3) Hierarchy of Settlements 2020 - Para 5.34 continued
One of the main factors in undertaking this Local Plan Review was the SAMDev Examination Inspector's concerns on the subjective 'opt-in' decision process by Parish Councils; and the need for it to be an objective decision based on set criteria.

> Report to Shropshire Council by Claire Sherratt DipURP MRTPI 30 October 2015:-
> Identification of Community Hubs and Clusters Paras 28-43 culminating in Para43
> A main modification is required to Policy MD1 to clarify the process for designation of Community Hubs and Clusters in the future which would be through a review of the SAMDev Plan or through a formal Community-led Plan or Neighbourhood Plan (MM3). This is necessary to ensure the plan is positively prepared and effective.

The purpose of the Hierarchy of Settlements Methodology was to be an "appropriate and robust assessment" of settlements against the full Community Hub key criteria:-
Community hub settlements – Whilst the exact combination varies, the settlements within this category are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities.

Those criteria requirements have been relaxed by the insertion of additional wording into Para 5.41 by officers following the inaccurate original Table 10 scoring. That is "unsound".

4)a) Hierarchy of Settlements 2020 - Para 5.41
The relaxation of the Community Hub key criteria for multiple significant employment and peak time public transport is still included – that is "unsound" and should be removed.

Lack of these will fundamental requirements will result in additional private vehicle use travel use which is contrary to the 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 seeks to minimise car travel and maximise trips by sustainable travel, and to reduce carbon emissions.

The officer's proposal of a "larger range" of services and facilities to compensate for the lack of these fundamental criteria is not defined, and is purely subjective.

It is patently obvious that facilities such as fortnightly mobile library visits, children's playgrounds, outdoor sport facilities & green space cannot possibly compensate in any way for lack of employment and/or public transport. This relaxation makes the Hub assessment "unsound" and should be removed.

This is particularly relevant when considered with:-
4)b) Hierarchy of Settlements 2020 - Para 5.41
Community Hubs to offer "a good range (at least 5) of services and facilities" in conjunction with employment and peak time public transport . This threshold is clearly too low.

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: