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:	Tables 1.1, 1.2, 2.7, 2.8	Policy:	DP3 - DP7
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:

The whole document is not objective but puts a positive spin on everything that the Cabinet sought to promote from the outset of the Review in its "highly ambitious" High Growth strategy for both housing and economic growth.

Hierarchy of Settlements
There are clear contradictions between the Sustainability Objectives set out in the Report with the application of Policy within the Hierarchy of Settlements and with Community Hub designations which are purported to give significant positive effects on sustainability.

The relaxation of key criteria for Community Hub settlements in the HofS to not require multiple significant employment and peak time public transport is still included

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.
Road transport is identified as the largest single contributor of CO2 emissions
SO6 is explicit to focus developments to accessible locations, and reduce vehicle use.

Table 1.1 Housing Targets
All options proposed at initial Issues & Options stage were above the FOAHN identified needs of the county, with additional growth additions of 5%, 10% or 15% respectively.
Therefore they all have significant benefits, irrespective of current SAMDev targets. The lower rates might as well not have been included as options if they were never going to be given creditability in the sustainability assessment

Table 1.2 'Poor' sites.
Numerous sites assessed as 'Poor' appear to have been selected to be allocated for development. That makes no sense.

Table 2.7
There is no assessment of employment opportunities within the Sustainability assessments for residential sites – if they are available in the settlement, how far they are from the site, how accessible they are by sustainable travel walking wheeling or cycling, or by public transport at times when they will trade (including shift patterns if applicable)
These are key factors in achieving sustainable development to meet Sustainability Objectives SO2 & SO4 economy and services, and also 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.
Road transport is identified as the largest single contributor of CO2 emissions
SO6 is explicit to focus developments to accessible locations, and reduce vehicle use. 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: