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:

continued/
Table 2.7 Services assessment
The footnote states that the list of services is consistent with the Primary Services in the HofS
That is incorrect. Table 2.7 does not assess Nursery, Convenience Store, Post Office, Petrol Station which are considered "essential for day-to-day life", whilst including many Secondary items that are "nice to have but not essential". Access to all the Primary services is fundamental to sustainability.

Table 2.8
Peak time public transport provision is included in Table2.7 but not in Table 2.8
This should be a key factor in assessing and comparing sites.

DP3 Affordable Housing Provision
This policy does not itself "reduce the need for people to travel by car", that is purely determined by the siting of the Open Market development that it forms part of and that being accessible by sustainable travel. If sites or settlements do not have that provision then all residents will have to use cars, potentially impacting more on lower income households, and on the environment.

DP4 Affordable Exception Sites
This policy does not itself "allow for a reduction in the need for private car use" It may not increase the need if every one of the new residents uses the other options. Also the requirement is only to access "local services" which in a rural settlement might not include many secondary services or, crucially employment. If settlements or sites do not have that provision then all residents will have to use cars, potentially impacting more on lower income households, and on the environment.

Whilst minimal harm to landscape character and historic feature is noted for urban settings, the impact to rural settlements from these developments is not specifically considered, and the likely impact is played down to suit. DP5 Entry Level Exceptions includes consideration of this fact.

DP6 Single Plot Exceptions.
Only reference is to urban settings with no mention of locations in or adjacent to rural settlements where impacts will be greater

DP7 Cross Subsidy Exceptions
This completely overlooks developments adjacent to rural settlements.
These do not have the "best access to services and facilities in the county"
It cannot be said that they "naturally" reduce the need for travel by car, or that they "encourage" sustainable travel.

DP7 only requires access to local service and facilities, but makes no mention of accessibility to employment opportunities If settlements or sites do not have work opportunities then all residents will have to use cars, which potentially impacts more on lower income households, and on the environment.

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: