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:

continued
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.

Table 1 lists 20 services and facilities - 7 Primary "essential to everyday life", and 13 Secondary expected in larger settlements but "not needed on a day to day basis".

Requiring only "at least 5" from the 20 for designation as a "Community Hub" is clearly too low
Also it is not defined whether they must be Primary or Secondary services & facilities

By reference to the 2020 Table 10, the top twenty "Other Rural" Settlements (down to 34 score) have "at least 5" services and facilities, so using that figure as the Hub threshold is clearly wrong.

Similarly, the requirement in Para 5.40 for Principal / Key Centres to have "a large range (at least 12)" is equally clearly set low as well. All the proposed Principal / Key Centres have at least 15 services & facilities including all 7 Primary, and all have significant employment and peak time public transport.

The full Hub criteria requires services sufficient to meet the "day-to-day needs" of residents so a high proportion of the Primary services & facilities must be required to fulfil that

The Hub threshold requirement for services & facilities should include a minimum of 5 Primary plus a good range (more than 6/13) of Secondary services & facilities - more than 11 total.

However, it is fundamental that to be designated as Community Hubs that settlement should have both multiple significant employment and peak time public transport as required by the full Hub criteria.
As an absolute minimum there must be multiple significant employment opportunities in the settlement or peak time public transport for residents to access employment elsewhere without the use of private transport.

When the very low threshold of "at least 5" for Hubs is used in combination with the proposed undefined "larger range" of services & facilities to compensate for a lack of employment and peak time public transport it is clearly "unsound".

Trefonen has no "significant employment opportunities" or "peak time public transport"
It is the only proposed Hub settlement with neither of these key requirements.
It is contrary to 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.
Therefore Trefonen should be designated "Other Rural" settlement, for which it meets the full criteria.

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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: