Shropshire Council: Shropshire Local Plan

Representation Form

*Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s).***

*We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.*

Part B: Representation

Name and Organisation:	**TREFONEN RURAL PROTECTION GROUP**

Q1. To which document does this representation relate?

☐ Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

☑ Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

☐ Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	Click or tap here to enter text.	Policy:		Site:		Policies Map:	

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

	Yes:	No:
A. Legally compliant	☐	☐
B. Sound	☐	☑
C. Compliant with the Duty to Co-operate	☐	☐

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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.

<u>Hierarchy of Settlements</u>
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.

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 <u>every one</u> 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.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1) Review of the overall Housing Target figure against full assessed needs and additional sustainable growth – amend SP2 and associated housing allocations

2) The Hierarchy of Settlements must be amended.
It must correspond with and support **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.

In **Para 5.41** setting a minimum range of only 5 from 20 services & facilities for a Hub settlement is patently far too low and must be increased.

In **Para 5.41** the relaxation wording must be removed
Remove "*In circumstances where there is no regular public transport service; and/or high speed broadband; and/or multiple significant employment opportunities, a larger range of services and facilities would be necessary to compensate to enable a settlement to achieve the specified point's threshold.*

The **full** Hub criteria set out in **Para 1.16 Table 2** and **Para 5.35 Table 6** must be used to determine Settlement status. Critically the requirement to have both "*significant employment opportunities"* **and** "*peak time public transport"* for Hub status must be met.
To achieve its stated purpose, the HofS must be an *objective* assessment and not include any element of *subjective* assessment.

The Settlement Threshold must be determined by the **full** Hub criteria, **not** by any "*gap*" that appears in the results, **nor** by any relaxation wording introduced to support inaccurate scoring results i.e. the Threshold must be set by the policy and **not** that the policy be re-written to fit the results.

The Table 10 assessment needs to be properly and fully reviewed using on the ground evidence of service & facilities and employment opportunities confirmed locally, not just reliance on the Mint Database information.

3) The list of Settlements must then be reviewed to confirm compliance with the **full** Hub criteria, and; **4) The Draft Plan settlement development status & allocations amended accordingly**

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

☐ No, I do not wish to participate in hearing session(s)

☑ Yes, I wish to participate in hearing session(s)

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To represent our member's views on the status of their village for current and future generations

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature:	Chair Trefonen Rural Protection Group	Date:	25/02/2021

Office Use Only	Part A Reference:
	Part B Reference: