

## 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:	Mrs Sharon Darlow
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#### 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:	<input type="text"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |

(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.

Policy SP2 states that growth opportunities in rural areas should be aligned with the ability of villages to provide a suitable standard of services and facilities. The Council stated that it would apply a consistent methodology for the identification of Community Hubs, assessed through the Hierarchy of Settlements document.

However, the application of Policy SP2 in the identification of Community Hubs is not based on up to date, accurate, or appropriate evidence.

Two amenities (Clive Village Store and Clive Hall bowling green) still feature in Clive's Hierarchy of Settlements assessment score, despite the fact that these two facilities no longer exist. Without these two amenities, Clive does not meet the criteria for Community Hub designation, and therefore Clive's inclusion as a Community Hub in Schedule SP2.2 is not based on accurate evidence and is not justified. This means the Plan is not effective, and therefore it is unsound.

(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.

Clive settlement should be removed from Schedule SP2.2 as the evidence provided shows that Clive settlement clearly does not possess the services and amenities required to meet the definition of a significant rural service centre, as defined by the Hierarchy of Settlements evidence base, and therefore does not qualify for a Community Hub designation.

(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:**

(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.

Office Use Only	Part A Reference:
	Part B Reference:

Signature: S Darlow

Date: 22/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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Name and Organisation:	Mrs Sharon Darlow
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#### Q1. To which document does this representation relate?

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- 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:	<input type="text"/>	Policy:	<input type="text" value="SP8"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
- (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.

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Policy SP8 defines Community Hubs as significant rural service centres. It sets out that the Community Hubs have been identified through a Hierarchy of Settlements Assessment, which has assessed settlement function through consideration of:

- The population and number of households within a settlement; and
- The extent to which the settlement provides services and facilities.

The evidence within this Hierarchy of Settlement assessment however is not based on up to date or accurate information and therefore Policy SP8 is not justified and is considered unsound.

The Local Planning Authority considers that the methodology in the “Hierarchy of Settlements” has been applied on a consistent basis that has responded to changes in local provision. However, consultation rounds have identified inaccuracies within this evidence base. The Local Planning

Authority, rather than addressing these matters prior to the Regulation 19 consultation, has chosen to defer them, rendering the Plan, Policy SP8 and the associated schedule SP2.2 unsound.

The Hierarchy of Settlements for Clive includes a bowling green as an outdoor sports facility and a local convenience store. The closure of both the bowling green and the local convenience shop mean that these facilities are no longer available to the local population.

The Local Planning Authority has recognised that there is no bowling green; it does not feature in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020). Despite this the Local Planning Authority justifies its retention as a local facility for Clive because of its inclusion in the Council's Open Space Needs Assessment 2017. This 2017 assessment has been superseded by Shropshire Council's own formally adopted Playing Pitch and Outdoor Sports Strategy Assessment Report in which there is no mention of a bowling green in Clive.

The Local Planning Authority has acknowledged that it has received correspondence from both the Parish Council and the shop owner that the shop is no longer in use. A change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL) has been submitted. The Local Planning Authority were notified of these changes through the Regulation 18 consultation but no updates were made to the Regulation 19 Plan, rendering Policy SP8 unjustified and unsound.

Whilst the timing of the Clive Village Store closure is more recent than the loss of amenities in Westbury and Myddle, both those Parish Councils have confirmed that, aside from simple correspondence, no additional evidence was required for their respective Hierarchy of Settlement assessment scores to be corrected and for Shropshire Council to agree to remove both Myddle and Westbury from the list of Community Hubs within the Local Plan. If Shropshire Council had applied the same methodology consistently to Clive's circumstances, then the matter of Clive's designation as a Community Hub would have been resolved long before the current Regulation-19: PreSubmission draft Local Plan consultation.

The Local Planning Authority has recognised that the Council's methodology regarding scoring allocation requires continual monitoring, but following the Regulation 18 consultation no changes to the scoring allocation was effected and the Regulation 19 version of the Local Plan still does not correctly reflect the services within Clive. On this basis and in light of the up-to-date information on local services, the Plan and Policy SP8 are not considered sound as they are not effective or justified.

*(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.**

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	Part B Reference:

Policy SP8 should remove reference to Clive as Community Hub as current evidence means it does not meet the definition of a significant rural service centre as defined by the Local Plan Review

(Please continue on a separate sheet if necessary)

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Signature: S Darlow

Date: 22/02/2021

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Part A Reference:

Part B Reference:

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- (Please tick one box)

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

Paragraph:	<input type="text"/>	Policy:	SP17.2	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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- A. Legally compliant      Yes:       No:
- B. Sound      Yes:       No:
- C. Compliant with the Duty to Co-operate      Yes:       No:
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<p>Settlement policy 17.2 sets out the Community Hubs within the Wem Place Plan Area and associated residential guidelines, where Clive is currently included as a Community Hub</p> <p>As the overarching policies (SP2 and SP8) that guide Settlement policy 17.2 are unsound, Policy S17.2 is therefore also rendered unsound. Policy 17.2 is based on inaccurate and out of date evidence on settlement sustainability. In addition, there has been inconsistent consideration and treatment about the presence of local facilities and changing circumstances across parishes during the plan development.</p> <p>Shropshire Council continue to include two amenities (Clive Village Store and Clive Hall bowling green) in Clive's Hierarchy of Settlements assessment score, despite the fact that these two facilities no longer exist. Without these two amenities, Clive does not meet the criteria for Community Hub designation, and therefore Clive's inclusion as a Community Hub in Settlement</p>
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Policy S17.2 is not based on accurate evidence and is not justified. Combined with the Council's deferral of matters relating to Clive settlement, this means the Plan is not effective, and therefore it is unsound.

The Local Planning Authority has recognised that there is no bowling green; it does not feature in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020). Despite this the Local Planning Authority justifies its retention as a local facility for Clive because of its inclusion in the Council's Open Space Needs Assessment 2017. This 2017 assessment has been superseded by Shropshire Council's own formally adopted Playing Pitch and Outdoor Sports Strategy Assessment Report in which there is no mention of a bowling green in Clive.

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Clive settlement should be removed from S17.2 as the evidence provided shows that Clive settlement clearly does not possess the services and amenities required to meet the definition of a significant rural service centre, as defined by the Hierarchy of Settlements evidence base, and therefore does not qualify for a Community Hub designation.

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Date: 22/02/2021

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	Part B Reference: