

## 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:	
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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"/>	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:                      No:

B. Sound                                      Yes:                      No:

C. Compliant with the Duty to Co-operate                      Yes:                      No:

(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.

(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.*

*(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.*

Signature:

Date:

Office Use Only

Part A Reference:

Part B Reference:



**FURTHER REPRESENTATION AND  
RESPONSE TO SHROPSHIRE COUNCIL'S  
CONSULTATION ON THE REGULATION 19:  
PRE-SUBMISSION DRAFT OF THE  
SHROPSHIRE LOCAL PLAN**

**AT**

**LAND AT FLEMLEY PARK FARM**

**HIGH STREET**

**CLIVE**

**(CLV012 & CLV018)**

**Halls Holdings Limited**

**Halls Holdings House**

**Bowmen Way**

**Battlefield**

**Shrewsbury**

**SY4 3DR**

**01743 450 700**

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**Ref: HPT10964**

**Date: SEPTEMBER 2020**

**PREPARED FOR**

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## 1.0 INTRODUCTION

- 1.1 These representations are made on behalf of Mr C. Dytor and are made in response to the Regulation 19 pre-submission draft of the Shropshire Local Plan. Mr Dytor has land interest in Clive, with a land allocation being proposed at CLV012 of the draft Local Plan – a housing allocation, in combination with CLV018 for 20 residential units and a number of wider community infrastructure improvements.
- 1.2 Throughout this Regulation 19, and former Regulation 18, consultation period, Clive Parish Council have made efforts at removing the settlement status of Clive from its current drafter Community Hub settlement. These efforts have been made aware through local parish leaflets, social media activity and previous responses made to Shropshire Council as part of former consultations.
- 1.3 Clive Parish Council are citing that the settlement does not fulfil the requirements for Hub status, owing to a number of factors, but mainly that the village shop has recently closed. To which the landlord has advised that they will not be re-letting the property for a similar use, therefore the Parish Council believe that this facility/service should be removed from the assessment for hierarchy categorisation.
- 1.4 We have prepared this representation as we strongly believe that Clive is a settlement worthy of Hub status, for the following reasons.

## 2.0 ASSESSMENT OF SETTLEMENT HIERARCHY

2.1 Appendix 2 of the 'Shropshire Local Plan Review Consultation on Issues and Strategic Options' document provides that it is necessary to introduce a settlement hierarchy, as a way of arranging settlements into an order and subsequent categories, based upon a specific and consistent criterion. This assessment is based on how a settlement functions, involving:

- The population of the settlement;
- The extent to which the settlement provides services and facilities, employment opportunities; and public transport links; and
- The hinterland served by the services and facilities; employment opportunities; and public transport links to and from the settlement.

2.2 The settlements are identified through a specific and rigorous methodology of four stages:

- 1) Identification of settlement
- 2) Screening of settlements
- 3) Assessment of screened-in settlements
- 4) Categorisation of settlements.

### 2.3 Stage 1

2.4 All recognisable named settlement are to be identified as a settlement.

- 2.5 There is no denying that Clive is an identified settlement, both named on OS mapping, forming a large group of properties all sharing a similar address and a place name that is referred to consistently by its residents and visitors alike.

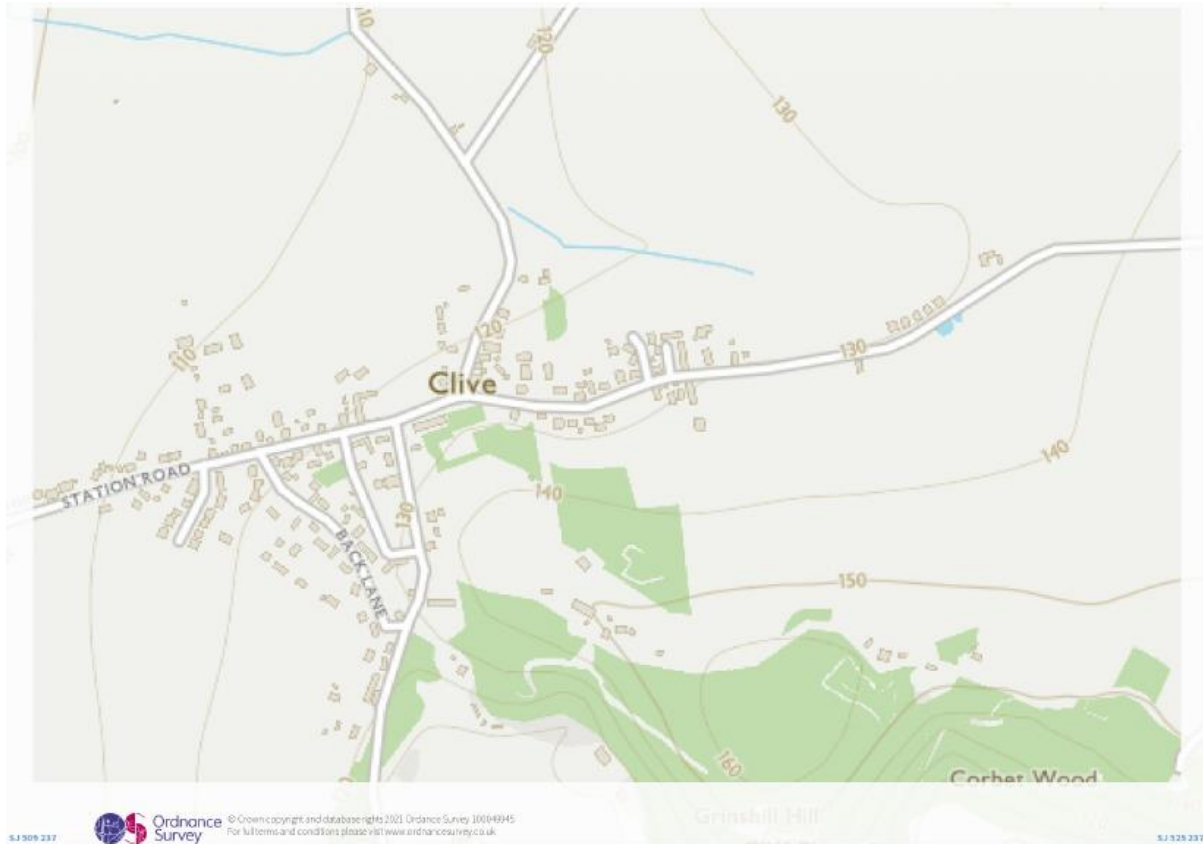


Figure 1 OS Map insert to show Clive named

**2.6 Stage 2:**

- 2.7 The initial screening of settlements is twofold: i) settlement size; and ii) self-containment.

- 2.8 In regards to settlement size, a threshold of 100 people or 50 dwellings is proposed. According to the 2011 census data, Clive had a population of 530 (current population estimates are approx. 540) with the number of registered properties well in excess of 50 – with estimates of 237.

- 2.9 On this basis, Clive is screened-in to further stages.

**2.10 Stage 3:**

- 2.11 This stage involves a review of the settlements, to understand how they function, through consideration of the range of services and facilities, employment opportunities and public transport links available. This stage utilises a scoring system to attribute points to a settlement, which will also reflect the extent of the hinterland serviced by the amenities available within the settlement.

2.12 As part of Shropshire Council’s Hierarchy of Settlements Assessment, Clive was awarded 54 points and therefore identifying it as a Community Hub.

2.13 However, since this Assessment the Parish Council have been working towards dropping this status owing to closed services/facilities since the Assessment was carried out.

2.14 The following services and facilities will all attribute points within the assessment

- |   |  |   |
|---|--|---|
| <ul style="list-style-type: none"> <li>• Nursery/Pre-School</li> <li>• Primary School</li> <li>• Secondary School</li> <li>• Library</li> <li>• NHS Hospital</li> <li>• NHS GP Surgery / Primary</li> <li>• Care Centre</li> <li>• NHS Dentist</li> </ul> | <ul style="list-style-type: none"> <li>• Chemist/Pharmacy</li> <li>• Supermarket</li> <li>• Convenience Store</li> <li>• Post Office</li> <li>• Bank/Building Society</li> <li>• Public House</li> <li>• Petrol Station</li> <li>• Place of Worship</li> </ul> | <ul style="list-style-type: none"> <li>• Community Hall</li> <li>• Leisure Centre</li> <li>• Children’s Playground</li> <li>• Outdoor Sports Facility</li> <li>• Amenity Green Space</li> </ul> |
|---|--|---|

2.15 On the above list, those highlighted in green are all services and facilities on offer within Clive.

2.16 In addition, Clive has consistent access to high-speed broadband where at least 75% of properties have access to download speeds of over 30mbps. A further 5 points is awarded.

2.17 In addition to the those above, Clive has a reliable and regular bus service through the village, during peak travel times and connecting Clive with Shrewsbury, Wem and Whitchurch – Arriva bus route 511 <https://www.arrivabus.co.uk/find-a-service/511-from-shrewsbury-bus-station-to-whitchurch-railway-station> . This bus service attributes a further 10 points.

2.18 The Parish Council are suggesting that the bowling green should not be included as an area of open space/outdoor recreation as the notice had been served to vacate the premises. However, the residents of Clive have the enjoyment of Ravenshaw’s field, with is an are of open space in the centre of the village. This land was purchased by the village residents and paid through an increase in council tax. It is currently run by a group of volunteers from the village (the Ravenshaw’s Field Association) and is available for hired events. It is used regularly by the local school for P.E and sports day and has 2 full-sized goalposts for anyone to play at any anytime – access is unrestricted. This facility clearly represents both an amenity green space and outdoor sports facility. Yet the Parish Council make no mention of this within their submissions.

2.19 On the note of the Convenience Store which is the clear contention of the Parish Council in trying to remove the identification of Clive as a Hub settlement. Whilst everyone is aware that this store is currently not operational, it nonetheless remains



in lawful A1 retail use. On this note, we are aware of a planning application to change its use to residential: LPA Ref 21/00048/FUL (and 21/00049/LBC). However, in reading through this application and its supporting documents, it is likely that this application will be refused. The shop is a protected community asset under CS8 of the LDP, whereby its loss must be justified or provisions made elsewhere – no such provision is being proposed and we are not aware of the property having undergone any marketing exercise. Therefore, the applicants have not reasonably evidenced that its loss is justifiable and permission should be accordingly refused. Resultantly, the Store remains a service available to the community and should remain to attribute points to the scoring system.

- 2.20 Furthermore, since the consultation on the Issues and Strategic Options Consultation, the former Clive Village Club has been set up as a Village Hub (Facebook page: <https://www.facebook.com/theclivehub> ). The Parish Council on their website, provide that the Hub was originally built as a clubhouse in 1933 and has been re-branded to provide a member's club (membership is free of charge) with a fully licenced bar, full-size snooker/billiards table, pool table, darts and dominoes. It is also available to book for private events/functions. The Hub holds quiz nights, bingo evenings, live music and private functions (when able to do so and restrictions permitting). This is a clear community facility that offers an array of services and supports the local and wider communities, further points should be awarded on this basis.





- 2.21 There are numerous businesses within Clive: 2 car repair garages for servicing and sales (1 of which offers MOT testing), a hairdressing and beauty salon with massaging facilities. Multiple small businesses including electricians, plumbers, builders, gardeners, seamstresses, holistic therapies and more. Additionally, Sansaw estate is in close proximity to Clive and are moderate employers within the area.
- 2.22 **Stage 4:**
- 2.23 Following the assessment in Stage 3, each qualifying settlement is then ranked within a settlement hierarchy – the decisions of hierarchy were informed by a consideration of the similarities and differences between settlements, having regards to their size, role and function as identified during the assessment.
- 2.24 The lower thresholds identified for Community Hubs was based on their being a three-point gap between the last community hub settlement and first rural settlement. Those settlements identified as Community Hubs are generally considered to offer sufficient services and facilities to meet the day-to-day needs of their resident communities. And in order to achieve Hub status, a settlement needs to offer a good range of services (at least 5), have regular public transport links, high speed broadband and multiple significant employment opportunities. In those settlements where there is no significant employment opportunities, this can be compensated by a larger range of services and facilities – enough to achieve a three point lead on the rural settlements.
- 2.25 Based on the initial assessment by Shropshire Council and the 54 points awarded, this placed Clive 23rd out of 40 Community Hubs and 9 points above the highest scoring rural settlement – well above the 3-point lead.

- 2.26 In reviewing those lower order Community Hub settlements – Weston Rhyn, Hanwood, Trefonen, etc – it is evident that Clive has much more services and facilities on offer and has a wider sphere of influence. Resultantly, if Clive was to be dropped from Hub status, so too would all the settlements below it, a total of 17 further settlements being dropped to ‘other rural settlements’.

## 3.0 TEST OF SOUNDNESS

- 3.1 As part of this Regulation 19 consultation of the draft Local Plan, responses are requested on the soundness of the plan and against four criteria within the NPPF:

1) Positively prepared

The draft Local Plan has clearly identified what the issues are that the Plan is seeking to address, with clear vision and objectives that are specific to Shropshire. The Plan policies are clear in how they meet the objectives, are internally consistent and set to realistic timescales.

2) Justified

The consultation of the Local Plan has allowed for effective engagement of all interested parties and based on credible and sound evidence base. Where all approaches have been shown to be the most reasonable.

3) Effective

The Plan policies are clear how the vision and objections will be met, with no obvious gaps in policy that reflect the concept of spatial planning and goes beyond traditional land use planning, utilising integrating policies from a variety of agencies and organisations. The Plan is flexible enough to respond to a variety of, or unexpected changes in circumstances.

4) Consistent with national policy.

The Plan policies are consistent with national policies, with no departures from the relevant national policy and the policies are justified in that they add to the implementation of national policies within the local context.

- 3.2 Overall, the Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board and at the county level.