

## 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:	Diana Dennis
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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:  Policy:  Site:  Policies Map:

#### 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.

The Council stated that it would apply a consistent methodology for the identification of Community Hubs, assessed through the Hierarchy of Settlements document.

The policy identifies Community Hubs as significant rural service centres but it is unsound in its application as it is not based on up to date or accurate evidence and the treatment of changes to local services and facilities throughout the Plan's development has been inconsistent.

The Hierarchy of Settlements (August 2020) supports the Local Plan Review and Policy SP2, by setting out the methodology and conclusions for identifying Shropshire's service centres. The purpose being to inform Policy SP2 with specific and consistent criteria about Shropshire's settlements and their sustainability.

Despite consultation responses highlighting changing evidence on the availability of local services and facilities in some of Shropshire's settlements, including the most recent Regulation 18: Pre-Submission Draft of the Local Plan (August 2020- September 2020), Policy SP2 does not take these into account.

Previous formal and informal consultations on the Local Plan Review have repeatedly highlighted the misidentification of available local services for the village of Clive. However Clive remains under Policy SP2 as a Community Hub and deemed a 'significant rural service centre' but without the actual presence of the necessary associated services and facilities to support this.

This therefore raises concerns about the soundness of the application of the Hierarchy of Settlements evidence base in the development of the Regulation 19 Plan and the application of a consistent approach cross the whole of the Plan area. For example, the village of Myddle, like Clive, was initially identified as a Community Hub but following closure of the local convenience store in summer 2018, the evidence base was reviewed and it was determined that the village fell below the threshold to be considered a 'significant rural service centre'. The same consistent application of this methodology has not been applied to the village of Clive, despite falling under comparative circumstances with a closure of a local convenience store. The village thereby also falls below the threshold for a Community Hub. This was raised with Shropshire Council by the Parish Council, local residents and indeed the shop owner during the Regulation 18 consultation stage but the Regulation 19 Plan remains unchanged, rendering Policy S2.2 unsound as it is not justified and based upon out of date evidence.

*(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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Policy SP2 should remove reference to Clive as Community Hub as current evidence on availability and accessibility of local facilities and services means it does not meet the definition of a significant rural service centre as defined by the Hierarchy of Settlements evidence base and subsequent Local Plan policies.

*(Please continue on a separate sheet if necessary)*

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**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)?**

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

Office Use Only	Part A Reference:
	Part B Reference:

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)*

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Signature:

Diana Dennis

Date:

20/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

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Name and Organisation:	Diana Dennis
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Policy SP8 states that Community Hubs have been identified through a Settlement of Hierarchy Assessment, which has assessed settlement function through the population and number of households within a settlement; and the extent to which the settlement provides services and facilities.

The evidence within this Settlement of Hierarchy Assessment is not however based on accurate information and thereby Policy SP8 is not justified and is unsound.

The Local Planning Authority considers that the methodology in the “Hierarchy of Settlements” has been applied on a consistent basis and that it has responded to changes in local provision. However, both formal and informal consultation rounds have identified inaccuracies within this evidence base which The Local Planning Authority has not acted upon, rendering the Plan, Policy SP8 and the associated schedule SP2.2 unsound.

The current scoring within the Hierarchy of Settlements for Clive includes a bowling green as an

outdoor sports facility and a local convenience store. Neither of these facilities exist following the closure of both the bowling green and the local convenience shop. The shop has now closed three times in recent years and has been shut for significant periods. It is clearly unviable as a convenience store.

The Local Planning Authority has previously recognised that there is no bowling green as the facility now falls under a private residential dwelling. This was confirmed in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020). This should supersede the Open Space Needs Assessment 2017 as it is based on more up to date and comprehensive information. The Open Space Needs Assessment 2017 was a desk baed update of data from 2009.

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. This has been confirmed through a formal change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL). The Local Planning Authority were notified of these changes through the Regulation 18 consultation but no associated updates have been made to the Regulation 19 Plan, rendering Policy SP8 as unjustified and unsound.

The Hierarchy of Settlements evidence base and Local Plan Policies are now based on inconsistencies which render them unsound.

Revisions to the Hierarchy of Settlements evidence base over the Plan development has led to inconsistencies in the policy with the definition of Community Hubs continuing to be set out as ‘settlements considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel times); significant employment opportunities; and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities’. The assessment criteria and associated threshold no longer require such facilities to be present. This is illustrated by the example of Clive which when assessed evidently doesn’t meet the criteria for a Community Hub in that it relies upon other settlements to meet many day to day needs such as employment and convenience goods. The Plan and Policy SP8 is therefore considered to be unsound as the methodology and application of associated evidence does not meet the intended definition of a Community Hub and overall settlement hierarchy needed to maintain overall sustainability and is therefore not justified.

*(Please continue on a separate sheet if necessary)*

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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: Diana Dennis

Date: 20/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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As 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.

The current scoring within the Hierarchy of Settlements for Clive includes the bowling green as an outdoor sports facility and the local convenience store. Neither of these facilities exist following the closures of both the bowling green and local convenience shop. These both are under private residential ownership and use. As a result, the scoring threshold for significant rural service centres has not been met and the village of Clive does not meet the requirements to be deemed a Community Hub under Policy S17.2.



The Local Planning Authority itself has recognised that there is no bowling green as the facility now falls under a private residential dwelling. This was evidenced in the Shropshire Council Playing Pitch and Outdoor Sports Strategy Assessment Report (Oct 2020). This was a comprehensive assessment undertaken between 2018 and 2019 the accuracy of which has been confirmed by Shropshire Council. In this assessment of bowls clubs and greens, Clive is not recorded as having such a facility. Despite this, consultation with the Local Planning Authority justifies its retention as a local facility for Clive following its inclusion in the Council's Open Space Needs Assessment which is based on out of date data from 2009. The Open Space Needs Assessment itself acknowledged that "without a catchment area analysis it cannot detect the reality of variations in provision within each Place Plan Area".

With regard to Clive's local convenience store, the Local Planning Authority has acknowledged that officers have received recent correspondence from the both the Parish Council and owner that the shop is no longer in use and now falls within a residential curtilage. This earlier engagement with the Local Planning Authority has been formalised into a change of use planning application from the owner to provide a residential annex for this former shop (ref 21/00048/FUL).

The Local Planning Authority appears to have been inconsistent in taking into account such changes in local services and facilities during the Plan development. Comparative changes have taken place in the village of Myddle where the closure of its local shop resulted in a swift change in designation to Open Countryside. Similar changes have taken place in Cockshutt and Westbury. There is no evidence that any other Parish Council has been asked to provide additional evidence to support this change in designation. Indeed, correspondence regarding changing local facilities between Parish Councils and the Local Planning Authority appear to have been sufficient. In comparison, there is evident disparity between the requirements placed on Clive Parish to further evidence these changes and a deferral by the Local Planning Authority to address via a main modification to the Regulation 19 Plan rather than addressing prior to the Regulation 19 consultation.

As a result, the Plan and Policy S17.2 do not meet the tests around being justified and effective and are therefore considered unsound.

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20/02/2021

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Part B Reference: