

## 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:	Richard Sherratt – Clive Landowner
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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 Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board.

Despite members of the community having concerns over the appraisal of the services and facilities afforded Clive, in assessment of the hierarchy of settlements, the status of Clive as a Hub is appropriate, reflective of the range of services and facilities afforded.

As a Hub only a modest amount of future managed growth will be allowed, securing much needed community infrastructure, protecting the village from speculative inappropriate development via. the proposed settlement boundary.

(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:**

**Representing the landowner of proposed allocated site for modest housing growth and delivery of needed community infrastructure in Clive (CLV018), I would welcome the opportunity to participate in the relevant examination hearing session.**

*(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: P.W. Richards Date: 25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Shropshire Council  
Planning Policy & Strategy Team  
Shirehall  
Abbey Foregate  
Shrewsbury  
Shropshire SY2 6ND

Sent via email - [Planningpolicy@Shropshire.gov.uk](mailto:Planningpolicy@Shropshire.gov.uk)

23<sup>rd</sup> February 2021

Dear Sirs,

**RE: FURTHER REPRESENTATION REG 19 CONSULTATION –  
LAND AT FLEMLEY PARK FARM & ADJACENT THE BUNGALOW HIGH STREET, CLIVE  
(CLV012 & CLV018)**

This representation is made on behalf of Mr R. Sherratt & family in response to the Regulation 19 pre-submission draft of the Shropshire Local Plan.

Mr Sherratt and his family has land interest in Clive, owning the housing land allocation being proposed at CLV018 of the draft Local Plan, in combination with his neighbours land – Mr Charles Dytor (CLV012 & CLV018) for 20 residential units and a number of wider community infrastructure improvements.

Both the Sherratt family and Mr Dytor are committed to work collaboratively to ensure the delivery draft housing allocation for Clive alongside the community benefits (car parking for primary school) detailed in earlier representations. Both Halls acting for Mr Dytor and Peter Richards & Co Ltd acting for the Sherratt family strongly believe that Clive is a settlement worthy of Hub status, and in particular support policy S.17.2.

It is acknowledged that through the Regulation 19, and former Regulation 18, consultation period, a section of the community and the Parish Council have made efforts at removing the settlement status of Clive from its current drafted Community Hub settlement.

Local parish leaflets, social media activity and previous responses made to Shropshire Council as part of former consultations, highlight that 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. Thus the Parish Council believe that this facility/service should be removed from the assessment for hierarchy categorisation.

## SETTLEMENT HIERARCHY

‘Shropshire Local Plan Review Consultation on Issues and Strategic Options’ (Appendix 2) advises 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 criteria. 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.

The methodology adopted by Shropshire council for creating a hierarchy of was a four stage process;

- 1) **Identification of settlement** – Clearly 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.
- 2) **Screening of settlements** - In regards to settlement size, a threshold of 100 people or 50 dwellings was proposed, which Clive is significantly above;
  - Clive = Settlement size = Population of 530 (2011 Census)
  - Self-containment = 237 Dwellings (2011)
- 3) **Assessment of screened-in settlements** - 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.

The facilities and services highlighted in green below are on offer within Clive;

- Nursery/Pre-School
- Primary School
- Secondary School
- Library
- NHS Hospital
- NHS GP Surgery / Primary
- Care Centre
- NHS Dentist

- Chemist/Pharmacy
- Supermarket
- Convenience Store
- Post Office
- Bank/Building Society
- Public House
- Petrol Station
- Place of Worship

- Community Hall
- Leisure Centre
- Children’s Playground
- Outdoor Sports Facility
- Amenity Green Space

In addition, Clive has consistent access to high-speed broadband where at least 75% of properties have access to download speeds of over 30mbps. Plus 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>. All of which contributed to the settlements points tally.

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

Whilst admirably Shropshire Council has continued to progress the local plan review through the Coronavirus pandemic, consideration must be given to the impact the pandemic is having on the economy. The challenges arising as a result of restrictions on normal life is hampering an high number of businesses and forcing many to close. Therefore it is unfair to suggest current service provision is a fair representation, therefore the original appraisal the council undertook as part of the issues and options route is considered a true assessment.

In respect of contention issue of the former village Convenience Store and the role it performs in defining the status of Clive as a Hub settlement; whilst it is evident the store is currently not operational, it nonetheless remains in lawful A1 retail use.

We are aware of a planning application to change its use to residential: LPA Ref 21/00048/FUL (and 21/00049/LBC). However as the shop is a protected community asset under CS8 of the LDP - its loss must be justified or provisions made elsewhere. Therefore unless an alternative facility and suitable marketing has been undertaken it is likely the current applications are likely to be refused. Resultantly, the Store remains a service available to the community and should remain to attribute points to the scoring system.

Furthermore, since the consultation on the Issues and Strategic Options Consultation, the former Clive Village Club has been set up as a social meeting point / licenced premises – 'The Clive Hub' (<https://www.facebook.com/theclivehub> ).



It is understood 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 and it is understood that there are plans to provide refreshments for walkers and visitors. As this is a clear community facility that offers an array of services and supports the local and wider communities, as such further points should be awarded on this basis.

#### 4) **Categorisation of settlements.**

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.

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.

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.

If the points score recalculated and thus status of Clive as a Hub is to be revisited, then the whole of the original assessment carried out as part of the issues and options consultation should be updated. As stated above, due to the current economic blip as a result of coronavirus this would seem inappropriate and unnecessary.

#### **TEST OF SOUNDNESS**

It is recognised that Regulation 19 consultation of the draft Local Plan, allows comment of on the soundness of the plan and against four criteria within the NPPF:

- **Positively prepared** - The draft Local Plan has identified the issues 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, consistent and set to reasonable timescales.
- **Justified** - The consultation process followed has allowed effective engagement of all interested parties and based on credible and sound evidence base.

- **Effective** - The Plan policies are clear how the vision and objections will be met, with no obvious gaps in policy, whilst being flexible enough to respond to unexpected changes in circumstances.
- **Consistent with national policy** - The proposed plan policies are consistent with national policies and aid the implementation of national policies within the local context.

In conclusion, the Plan is considered sound and the accompanying evidence base is clear in how decisions and judgements were made across the board.

Whilst comments made by the parish council, alongside their invitation to the local community to make representations to challenge the status of the village and soundness of the plan are acknowledged, we do contest the merits of the argument being made.

The status of Clive as a Hub is appropriate, reflective of the range of services and facilities afforded. As a Hub a modest amount of future managed growth will be allowed, which will secure much needed community infrastructure, with speculative inappropriate development protected via the proposed settlement boundary.

Yours Faithfully

**Peter Richards MRICS**  
**Chartered Surveyor**