

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0457, Ford Parish Council
Matter	4
Relevant questions nos	1

Matter 4 – Housing and Employment Land Needs (policy SP2)

1. Is the preferred approach to housing growth and the housing requirement set out in Policy SP2 of 30,800 dwellings (1,400 dwellings per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?

An appendix is attached which shows the response to Matter 3, Question 15.



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1. Ford Parish Council does not wish to comment on how the Standard Method was applied in the preparation of the plan nor object to the manner in which the spatial strategy was conceived and delivered, except with regard to the categorisation of Ford as a Community Hub.
2. The PC's previous response to Matter 3, Q15 sets out its position that the manner in which the Hierarchy of Settlements assessment was undertaken and the consequent identification of Ford as a Community Hub was flawed and based on an incorrect understanding of the availability of services in Ford. Those arguments are repeated in the Appendix below to remind the Inspector that Ford should not be classified as a Community Hub because of its lack of services and employment opportunities.
3. Because of these deficiencies, Ford is not a sustainable settlement according to SC's own methodology, and it should therefore not be allocated 125 additional dwellings within a newly formed development boundary. In addition, the allocation of site FRD011 should be stricken from the plan because it accommodates an allocation that is unsustainable.
4. The preferred site (FRD011) is also not a suitable site for the following reasons which have already been discussed between SC officers and Ford PC:
 - The site is agricultural land classification 3 (Good) and some is 2 (Very Good) and so should be preserved for food production which is not done with the proposed allocation;
 - Site FRD011 is a field with an archaeological feature – ridge and furrow – and removing it would contradict the aims of SC's policy DP24;
 - Site FRD011 is permanent pasture and therefore a full environmental impact risk assessment is required;
 - Ford is within SC's Mineral Safeguarding Area (sand/gravel and coal) and developing the land would contradict the aims of SC's policy SP13;
 - Significant housing development on the proposed scale is NOT sustainable within Ford's infrastructure
5. In a further discussions between SC officers and Ford PC in January 2020, an SC officer admitted that there did not appear to be a need for additional housing in Ford and since it has been shown in response to Matter 3 that there is not sufficient infrastructure to support an allocation, all reference to the allocation of FRD011 should be removed from the plan.
6. **Ford PC requests that:**

- **Reference to Ford in S16.2. Community Hubs: Shrewsbury Place Plan Area should be removed;**
- **The requirement for 125 dwellings should be removed (though a suitable windfall allowance should be retained to allowed natural growth in this Countryside location);**
- **The proposed development boundary should be removed.**

APPENDIX

Matter 3 – Development Strategy (Policies SP1 – SP15)

15. Is the Community Hub and Community Cluster approach to development set out in Policies SP8 and SP9 justified and effective and consistent with national planning policy? Do these policies duplicate parts of other policies?

Introduction

1. This response from Ford Parish Council (PC) relates to Development Strategy Policy SP8 where Ford is proposed as a Community Hub. The argument made in this response is also relevant to Ford PC's responses to Matters 4 and 8.
2. The main justification for community hub status can be found in the first sentence of the policy: "Community Hubs are considered significant rural service centres and the focus for development within the rural area." Where Shropshire Council (SC) considers that a settlement is a Community Hub, the remainder of the policy sets out how strategic land allocations will be delivered. In addition, the policy sets out in clause 2 that "Development proposals outside the development boundary of Community Hubs will be managed in accordance with Policy SP10 and any other relevant policies of this Local Plan." Clause 3 sets out that "Community Hubs are identified within Schedule SP2.2 of Policy SP2 of this Local Plan."
3. Para. 3.52 of the Local Plan emphasises that the strategic approach to the distribution of development which underpins this Local Plan is one of urban focus, whereby the majority of development is focused into the urban areas. In Para 3.53, the plan makes a caveat relevant to Ford: "However, recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, the strategic approach to the distribution of development also allows for appropriate development in rural areas."
4. In Para. 3.54, it is explained that Community Hubs have been identified through a Settlement Hierarchy Assessment based on the population size and the extent to which the settlement provides services and facilities, broadband, employment and public transport links.
5. Para. 3.59 indicates that Community Hubs are assigned a development boundary, the definition of which has been informed by consideration of the characteristics of each Community Hub and provide greater certainty to local communities and the development industry.
6. This response questions how the process outlined in the text above has been applied to Ford Parish and argues that in this instance, the process can be proven to be flawed, and that conclusions regarding Ford's potential status as a Community Hub are incorrect.

Summary of SC's process for identifying Community Hubs

7. At the time that SamDev was prepared, parishes were given the option of whether to be a hub or not, and Ford PC opted to be Open Countryside. Accordingly, **SamDev** (2015) does not identify Ford as a community hub in Schedule MD1.1 settlement Policy Framework nor within a Community Cluster Settlement (Shrewsbury Area). Ford is not mentioned in Policy S16 Shrewsbury Area, and Policy S16.3 Area-wide policies and other allocations only makes an

employment allocation for commercial and waste uses in Ford. It is therefore Open Countryside.

8. In 2017, at the start of evidence gathering for the Local Plan review, SC issued a **Hierarchy of Settlements** document. The settlement hierarchy was designed to inform decisions on a settlement's potential to accommodate new development. In this way, the settlement hierarchy supports the review of the Shropshire Council Development Plan.
9. The Hierarchy of Settlements set out a scoring system whereby individual settlements could be objectively assessed relative to one another. This is set out in Table 1 of that document on pages 3 and 4. The footnote to Table 1 states:
 - "In a rural settlement, a post office or petrol station offers multiple functions (e.g. banking, convenience and comparison shopping; and often acts as a community hub". In this definition therefore, a petrol station, as a single facility, may be at the same time be a petrol station and a comparison shop. This will be referred to below.
 - "A public transport service is considered to be regular and offered during peak travel times when it runs an outward service between 06.00 and 09.00 and a return service between 15.00 and 18.00, Monday to Friday. This will also be referred to below.
10. Table 2 of the 2017 assessment provides further definition of community hub settlements as settlements that: "are considered to provide a combination of services and facilities; public transport links (often operating regularly through peak travel time); significant employment opportunities; and high speed broadband generally considered **sufficient to meet the day-to-day needs of their resident communities** (emphasis added).
11. Under the heading of "How the Hierarchy Will Be Utilised", in para. 2.6, it is stated that the settlement hierarchy will inform decisions on a settlement's potential to accommodate new development. However, the following paragraph (2.7), there is a proviso stating that the assessment is "solely for the purpose of identifying settlement function in order to **inform** the development of a settlement hierarchy (emphasis added)". Para 2.8 states that the assessment "ultimately provides information which will be investigated further through the plan-making process."
12. The section under the heading "Thresholds" indicates that the thresholds "were identified by Shropshire Council Officers, applying their professional judgement, following the completion of the assessment....The decisions were informed by a consideration of the similarities and differences between settlements, having regard to their size, role and function as identified during this assessment".
13. The Inspector's attention is drawn at this point to the fact that there is NO specific quantifiable threshold and that the application of all assessments is based solely on officer judgment. This cannot therefore be considered a robust and transparent process.
14. Finally, in para. 5.40, the assessment states that "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." The final bullet point of para. 5.40 states:
15. In order to achieve this threshold a settlement needs to offer a good range (at least 5) of services and facilities; a regular public transport service; high speed broadband; and multiple significant employment opportunities. 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. [Note: this wording was retained in the 2020 update of the Hierarchy of Settlements.]

16. The Inspector's attention is drawn first to the fact that this "threshold" is not a threshold (a threshold is a magnitude or intensity that must exceed a defined goal or point) but rather a categorisation assigned by officers. What this paragraph indicates is that officers assigned settlements, using their professional judgement, into the category of "Community Hub" since the process was only "informed" by the assessment. This left significant scope for officers to change their minds as the assignment process unfolded.
17. The final score of 50 points was justification for changing Ford's status from SamDev "none" to "Community Hub" in the Local Plan. This score was later changed to 51 by officers, in the updated Hierarchy of Settlements (2020) which will be discussed further, below.
18. In the **Preferred Scale and Distribution of Development consultation** (2017), the overall strategy was set out as having an "Urban Focus" in para. 4.4 and following where the approach seeks to focus the majority of development into key centres, especially Shrewsbury. The approach is summarised in para. 4.18 (emphasis added):
19. 4.18 The Urban Focus strategy **will require a reduction in the rate of delivery in the rural area compared to current policy levels**. However, there remains a need to maintain and enhance the vitality of rural communities, including through the delivery of both market and affordable housing, as well as smaller scale employment opportunities. **In focussing rural development most appropriately it is proposed to continue the current approach of Community Hubs and Community Clusters.**
20. The Inspector's attention is drawn to the emphasised sentences from the quote above. The urban focus would, according to this paragraph, preserve the current approach, which is set out in the SamDev as Open Countryside for Ford. It also requires a reduction in the rate of delivery in rural areas, which is the SamDev designation for Ford. Therefore, for para. 4.18 to be true, officers, in using their professional judgement, should avoid changing Ford's status to Community Hub.
21. However, contrary to this logical conclusion, Ford is proposed as a Community Hub in Table 3, line 16, based on the conclusion in para. 6.14 that ".....2. There is sufficient infrastructure capacity, or any infrastructure capacity constraints can be addressed to appropriately meet the development's needs."
22. Ford PC representatives met with SC planners as they discussed their emerging proposals in August 2018 in a 'Final Consultation' on Ford's Community Hub status, development options and setting a development boundary.
23. Ford PC argued against Hub status based on:
 - Not agreeing with points awarded:-
 - Bus service not regular and no inbound service within criteria times;
 - No public house;
 - Duplication of petrol station and convenience store point scoring (which should only be counted as one facility according to the assessment methodology);

- The library service is a mobile one for 20 mins every fortnight, yet this was awarded the same point score as a fixed library building;
 - The bowling green cannot be classed as an outdoor sports facility because it is in private ownership and the club is not now in existence and planning permission has been granted for housing on the land;
 - Amenity green space on Quail Ridge does not meet the size specified in the assessment methodology.
- Ford settlement within the development boundary is mainly in a Conservation Area so it will be difficult to achieve windfall development within it;
 - Agricultural land classification is 3 (Good) and some is 2 (Very Good) so should be preserved for food production which is not done with the proposed allocation;
 - Site FRD011 is a field with an archaeological feature – ridge and furrow – and removing it would contradict the aims of SC’s policy DP24;
 - Site FRD011 is permanent pasture and therefore a full environmental impact risk assessment is required;
 - Ford is within SC’s Mineral Safeguarding Area (sand/gravel & coal) and developing the land would contradict the aims of SC’s policy SP13;
 - Significant housing development on the proposed scale is NOT sustainable within Ford’s infrastructure
24. Although not agreeing with Community Hub status, Ford PC in conjunction with SC, provisionally agreed a development boundary which was eventually put forward in the preferred sites consultation (below).
25. Ford PC arranged a public meeting on 11 December 2018 to raise awareness and discuss options. The meeting unanimously endorsed Ford PC’s stance on opposing the imposition of Community Hub status.
26. Ford PC members attended a general update meeting for parish councils at the Guildhall organised by SC on 17 January 2019. There were only 16 attendees including 3 from Ford.
27. A Local Housing Survey for Ford carried out by Ford PC and SC in January 2020 showed that the scale of demand for new housing development in Ford is low. Subsequently, Matthew Mead, SC Officer, commented: “This survey shows the scale of demand (for housing) is low and this should be met by the planned new developments (Cross Gates Meadow)¹. There doesn’t seem to be much evidence for a big increase in development.” This was highlighted by the fact that it has been particularly difficult to find tenants for the recently completed affordable housing project of 32 homes at Cross Gates Meadow.
28. In 2020, the **Hierarchy of Settlements** was updated as the third iteration of the assessment. The wording cited above from 2017 remained largely unchanged.
29. Para. 5.38 of the 2020 Hierarchy of Settlements reiterates that officer judgement is the basis of the assessment but still relies upon Hubs provision of day-to-day services (para. 5.41). **Table 1**
1. _____

¹ This development was not actually “planned” but rather was the result of a planning permission for unplanned development granted at a time when Shropshire could not prove it had a 5 year housing land supply. The developer then decided to sell the site to a housing association and as it already had housing approved on it, the housing association was successful in obtaining planning permission.

shows the final score for Ford from this document. The Inspector's attention is drawn to the fact that despite evidence supplied by the PC that the score was too high, the score was not reduced by officers, but was increased to 51.

30. Table 1 (below) compares the score for Ford assigned by officers on 2020 using their professional judgement against the local knowledge of Ford PC. The PC advised SC officers then and in all subsequent consultations, that the officers' assumptions about service facilities in Ford was incorrect. However, officers failed at this stage and following stages to update their evidence. Table 1 shows that according to the facts, Ford PC considers that the assessment score for Ford is not 51 (previously 49) assumed by officers, but is actually 32. The shading in the table shows where Ford PC disagreed with the SC officers' assessment.

Table 1: Comparison of Shropshire Council and Ford Parish Council assessment of services in Ford Parish

SC services category	SC score for Ford (2020)	Ford PC score	Ford PC justification
Public transport link	5	5	
Regular Service Offered during Peak Travel Times	5	0	Bus service not regular and no inbound service within criteria times
Nursery/ Pre-school	0	0	
Primary School	4	4	
Secondary School	0	0	
Hospital	0	0	
NHS GP surgery	0	0	
NHS dentist	0	0	
Chemist/ pharmacist	0	0	
Supermarket	0	0	
Convenience store	4	4	Duplication of petrol station and convenience store point scoring
Post office	0	0	
Bank/ building society	0	0	
Public house	3	0	No public house
Petrol station	4	0	Duplication of petrol station and convenience store point scoring
Place of worship	3	3	
Community hall	4	4	
Library	3	0	Library service is a mobile one for 20 mins every fortnight, yet this was awarded the same point score as a fixed library building
Leisure centre	0	0	
Children's playground	4	4	
Outdoor sports facility	4	3	Bowling green cannot be classed as outdoor sports facility as in private hands and club not now in existence. The land has been granted outline planning permission for 2 houses- 21/00475/OUT.
Amenity green space	3	0	Amenity green space on Quail Ridge does not meet the size specified

Superfast broadband	5	5	
Employment	0	0	
TOTAL	51	32	

The **Preferred Sites Consultation** (November 2018 – January 2019) identifies Ford as a Community Hub in the Shrewsbury Place Plan Area (para. 19.1). Ford is identified as a Community Hub:

31. 19.52. Ford was not identified as a location for planned development in the SAMDev Plan but was identified as such in the preceding Local Plan. The previous allocations brought forward highway measures to control traffic movements around the school site, on But Lane, at the entrance to the village. These measures are no longer as effective in controlling traffic movements around the school and now constrain the flow of vehicular traffic into the village from the A458.
32. 19.53. It is proposed that a single site allocation on the route of the A458 should accommodate the planned development in the village. There will also be an allowance for windfall development in the village. Local aspirations for this Community Hub are therefore to ensure the development of the allocated site delivers a good contemporary design and addresses matters relating to the ways that the A458 affects the village community and its amenities. It is expected the new housing will meet the community's housing needs for high quality, affordable housing across a range of tenures.
33. The Inspector's attention is drawn to the admission in para. 19.52 that previous transport mitigation is no longer effective and that, a site allocation is proposed, despite the fact that Ford PC have indicated that the settlement hierarchy assessment was flawed and contained incorrect assumptions about the sustainability of Ford as the location for strategic development. There is a reference in para. 19.53 to how the proposed allocation for 50² houses "affects the village community and its amenities" but there are no specific indications how this should occur. Para. 19.53 would indicate that Ford has been chosen not for its sustainability characteristics, but rather for its potential to deliver safer transport outcomes. However, delivering transport outcomes was not part of the rationale set out in the Preferred Scale of Development Consultation. Clearly, officer judgement has changed regarding what is important in identifying sites for future development and this has not been done in a transparent manner.
34. A settlement boundary is introduced (absent in the SamDev) for Ford in para. 19.60 as part of the Preferred Sites consultation. The development boundary includes the proposed allocation (FRD011) but rather arbitrarily excludes other built development in what is a rural settlement with a non-compact form.
35. In the **Regulation 19 Pre-Submission draft local plan**, 125 dwellings are proposed in policy S16.2, including 75 dwellings at site FRD011. The requirements for the allocation set out under Schedule S16.2(i) requires improvements for transport, sets out basic parameters for design and green infrastructure, and what supporting evidence is required. The provisions DO NOT seek to make Ford a more sustainable settlement by making any contribution whatsoever to necessary services. The conclusion must be that the new residents of FRD011 will of necessity

1. _____

² This would be raised to 125 dwellings in the Reg. 19 Local Plan.

use the improved transport infrastructure to commute to nearby Shrewsbury for their day-to-day needs. This is contrary to the urban focus of the plan and its supporting strategies.

- 36. In September 2020 a petition was set up by Ford PC, objecting to SC’s designation of Ford village as a Community Hub and the subsequent development of Field FRD011 for residential purposes. Inhabitants of 84.9% of households responded. 93.4% of responders fully supported the petition and Ford PC’s actions and only 0.8% favoured the designation of Ford as a Hub. 5.8% refused to sign the petition for other reasons.
- 37. Ford PC sent written objections to SC’s Local Plan via the consultation forms on 30 September 2020.
- 38. The inadequacies of the proposed approach for Ford were pointed out to SC again in the Parish Council’s response to that consultation. The **Summary of Representations on the Regulation 19** shows in Schedule 3, that Ford Parish Council’s unique reference number is A0457. The actual summary of the representation is copied here. Corrections to the settlement assessment score have clearly not been taken into account since the response refers to a score of 51.

1	2	9	10	11	Admin
Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)	Officer Ascribed Policy
A0457	B001	Ford should no longer be designated as a community hub in Policy S16.2 and associated maps and supporting text. Ford should instead be Open Countryside	Shropshire Council considers that the proposed strategic approach to the level and distribution of development across Shropshire is appropriate, effective, sustainable and deliverable. Shropshire Council also considers that the methodology applied within the Hierarchy of Settlements Assessment (HoS) is appropriate and has been applied consistently across Shropshire, including in relation to Ford. Consequently, it is considered appropriate that Ford is identified as a proposed Community Hub and it is further proposed to identify a development guideline, development boundary and a housing allocation on site FRD011 consistent with other rural settlements considered to be appropriate for designation as a Community Hub. This service score recognises the accessibility of the village from Shrewsbury by public transport and its broadband connectivity to electronic communications and services. The village also has a good range of local services including a primary school, local shop and petrol filling station, community hall, mobile library service, public house and church with a range of outdoor sports and play spaces. The proposed allocation FRD011 is expected to meet its own infrastructure requirements and to further improve the capacity of services where necessary to improve the infrastructure capacity of the village. It is therefore considered that Ford is appropriately designated as a Community Hub in the draft Shropshire Local Plan along with the allocation of site FRD011 for housing development.	No	S16.2 Ford

- 39. The Inspector’s attention is drawn to the text which refers to “a threshold of 48 points”. This is not to be found in any of the published documents as the necessary threshold, as discussed above. It appears to be an arbitrary cut-off point.
- 40. However, assuming that it is necessary or useful to “draw a line” somewhere, and 48 points is a reasonable place to do this, despite the lack of any justification WHY 48 points is appropriate, the facts show that Ford scores only 32 points, not the 51 points purported in the response in AO457.

Response to Q.15

- 41. In response to this question, Ford PC wishes the Inspector to accept their position that no, in the case of Ford, the Community Hub approach was not justified nor effective and is based on changing officer opinions and not on objective facts.
- 42. Ford PC promotes the view that the approach to identifying a settlement hierarchy was inconsistent and not based on objective reasoning, did not take account of evidence provided by the Parish Council in meetings and in its submissions to Regulation 18 and 19 consultations on the emerging local plan, and will not lead to additional community infrastructure which would be required to enable an additional housing allocation of 75 homes with a total requirement of 125 homes. Ford’s infrastructure can not meet the day-to-day needs of the proposed new residents.
- 43. The approach taken is contrary to policies in the NPPF (2021) para. 35.(b) in that it is not justified nor is the approach which focuses on land allocation to address identified transport

deficiencies whilst having no proposals for meeting evident deficiencies in social infrastructure, contrary to the principles of sustainable development set out in NPPF para. 8.

44. In conclusion, Ford PC considers that Ford should not be deemed suitable to be a Community Hub since it is not “a significant rural centre” as required by SP8 nor is Ford a sustainable community as set out in para. 3.54 of the plan. Existing services cannot meet the day-to-day needs of a growing community and there is no major employment.
45. Inclusion of Ford as a Community Hub would be contrary to the plan’s strategic aim to promote an “urban focus” in Shropshire. Ford should remain Open Countryside.
46. Ford PC requests that:
47. References to Ford should be removed from Policy SP2 and all references to Ford as a Community Hub in the remainder of the document.
48. Reference to Ford in S16.2. Community Hubs: Shrewsbury Place Plan Area should be removed;
 - The requirement for 125 dwellings should be removed (though a suitable windfall allowance should be retained to allowed natural growth in this Countryside location);

The proposed development boundary should be removed.