



# Trefonen Rural Protection Group

The Chairman •

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## SHROPSHIRE COUNCIL - LOCAL PLAN REVIEW

### EXAMINATION STAGE

1<sup>st</sup> JUNE 2022

### STAGE 1 HEARINGS

#### **RESPONDENT A0627      STATEMENT on Inspectors' Stage 1 Matters and Issues**

With regard to **Policy SP2**, in particular **SP2.2 Community Hub Schedule**, and related to

#### **Matter 3 Question 15**

*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?*

#### **SP8 Explanation Para 3.54.**

*“Community Hubs have been identified through a Settlement Hierarchy Assessment, which assessed settlement function through consideration of:*

- a. The population and number of households within a settlement; and*
- b. The extent to which the settlement provides services and facilities; high speed broadband; employment opportunities; and public transport links.”*

#### **1) With reference to SD01401-regulation-19-consultation-response-summary.pdf**

We note that numerous Respondents (Parish Councils and residents) from a host of settlements have objected to their Community Hub status due to incorrect Settlement Scores within the Council's Hierarchy of Settlements and the Council's subjective assessment and setting of Threshold.

At every stage of consultation we have submitted details of known inaccuracies in the Table 10 scorings in the 2017 HofS, 2018 HofS, and the 2020 HofS used to determine settlement status under SP2. We believe that the 2020 scores were still inaccurate and therefore an objective assessment could not be made to determine the correct and appropriate status of settlements based upon them.

At meeting with Officers on 21<sup>st</sup> November 2017 they assured us that that the final status of settlements would be determined by the correct score of extant services and facilities; employment; public transport; and high speed broadband at the Examination Stage prior to Adoption.

There does not appear to be any process for this review, nor for a change in settlement status should circumstances change during the remainder of the Plan Period.

The list of Settlements in SP2.2 therefore seems to be 'set in stone', contrary to the assurance given in 2017.

Clearly settlements may well gain or lose services & facilities; employment; and public transport affecting their sustainability for development at any time during the Plan Period, and therefore a process for review of their Status must be required.

#### **Modifications necessary for Soundness**

a) Review of Settlements scoring to correct data prior to adoption – and appropriate adjustment of Settlement Status List in SP2    \*\*

b) Process for review of individual Settlement Status when services & facilities; employment; or public transport change during the Plan Period, independently of 5yearly Plan Reviews.

[\*\*We would refer to our Reg19 submission raising issues with the determination of Threshold for Hub status and an objective assessment against the full Hub criteria – see following]      Cont/



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2) With reference to **SD01401-regulation-19-consultation-response-summary.pdf**  
Shropshire Council's response to submission **A0627**

*“Specifically with regard to Community Hub status, at no point has it been suggested that the presence of regular public transport links or significant employment opportunities is a mandatory requirement to attain Community Hub status, rather it is recognised that whilst the exact combination varies, such settlements are 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. It is to allow appropriate consideration and comparison between these differing categories that points are ascribed to them within the Assessment.”*

Throughout all the Consultation and Final documents the definition of Hub status has been:-

## **SP8 Explanation**

### **Para 3.54.**

*“Community Hubs have been identified through a Settlement Hierarchy Assessment, which assessed settlement function through consideration of:*

- a. The population and number of households within a settlement; and*
- b. The extent to which the settlement provides services and facilities; high speed broadband; employment opportunities; and public transport links.”*

### **Para 3.58.**

*“This policy recognises that the Community Hubs are diverse. They range in size, offer differing levels and combinations of facilities, have differing levels of constraints and opportunities and have their own unique character and identity.”*

## **HofS Table 2**

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**Community hub settlements** – Whilst the exact combination varies, the settlements within this category are 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.

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We would continue to contest that means a Hub should have **all four** criteria:-

- 1) a combination of services and facilities;
- and** 2) significant employment;
- and** 3) peak time public transport;
- and** 4) high speed broadband.

and believe our view is supported by **Para 5.41** of **2018 HofS** and **2020 HofS**

- 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.

which reads that **all four elements** are a pre-requisite for Hub status.

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Further, the addition (to the original **2017 HofS** para **5.40**) of ‘relaxation’ wording saying a larger range of services and facilities would “*compensate*” for a settlement not having significant employment; and/or peak time public transport; and/or high speed broadband confirms that the **full** definition requirement is to have **all four key elements** for Hub status.

Settlements lacking in employment and/or peak time public transport will clearly result in additional private transport use contrary to sustainability and Climate Change policies.

## Modifications necessary for Soundness

- a) The list of Settlements in SP2.2 to be reviewed to confirm compliance with the full Hub criteria, and;
- b) The Draft Plan settlement development status & allocations amended accordingly.

END