

Stage 2 hearing statement

Representor ref:	A0128
Organisation:	CLIVE PARISH COUNCIL
Matter:	Matter 23 – Wem Place Plan Area: CLV012 & CLV018 – Land off Flemley Park Farm, High Street, Clive and adjacent to the Bungalow
Question:	Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy?

Introduction

Clive Parish Council formally objects to the proposals for the Wem Place Plan Area (S17) in respect of Clive parish. Clive does not meet the objective Hierarchy of Settlements (HoS) criteria for Community Hub designation and therefore its inclusion as a Community Hub is not justified, consequently the S17 proposals for Wem Place Plan Area and site allocations CLV012 and CLV018 are also not justified.

Clive Parish Council therefore requests that the Inspectors propose a main modification to remove all references to Clive being a Community Hub, and to remove the proposed site allocations CLV012 and CLV018 and associated residential guideline from S17.

Background to site allocations CLV012 and CLV018

- Sites CLV012 and CLV018 were proposed at a time when Clive was just over the HoS threshold for Community Hub status. The Parish Council and community had already voiced serious concerns at previous stages of the Local Plan consultation about the negative impact of over-development on a small, rural settlement in Open Countryside, and the resulting pressure on existing amenities, services, and infrastructure. The medical centre, primary school, and sewage works were already at maximum capacity, and combined with the limited public transport, and the inadequate network of single-track lanes serving the village, the strong belief was that Community Hub status was inappropriate for Clive. Nevertheless, as the HoS score put Clive above the threshold for Community Hub designation, the only course of action at the time was to strive to mitigate negative impact by objecting to more harmful site allocations (CLV010), supporting sites CLV012 and CLV018 as slightly less harmful alternatives, and lobbying for a lower residential guideline figure.
- However, the permanent loss of the bowling green (in 2018) and village shop (in 2020), meant that in clear, objective terms Clive parish no longer possessed the minimum amenities, services, and infrastructure deemed necessary to sustain the proposed development associated with Community Hub status and sites CLV012 and CLV018. There has also been a significant reduction of the 511 bus service to Clive in the intervening period, meaning that the proposed development of sites CLV012 and CLV018 would be even less sustainable.

S17 Wem Place Plan Area: Not justified or effective

Clive Parish Council maintains that S17 is not justified or effective because Clive's incorrect Community Hub designation is based on:

- inaccurate data that does not reflect the reality of amenities and services in Clive
- reliance on out-of-date information, rather than more recent data that contradicts Shropshire Council's HoS scoring for Clive
- inconsistent and unfair application of the HoS methodology

- deferral and inaction relating to Clive HoS score and settlement designation

Inaccurate data

- Shropshire Council's basis for the Community Hub designations and resulting site allocations (CLV012 and CLV018) is the HoS which continues to score Clive incorrectly for non-existent amenities. This is despite repeated assurances the HoS score would be corrected. The former bowling green ceased to exist and has been used as a private lawn, with no access for the general public since June 2018. The village shop was closed permanently in Oct 2020, change of use planning permission was granted in May 2021, and the building has since been converted into a residential annex. Clive's correct HoS score is 47 points, which falls below the threshold for Community Hub designation (48 points), therefore Clive's settlement designation must automatically revert to Open Countryside and the proposed site allocations CLV012 and CLV018 should be removed for Clive in S17.

Reliance on out-of-date data

- Shropshire Council is basing its decisions on future development on significantly out-of-date and unverified data. The evidence used to justify the continued inclusion of the former bowling green is the Open Space Needs Assessment (OSNA), 2017, which itself relies on data from PMP Consultants Report 2009, some 15 years ago. In the original 2009 report all sites were assessed, but for the OSNA only 500 sites were assessed. The OSNA acknowledged *"Although the data collation captured existing outdoor sport provision, a detailed assessment of outdoor sport pitches e.g. football and tennis for formal recreation has not been undertaken as this falls outside the scope of this report. Outdoor sport should be considered in greater detail in accordance with methodologies prescribed by Sport England."* More recent data from the 2020 Shropshire Playing Pitch and Outdoor Sports Strategy (PPOSS) lists no bowling green in Clive, either active or lapsed, and no need for a green, as county bowls provision is already adequate without a green in Clive. Yet Shropshire Council chooses to ignore this more up to date and accurate data, in favour of the out of date, inaccurate OSNA data. The reliance on out-of-date information means that the S17 proposals for Clive are not justified and the policy is unsound.

Inconsistent and unfair application of the HoS

- Shropshire Council assured communities, including Clive, that the HoS was an objective and consistent methodology, and that settlement scores would be adjusted to reflect the gain or loss of amenities. There is precedent for HoS scores and settlement designations being adjusted for some settlements, but the same methodology has not been applied to Clive parish. This is fundamentally unsound.
- Both Myddle and Westbury parishes were removed from Community Hub designation after the loss of amenities/services dropped them below the 48-point threshold. Clive's HoS score has never been corrected, despite Shropshire Council's assurances that this would be actioned.
- Additional evidence was also required for Clive before Shropshire Council would consider adjusting the HoS score, e.g. Change of Use planning application, and proof that the former bowling green was surplus to requirements, yet no evidence was required to adjust Myddle or Westbury's HoS scores. Additional evidence was subsequently provided (change of use planning applications, and the PPOSS demonstrated no presence of or need for a bowling green in Clive), yet the HoS score has still not been corrected for Clive and it is still being proposed as a Community Hub.
- The inconsistent and unfair application of the HoS methodology means Clive's inclusion as a Community Hub and the site allocations CLV012 and CLV018 are not justified, and therefore S17 is unsound.

Deferral and inaction

- Shropshire Council was notified early of the loss of the bowling green (via email and via the Preferred Sites Local Plan consultation Feb 2019). Planning Policy staff confirmed in writing that they accepted the bowling green was to be removed and that Clive's HoS score would be reduced to reflect this change. In E. West's email dated 21.11.2019, he wrote **"I would continue to consider therefore the village scores 51 points, given I have accepted the parish council's view that the outdoor play facility [i.e. the bowling green] which had scored three points, is to be removed."** The village HoS score should have been reduced from 54 to 51 points at that time, given that it was clearly accepted that the bowling green was no longer in use. Despite the assurance that the 3 points for the former bowling green would be removed from Clive's HoS score, this was not actioned.
- Shropshire Council was also given advance notice of the imminent closure of the Village Shop (26.09.2020) and the Parish Council confirmed the official closure on 16.10.2020. The Parish Council attempted to engage with Shropshire Council on several occasions and repeatedly asked for confirmation that the HoS score had been reduced and that Clive would no longer be a Community Hub (via phone calls, emails, Preferred Sites consultation, Regulation-18 consultation, and participation at Cabinet meetings).
- The Parish Council also made several overtures to Shropshire Council to discuss the possibility of opting in to become a Community Cluster with Grinshill parish (given that the lower HoS score would mean Clive would default to Open Countryside), but Shropshire Council refused to engage on this point.
- Shropshire Council has had ample opportunity to reduce the HoS for Clive and to consider alternative settlement options for the parish, yet its repeated deferral of this matter meant that Clive remained as a Community Hub in the Regulation-19 Pre-Submission Plan. After this point, a main modification is required to change Clive's settlement status.
- The matter of Clive's HoS score could and should have been dealt with quickly, and positively, as promised at numerous stages of the Local Plan review process, and an alternative settlement designation (Cluster) could potentially have been negotiated to enable a compromise on development within the parish area. Shropshire Council's failure to act and deliberate deferral of these matters has instead contributed to the protracted examination of the Local Plan.
- Shropshire Council's failure to act on the evidence presented has resulted in a loss of support from the community for the Local Plan Review as it appears to lack face validity.

Conclusion.

Clive Parish Council has been advised by Shropshire Council on numerous occasions that the best way to raise concerns and influence the outcome of the Local Plan review was to participate in consultations and hearings for the Local Plan examination. The Parish Council has done so at every relevant stage of this process. It has provided additional evidence when requested and has shown willingness to compromise on a potential Community Cluster designation instead of Open Countryside.

Shropshire Council has repeatedly promised that it would apply the methodology of the HoS consistently and that it would adjust Clive's HoS score and settlement designation if amenities were lost or gained. Shropshire Council has failed to follow through on this promise, it has failed to apply the HoS methodology consistently, and it has persisted in deferring this matter. Therefore S17 is not effective or sound.

Clive is by far the smallest settlement proposed as a Community Hub in S17 Wem Place Plan area. The HoS score clearly shows that Clive is not a "significant rural centre" as defined by the Hierarchy

of Settlements, and simply cannot support the level of development proposed with the minimal level of amenities, services, and infrastructure it possesses. The very basis of Clive's proposed Community Hub designation is based on inaccurate, out of date data, and an inconsistent application of the HoS methodology. The Community Hub designation is therefore unjustified, and consequently S17 and sites CLV012 and CLV018 are also unjustified.

As was previously promised by Shropshire Council, the Parish Council now requests that a main modification to S17 be actioned as follows:

- reduce Clive's HoS score to 47
- remove Clive's designation as a Community Hub
- revert Clive's designation to Open Countryside
- remove site allocations CLV012 and CLV018
- remove residential guideline for Clive