

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 2 Hearing Statement
Representor unique Part A Ref *

A0457, Ford Parish Council

Matter

22

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Site

FRD011 – Land adjoining But Lane on A458, Ford

Matter 22 – Shrewsbury Place Plan Area (policy S16) – see MMs 110-121

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Submission prepared by Lee Searles MRTPI (Andrea Pellegram Ltd) on behalf of Ford Parish Council.



Current position after Stage 1 Examination

1. Ford Parish Council commented on Matter 3, Matter 4 and Matter 8 during Stage 1 of the Examination. These are appended and should be referred to in the reading of the statement which follows.
2. During and following Stage 1 of the Examination, it is the Parish Council's understanding that Inspectors did not ask questions of Shropshire Council relating to the content of submissions made by Ford Parish Council. This may be because the focus was on the overall approach to the development strategy and the role of Community Hubs within it, and not with how the strategy has been executed to select specific settlements as Community Hubs in line with the criteria set out in the settlement hierarchy assessment (EV060). Nor was it concerned with specific site allocations within Community Hubs which should be influenced by criteria set out in Appendix Q of the Sustainability Appraisal dealing with Shrewsbury Place Plan Site Assessments (SD006). Ford Parish Council assumes the matters it has raised will be fully considered in Stage 2 of the Examination under Matter 22.
3. Shropshire Council has issued an Additional Updated Sustainability Appraisal Report (GC44) and this does not address matters raised by Ford Parish Council in relation to the settlement hierarchy assessment, the selection of Community Hubs or site selection at Ford Village.
4. Shropshire Council has issued Main Modifications (GC4m) and Minor Modifications (GC4i) and these do not address the content of Stage 1 submissions from Ford Parish Council. These did not remove Ford from the list of Community Hubs or remove FRD011 as a site allocation within the Local Plan.
5. As far as they are aware, Hearing Statements from Ford Parish Council submitted to the Examination at Stage 1 have not been responded to in any form.
6. Shropshire Council, in responding to Matter 3 during Stage 1 of the Examination (M3.01), sought to justify its development strategy on the basis of iterative development of the strategy following successive rounds of consultation, including at Regulation 18: Preferred Sites, Regulation 18: Pre-Submission Draft and Regulation 19: Pre-Submission Draft. In response to matters raised in those consultations from Ford Parish Council and others, it has been asserted that the issues raised have been taken into account, considered and responded to. This is evidenced with reference to the following taken from Figure 3.1 of the Council's response. Reference is made to the updated Hierarchy of Settlements Assessment (EV060, from 2020) and updates to the Sustainability Appraisal (referred to above).

<p>Regulation 18: Preferred Sites</p>	<ul style="list-style-type: none"> - Refinement of the proposed settlement hierarchy. - Proposed strategy (including where appropriate, proposed allocations) for achieving proposed residential development and employment land guidelines for proposed Strategic, Principal and Key Centres. - Proposed residential development guidelines for updated proposed Community Hubs. - Proposed strategy (including where appropriate, proposed allocations) for achieving the proposed residential development guidelines for the updated proposed Community Hubs. 	<ul style="list-style-type: none"> - All previous consultation responses (summarised in EV003.02 and EV004.02). - Evidence including an updated Hierarchy of Settlements Assessment, data for specific settlements, characteristics / constraints / opportunities of specific settlements, our understanding of the importance of ensuring the long term vitality and sustainability of communities, and comprehensive site assessments. - Technical Assessments including the Sustainability Appraisal (EV005.03.01-EV005.03.02), Habitats Regulations Assessment (EV005.05.01 and EV004.05.06) and Equality and Social Inclusion Impact Assessment (EV005.07).
<p>Regulation 18: Pre-Submission Draft of the Shropshire Local Plan</p>	<ul style="list-style-type: none"> -Proposed strategy for the distribution of development. 'Urban focus', by which the majority of development will be directed into identified 'urban' areas: <ul style="list-style-type: none"> a. Shrewsbury (Strategic Centre); b. 5 proposed Principal Centres and 11 proposed Key Centres; c. Two proposed Strategic Settlements and the proposed Strategic Site. Complemented by appropriate new development within the proposed Community Hubs and to a lesser extent Community Clusters. Development within the wider rural area will consist of affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification. -Refinement of the proposed settlement hierarchy. - Refinement of the proposed residential development and employment land guidelines, strategies for achieving them (including where appropriate, proposed allocations) for Strategic, Principal and Key Centres. - Refinement of the proposed residential development guidelines, strategies for achieving them (including where appropriate, proposed allocations) for updated proposed Community Hubs. -Refinement of the proposed approach to managing development within proposed Community Clusters and the wider rural area. 	<ul style="list-style-type: none"> - All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), and EV006.02). - Evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, data for specific settlements, characteristics / constraints / opportunities of specific settlements, a further updated Hierarchy of Settlements Assessment, comprehensive site assessments, national policy and guidance, the principles of sustainable development, and potential policy objectives. - Technical Assessments including the Sustainability Appraisal (EV007.04.01-EV007.04.21), Habitats Regulations Assessment (EV007.06.01-EV007.06.03) and Equality and Social Inclusion Impact Assessment (EV007.08).
<p>Regulation 19: Pre-Submission Draft of the Shropshire Local Plan</p>	<ul style="list-style-type: none"> - Proposed strategy for the distribution of development. 'Urban focus', by which the majority of development will be directed into identified 'urban' areas: <ul style="list-style-type: none"> a. Shrewsbury (Strategic Centre); b. 5 proposed Principal Centres and 11 proposed Key Centres; c. Two proposed Strategic Settlements and the proposed Strategic Site. Complemented by appropriate new development within the proposed Community Hubs and to a lesser extent Community Clusters. Development within the wider rural area will consist of affordable housing, where there is evidenced local needs, and appropriate rural employment and economic diversification. -Refinement of the proposed settlement hierarchy. - Refinement of the proposed residential development and employment land guidelines, strategies for achieving them (including where appropriate, proposed allocations) for Strategic, Principal and Key Centres. - Refinement of the proposed residential development guidelines, strategies for achieving them (including where appropriate, proposed allocations) for updated proposed Community Hubs. -Refinement of the proposed approach to managing development within proposed Community Clusters and the wider rural area 	<ul style="list-style-type: none"> - All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), EV006.02 and EV007.03). - Evidence and wider factors including that relating to the demographics and characteristics of Shropshire, past trends, data for specific settlements, characteristics / constraints / opportunities of specific settlements, a further updated Hierarchy of Settlements Assessment, comprehensive site assessments, national policy and guidance, the principles of sustainable development, and potential policy objectives. - Technical Assessments including the Sustainability Appraisal (SD006.01-SD006.21), Habitats Regulations Assessment (SD008.01-SD008.03) and Equality and Social Inclusion Impact Assessment (SD010).
<p>Submission</p>		<ul style="list-style-type: none"> - All previous consultation responses (summarised in EV003.02, EV004.02, EV005.02 (including EV005.02.01-EV005.02.18), EV006.02, EV007.03). - The representations to the Regulation 19 consultation (summarised in SD014.01 and SD014.02).

7. As stated above, Shropshire Council claim to have ‘heard’, ‘seen’ and ‘had regard’ (my emphasis) to previous responses and submissions. The submission on Matter 3 from Ford Parish Council to the Stage 1 Examination provides details of the occasions on which the parish council has provided submissions and held discussions with Shropshire Council to identify mistakes in the settlement assessment for Ford which it contends have resulted in a significantly inflated settlement score for the village. At no time following pre-submission consultations (going back to 2017) have these mistakes been acknowledged or responded to substantively by Shropshire Council.

8. At present, the settlement assessment score for Ford Village remains uncorrected with a score of 51, Ford Village remains proposed as a Community Hub with a residential guideline of 125 homes and, following on from this, Site FRD011 remains a site allocation for around 75 homes.

Stage 2 Matter 22 Issues

Policy S16.2 Community Hubs: Shrewsbury Place Plan Area

9. The matters raised by Ford Parish Council, detailed in the hearing statements produced for Stage 1 (appended), relate to factual errors recorded on the Hierarchy of Settlement Assessment and the Appendix Q of the Sustainability Appraisal by Shropshire Council. The Matter 3 Hearing Statement provides full details and should be referred to, but a summary of the main matters raised is set out below:
 - i. Points were awarded for bus services when bus services to Ford do not meet the criteria for the score given to them in the assessment. Services operate outside the defined pm peak-period.
 - ii. Points were awarded for a public house when there isn't one in the village.
 - iii. Full-points were awarded were the presence of library (same as Shrewsbury would get), when it's a mobile library van that visits for 20 minutes once every two weeks.
 - iv. Double points were awarded for a Petrol Filling Station with a small shop. In the methodology, double points are awarded when there are two of something eg two separate shops. It seems perverse to award double points to a single facility which meets two needs, as a single closure would mean the loss of two facilities – it points to a weakness of provision not a strength. The points should be for one facility.
 - v. There was a bowling green that has been closed for some time, which is derelict and has been granted planning permission for change of use and development for housing and storage development. Shropshire Council scored this positively as an available outdoor sports facility (questionable as to whether bowls is what is meant by outdoor sports – Sports England does not think bowls should be defined this way).
 - vi. A local amenity space exists and this has attracted a positive score, except that the amenity area available is very small and does not meet the threshold size for recognition or a score in the assessment.
10. If the matters raised by Ford Parish Council were addressed by Shropshire Council through a re-scoring of the settlement assessment, then the resulting score for Ford would be 32 and not 51. According to Table 10 'Summary of the Assessment of Services and Facilities, Public Transport Provision, and Significant Employment Opportunities within Relevant Shropshire Settlements' within Appendix Q of the Sustainability Appraisal dealing with Shrewsbury Place Plan Site Assessments (SD006), Ford Village with a score of 32 would have fully 32 settlements above it in the assessment results before the threshold score of 48 is reached for designation as a Community Hub.
11. Given the poor availability of local facilities, a site allocation of 75 homes will produce around 165 extra people living in Ford Village, with the great majority of adults driving for work, essential services and access to facilities.

12. At this point, given that the errors in scoring Ford’s place in the settlement hierarchy have been plain for a long time, and they have been raised consistently but have been ignored, it creates questions in the community in Ford Village about the approach to the identification of Community Hubs. Is the hierarchy of settlement assessment a key part of the process or not? To what extent has the settlement assessment been overrode by what Shropshire Council refers to as.....‘*our understanding of the importance of ensuring the long term vitality and sustainability of communities, and comprehensive site assessments*’ (see Figure 3.1 referred to above). Ford Parish Council is not clear what this means and how it has influenced proposals for Ford Village but would like to know so that it can be considered and responded to if necessary.
13. If, at this point, the idea is aired that the provision of homes in Ford will *make* the settlement more sustainable because it will increase demand for local facilities (which will develop or open), then Ford Parish Council would question this as not supported by experience of the modern climate of retail and leisure consumption, of bus service provision or public sector service provision in small settlements like Ford.
14. The approach to defining Community Hubs is not questioned as a methodology written down in the Sustainability Appraisal. The question is whether the methodology is being applied and executed as set out, certainly in relation to Ford Village. Without ever having received a satisfactory response to the matters raised, it seems to Ford Parish Council that the assessment is of less significance, and this throws into question the wider approach on which the definition of Community Hubs within the development strategy is based.

Conclusion and Recommendation on the inclusion of Ford as a Community Hub

15. The issue related to Matter 22 is whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy. Ford Parish Council has raised specific concerns about the application/execution of the hierarchy of settlement assessment and its subsequent use in the Shrewsbury Place Plan Area Site Assessments. There is no evidence that these have been heard and addressed, and the errors in the assessment have not been addressed. This has led to **unjustified designation** of Ford as a Community Hub. Mitigating justification (officer judgement) has not been explained and so cannot be assessed.
16. This results in proposals for significant development of homes in a community which lacks essential facilities and services which result in car-based development and daily trips out of the settlement. This is **not an effective strategy** in terms of achieving sustainable development objectives and reducing carbon emissions. Local residents recognise the lack of facilities available to support significant new development in the village, expressed through a petition against further development with 90% support.
17. Ford PC requests that:
 - i. Reference to Ford in S16.2. Community Hubs: Shrewsbury Place Plan Area should be removed;
 - ii. The requirement for 125 dwellings should be removed (though a suitable windfall allowance should be retained to allowed natural growth in this Countryside location);
 - iii. The proposed development boundary should be removed.

Site Allocation FRD011

18. If action is taken to address the settlement assessment outcome for Ford Village then, subject to officer judgement on the need for future development (which is unknown), Ford should have its Community Hub status and proposed development boundary removed from the Local Plan.
19. If this does not happen and site allocation proposals remain, then the approach to the assessment of site FRD011 and other candidate sites in Ford Village need to be updated to reflect the factual position on the availability of facilities and services. At present the site assessment set out in the Sustainability Appraisal - Appendix Q Shrewsbury Place Plan Area Site Assessments (SD006) includes the same mistakes as set out for the settlement as a whole in relation to the availability of outdoor sports facilities and amenity green space.
20. Ford Parish Council submissions on Matter 4 and Matter 8 are appended. These raise specific site constraints and concerns about infrastructure in relation to site allocation FRD011 which should be taken into account. These include the following which are explained more fully in the Stage 1 submissions referred to:
 - i. Operational impacts on MOD operations (objector reference A2308819).
 - ii. Potential impacts on Strategic Road Network (objection from National Highways).
 - iii. Conservation Area setting constraints and potential impacts.
 - iv. Non-designated heritage assets.
 - v. The potential for minerals resource sterilisation.

APPENDICES STAGE ONE EXAMINATION SUBMISSIONS

MATTER 3

MATTER 4

MATTER 8

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0457, Ford Parish Council
Matter	3
Relevant questions nos	15

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?

An appendix is also attached to this statement which shows relevant quotes from SC policy documents from the evidence supporting the Local Plan Inquiry.



Andrea Pellegram Ltd.

Prepared by Dr Andrea Pellegram, MRTPI

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, Mathew 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

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

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** 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	

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.

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

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

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 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.

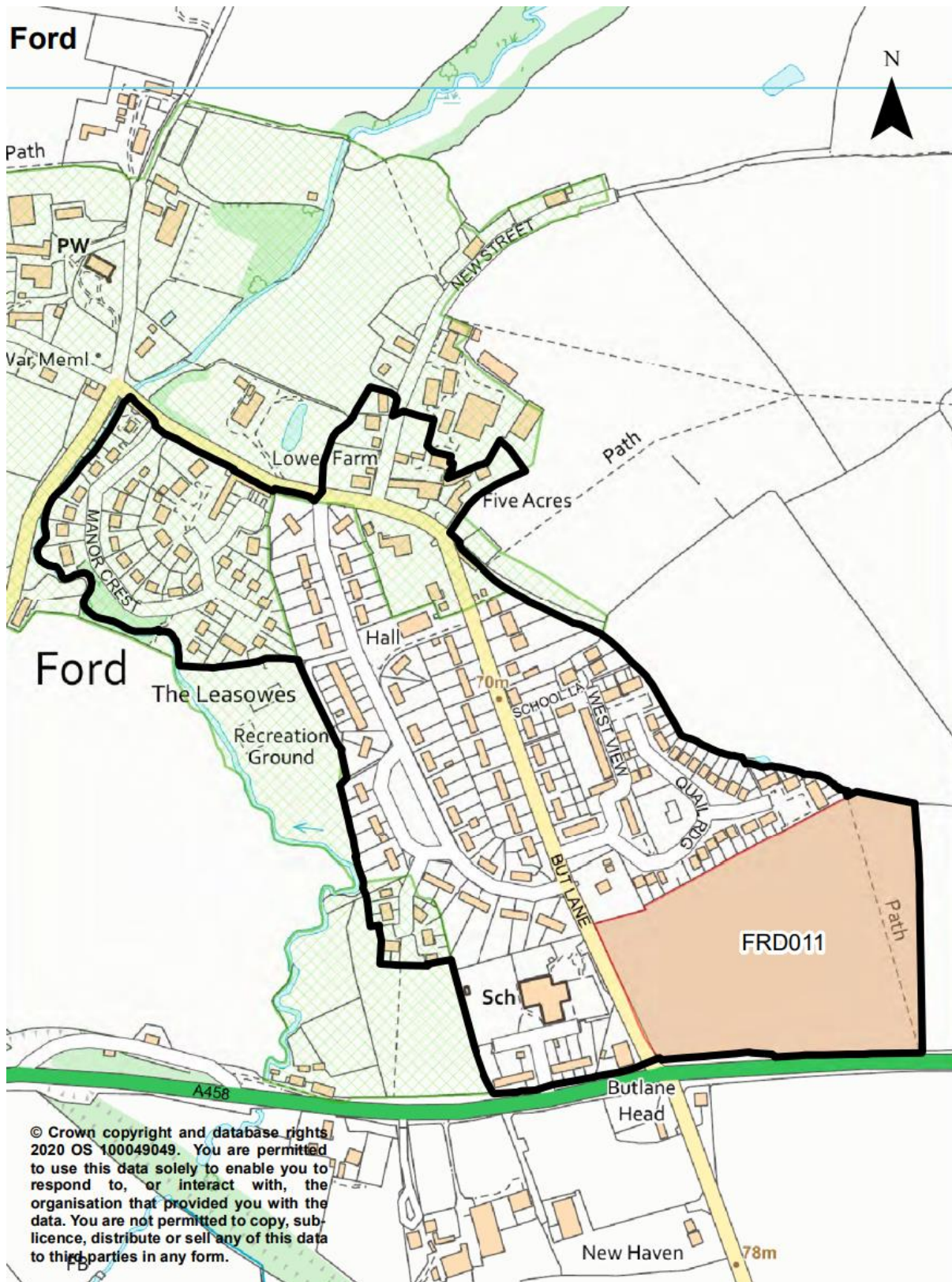
1	2	9	10	11	Admin
Part A Ref	Part B Ref	Summary of Main Proposed Modification(s)	Shropshire Council Response	Proposed Minor Modification(s)	Officer Ascribed Policy
A0457	B001	Ford should no longer be designated as a community hub in Policy S16.2 and associated maps and supporting text. Ford should instead 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 for policy purposes. Ford has a service points score of 51 points above the threshold of 48 points to be designated 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:**
 - **References to Ford be removed from Policy SP2 as should all references to Ford as a Community Hub in the remainder of the document.**
 - **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



Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (2020)

Schedule S16.2(i). Site Allocations: Community Hubs in the Shrewsbury Place Plan Area

Land adjoining But Lane on A458, Ford (FRD011), 75 dwellings

FRD011 will be developed in its entirety and will deliver a lower density development to satisfy the settlement housing guideline and provide infrastructure improvements to the benefit of the local community.

Highway infrastructure improvements to address the capacity of the A458 ghost island right turning lane, create a suitable access on But Lane as a gateway feature to the village, the access positioned on the north end of this boundary (west) to avoid conflict with traffic movements along But Lane and into/from the A458 junction, remove the traffic calming measures around the school and replace with school parking and dropping off point within FRD011, extend pedestrian and cycling links from the existing networks to include the existing footpath (PROW) through FRD011 linking the A458 to Quail Ridge. An improved access across the A458 to the services on the south side should also be considered.

Any other necessary improvements to the local and strategic road network will be undertaken, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact).

Protect existing mature trees and hedgerows particularly around the new highway access on But Lane with compensatory planting to replace any removal of the existing. Landscaping to enclose the development from Quail Ridge and adjacent countryside (east) to protect the amenity of existing and new residents.

Separation distances, layout, dwelling orientation, acoustic design/materials and green infrastructure to enclose the southern edge of the village will manage noise from the A458. Traffic volume increases may require a Habitats Regulations Assessment of impacts on the distant Hencott Pool Ramsar site.

Relevant supporting studies should be undertaken particularly transport assessments, heritage assessment with particular focus on potential archaeology, ecology, tree and hedgerow surveys, surface water flood risk and drainage. Recommendations to be clearly reflected in the development scheme.

Shropshire Council Site Allocations and Management of Development (SAMDev) Plan Adopted Plan 17/12/2015

Ford is not identified as a community hub in Schedule MD1.1 settlement Policy Framework nor within a Community Cluster Settlement (Shrewsbury Area)

Policy S16 Shrewsbury Area – no housing allocations or mention of Ford.

Policy S16.3 Area-wide policies and other allocations

Schedule S16.1e: Committed Rural Employment Sites		
Settlements	Employment Sites	Provision (hectares)
Dorrington	Station Road, Dorrington	0.2
Ford	Land adjoining Poultry Unit, Ford – Site committed for employment uses and capable of accommodating the development of recycling and	5.8

Shropshire Council Hierarchy of Settlements (2017) The document was updated in 2020.

This table is identical in the 2020 draft.

with Table 1 below.

Table 1: Settlement Function Scoring

Category		Description	Function	Total Points
Services and Facilities	Primary Services	Services and facilities that people need to use on a regular basis that are essential to everyday life.	• Nursery/Pre-School	6
			• Primary School	6
			• NHS GP Surgery	6
			• Convenience Store	6
			• Post Office*	6
			• Petrol Station*	6
	Secondary Services	Services and facilities that people would expect to be available in larger settlements and are not needed on a day to day basis.	• Community Hall	6
			• Secondary School	4
			• Library	4
			• NHS Hospital	4
			• NHS Dentist	4
			• Chemist/Pharmacy	4
			• Supermarket	4
			• Bank/Building Society	4
			• Public House	4
			• Place of Worship	4
• Leisure Centre	4			
• Children's Playground	4			
• Outdoor Sports Facility	4			
• Amenity Green Space	4			

Hierarchy of Settlements (2017)

Page 3

Category		Description	Function	Total Points
High Speed Broadband		A settlement is considered to have consistent access to high speed broadband where at least 75% of properties have access to download speeds of over 30mbps.	• Consistent access to high speed broadband	5
Employment Opportunities		An individual employer which employs 5 or more people in one of the specified sectors**.	• Significant employment opportunity	7
Public Transport Links	Active Link	An active main line train station or active bus stop.	• Train station or bus stop	5
	Regular Link	A regular service offered during peak travel times***.	• Regular peak time public transport service	5
Maximum Score Available:				116

*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), so giving it special local importance in the assessment.

**In summary, Use Class B includes offices; research & development; light industry; general industry; and/or storage and distribution; appropriate A2 financial and professional services; and/or appropriate Sui-Generis comprises commercial and/or industrial activities.

***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.

A weighted scoring was applied to settlements as explained at Table 4 in Hierarchy of Settlements 2020

How the Hierarchy Will Be Utilised

- 2.6. The settlement hierarchy will inform decisions on a settlement's potential to accommodate new development. In this way, the settlement hierarchy will support the partial review of the Shropshire Council Development Plan.
- 2.7. ***Please Note:***
The assessment undertaken is solely for the purpose of identifying settlement function in order to inform the development of a settlement hierarchy. It is not intended to represent a comprehensive assessment of all services and facilities; high speed broadband provision; employment opportunities; or public transport links across Shropshire.
The assessment is informed by the availability of services and facilities; high speed broadband provision; employment opportunities; and public transport links at the time the assessment was published.
Whilst the settlement hierarchy is an important technical document, it does not make decisions on whether a settlement is or is not appropriate for development; the levels of development which are appropriate within a settlement; or whether specific sites for development within settlements are available or appropriate.
- 2.8. The settlement hierarchy ultimately provides information which will be investigated further through the plan-making process.

This text has been retained in the 2020 draft.

5.29. This is summarised within Table 5.

Table 5: Settlement Function Scoring

Category	Description	Function	Total Points
Services and Facilities	Primary Services Services and facilities that people need to use on a regular basis that are essential to everyday life.	• Nursery/Pre-School	6
		• Primary School	6
		• NHS GP Surgery	6
		• Convenience Store	6
		• Post Office*	6
		• Petrol Station*	6
		• Community Hall	6
	Secondary Services Services and facilities that people would expect to be available in larger settlements and are not needed on a day to day basis.	• Secondary School	4
		• Library	4
		• NHS Hospital	4
		• NHS Dentist	4
		• Chemist/Pharmacy	4
		• Supermarket	4
		• Bank/Building Society	4
		• Public House	4
		• Place of Worship	4
• Leisure Centre	4		
• Children's Playground	4		
• Outdoor Sports Facility	4		
• Amenity Green Space	4		
High Speed Broadband	A settlement is considered to have consistent access to high speed broadband where at least 75% of properties have access to download speeds of over 30mbps.	• Consistent access to high speed broadband	5
Employment Opportunities	An individual employer which employs 5 or more people in one of the specified sectors**.	• Significant employment opportunity	7
Public Transport Links	Active Link An active main line train station or active bus stop.	• Train station or bus stop	5
	Regular Link A regular service offered during peak travel times***.	• Regular peak time public transport service	5
Maximum Score Available:			116

*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), so giving it special local importance in the assessment.

**In summary, Use Class B includes offices; research & development; light industry; general industry; and/or storage and distribution; appropriate A2 financial and professional services; and/or appropriate Sui-Generis comprises commercial and/or industrial activities.

***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 text has been retained in the 2020 draft.

Thresholds

5.37. As specified above, the specific thresholds for each category of settlement were identified by Shropshire Council Officers, applying their professional judgement, following the completion of the assessment of the services and facilities; public transport links; broadband provision; and employment opportunities available within settlements. 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.

This text has been retained in the 2020 draft.

- 5.40. The lower threshold identified for community hubs is considered appropriate as:
- There is a three point gap between the last community hub settlement and the first other rural settlement.
 - 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. Whereas settlements classified as 'other rural settlement' are likely to have at least a partial reliance upon other settlements to meet certain day-to-day needs.
-
- 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.

This text was modified in the 2020 draft as follows:

- 5.41. The lower threshold identified for community hubs is considered appropriate as:
- 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. Whereas settlements classified as 'other rural settlement' are likely to have at least a partial reliance upon other settlements to meet certain day-to-day needs.
 - 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.

Shropshire Local Plan Review Consultation on Preferred Scale and Distribution of Development October 2017

Preferred Spatial Distribution

4.4 The preferred spatial distribution of the proposed housing and employment requirements is 'Urban Focus'.

4.5 The proposed settlement hierarchy will reflect the 'Urban Focus' approach and seek to focus the majority of development into Shrewsbury and Shropshire's network of Principal and Key Centres. Rural areas will continue to see appropriate development but at a level below the currently adopted policy.

4.6 The 'Urban Focus' approach therefore seeks to broadly distribute development across the County in the following manner: - Shrewsbury – around 30% - Principal Centres – around 24.5% - Key Centres – around 18% - Rural Areas – around 27.5

4.17 Each of the identified Strategic, Principal and Key Centres will include a development boundary that will help to manage future growth. Where appropriate the Council will also allocate specific

sites for development to support the delivery of the emerging settlement strategies. Preferred development boundaries and site allocations will be published early in 2018 for further consultation.

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. More information is provided in section 6 of this document.

6.3 To seek to maintain and enhance the vitality of these rural communities, it is proposed that around 27.5% of the total growth in Shropshire should occur in sustainable rural settlements and on rural exception sites where these are appropriate and consistent with policy. This level of provision represents a reduction from the 35% currently planned within the rural area, reflecting the preferred approach to the distribution of development outlined within this Consultation Document – an Urban Focus.

6.4 Sustainable rural settlements are considered to be: Community Hubs: Settlements which have a ‘sufficient population’ to maintain a range of services; facilities; and employment. In these settlements, appropriate sustainable development should contribute to the retention and enhancement of these existing services; facilities and employment. It should also support the provision of new housing to meet local needs; services; facilities; and employment opportunities.

6.8 Based on the results of this assessment, the following settlements are proposed as Community Hubs in the Local Plan Review: Table 3: Proposed Community Hubs

Table 3: Proposed Community Hubs

	Settlement	Parish	Place Plan Area
1	Alveley	Alveley And Romsley	Bridgnorth
2	Baschurch	Baschurch	Shrewsbury
3	Bayston Hill	Bayston Hill	Shrewsbury
4	Bicton	Bicton	Shrewsbury
5	Bomere Heath	Bomere Heath	Shrewsbury
6	Bucknell	Bucknell	Bishops Castle
7	Burford	Burford	Ludlow
8	Chirbury	Chirbury with Brompton	Bishops Castle
9	Clee Hill/The Knowle	Caynham	Ludlow
10	Clive	Clive	Wem
11	Clun	Clun	Bishops Castle
12	Cockshutt	Cockshutt-cum-Petton	Ellesmere
13	Cressage	Cressage	Much Wenlock
14	Ditton Priors	Ditton Priors	Bridgnorth
15	Dorrington	Condover	Shrewsbury
16	Ford	Ford	Shrewsbury
17	Gabon	Gabon and Gabon	Shrewsbury

6.14 The proposed criteria based policy for Community Hubs is:

.....2. There is sufficient infrastructure capacity, or any infrastructure capacity constraints can be addressed to appropriately meet the development’s needs.

Shropshire Local Plan Review Consultation on Preferred Sites Consultation Period: Thursday 29 November 2018 – Thursday 31 January 2019

19. Shrewsbury Place Plan Area 19.1. The Shrewsbury Place Plan Area is in central Shropshire. The Place Plan area contains the Strategic Centre of Shrewsbury; the proposed Community Hubs of Baschurch, Bayston Hill, Bicton, Bomere Heath, Cross Houses, Dorrington, **Ford**, Hanwood, Longden,

Minsterley, Nesscliffe and Pontesbury; and numerous smaller villages and hamlets, many of which have opted in as parts of Community Clusters.

Ford is identified as a Community Hub

- 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.
- 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.

Summary of residential requirements

	Number of Dwellings
Preferred dwelling guideline 2016-2036	100
Dwellings completed in 2016-17*	3
Dwellings committed as at 31 st March 2017*	28
Remaining dwelling requirement to be identified	69
Dwellings to be allocated	50
Balance/Windfall allowance**	19

*Analysis of Housing Supply as at 31st March 2018 will be provided towards the end of 2018.

**Local Plan policies will allow flexibility for appropriate windfall, rural exception and cross-subsidy development.

Shropshire Local Plan Review: Consultation on Preferred Sites
November 2018

19.61. The table below provides information on the preferred allocation:

Site Reference	Site Location	Site Area (Ha)	Approximate Capacity	Site Guidelines
FRD011	Land at A458 and But Lane	4.1	50 dwellings	To satisfy national and local heritage policies through a heritage assessment, delivering good contemporary design with appropriate use of materials, layout, landscaping and open space. Relevant supporting studies should be undertaken particularly transport assessments, ecology, tree and hedgerow surveys, flood risk and drainage with their recommendations clearly reflected in the proposed development scheme. This should include a suitable access to the highway network with pedestrian and cycling access linking to local networks.

Regulation 19 consultation responses

47.

1	2	3	4	5	6	7	8
Part A Ref	Part B Ref	Relevant Document	Part of the Document Referenced	Legally Compliant	Sound	Compliant with Duty to Cooperate	Summary of Main Issue(s) Raised Within the Representation
A0457	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Ford	No	No	No	Ford should not be a Hub - the Hierarchy of Settlements is flawed. Ford has scored 51 points but the scoring system has been misapplied and the correct number of points is 42. Hub status should also be removed due to Conservation Area, lack of infrastructure, soils, minerals, species, contrary to RBHP findings. Petition against this Hub status. Plan is un-sound as consultation responses ignored. Question the summary of the previous consultation. No evidence has been produced that the local housing need will be met. There is no infrastructure plan.
A0540	B001	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan	S16.2 Ford	No	No	Not Specified	Ford does not enjoy the facilities to cope with the housing proposed in the LPR. Previous developments in the village have been met with false promises. Further house building in Ford before the promised infrastructure changes are delivered is, therefore, contrary to the Government's and the Council's own guidelines. Ford is not a Hub by any nationally agreed definition and lacks many services. School numbers cannot cope. 125 is contradictory to the Government's green strategy and the Council's 2019 declaration of a climate emergency. Car dependency - affects climate change. No local demand for affordable housing. The current proposal appears to be no more than a justification for meeting a house-building target, away from real Community hubs and with no apparent regard for the quality of life of those who live there. The consultees' comments were never presented to the decision-making body. What was presented instead was a 'summary' of the comments. These summaries were so short, and so general in nature that the thrust and importance of the issues raised was lost. This appears to be a clear case of maladministration by Shropshire Council.

48.

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 for policy purposes. Ford has a service points score of 51 points above the threshold of 48 points to be designated 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
A0540	B001	Remove Ford's hub status. The Plan is amended to defines how an upgrade to the primary schooling capacity in Ford will be delivered before any new house building in Ford is approved. The plan is amended to reconcile the climate and environmental impact of additional house building in Ford with national and local requirements and aspirations, before any new house building in Ford is approved. The Plan details the evidence that there is local demand for 125 new homes in Ford before any new house building in Ford is approved. The Plan mandates a full assessment of the capability of all local services to cope with 125 new homes and that changes required as a result of that review are implemented before any new house building in Ford is approved. The Council re-runs the review of the public comments and re-issues the un-edited by Council office workers, and re-issues the	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 for policy purposes. Ford has a service points score of 51 points above the threshold of 48 points to be designated 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

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.



Andrea Pellegram Ltd.

Prepared by Dr Andrea Pellegram, MRTPI

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.

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0457, Ford Parish Council
Matter	8
Relevant questions nos	2, 3 and 7

Matter 8 – Infrastructure and delivery, monitoring and viability (policies SP1, SP2, SP14)

Issue Whether the approach to infrastructure delivery, implementation and monitoring is positively prepared, justified and consistent with national policy.

2. What are the likely impacts of the proposed scale and distribution of development on the various aspects of infrastructure? How have these been assessed?
3. Are the infrastructure requirements clearly set out in a policy/policies in the Local Plan? If not, should they be?
7. How will the provision of infrastructure be related in terms of timing/phasing to development proposals / areas?



Andrea Pellegram Ltd.

Prepared by Dr Andrea Pellegram, MRTPI

1. In Ford PC's response to Matter 3, Q15, the point was made that Ford is not a sustainable settlement that can meet the day-to-day needs of its residents. This will be made worse if the proposed allocation FRD011 is retained in the adopted plan, which the PC has advised against. Those arguments will not be repeated here.
2. The infrastructure requirements set out for land adjoining Butt Lane on A458 (FRD011) are set out in Policy S16.2 and Schedule S16.2(i). Should this site be allocated in the adopted plan, the PC wishes that these requirements be amended and augmented to take account of the following matters:
 - a. The policy wording fails to acknowledge that the existing primary school is at capacity and that this proposed allocation will put additional strain on it. The wording of the policy should recognise that the school must increase its intake.
 - b. The proposal should make an appropriate contribution towards the reinstatement of bus services in order to mitigate against the additional traffic to locations such as Shrewsbury which the new residents will require to meet their day-to-day needs.
3. In addition, Ford PC is concerned that Shropshire Council's approach has been to spend the majority of CIL (Local element- circa 90% of CIL) in the Place Plan area a development takes place in. In Ford's case, this is Shrewsbury Place Plan area which is a wide area. Facilities used by parishioners do not always align to the Place Plan area, for instance, the local secondary school for Ford, Mary Webb, is in a different Place Plan area (Pontesbury and Minsterley). Therefore, Ford PC is concerned that CIL collected from any development at FRD011 is not guaranteed to be spent on necessary improvements in the parish, such as provision of additional school places. Policy DP25(2) states:

For new development where the Community Infrastructure Levy (CIL) applies, priority will be given to using CIL funds to support any critical or statutory infrastructure requirements resulting from the development.
4. This wording should provide a clear commitment in either DP25 or policy S16.2 that the CIL from the allocation will be spent to meet locally identified shortfalls to support that particular

development (FRD011). “Locally” should be defined as Ford parish not the wider Shrewsbury Place Plan area as is the case at present. CIL raised in Ford should be spent in Ford parish and not at other locations.

5. Ford PC requests that:

- **DP25 insert the text in bold:**

*For new development where the Community Infrastructure Levy (CIL) applies, priority will be given to using CIL funds to support any **local**, critical or statutory infrastructure requirements resulting from the development.*

- **Schedule S16.2(i) insert text in bold:**

*FRD011 will be developed in its entirety and will deliver a lower density development to satisfy the settlement housing guideline and provide infrastructure improvements **such as school places** to the benefit of the local community.*

*....An improved access across the A458 to the services on the south side should also be considered. **A contribution towards improvements to bus services will be required.***