

Shropshire Local Plan Review - Preferred Scale and Distribution of Development

Detailed comments on the Hierarchy of Settlements methodology, for Question 7 of the consultation questionnaire:

Do you agree with the proposed 'Community Hubs' identified within Table 3 of the Consultation Document?

Introduction

On the questionnaire requested by Shropshire Council as part of the Consultation on the Local Plan review, Question 7 relates to the designation of 'Community Hubs' and asks whether you agree with the list they have produced. This CPRE paper sets out in detail how the 'scoring' has been done in order to arrive at the list of designated Hubs. We think that:

- the scoring system was not necessarily agreed at the last consultation, contrary to what Shropshire Council maintain,
- the scoring system has in any case been significantly changed, and
- the list of Community Hubs as produced includes some settlements that do not meet Shropshire Council's own definition of what a Hub should contain.

Background

For this Local Plan Review Shropshire Council want to impose "Hub" status on certain villages, using an 'objective' system, rather than allowing each village to choose whether it becomes a Hub, as happened last time. Hubs and "Clusters" are those settlements where most of the housing in rural areas will go. Hubs will probably get the lion's share of the 7,875 houses that are earmarked for villages, and these are likely to be built within designated development boundaries. Clusters will get mainly "infill", but will not have any development boundaries.

In the last round of consultation, Shropshire Council asked about their proposed scoring system for deciding "objectively" which villages should be Hubs. The question they actually asked (Question 12) was: *Do you agree with the approach and/or the methodology proposed to identify Community Hubs?* 73% of respondents did agree, but to what? It is quite possible that agreement was with only the general approach of using some 'objective' criteria, rather than with the precise methodology.

But Shropshire Council maintain that because of that 73% agreement, the scoring system is no longer subject to further consultation. However, they do say that the way it has been applied in order to identify proposed Community Hubs is open for consultation. Question 7 of the questionnaire specifically asks for views on the suitability of the proposed Community Hubs.

But (1) they have actually significantly altered the scoring system, and (2), it is clear that villages could not possibly have seen whether the proposed scoring system was fair and equitable, until they saw how it was applied in practice, particularly in comparison with the County's towns.

So we think that Parishes (and individuals) should tell Shropshire Council if they think the scores are wrong. They should also say if they disagree with any of the proposed Hubs.

Below, we comment in detail (particularly on the scoring system) on each of the four steps taken in the process of settling on the 40 proposed Community Hubs, as set out in the Hierarchy of Settlements methodology.

Stage 1: Identification of Settlements

Shropshire Council staff first identified about 550 '*recognisable named settlements*' throughout Shropshire (Appendix 1, pages 19 to 22 of the HoS document). Although people may know some hamlets that are not in the list, all settlements that could possibly be designated as Hubs will have been included in the list.

Stage 2: Screening of Settlements

The Council's demographers then worked out, as best as they could, how many people and how many houses were in each settlement. They say that they then screened-out all settlements that had either less than 100 people, or less than 50 dwellings, and any other settlements that were too dispersed. Those lists are at Appendix 2, pages 23 to 33 of the HoS document.

Stage 3: Assessment of Screened-In Settlements - the scoring system

The screened-in settlements were then assessed, and scored on a number of criteria. The criteria are tabled on pages 11 and 13 of the HoS document, and the scoring lists are set out in Appendix 3, pages 35 to 42 of the HoS document. A few of the supposedly screened-out settlements have for some reason crept back into these lists, and a few of those have scored surprisingly well.

Changes in the methodology

Shropshire Council maintain that the scoring system was agreed by 73% of people in the last consultation, and that it should not therefore be part of this consultation. But even if that proportion of people agreed *with the approach and/or the methodology proposed to identify Community Hubs* (Question 12 of the I&O consultation) they may well have assumed that scores would be awarded proportionately for each criterion, up to the maximum stated. But instead, scores have been awarded on a simplistic binary system; settlements either get the whole score, or they get no score (subject to the additions for multiple facilities).

Furthermore, the scoring system has been changed, and the maximum score has been reduced from 130 to 116.

- 'Significant employment opportunity' has been reduced from a score of 10, to one of 5, with an additional 2 scored for more than one qualifying employer at that settlement.
- 'Train station or bus stop' has been reduced from a score of 10, to one of 5. In the I&O papers, the criteria was in one place (paragraph 3.23) described as being a 'main line railway station or bus station' rather than a 'train station or bus stop'.
- 'Regular peak time public transport service' has been reduced from a score of 10 to one of 5.
- 'Rural hinterland', which had a score of 6, has been removed from the scoring system.
- 'Consistent access to high speed broadband' has been added to the scoring system and given a score of 5.

We cannot find any explanation for these changes in the scoring system, other than for broadband provision, which arguably should not have been omitted originally.

When compared with the scores awarded to urban areas, it is clear that the scores for villages are not at all proportionate. Some of the scores are plainly wrong, being based on factually incorrect assumptions.

The actual criteria used are as follows:

Primary services used on a regular basis that are essential to everyday life

- Nursery/Pre-School
- Primary school
- NHS GP Surgery
- Convenience store
- Post Office
- Petrol station
- Community Hall

Each such service present is given a score of 4, with an additional 2 points where there is more than one such service present.

We suggest that centres like Shrewsbury and the Principal market towns should be awarded 4 points for each such service, rather than a single extra score of 2 if they have more than one such service, however many over one that happens to be.

There should also be a grading according to the offer given by the particular service in question, particularly if it is a restricted service. For instance, a well-stocked shop might be awarded a score of 4, but a very basic shop might have a score of only 2.

Secondary services that are not needed on a day to day basis

- Secondary school
- Library
- NHS Hospital
- NHS Dentist
- Chemist/Pharmacy
- Supermarket
- Bank/Building Society
- Public House
- Place of Worship
- Leisure Centre
- Children's playground
- Outdoor sports facility
- Amenity green space

Each such service present is given a score of 3, with an additional 1 point where there is more than one such service present.

Again, we suggest that centres like Shrewsbury and the Principal market towns should be awarded 3 points for each such service, rather than a single extra score of 1 if they have more than one such service, however many over one that happens to be. There should also be a grading according to the offer given by the particular service in question, particularly if it is a restricted service.

Where a village has a service that is much more limited than in one of the towns (for instance playgrounds, outdoor sports facilities and amenity green spaces) it is disproportionate for it to be awarded the same score as a town. It seems particularly preposterous that villages that have a library bus only once a fortnight for less than one hour should be awarded the same number of points as towns with a permanent library open at all usual times.

We note that the Orthopaedic Hospital at Gobowen does not appear to have been scored anywhere on the scoring matrix, nor the employment that it provides.

Other services

- Consistent access to high speed broadband: score of 5.
The first stated aim of Connecting Shropshire is to deliver superfast broadband to all premises in the Shropshire Council area by 2020. A maximum score of 5 for coverage of only 75% does not therefore pick out those settlements with the best coverage. There are still many rural "premises" that do not have good or even reliable broadband coverage. Rural settlements are still at a disadvantage, so it seems unlikely that a score of 5 is justified for many rural villages, in comparison with urban areas with better coverage. The Council's chosen threshold of 75% coverage seems to be too low, and essentially meaningless; there are only five settlements out of the 223 listed in the scoring system which do not get the top (and only) score of 5.
- Significant employment opportunity: score of 5 with an extra 2 points where there is more than one such opportunity.

Once again, it seems preposterous that villages with relatively limited employment options are awarded the same number of points as Shrewsbury and market towns, with their huge number and variety of jobs. The scoring system should be graduated, according to the number of jobs available.

- Active public transport link: score of 5.

The public transport available in villages is often a fairly rudimentary bus service. It seems preposterous that such villages are awarded the same number of points as Shrewsbury and market towns which have much more extensive services. There should be some weighting according to the number of buses available, rather than giving an all or nothing score for this service. There should also be separate scores awarded for bus links and for train links.

- Regular public transport link: score of 5.

The same comments as for the Active link apply equally for the Regular link. In addition, the ability to return to a village after an evening's entertainment in Shrewsbury or a local town should also figure.

Stage 4: Categorisation of Settlements

Page 25, paragraph 6.4 of the main Preferred Options document has the following definition of 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

Page 4, Table 2 of the Hierarchy of Settlements document says of Community Hub Settlements that:

Whilst the exact combination varies, the settlements within this category are considered to provide a combination of services and facilities, public transport links (often operating regularly through peak travel times), significant employment opportunities, and high speed broadband generally considered sufficient to meet the day-to-day needs of their resident communities.

Both these two definitions require Community Hubs to have significant employment opportunities. However, page 17, paragraph 5.40 of the Hierarchy of Settlements document says, of Thresholds, that

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.*

The actual choice of the 40 proposed hubs in accordance with paragraph 5.40 is therefore inconsistent with the above two definitions of Hubs, which require that Hubs should have (1) a combination of services and facilities AND (2) public transport links AND (3) significant employment opportunities.

We therefore do not think that the presently adopted scoring system (with an arbitrary line drawn between Weston Rhyn/Preesgweene and Wistanstow, simply because there happens to be a three-point gap between them) is a properly objectively assessed method for identifying Hubs according to the definitions given above.

On the public transport criterion, at least one of the settlements identified (Ditton Priors) would fail the test.

On the employment criterion, 19 of the settlements identified (i.e. nearly half) would fail the test.

On the combination of services and facilities criterion, if for instance, it had been objectively decided that, to be designated as a Hub, a settlement should have at least five of the seven criteria deemed to be essential to everyday life, then seven of the forty designated Hubs would have failed the test. In fact, it could be argued that, to be sustainable, a Hub should contain all seven of the services deemed to be essential to everyday life. If that were the case, only four of them would qualify.

If the scoring system proposed at the Issues & Options stage were used, the "three-point gap" would not exist. In fact, there would be no easily identifiable demarcating gap sufficient to draw a line at a suitable place in the scoring order. Also, one of the supposedly screened-out settlements (Hopton Wafers) would score more than one of the proposed Hubs (Trefonen).

Conclusion

We conclude that both the scoring system and the list of 40 Community Hubs must be revised, in order to be deemed to be arrived at under a properly objectively assessed methodology.