

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0506
Matter	3
Relevant questions nos	Q3, Q4, Q14, Q15,

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

Shropshire Local Plan Review Examination

Stage 1: Matters, Issues and Questions

Matter 3: Development Strategy

Hearing Statement on behalf Mr J Lovegrove-Fielden

Wednesday 6th/Thursday 7th July 2022

Introduction

This Hearing Statement is prepared in order to set out Mr J Lovegrove-Fielden's (the Representor) position with regard to a number of policies contained in the Draft Local Plan Review, but most particularly the operation of Policies SP2, SP7 and SP8. Mr Lovegrove-Fielden's family owns land in and around Longden.

The Statement concentrates on the issues raised by the Inspectors and which will be discussed in Stage 1 of the Examination which relate to the "Development Strategy" (Policies SP1-SP15) of the Draft Plan, and in relation to questions 3, 4, 14 and 15 posed by the Inspector in their Matters, Issues and Questions document ID7, as far as they relate to the identification of Longden as a Community Hub and to allocate a target of 50 dwelling houses to the village. Detailed representations were made at the Reg. 19 stage of the Local Plan process.

Summary of the objection

In brief, the objection submitted in respect of the Regulation 19 consultation draft of the Plan Review and which remain Mr J Lovegrove-Fielden's concern are:

The strategy outlined in Policy SP2.2 as far as it relates to residential development indicates that some 30,800 dwellings will be delivered during the Plan period. This will be accompanied by 300ha of employment land. The "rurality" of much of Shropshire is noted in Policy SP2.6 as is "the importance of ensuring the long-term sustainability of rural communities". On this basis development in the rural area of the County will be guided towards Community Hubs and Community Clusters, outside of which new development will be limited to affordable housing and to support rural employment.

This approach is considered appropriate by the Representor as a general principle, but in practice the system set up to identify appropriate settlements as Community Hubs or Community Clusters based on point scoring is too inflexible to deliver rational categorisations, and thus to secure short or long term growth of sustainability.

Policy SP8 relates to managing development in Community Hubs which, the policy says, are significant service centres in the rural area. These settlements will be permitted “appropriate” levels of development, subject to a number of detailed criteria. Those settlements that will be regarded as Community Hubs are identified in Schedule SP2.2 which follows Policy SP2. Longden is named as a Community Hub, though it has a very limited range of public services, and a Community which is seriously opposed to that designation.

The effect of the designation of Longden as a Community Hub with an allocation of 50 dwellings is unlikely to bring about an increase in services and thus sustainability but, as it could mean an increase of perhaps 45% (even at an occupancy rate for the new houses of only 3 per dwelling) could easily lead to strain on the local services and community.

Background

Longden is a small village lying around 8.75km south-west of Shrewsbury (on the Bishop’s Castle road). It has a population of 332 people living in 135 houses.

Before Shropshire became a Unitary Authority the area in which Longden is situated lay in the jurisdiction of Shrewsbury and Atcham Borough Council (SABC). The last Local Plan prepared by SABC before it became part of Shropshire Council was adopted in June 2001. In that document Longden was classified as one of only twelve villages in the district as a village that had a development boundary. Such villages were said to be suitable for development within the development boundary. The development boundaries were tightly drawn around existing development in order, the Plan said, “to restrict development opportunities”.

SABC had become part of Shropshire Council Unitary Authority in April 2009. Shropshire Council adopted its first strategic plan, the Shropshire Core Strategy (CS), in 2011. This document introduced the concept that, in the rural area of the County, “communities will become more sustainable” by focusing private and public investment, allowing development, ensuring that development made appropriate contributions to compulsory infrastructure, and “by identifying Community Hubs and Community Clusters”. The identification of Community Hubs and Clusters was to be carried out in the following Site Allocations and Management of Development Plan (SAMDev), adopted in December 2015.

The Core Strategy indicated that its purpose was to improve the sustainability of rural settlements and their hinterlands, and not abandon settlements that may have lost services to “perpetual sustainability”. A key consideration in identifying Hubs and Clusters, the CS said, was the view of the local community on the status they wished to adopt. In fact the Council produced a document entitled Shropshire’s Localism Approach to Plan Making (July 2014).

The Council took the Localism Act 2011 to heart and indicated that “The identification of Community Hubs and Cluster settlement and their settlement policies have been based primarily on the aspirations of those communities as expressed in their Parish Council/Meetings, but also with regard

to the evidence base and to information and views from the promoters of sites, residents and stakeholders”.

Longden along with four other nearby smaller villages was eventually classified as a Community Cluster in the SAMDev Plan and set a housing target of 10-50 dwellings to be provided in the Cluster with 25-30 of these being in Longden. Longden, even though being permitted additional dwellings in the SAMDev Plan, was recognised as a settlement that had limitations in its service provision.

Longden Parish Council had produced a Settlement Strategy as an addendum to their Parish Plan, and this indicated those locations where the Parish Council believed the SAMDev plan’s allocation would best be located. It was regarded by Shropshire Council as a helpful approach to securing a sensible level of growth in the village.

The idea that the category of the settlement that villages might be assigned to would be based primarily on the aspirations of local, usually Parish Councils, has not been carried forward into the current Plan Review. There was concern that the over-riding principle that rural settlements should become more sustainable was not being fulfilled by this approach, with some sustainable settlements not opting to grow at all, and some settlements were being granted allowances for development which increased marginally the number of dwellings in the settlement but in fact creating no uplift in sustainability.

Representor’s Concerns

The “community opinion” approach to categorisation of villages has been substituted in the current Local Plan Review by a system of point scoring, whereby the presence of local facilities are awarded points based on a pre-determined enumeration (see Table1: Settlement Functional Scoring which follows para 1.14 of the Hierarchy of Settlements document issued by the Council in August 2020 – doc. EVO60).

The suitability of this approach depends upon adopting the appropriate number of points for each function. The total number of points ‘scored’ then fixes the categorisation of each settlement, with the highest category in the rural area being Community Hubs. It does not, however, produce an accurate assessment of the functions of a village, or carefully analyse the results of the scoring system so as to appreciate what has caused the score recorded and what might be done to increase the score by making the settlements more sustainable.

Longden has, then, for many years been regarded as a “Local Service Village” but has always had restricted services. However, using the scoring system adopted in the Plan Review, Longden scores a total of 50 points and is thus classified as a Community Hub. Nevertheless, during the SAMDev plan period, the small local convenience store has reduced in size, the Post Office has reduced their operation time to 1½ hours on 2 days a week and the visiting mobile library, has reduced their operation to just 20 minutes every second week. The scoring system, however, does not make allowances for such situations. The cut-off point, for a village to be regarded as a Community Hub is 48 points and, had the loss of the function of the post office and library been properly assessed the village would not have scored sufficient points to qualify as a Community Hub.

It should also be said that this situation is unlikely to be confined to Longden and the Representor is aware of situations relating to other villages where the scoring is questionable, with the result being that some settlements have not been classified as Community Hubs where their function in the local community is obviously that of a Hub, while others have been elevated to Community Hub status but

have very small populations and little chance, even with the housing proposed in the Plan Review, of increasing sustainability. Longden only has a population of just 332 people (Hierarchy of Settlement documents (EVO600)) and only limited services introducing significant amounts of development will not lead to increased services and will not therefore make any advancement in terms of sustainability.

As a general principle the idea of classifying villages, where they have local services that need support is considered an appropriate approach. However, the manner in which the adopted scoring system works, and the lack of careful and informed consideration of the reasons for the scoring and what should be done with the conclusion, is considered to present significant difficulties and restrictions to the stated aim of making rural settlements more sustainable.

It is appreciated that this statement touches, at times, on matters specific to Longden but the issue is one of strategy and trying to improve sustainability in the rural area, and therefore it is appropriate to consider it in the Matter 3 examination discussion. It does, however, illustrate the problems with the scoring system upon which rural development strategy is based.

There is provision in the Review for settlements to apply to have their status reviewed if they wish to become Community Hubs or Clusters, but that depends on the local Parish Council wishing that to happen. There does not appear, however, to be an option for a village to opt-out of being a Community Hub if circumstances mean that the Hub status becomes appropriate.

The Representor is also concerned about the ability of Longden to absorb, physically, 50 dwellings as proposed in the Plan Review, whilst retaining its existing character and extent.

When designated part of a Community Cluster, Longden became the subject of a series of planning applications proposing housing estates immediately adjacent to the outskirts of the settlements (Longden did not have a development boundary in the SAMDev). Despite the limit placed on development in the settlement of between 10 and 30 in the SAMDev, and the fact that Community Clusters were intended to accept only small amounts of development, the applications submitted proposed developments of between around 12 houses to 50.

The Council's officers encouraged these developments, and after modification, recommended to the Council's Planning Committee that they should be approved. The Planning Committee however, took a different view and refused the applications.

However, the several prospective developers appealed, and the Parish Council and the Residents Action Group had to undergo 3 appeals, two of which were full public inquiries. All of the appeals were dismissed by the Government Inspector.

It is then, not surprising that the Responder is wary of the proposal to move Longden into the Community Hub category without any sensible justification or any proper assessment of whether the houses proposed (50 units) could be accommodated within the development boundary proposed for the village, or that the development would result in an increase in sustainability.

The wording of Policy SP7.2 gives further concern, as it is clear that if the dwellings proposed for Longden could not be accommodated within the development boundary, then the Council might well be looking to approve housing development outside the boundary. It is likely in that situation that those sites which were the subject of appeal dismissals over the past five year or so, would, in fact, be proposed again for development, but against a different policy background.

This, it is considered, means that the aims of the Plan Review – to make rural settlements more sustainable – is not properly evidenced or justified and is unlikely to be effective and meet the tests of soundness set out in para 35.b) and c) of the NPPF.

The Representor wishes to see the scoring system upon which settlements are categorised, refined to give greater accuracy in assessing settlements functions, Longden removed from the list of Community Hubs and Policy SP7.2.