

## SHROPSHIRE LOCAL PLAN EXAMINATION

### Stage 1 Hearing Statement

<b>Representor unique Part A Ref *</b>	<b>A0511</b>
<b>Matter</b>	<b>3</b>
<b>Relevant questions nos</b>	<b>Q2, Q3, Q4, Q14, Q15, Q24</b>

\*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

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##### Hearing Statement on behalf Mrs W de Capell-Brooke

Wednesday 6<sup>th</sup>/Thursday 7<sup>th</sup> July 2022

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##### Introduction

This Hearing Statement is prepared in order to set out the position of Mrs W de Capell-Brooke (the Representor) whose family own an area of land at Cockshutt extending to 3.81 ha which lies to the south of the main body of development in Cockshutt off Shrewsbury Road, , with regard to a number of policies contained in the Draft Local Plan Review, but most particularly the operation of Policies SP2, SP8, SP9 and SP10.

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 particular with regard to questions 1, 3, 4, 15,16 and 18 as set out in the Inspectors’ “Matters, Issues and Questions” document ID7.

Cockshutt is used in this instance as a direct example of the limitations of the strategy adopted by the Council with regard to encouraging sustainability in the rural area of the County. The Plan does not identify Cockshutt as a Community Hub or allocate the land (or part of) that Mrs de Capell-Brooke’s family own at Cockshutt, for residential development and other useful services. This statement comments on the strategy adopted by the Council for identifying settlements in the rural area that are suitable for development; it is not an examination of the merits of the site owned by Mrs de Capell-Brooke’s family.

##### Summary of the objection

In brief, the objection submitted in respect of the Regulation 19 consultation draft of the Plan Review and which remain Mrs de Capell-Brooke’s concerns 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 general approach is considered appropriate by the Representor in principle but in practice the system set up to identify settlements to be 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 growths 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. Cockshutt is not named as a Community Hub, though it does, indeed, act as a focus in the rural area, and will need development in order to support short and long term sustainability.

Policy SP9 relates to managing development in Community Clusters, which consist of individual or groups of small rural settlements with aspirations to maintain or enhance their sustainability, subject to meeting some detailed considerations. Existing Community Clusters (presumably identified in the current SAMDev Plan) are identified in Schedule SP2.2 to Policy SP2. No new Community Clusters are identified in the Review. Cockshutt is not identified as being, or being part of, a Community Cluster.

Policy SP10 deals with Managing Development in the Countryside, and says that the focus for new development in rural areas will be on Community Hubs and Community Clusters, and fostering evidenced local need for affordable housing and appropriate rural employment opportunities. Cockshutt having not been identified as a Community Hub or Community Cluster is to be regarded as “Countryside” and thus housing development will be limited to evidenced local affordable housing need, and appropriate rural employment opportunities.

The effect of Policies SP8, SP9 and SP10 will be to starve Cockshutt of development opportunities and will be likely to lead to a reduction in the sustainability of the settlement.

### Background

Cockshutt is a village lying around 18km north-west of Shrewsbury (on the A528) and 7km south-east of Ellesmere. A small number of villages lie on the A528 between Shrewsbury and Cockshutt – Preston Gubbals, Harmer Hill and Myddle, for instance – but none has a comprehensive range of services and facilities or a population approaching even half that of Cockshutt. There are no other villages on the A528 between Cockshutt and Ellesmere.

Before Shropshire became a Unitary Authority the area in which Cockshutt is situated lay in the jurisdiction of North Shropshire District Council (NSDC). The last Local Plan prepared by NSDC before it became part of Shropshire Council was adopted in December 2005. In that document Cockshutt was classified as a “Main Service Village”. This was the second tier of the settlement hierarchy in the District, after the Market Towns of Ellesmere, Market Drayton, Wem and Whitchurch. The main Service Villages were said to be the principle focus of development in the rural area because they had a wide range of facilities and were accessible by public transport. Cockshutt was allocated a single residential housing site for 30 dwellings, but was indicted as also being suitable for infilling and small groups of houses within its development boundary.

The Plan also indicated acceptance for development for employment purposes of sites within villages that had development boundaries, which, of course, Cockshutt had.

NSDC became 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 and 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 due course, 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 unsustainability”. A key consideration in identifying Hubs and Clusters, the CS said, was the views 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).

Cockshutt was eventually classified as a Community Hub in the SAMDev Plan, and set a housing target of 50 dwellings to be provided on three new allocated housing sites each having between 5 and 10 houses, infilling and conversions, and most importantly, the balance of the housing development that had been allocated in the North Shropshire Local Plan of 2005, which had not been completed, and which totalled around 18 dwellings. All of these newly allocated sites and the site held over from the NSDC Plan, have now been built-out.

Shropshire Council, then, took the Localism Act 2011 to heart and indicated that “The identification of Community Hubs and Cluster settlement and their settlement policies has 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”.

#### Concerns about the proposed strategy.

Basing the category of settlements that each village might be placed into primarily on the aspirations of local, usually Parish Councils, is an approach that 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 being granted allowances for development which increased marginally the number of dwellings in the settlement but in fact created no uplift in sustainability. The result in some cases was a reduction in available services, increased travel and reduced sustainability.

Cockshutt, even though being recognised as a sustainable settlement and permitted additional dwellings in the SAMDev Plan, was restricted in numbers due to the Parish Council’s opposition to further growth. This however, has resulted in a reduction in the sustainability of the village.

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 pre-determined values (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 against the relative value of other functions. The total number of points then fixes the categorisation of a settlement – the lowest category being Community Hubs. This system is considered to be far too rigid, and ought to involve an accurate assessment of the functions of the village then a careful analysis of the results of the scoring system and finally, an appreciation of what has caused the score recorded and an assessment of what might be done to increase the score by making the settlements more sustainable.

Cockshutt has for many years been regarded as a “Main Village”, or “Main Service Village” or a “Community Hub” and has had a good level of community facilities and services. However, using the scoring system adopted in the Plan Review, Cockshutt scores 46 points, largely due to the loss, during the SAMDev plan period of the small local convenience store to become, first, a fish and chip shop, and then, more recently a small bakery (which has an employment level of less than 5, thus not scoring any points at all on the Council’s system), the loss of a public house, a filling station and a small garden centre. The cut-off point for a village to be regarded as a Community Hub is 48 points and, had the local shop been retained the village would have scored sufficient points to qualify as a Community Hub.

As the Plan now stands, the village will be regarded as “countryside” where the Plan Review’s policy is to restrict development to affordable housing for evidenced local needs or appropriate rural employment opportunities. The result of this will be that virtually no development will be permitted in Cockshutt during the Review Plan’s plan period. The inability to grow the village is likely to result in greater loss of services.

It should be said that the scoring calculations appear, in any event and in respect of Cockshutt, to have been incorrectly assessed because incorrect scores were recorded for certain recreational function, as explained in the Representors Reg. 19 submission. It should also be said that this situation is unlikely to be confined to Cockshutt and the Representor is aware of situations relating to other villages where the scoring is questionable, with the result being that some settlements, like Cockshutt, have not been classified as Community Hubs and thus will be starved of development, while others have been elevated to Community Hub status but have very small populations and only limited services where significant amounts of development will not lead to supporting 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 strategy. 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 calculated score, is considered to present significant difficulties and restrictions to the stated aim of making rural settlements more sustainable. It appears that Cockshutt may be on course towards “perpetual unsustainability”.

It is appreciated that this statement touches, at times, on matters specific to Cockshutt and the Representor’s proposed development site, but the issue is one of general strategy and trying to improve sustainability in the rural area.

The Representor has an area of land on the southern edge of Cockshutt, the development of which has as part of the local Plan Review process and “call for sites” exercise has been proposed for housing. In fact the proposition put to the Council included the possibility of a new village shop, some small

employment accommodation, recreational space, affordable housing – all things that would increase the sustainability of the settlement. The village already has a population of around 850 which exceeds the population of over 50% of those settlements that have been identified as Community Hubs in the Plan Review and yet, if the policy remains as it stands, it will find great difficulty in the future in reaching Hub status or improving sustainability.

There is provision in the Review for settlement 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. It is unlikely that that will happen in Cockshutt, as the general approach by the Parish Council over the years to development has been to try to restrict it, irrespective of the matter of sustainability.

It is essential, therefore, that greater and more detailed consideration is given both to the points awarded to individual services/functions, and that greater thought is actually given to the current and future sustainability of villages like Cockshutt.

It is not at all clear that the current system of identifying settlements for development in the rural area is properly justified or likely to be effective in the aim of increasing sustainability in the rural area.