

Shropshire Local Plan Review Examination

Stage 2: Matters, Issues and Questions

Matter 2: Development Strategy

Hearing Statement on behalf of Mr J Lovegrove-Fielden

Wednesday 16 October 2024

1.0 Introduction.

1.1 The **ISSUE** raised by the Inspectors in Matter 2 is:

“Whether the Development Strategy is justified, effective and consistent with national policy.”

1.2 This Statement is prepared in order to set out Mr. Lovegrove-Fielden’s (the Representor) position with regard to the ISSUE raised by the Inspectors in Matter 2 and a number of the policies contained in the Draft Local Plan Review, but most particularly the operation of Policies SP2, SP7, SP8 and SP10. Mr Lovegrove-Fielden’s family owns land in and around Longden, and it is the potential effect that the abovementioned policies would have on Longden village that is of concern.

1.3 The Inspectors will recall that representations were made at the Regulation 19 stage of the Local Plan process and at the time of the Stage 1 Examination.

1.4 The main concern expressed at the time of the Stage 1 Hearing was not that the policies that related to the identification of villages in the County as Community Hubs and Community Clusters were inappropriate as a general approach to guiding development in the rural area of the County to identified settlements in an attempt to increase the sustainability of the rural area, but rather to register opposition to the manner in which the policies are likely to operate and the way settlements have been identified and designated Community Hubs and Community Clusters, and the implications of those designations for the village communities concerned.

1.5 It is not proposed to simply restate the objections to the system of identifying villages as Hubs or Clusters that was undertaken in Stage 1 of the Examination, as the Inspectors will already be aware of them, but rather to bring the Inspectors up to date with changes that **have** taken place in Longden in the 2 -year period since the Stage 1 Hearing. These illustrate that the objections made at the time about the way villages

were designated Community Hubs, Clusters or ‘countryside’ have already been found to be overtaken by events and are now even more pertinent.

- 1.6 A summary of Mr Lovegrove-Fielden’s objection was set out in the Stage 1 Hearing Statement, as well as the background to the objection which outlined the size and nature of Longden, the community’s involvement in the planning history of the village and their attempts to maintain the physical and social character of the village. That assessment is not repeated in this Statement but the background remains an important consideration.

2.0 Longden Identified as a Community Hub

- 2.1 The Inspectors will recall that the manner in which Shropshire Council had identified Longden as being a Community Hub was based on a scoring system whereby points were awarded for various facilities that existed in the village, and then those rural settlements that scored 48 points or more automatically became Community Hubs. Longden’s score of 50 points included 3 points for having the facility of a mobile library which visited the village for 20 minutes every 2 weeks – the same as towns and villages that had permanent, always available, libraries.
- 2.2 Some 5 points were attributed to Longden on the basis that it had a Public Transport Link and a further 5 points because that link provided a “regular service during peak travel times”. At the time of the Stage 1 Hearing the village enjoyed both of these, but now both have stopped to be replaced by an irregular on-demand service that is not geared to provide a regular peak hour operation.
- 2.3 At the time of the Stage 1 Hearing the village also had an operational public house (3 points) and a Post Office (4 points). It now has neither. A village shop remains but it is now located within the former public house.
- 2.4 The points score for Longden, if taken in September 2024, would, then, be reduced by 17 points) taking it to 33 points, well below the 48 points threshold. The village would, therefore, not be classified as a Community Hub.
- 2.5 This situation demonstrates the inflexibility of the Council’s approach to the village classifications, as it appears that the Council is now regarding Longden as a Community Hub and forcing a level of development on it that would only be appropriate if it were indeed a Hub.

3.0 The Relevant Policies in the Draft Local Plan

- 3.1 As far as development is concerned, Policy SP2: *Strategic Approach*, says that, in order to ensure the long-term sustainability of rural communities, appropriate new development will be permitted in Community Hubs and Community Clusters which “consist of settlements with aspirations to maintain or enhance their sustainability”. Outside these settlements new development will be restricted to affordable local needs housing or appropriate rural employment and economic diversification.

The Draft Plan does not explain the process by which Shropshire Council assessed whether or not a settlement has “aspirations to maintain or enhance their sustainability” or what might happen if the community in a particular settlement did not indicate any such aspiration.

- 3.2 Policy SP7: *Managing Housing Development*, indicates that the Council will give positive consideration to sustainable housing development where it does not conflict with the Local Plan policies. However, sub-para 4 of Policy SP7 indicates that additional market housing development outside settlement development boundaries will be strictly controlled and will only be considered acceptable where there is clear evidence that relevant settlement development guideline appears unlikely to be met over the plan period.

This is of particular concern to Longden, given the very tightly drawn development boundary shown in the Draft Plan, and the significant number of permissions for new dwellings that have been permitted over the past five years or so, which use up much of the currently undeveloped land in the village. It is quite likely that there will be insufficient land left in the village to meet the settlement guideline of 50 dwellings. If that becomes the case developers will, no doubt, look for the sites immediately outside the development boundary and be able to argue that Policy SP7 permits such development. The Longden community are fearful that, given the attitude to development on the outskirts of the village shown by Shropshire Council’s Planning Officers over the past 10 years or so (outlined in the Stage 1 Hearing Statement) such proposals could be recommended for acceptance under the abovementioned provision, irrespective of the wishes of the community.

- 3.3 Policy SP8: *Managing Development in Community Hubs*, says that development will be allowed in such settlements on allocated sites and other sustainable sites within the development boundary subject to conditions. However, Policy SP8.2 then says that proposals for development outside the development boundaries of Community Hubs will be managed in accordance with Policy SP10 and other relevant policies in the Plan. This raises the same concern in Longden as expressed in relation to Policy SP7 above. It appears to be another means by which further development, and development outside the development boundary of Longden, might take place.

- 3.4 Policy SP10: *Managing Development in the Countryside* says that Community Hubs and Clusters will be the focus for development in the rural area, supporting the provision of new affordable housing for evidenced local needs, and for local employment. However, Policy SP10.4 says that housing **outside** Community Hubs (amongst other settlements) will be positively considered where they meet all the relevant requirements of Local Plan policies, and are for certain forms of development, which includes affordable exception site dwellings, and schemes which meet evidenced local housing needs and affordable exception provision. Again, when applied to Longden, and given the history of planning applications adjacent to the developed area of the village, there is great concern that such development might be encouraged irrespective of the wishes of the residents.

4.0 Conclusion.

- 4.1 Mr Lovegrove-Fielden, taking into account the concerns expressed in Section 3 above, concludes that the policies that will govern the development that the Draft Plan suggests for Longden, will not achieve the strategy set out in Policy SP2, and will not deliver sustainable development.
- 4.2 Longden is already losing services and facilities even though, over the life of the Core Strategy and SAMDev Plans, the community has shown a willingness to accept small scale developments that have been proposed within the body of the village, despite the village being designated only as an element in a Community Cluster. The community very much wish to contain the village and allow only that development that can be readily assimilated into the community and which will reflect the character of the settlement. They have consistently opposed proposals to extend the village into the surrounding countryside, particularly in the form of small housing estates, that have been presented over the past ten years or so and are now concerned that they will be faced with similar situations if the policies that are now proposed in the Draft Local Plan become formally adopted. If the current situation is maintained, the village could continue with a much-reduced level of services and yet still have to accept 50 or more dwellinghouses.
- 4.3 No evidence or calculations appear to have been advanced in the Plan that would demonstrate that the designation of Longden as a Community Hub and the provision of some 50 houses in the Plan period would lead to a more sustainable future for the village, or that any of the services recently lost would return. This being the case it does not appear that the Local Plan will fulfil the requirements of paragraph 16 of the National Planning Policy Framework which include (amongst other things),
- i. Being prepared with the objective of contributing to the achievement of sustainable development,
 - ii. Being shaped by early, proportionate and effective engagement between plan-makers and communities, etc.....
 - iii. Containing policies that are clearly written and unambiguous, and
 - iv. Serving a clear purpose.

None of the above are evident in the policies referred to in Section 3 of this Statement.

5.0 Questions Posed by the Inspectors.

- 5.1 With regard to the specific questions posed by the Inspectors it is not thought that any of the policies in the Plan that are referred to above require alteration as a result of any further work undertaken so far by the Council, or that the issue of accommodating unmet housing need from the Black Country has any implications for the Policies referred to in this Statement.

6.0 **Suggested Revisions to the Plan.**

6.1 Mr Lovegrove-Fielden would like to see,

- i. The classification of Longden as a Community Hub reconsidered in the light of the current situation on the village, with a view to deleting its designation as a Community Hub.
- ii. The present ambiguity in the abovementioned policies revised to make it quite clear the development outside the development boundaries of Community Hubs will not be allowed.
- iii. The reconsideration of the policies that relate to housing development and housing in Community Hubs, Community Clusters, and the open countryside, to become much more flexible so as to allow movement between the various identified categories to be easier and more readily responsive to changes that are bound to take place within the Local Plan plan period. In fact, to put into operation the aspiration expressed in paragraph 3.38 (explanatory note to Policy SP7) that requires plans to remain flexible and adaptable to changing circumstances.