



The countryside charity Shropshire

Examination of Shropshire Local Plan 2016-2038

Stage 2 Matters, Issues and Questions

Matter 20 – Oswestry Place Plan Area (policy S14)

CPRE Shropshire Hearing Statement

Representor refs: A0410 and B-A127

20 September 2024

1. Our Hearing Statement for Matter 20 follows the MIQs as set out in document ID40.

Matter 20 – Oswestry Place Plan Area (policy S14) – see MMs 096-104

Issue

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

Sites

PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 – Land at Park Hall

GWR009 – Land west of Agnes Hunt Memorial Bungalows, Gobowen

KCK009 – Land north of Church Lane, Knockin

LYH007 – Land east of Barley Meadows, Llanymynech

PYC021 – Land east of A483, Pant

RUY019 – Former Dairy Site, School Road, Ruyton XI Towns

SMH031 – Land east of Moors Bank, St Martins

SMH038 – Former Ifton Heath Primary School, St Martins

WEF025 – Land at West Felton

WRP001VAR – Land west of Trehowell Lane, Weston Rhyn

WRP017 – Land off Station Road, Weston Rhyn

WHN024 – Land off Donnett Close, Whittington

Questions

2. Our Regulation 19 submission of February 2021 concentrated, for the Oswestry Place Plan Area, on the balance between housing numbers and employment land for Oswestry, and on the allocations at Park Hall.
3. In relation to that we now comment briefly in this Hearing Statement mainly on the following selected questions only.

Q1. What is the background to the site allocation? How was it identified and which options were considered?

Q12. Are the detailed policy requirements effective, justified and consistent with national policy?

4. We repeat, in relation to the Park Hall allocations, that the proposed allocations were altered substantially from those proposed at the Preferred Sites stage, without any apparent explanation. PKH007 was removed as a proposed allocation, and PKH013, PKH029 and PKH032

were added , increasing the overall allocation at Park Hall by 80 houses. The Residential Conclusions Map indicates that sites PKH029 and PKH013 were rejected, so it is surprising that they were put forward as allocated sites. Site PKH007 does not appear on the Residential Conclusion Map at all. No mitigation for the rejected sites has been proposed within Table 11.4 on pages 255-260 of the SA (document SD006.01, dated December 2020).

5. We therefore continue to consider that the allocations at Park Hall are not supported by proportionate evidence, and are therefore unsound, because :
 - i) it is unsustainable to treat allocations at Park Hall as being to satisfy need at Oswestry; and
 - ii) some of the new allocations now proposed for Park Hall are in any case on rejected sites.
6. In Shropshire Council’s Summary of Representations on the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan dated July 2021 (document SD014.01) we do not believe that it addressed these specific points in its response to our comments on policy S14, at electronic page 778 (Schedule 2: page 728). It merely re-iterates that *“the proposed development strategy for Oswestry and the existing and proposed allocations . . . are appropriate, effective, sustainable and deliverable”*.
7. We also continue to consider that the quantum of employment land proposed for Oswestry needs to be reappraised, in view of the lack of balance between the housing allocation and the employment land allocation, with the resulting issues of unsustainability, partly because of increased levels of commuting. In this regard, it is to be noted that there is an oversupply of employment land in the county, with at least 375 Ha identified, against the present proposed guideline figure of 320 Ha (see Appendix 4a of our submission of 11 June 2024 on the Additional Material).