

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	AO358
Matter	1 and 4
Relevant questions nos	Matter 1 - q 1 and 3. Matter 4 - q 1,2,3 and 4

*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/>

This hearing statement in relation to the Shropshire Local Plan Examination details why the council has not complied with the relevant procedural and legal requirements in relation to Matter 1 – Legal/Procedural Requirements (Policy SP3), specifically Question 1 and 3 and Matter 4; questions 1, 2, 3 and 4 – Housing and Employment Land Needs (policy SP2), hereby the local plan is not compliant with the Local Development Scheme. The reasons are detailed below;

Overview

Church Stretton is a sizeable settlement of around 4,000 residents, it has a very good range of services and facilities, scoring 98 points in the Council's "Hierarchy of Settlements" Paper (August 2020) and ranking 3rd among the Plans 11 Key Centres.

Despite Church Stretton's excellent sustainability credentials, the submission local Plan proposes no new allocations for residential development in the town, having removed one of the existing SAMDev Plan allocations for a 50 dwelling site (CSTR018), it has also removed the two sites proposed for allocation at "preferred Options" stage, sites CST020 and CST021.

Having removed these 3 sites the proposed Local Plan does not identify where the town's future housing development will be sited, relying instead on windfall and the remaining saved SAMDev Plan housing allocation CSTR019 which has so far failed to be delivered. For the above reasons the Local Plan's failure to identify land to meet the town's housing requirements fails the "positively prepared", "justified" and "effectiveness" tests of soundness.

Policy S5.1 proposes a low level of growth for the town, less than half the county average, despite a very high demand for housing in Church Stretton and a significant affordability problem. For the reasons elaborated further in this representation, we consider the Plan fails the "positively prepared" and "justified" tests of soundness.

Local Plan Delivery and Viability

The Local Plan Delivery and Viability Study (July 2020) separates Shropshire into four sub-areas, namely Shrewsbury, North, South and South Higher. South Higher comprises the three towns of Ludlow, Bishops Castle and Church Stretton (page 64 of the Viability Study) and has the highest viability rates in the country as shown in the summary tables on pages 226-230 of the Viability Study.

The Viability study shows significant viability problems for the Plan as a whole. In the North area, only 2 of the 25 typologies are viable (p228); in the South area, only 4 of the 25 typologies are viable (p226); in the Shrewsbury area, only 5 of the 25 typologies are viable (p227). In this context, the Local Plan needs more allocations in the South Higher area. It cannot afford to minimise the level of development in Church Stretton, which is one of only 3 settlements in this higher viability area. Its current distribution of growth, including only 200 dwellings in Church Stretton, fails the "effective" test of soundness.

Allocation of Sites in Church Stretton

No new sites are allocated for development in Policy S5.1, with the town relying heavily on windfall and the saved SAMDev Plan allocation for 50 dwellings (CSTR019). Please note promoted site CST019VAR is no relation to the SAMDev allocation CSTR019, despite the similarity in numbering. SAMDev Plan allocation CSTR018 (School Playing Fields) is one of the few allocations deleted by the emerging Local Plan in Schedule A2 on page 317 of the Plan. This allocation for around 50 dwellings was previously relied on by Shropshire Council to demonstrate that Church Stretton's housing needs could be met in a plan-led manner. At Preferred Options stage site CST021 (Snatchfield Farm) was proposed for allocation for 70 dwellings and site CST020 (Land NW of Gaerstone Farm) was proposed for allocation for 40 dwellings. Due to a high level of public objections, both sites were dropped in the pre-submission Local Plan.

The emerging Local Plan allocates no new sites. With the deletion of one of the SAMDev Plan allocations (CSTR018) it now relies on only one saved SAMDev allocation that has so far failed to deliver (CSTR019) and windfall. Church Stretton has experienced high housing demand for many years and almost all suitable windfall sites have long since been developed. There are few suitable windfall plots left in the town. The few that remain will struggle to meet the Plan's environmental policies SP5 (High-Quality Design), DP12 (The Natural Environment), DP23 (Conserving and Enhancing the Historic Environment) and DP24 (Shropshire Hills Area of Outstanding Natural Beauty). Church Stretton's heavy reliance on windfall fails the 'effective' test of soundness. The Plan's failure to allocate any new sites for development over the 22 year plan period fails the 'positively prepared', 'justified' and 'effective' tests of soundness.

Conclusion

For the reasons aforementioned within this statement, the low level of new housing allocation within Church Stretton means Policy S5.1 fails the “positively prepared”, “justified” and “effective” tests of soundness. Whereby the site known as Land South of Springbank Farm (CST019VAR) AO358 for the proposal for 65 dwellings, should be included within the Local Development Plan and brought to the inspectors attention as the only viable and sustainable option for housing allocations in Church Stretton.

We reserve the right to provide further information in addition to this statement as required.