

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0361
Matter	1 - Legal/Procedural Requirements
Relevant questions no's	8 and 9
Comments as attached.	

SHROPSHIRE LOCAL PLAN EXAMINATION Stage 1 Hearing Statement Matter 1 - Legal/Procedural Requirements

Reference: A0361

Date: 31/05/2022

Question 8

- 1.1 Cooke Bros. are the landowners of proposed housing allocation CLU005 and saved SAMDev housing allocation CLUN002. CLUN002 is subject of a current planning application (reference 13/03440/OUT).
- 1.2 We have reviewed the conclusions of the River Club SAC Mitigation Measures Study which identifies a series of options for mitigating the total phosphate budget for the Clun catchment over the proposed Plan period. The study identifies the most suitable mitigation options for the Clun catchment along with the amount of land each would require and a comparison with the amount of such land available within the catchment.
- 1.3 We recognise the complexity of this issue however consider that the mitigation measures identified are possible in relation to both saved allocation CLUN002 and proposed housing allocation CLU005.
- 1.4 In respect of delivery then it will take time to work through these complex issues however we have already submitted a mitigation option to the Council in respect of CLUN002 and await the Council's response in light of the submitted evidence. We would need to consider the implications and mitigation options for CLU005 however there is no reason why this cannot be delivered early in the plan period.
- 1.5 In respect of viability the mitigation options have not been fully costed and there remains a high degree of uncertainty as to how the options might translate into a developer contribution model. We consider that CIL is a far more appropriate alternative option. It has the added benefit that contributions from development in a wider area, not just in the Clun catchment, could be used to fund the mitigation measures needed to deliver nutrient neutrality. This would reduce the financial burden on the relatively small amount of growth proposed for the catchment. It may also enable larger scale 'strategic' schemes which would not only mitigate the development within the catchment, but potentially contribute to the restore objective for the SAC.

Question 9

- 1.6 We consider that the mitigation measures should be resolved before the Local Plan is adopted. The issues have already caused considerable delay to the delivery of the saved allocation with the original outline application remaining undetermined since 2013. It is vital that landowners and developers have clarity on the mitigation measures and fundings before the Local Plan is adopted rather than leaving it to an unspecified timescale and the uncertainty of the Supplementary Planning Document.