**To: Shropshire Council, Planning Policy & Strategy Team, Shirehall, Abbey Foregate, Shrewsbury, Shropshire SY2 6ND. Email: planningpolicy@shropshire.gov.uk**

***Response to:* Shropshire Council consultation on Local Plan Review Dec 2017 ‘Preferred Scale and Distribution of Development’ *Deadline Friday 22nd December 2017***

***Respondent Information***

***Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_***

***Company Name (if relevant): Position (if relevant):***

***Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_***

***Post Code: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_***

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***Below are my responses to the questionnaire***

**SECTION: Level of Future Growth**

**Q3. Preferred housing requirement.**

**Tick ‘NO’ - I do not agree with the preferred target of ‘High Growth’ (28,750).**

The preference of respondents is for the lowest housing target - ‘Moderate Growth’ (26,250 homes). We should be considering no more than ‘Moderate Growth’, given that even this exceeds Shropshire’s housing need for 25,400 homes calculated to the Government’s proposed new, harmonised method. The proposal for ‘High Growth’ is excessive and unrealistic. The low economic growth forecast until 2030 and anticipated decline in EU workers as a consequence of Brexit mean there is little certainty over housing demand. Adopting unfounded and inflated housing targets will force many more land allocations than needed, offering up developers a greater choice of more aspirational and therefore more profitable sites. This will result in unnecessary urban encroachment on areas of natural beauty, heritage landscapes, and greenfield separating historical settlements, damaging the essential character and appeal of Shropshire’s market towns and villages. Using the recent high rate of housing delivery to justify excessive growth levels is flawed; this is simply a phenomenon of several years of marked under-delivery. It is no guarantee that we will see consistently higher rates of delivery, given the likelihood of depressed demand for the reasons already given.

**Q4. Preferred employment land requirement**

**Tick ‘NO’ - I do not support the preference for 305 hectares/‘Balanced Growth’.**

It assumes the ‘High Growth’ option for housing, which I oppose for the above reasons. It also assumes ‘High’ economic growth which I oppose for similar reasons. Excessive allocation of employment land based on optimistic growth expectations, despite the down-graded economic forecast, is unreasonable. It is a preference without any realistic basis that simply props up the argument for ‘High Growth’ in housing. I support the option of ‘Productivity Growth’ given in the previous consultation for Shropshire’s economic growth.

**Section: Distribution of Future Growth**

**Q5. Preferred spatial distribution of proposed housing and employment requirements**

**Tick ‘NO’ - I do not support the preferred ‘Urban Focus’.**

This will threaten the distinctiveness of the County’s market towns, burdening them with excessive allocations of housing land and associated employment land. We will significantly alter the character of the County, creating corridor conurbations along strategic roads, with the prospect of settlements losing their identifiable boundaries to urban sprawl.

We should make every effort to deliver housing on brownfield, in line with the government’s target of 20%, and regenerate town centre buildings to create homes. This will reduce the need to construct more roads and infrastructure on greenfield with the ensuing loss of visitor appeal and lifestyle quality.

**Q6. Settlement strategy – Oswestry**

* In line with my objection to the preferred ‘High Growth’ for housing, I also object to the proposed need for 1800 homes in Oswestry. This is due to the unnecessary pressure to identify housing land based on unfounded housing growth need, keeping Old Oswestry hillfort, in particular, at continued risk of northwards town expansion that will damage its setting.
* Shropshire Council’s 5 year housing land statement shows a 6.04 years supply of deliverable housing land. There is no longer an imperative to include OSW004 (117 houses) in the figures, given the site will harm the setting of a nationally significant hillfort.
* For the following reasons, OSW004 fails the test of being a deliverable site, which should justify its removal from the Local Plan:

-The Inspector’s approval of OSW004 on the current Local Plan does not equate to planning approval.

-The Statement of Common Ground means that Historic England can still reject the housing application if it does not meet criteria for design, layout, maintaining views of the hillfort which would be impossible with the density of houses proposed, and mitigation of harm to the hillfort’s setting and significance.

-Meeting these criteria, as well as the required environmental and archaeological assessments, could see a significant reduction in housing numbers and even preclude the viability of developing the site for the housebuilder.

-Also of material consideration regarding OSW004 is the fact that the proposer stated at the public inquiry that OSW004 would continue to be promoted as part of a Masterplan, which includes OSW002 and OSW003 located at and adjacent to Oldport Farm immediately south-east of the hillfort. Therefore, OSW004 on its own cannot be deliverable as its original planning justification was as part of an integrated scheme involving two sites that have already been rejected from the current Local Plan.

* The settlement statement for Oswestry stresses the need to recognise physical, heritage and environmental constraints, and includes specific reference to the setting of Old Oswestry. Protection of the historic environment (as per Core Strategy Objective 11) is also stated as a strategic objective of the review. The allocation of housing at OSW004, within the setting of a nationally significant ancient monument, contradicts these, as well as heritage protection requirements of the NPPF and international heritage law.
* Updated guidance\* from Historic England relating specifically to Local Plan making has given even greater weight to objections to development at OSW004. *[\*Historic England Advice Note 3: Site Allocations in Local Plan (October 2015); Historic England Good Practice Advice in Planning 1: Local Plans (March 2015)]*
* Old Oswestry and its setting are acknowledged by leading archaeologists as being as important to Iron Age understanding as Stonehenge and its landscape are to Europe’s late Stone Age. HOOOH, other objectors, and leading figures of British archaeology academia, who have provided expert testimony to its extreme national importance in an open letter, believe that OSW004 will significantly harm the significance and setting of the hillfort.
* I believe that Old Oswestry’s unique heritage importance together with local concerns for its landscape protection, call for the consideration of a ‘positive strategy for conservation’. The current Local Plan review offers an opportunity for Shropshire Council and local stakeholders to discuss the potential for a heritage strategy for Oswestry. This should include more appropriate protection for the hillfort and its setting, to reflect its national importance, integrated with a range of heritage conservation objectives for the town.
* Current policy and initiatives, including Shropshire’s Economic Development Strategy and Core Strategy, stress the value of heritage and environmental assets for tourism, attracting employers, and for well-being and quality of life. Objectives of the Oswestry Business Improvement District (BID) include building on the town’s rich heritage for tourism. The Oswestry Place Plan (2015-2016) states the objective *“Look at opportunities to make more of the Oswestry Hill Fort”.* The town’s application for Heritage Action Zone status would focus on its heritage assets, facilitating investment in the town’s historic centre and conservation area. This would benefit from re-use of upper storeys of historic properties within the town centre as refurbished housing to help meet housing numbers, while also providing an income for appropriate maintenance of listed buildings, and buildings that contribute to the character of the conservation area and proposed Heritage Action Zone. Major economic benefits would result for the town centre and property owners within it.

I believe that the Local Plan should align with the heritage/tourism focus of these strategies, which would be better served by the removal of OSW004. This would ensure against any further loss of Old Oswestry’s landscape, which is integral to its appeal as one of Shropshire’s outstanding heritage assets.

* The Local Plan review should take steps to anticipate future pressures for infrastructure expansion impacting on the hillfort’s eastern and south-eastern setting. These include the likely A5 dualling, on-going expansion at the Oswestry Grid Substation, and development on employment land east of the A5 near the Whittington A495/A5 roundabout. These will exacerbate the effect of urban enclosure of the hillfort’s landscape, especially when impacts are accumulated with the harm to setting from OSW004. Strategic planning in Oswestry must consider and mitigate now against these identified longer term threats to the hillfort and its landscape with the removal of OSW004. This would ensure that the existing urban edge along the south side of Whittington Road is sustained, and the town is prevented from creeping further north to the detriment of the historic landscape and potential tourism advantages of this rural setting
* Oswestry has a huge excess of employment land – currently 57 hectares. Opportunities should be explored for allocating some of this employment land to deliver housing, avoiding the need in particular for the OSW004 allocation damaging the hillfort’s setting.
* High housing growth in Oswestry will create pressures on pupil places, particularly secondary places, made worse by cuts in bus services/funding to outlying secondary schools. OSW004 north of the town is poorly related to the Marches School. Since there is no strategic planning for additional school infrastructure nor certainty of funding for it from developers’ CIL contributions, OSW004 would not be sustainable and should be removed from the Local Plan.

**ENDS**