

## Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Worthen with Shelve Parish Council
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#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	S2.2(i)	Policy:	Regulation 19-Pre submission Draft of the Shropshire Local Plan	Site:	WBR 007- /008	Policies Map:	Worthen and Brockton Map
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- A. Legally compliant      Yes:       No:
- B. Sound      Yes:       No:
- C. Compliant with the Duty to Co-operate      Yes:       No:
- (Please tick as appropriate).

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This Parish Council considers that a Consultation under the current Covid 19 Pandemic Conditions is not workable, public meetings are not legally allowed and the word of mouth grapevine in rural communities has been limited to nearly non-existent due to social distancing measures. Conducting a consultation during a time of national lockdown does not allow for a full response to this consultation.

The consultation is again not easy to respond to and is advertised on Shropshire Councils website as 'Reg 19 pre-submission draft local plan consultation'. How do the public know where to find the consultation? The response to this consultation is not website/computer friendly, users are expected to print or download the forms, save them, add comments and attach to an email for return.

It is further considered that the Hierarchy of settlements points scoring is flawed and cannot be a one size fits all scoring system which was used in urban and rural settings.

Following a series of public meetings and consultations across the parish, on 27<sup>th</sup> October 2019 Worthen with Shelve Parish council conducted an advisory consultation of the residents of this parish as regards the future status of the current Cluster and Settlement arrangements. We engaged comprehensively with all of the residents of this parish in order to properly ascertain their views. The overwhelming response was for the parish as a whole to be returned to Open Countryside. This proposal was supported by 76.4% of respondents across the parish. The residents of Worthen and Brockton voted 77% in favour of rejecting the current cluster and settlement status and reverting to open countryside.

A key driver of the overwhelming vote in favour of a return to open countryside is the fact that so many planning consents have been granted across this parish in recent years. There has been substantial over delivery of open market housing in this parish, especially of executive 4 and 5 bedroomed properties which are totally unsuitable for meeting local need. Far too little consideration has been given to the type of housing needed in this area.

A parish wide SAMDev target figure of **60** new open market dwellings was agreed for delivery in the period 2012-2026. To date planning consents have been granted for **97** open market dwellings, plus 3 holiday let and affordable dwellings, making 100 dwellings consented thus far.

In the Worthen Ward of this parish, which takes in Worthen and Brockton, a target figure of **30** new open market dwellings was agreed for delivery in the period 2012-2026. To date planning consents have been granted for **37** open market dwellings which 3 more applications pending.

It is demonstrably the case that this parish as whole, and both Worthen and Brockton individually, has already borne a greater number of planning consents than the target figures set in SAMDev.

**In response to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, which assesses the extent to which the Regulation 19: Pre-Submission Draft Local Plan will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives.**

**WBR 007 and 008** both scored POOR in the SA rating and notes that the site is not within walking distance (480m) of services and facilities (Primary School, GP surgery, Leisure centre, Library, Children's playground, Outdoor sports facility, Amenity green space and Accessible natural green space). A Transport Assessment should be carried out to determine appropriate measures for improving safe pedestrian and cycle access to local services and amenities. As part of this, an attractive pedestrian route should be provided through the Site and the Public Right of Way across the Site retained. Vehicular access will be provided from an appropriate location onto the B4386 and appropriate traffic calming measure introduced, including extension of the 30mph speed limit. This Parish Council has advised Shropshire Councils officers on more than one occasion that the proposed route is not safe. It would exit onto a primarily single track lane, this lane exits onto the very busy and fast B4386 with poor visibility to enable safe crossing. The current speed limit of 30 mph is not adhered to in the village and as soon as cars exit near Worthen Hall Farm and see the national speed limit sign they speed up even more. Speeding is a community concern and the village is part of the PACT priority for the local policing team. Many services are not accessible in the village and due to the limited bus service any new housing would require the residents to have at least one car. This would put additional traffic on these rural, poorly maintained roads with an evident speeding issue. On the 20<sup>th</sup> January 2021 the road along site WBR007/008 flooded and was impassable by car. This is the 3<sup>rd</sup> such instance since October 2019.

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Part A Reference:

Part B Reference:

**WBR010** scored Good in the above exercise, but was not promoted at the stage the report was prepared, so there is not further information detailed in the report. There is no safe pedestrian access to this site and the road which adjoins the site, and the available footpath on the other side of the road are not to the regulation width. Speeding with the addition of the poor visibility would merit a discussion on the safe accessibility of residents to the services offered in the village location. Due to the limited bus service a private vehicle would be required to access services in Shrewsbury or Welshpool both being some distance away from the settlement.

Additional flooding, sewerage, uplift in road use must be a consideration when considering this inclusion of these two sites.

**The Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, which considers the impact on internationally designated nature conservation sites states that through the Development Policies and Settlement Policies wording and the statutory requirement for a project level HRA for development, states there will be no adverse effects on the integrity of The Stiperstones and The Hollies SAC as a result of the Draft Local Plan.**

This Parish Council does not agree that there will be no adverse impact. The Impact on the view from the AONB vantage points and the impact on the beauty of this natural protected environment needs to be taken into full account. The Glover Report should be a consideration for future planning policy. Planning Officers and indeed a Planning Inspector have made reference to the impact of development neighbouring the AONB and have referred to the potential impact on the view from the AONB. Worthen is visible from the protected vantage points within the AONB and sits just outside of the boundary of this protected landscape. It is considered by this Parish Council that the visual impact of development in this location from protected viewpoints within the AONB would be negatively impacted by the urbanisation of this rural village.

Site **WBR010** was put forward for development in 2014 and was refused by a planning inspector. Appeal reference and notes are as below:

**Appeal Ref: APP/L3245/A/14/2220992 Land at Worthen, Shropshire SY5 9HT**

18. Whilst noting the appellant's willingness to provide affordable housing upon the site, I have not been provided with a mechanism to secure this. I am therefore not satisfied that the Framework's objective to create sustainable, inclusive and mixed communities would be achieved.

19. *The Framework is clear that the environmental role of sustainability includes protecting and enhancing the natural environment. The appeal site is deeper than neighbouring residential sites on this side of the road and it projects significantly into the surrounding countryside. Whilst acknowledging that the layout and appearance of the scheme is not before me, I am not satisfied that the size and shape of the site would allow a development that respected the linear character of this part of the village. The proposal for up to 25 dwellings*

*would result in an urbanisation of this area of countryside which would be harmful to its intrinsic character and beauty. Further harm would be caused to the attractive landscape setting of the village that I observed on my site visit.*

20. *In light of my findings, I conclude that the scheme would not protect, restore, conserve and enhance the natural and built environment. This would result in the scheme being in conflict with Core Strategy Policies CS6 and CS17. There would be significant conflict with the environmental role of sustainability. The relocation of the Roadside hedge and landscaping of the site would not mitigate this harm.*

21. *Whilst there would be economic and social benefits associated with the proposal, the Framework is clear at paragraph 8 that the 3 roles of sustainability should not be undertaken in isolation, because they are mutually*

*dependent. Given that I have found that the proposal would conflict with the environmental role, I conclude that the proposal would not result in sustainable development. Although not a determining factor, the absence of a mechanism to secure affordable housing adds weight to my conclusion that the proposal is not sustainable. Housing in this location would not be acceptable.*

**POINTS BELOW HAVE ALREADY BEEN MADE AVAILABLE TO SHROPSHIRE COUNCIL IN PREVIOUS CONSULTATIONS ON SITES WB007/008 AND 010**

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	Part B Reference:

There are further concerns that the size of the Land put forward for development on sites **WBR007 & WBR008** (in the 'Preferred Sites' Consultation (29th November 2018 to Thursday 31st January 2019) this was for 30 dwellings) the site could accommodate more than the 25 indicated in the pre-submission draft. It is a concern of this parish council that the Government White Paper indicates that any land included in the Local Plan would automatically be granted outline planning permission upon adoption of the Local Plan. This site could accommodate at least 35 dwellings. It is noted that there are currently 148 dwellings in Worthen. The draft local plan indicates 55 new dwellings for Worthen, this would increase the housing stock/size of the village by of nearly 38% which is considered excessive for this rural location. This prediction could be exceeded an alarming 61% if all sites included in this submission are developed to their full potential. This Parish Council estimates that at least 90 plus new dwellings could be delivered. This would change the character of Worthen and Brockton forever from a rural village(s) location to an urban site. This could put pressure on services and road usage in these villages and neighbouring villages located along the B4386.

A new site, **WBR010**, has been included in the Draft Local Plan. It has been suggested that this site has "capacity" to provide 20 new dwellings. In reality we believe this site could be made to accommodate up to 50 dwellings under a more relaxed development regime such as has been outlined in the recent Government White Paper.

It is suggested that sites, WBR007, WBR008 and WBR010, when combined with a further 10 dwellings arising from windfall development within the settlement boundary, could give rise to a total of 55 new dwellings, as noted in the draft Local Plan. This is considered excessive overdevelopment by this Parish Council.

- Road Safety – The condition of the poorly maintained B4386 is a concern, there has been a dramatic uplift in usage, type and excessive speed in recent years, and this is well documented with Shropshire Councils Highways and the local policing team. The proposed site sits within a 30 mph zone and vehicle travel in excess of this speed regularly. The parish council have raised concerns about speeding and volume of traffic through the villages. A police camera van is in place. A 40 mph- 30 mph zone is required on the B4386 approaching from Shrewsbury. A safe crossing is required in Worthen now, we have experienced one fatality this year, and if more pedestrians use Back Lane then this is imperative. A safe pavement for Brockton to Worthen is an urgent requirement. The B4386 has flooded numerous times in this location. Essential services (School, Drs, Shop, Village Hall, Public House and Post Office) in Brockton and Worthen are located in both settlements and on either side of the very fast and busy B4386. The BOAT between the villages needs to be improved for pedestrian access.
- There is an issue with cars parking outside the school due to the unsafe vehicle and pedestrian routes through the villages. It is not environmentally friendly to force people into cars to access local services, which are in walking distance.
- Sewerage - Whilst Severn Trent have a duty to connect new dwellings to the already over capacity facilities they do not have a duty to connect. We have an issue with raw sewerage entering gardens and indeed homes in Worthen.
- Flooding – the road has flooded in this location on numerous occasions making entry/exit to the village impossible. The neighbouring farmland is subject to flooding and any development could result in further flooding of the surrounding areas.
- Worthen with Shelve Parish council conducted a survey on the Cluster Status and engaged with all of with the residents of the parish and the overwhelming response was for the parish as a whole to be returned to Open Countryside. This is in part due to the over delivery of open market housing in the parish in recent years. This parish Council put a target of 60 open market dwellings in the parish under SAMDev, so far permissions have been granted for 90 open market dwellings. The vast majority of the permissions are for executive 4 and 5 bedroomed properties.
- Rural rebalance and impact of type of housing delivered to date. 70-80% of the rural population of Shropshire are incapable of buying the average priced home due to the abundance of executive style housing planning permissions granted. These properties are largely purchased by people moving into the location and the demographic age is plus 55. The 2011 Census for Shropshire indicated a higher percentage of residents who are 65 plus and Shropshire Councils strategic housing data indicates that 33% of the population of Shropshire will be 65+. This parish council is in danger of losing more schools and services due to decisions made about the type and style of housing

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	Part B Reference:

delivered to date. This parish council is supportive of development, but the right type of development, which to date has not been delivered. It is not considered this site can guarantee 2 and 3 bedrooomed properties which is what has been highlighted in the Parish Plan and Right Place Right Home survey as a priority for this parish.

*(Please continue on a separate sheet if necessary)*

**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

*(Please continue on a separate sheet if necessary)*

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

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	Part B Reference:

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*(Please continue on a separate sheet if necessary)*

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature: 

SSMITH
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Date: 

22/02/2021
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	Part B Reference:

## Representation Form

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#### Q2. To which part of the document does this representation relate?

Paragraph:	S2.2(i)	Policy:	Regulation 19-Pre submission Draft of the Shropshire Local Plan	Site:	WBR 010	Policies Map:	Worthen and Brockton Map
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
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There are further concerns that the size of the Land put forward for development on sites **WBR007 & WBR008** (in the 'Preferred Sites' Consultation (29th November 2018 to Thursday 31st January 2019) this was for 30 dwellings) the site could accommodate more than the 25 indicated in the pre-submission draft. It is a concern of this parish council that the Government White Paper indicates that any land included in the Local Plan would automatically be granted outline planning permission upon adoption of the Local Plan. This site could accommodate at least 35 dwellings. It is noted that there are currently 148 dwellings in Worthen. The draft local plan indicates 55 new dwellings for Worthen, this would increase the housing stock/size of the village by of nearly 38% which is considered excessive for this rural location. This prediction could be exceeded an alarming 61% if all sites included in this submission are developed to their full potential. This Parish Council estimates that at least 90 plus new dwellings could be delivered. This would change the character of Worthen and Brockton forever from a rural village(s) location to an urban site. This could put pressure on services and road usage in these villages and neighbouring villages located along the B4386.

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- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

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	Part B Reference:

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*(Please continue on a separate sheet if necessary)*

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature: 

SSMITH
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Date: 

22/02/2021
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	Part B Reference:

## Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

### Part B: Representation

Name and Organisation:	Worthen with Shevle Parish Council
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#### Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	Page 16	Policy:	Sustainability Appraisal of the Regulation 19 Bishops Castle Place Plan Area	Site:	Sites WBR007/008/010	Policies Map:	
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
- (Please tick as appropriate).

#### Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This Parish Council considers that a Consultation under the current Covid 19 Pandemic Conditions is not workable, public meetings are not legally allowed and the word of mouth grapevine in rural communities has been limited to nearly non-existent due to social distancing measures. Conducting a consultation during a time of national lockdown does not allow for a full response to this consultation.

The consultation is again not easy to respond to and is advertised on Shropshire Councils website as 'Reg 19 pre-submission draft local plan consultation'. How do the public know where to find the consultation? The response to this consultation is not website/computer friendly, users are expected to print or download the forms, save them, add comments and attach to an email for return.

It is further considered that the Hierarchy of settlements points scoring is flawed and cannot be a one size fits all scoring system which was used in urban and rural settings.

Following a series of public meetings and consultations across the parish, on 27<sup>th</sup> October 2019 Worthen with Shelve Parish council conducted an advisory consultation of the residents of this parish as regards the future status of the current Cluster and Settlement arrangements. We engaged comprehensively with all of with the residents of this parish in order to properly ascertain their views. The overwhelming response was for the parish as a whole to be returned to Open Countryside. This proposal was supported by 76.4% of respondents across the parish. The residents of Worthen and Brockton voted 77% in favour of rejecting the current cluster and settlement status and reverting to open countryside.

A key driver of the overwhelming vote in favour of a return to open countryside is the fact that so many planning consents have been granted across this parish in recent years. There has been substantial over delivery of open market housing in this parish, especially of executive 4 and 5 bedroomed properties which are totally unsuitable for meeting local need. Far too little consideration as been given to the type of housing needed in this area.

A parish wide SAMDev target figure of **60** new open market dwellings was agreed for delivery in the period 2012-2026. To date planning consents have been granted for **97** open market dwellings, plus 3 holiday let and affordable dwellings, making 100 dwellings consented thus far.

In the Worthen Ward of this parish, which takes in Worthen and Brockton, a target figure of **30** new open market dwellings was agreed for delivery in the period 2012-2026. To date planning consents have been granted for **37** open market dwellings which 3 more applications pending.

It is demonstrably the case that this parish as whole, and both Worthen and Brockton individually, has already borne a greater number of planning consents that the target figures set in SAMDev.

**In response to the Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, which assesses the extent to which the Regulation 19: Pre-Submission Draft Local Plan will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives.**

**WBR 007 and 008** both scored POOR in the SA rating and notes that the site is not within walking distance (480m) of services and facilities (Primary School, GP surgery, Leisure centre, Library, Children's playground, Outdoor sports facility, Amenity green space and Accessible natural green space). A Transport Assessment should be carried out to determine appropriate measures for improving safe pedestrian and cycle access to local services and amenities. As part of this, an attractive pedestrian route should be provided through the Site and the Public Right of Way across the Site retained. Vehicular access will be provided from an appropriate location onto the B4386 and appropriate traffic calming measure introduced, including extension of the 30mph speed limit. This Parish Council has advised Shropshire Councils officers on more than one occasion that the proposed route is not safe. It would exit onto a primarily single track lane, this lane exits onto the very busy and fast B4386 with poor visibility to enable safe crossing. The current speed limit of 30 mph is not adhered to in the village and as soon as cars exit near Worthen Hall Farm and see the national speed limit sign they speed up even more. Speeding is a community concern and the village is part of the PACT priority for the local policing team. Many services are not accessible in the village and due to the limited bus service any new housing would require the residents to have at least one car. This would put additional traffic on these rural, poorly maintained roads with an evident speeding issue. On the 20<sup>th</sup> January 2021 the road along site WBR007/008 flooded and was impassable by car. This is the 3<sup>rd</sup> such instance since October 2019.

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	Part B Reference:



**WBR010** scored Good in the above exercise, but was not promoted at the stage the report was prepared, so there is not further information detailed in the report. There is no safe pedestrian access to this site and the road which adjoins the site, and the available footpath on the other side of the road are not to the regulation width. Speeding with the addition of the poor visibility would merit a discussion on the safe accessibility of residents to the services offered in the village location. Due to the limited bus service a private vehicle would be required to access services in Shrewsbury or Welshpool both being some distance away from the settlement.

Additional flooding, sewerage, uplift in road use must be a consideration when considering this inclusion of these two sites.

**The Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, which considers the impact on internationally designated nature conservation sites states that through the Development Policies and Settlement Policies wording and the statutory requirement for a project level HRA for development, states there will be no adverse effects on the integrity of The Stiperstones and The Hollies SAC as a result of the Draft Local Plan.**

This Parish Council does not agree that there will be no adverse impact. The Impact on the view from the AONB vantage points and the impact on the beauty of this natural protected environment needs to be taken into full account. The Glover Report should be a consideration for future planning policy. Planning Officers and indeed a Planning Inspector have made reference to the impact of development neighbouring the AONB and have referred to the potential impact on the view from the AONB. Worthen is visible from the protected vantage points within the AONB and sits just outside of the boundary of this protected landscape. It is considered by this Parish Council that the visual impact of development in this location from protected viewpoints within the AONB would be negatively impacted by the urbanisation of this rural village.

Site **WBR010** was put forward for development in 2014 and was refused by a planning inspector. Appeal reference and notes are as below:

**Appeal Ref: APP/L3245/A/14/2220992 Land at Worthen, Shropshire SY5 9HT**

18. Whilst noting the appellant's willingness to provide affordable housing upon the site, I have not been provided with a mechanism to secure this. I am therefore not satisfied that the Framework's objective to create sustainable, inclusive and mixed communities would be achieved.

19. *The Framework is clear that the environmental role of sustainability includes protecting and enhancing the natural environment. The appeal site is deeper than neighbouring residential sites on this side of the road and it projects significantly into the surrounding countryside. Whilst acknowledging that the layout and appearance of the scheme is not before me, I am not satisfied that the size and shape of the site would allow a development that respected the linear character of this part of the village. The proposal for up to 25 dwellings*

*would result in an urbanisation of this area of countryside which would be harmful to its intrinsic character and beauty. Further harm would be caused to the attractive landscape setting of the village that I observed on my site visit.*

20. *In light of my findings, I conclude that the scheme would not protect, restore, conserve and enhance the natural and built environment. This would result in the scheme being in conflict with Core Strategy Policies CS6 and CS17. There would be significant conflict with the environmental role of sustainability. The relocation of the Roadside hedge and landscaping of the site would not mitigate this harm.*

21. *Whilst there would be economic and social benefits associated with the proposal, the Framework is clear at paragraph 8 that the 3 roles of sustainability should not be undertaken in isolation, because they are mutually dependent. Given that I have found that the proposal would conflict with the environmental role, I conclude that the proposal would not result in sustainable development. Although not a determining factor, the absence of a mechanism to secure affordable housing adds weight to my conclusion that the proposal is not sustainable. Housing in this location would not be acceptable.*

**POINTS BELOW HAVE ALREADY BEEN MADE AVAILABLE TO SHROPSHIRE COUNCIL IN PREVIOUS CONSULTATIONS ON SITES WB007/008 AND 010**

Office Use Only	Part A Reference:
	Part B Reference:

There are further concerns that the size of the Land put forward for development on sites **WBR007 & WBR008** (in the 'Preferred Sites' Consultation (29th November 2018 to Thursday 31st January 2019) this was for 30 dwellings) the site could accommodate more than the 25 indicated in the pre-submission draft. It is a concern of this parish council that the Government White Paper indicates that any land included in the Local Plan would automatically be granted outline planning permission upon adoption of the Local Plan. This site could accommodate at least 35 dwellings. It is noted that there are currently 148 dwellings in Worthen. The draft local plan indicates 55 new dwellings for Worthen, this would increase the housing stock/size of the village by of nearly 38% which is considered excessive for this rural location. This prediction could be exceeded an alarming 61% if all sites included in this submission are developed to their full potential. This Parish Council estimates that at least 90 plus new dwellings could be delivered. This would change the character of Worthen and Brockton forever from a rural village(s) location to an urban site. This could put pressure on services and road usage in these villages and neighbouring villages located along the B4386.

A new site, **WBR010**, has been included in the Draft Local Plan. It has been suggested that this site has "capacity" to provide 20 new dwellings. In reality we believe this site could be made to accommodate up to 50 dwellings under a more relaxed development regime such as has been outlined in the recent Government White Paper.

It is suggested that sites, WBR007, WBR008 and WBR010, when combined with a further 10 dwellings arising from windfall development within the settlement boundary, could give rise to a total of 55 new dwellings, as noted in the draft Local Plan. This is considered excessive overdevelopment by this Parish Council.

- Road Safety – The condition of the poorly maintained B4386 is a concern, there has been a dramatic uplift in usage, type and excessive speed in recent years, and this is well documented with Shropshire Councils Highways and the local policing team. The proposed site sits within a 30 mph zone and vehicle travel in excess of this speed regularly. The parish council have raised concerns about speeding and volume of traffic through the villages. A police camera van is in place. A 40 mph- 30 mph zone is required on the B4386 approaching from Shrewsbury. A safe crossing is required in Worthen now, we have experienced one fatality this year, and if more pedestrians use Back Lane then this is imperative. A safe pavement for Brockton to Worthen is an urgent requirement. The B4386 has flooded numerous times in this location. Essential services (School, Drs, Shop, Village Hall, Public House and Post Office) in Brockton and Worthen are located in both settlements and on either side of the very fast and busy B4386. The BOAT between the villages needs to be improved for pedestrian access.
- There is an issue with cars parking outside the school due to the unsafe vehicle and pedestrian routes through the villages. It is not environmentally friendly to force people into cars to access local services, which are in walking distance.
- Sewerage - Whilst Severn Trent have a duty to connect new dwellings to the already over capacity facilities they do not have a duty to connect. We have an issue with raw sewerage entering gardens and indeed homes in Worthen.
- Flooding – the road has flooded in this location on numerous occasions making entry/exit to the village impossible. The neighbouring farmland is subject to flooding and any development could result in further flooding of the surrounding areas.
- Worthen with Shelve Parish council conducted a survey on the Cluster Status and engaged with all of with the residents of the parish and the overwhelming response was for the parish as a whole to be returned to Open Countryside. This is in part due to the over delivery of open market housing in the parish in recent years. This parish Council put a target of 60 open market dwellings in the parish under SAMDev, so far permissions have been granted for 90 open market dwellings. The vast majority of the permissions are for executive 4 and 5 bedroomed properties.
- Rural rebalance and impact of type of housing delivered to date. 70-80% of the rural population of Shropshire are incapable of buying the average priced home due to the abundance of executive style housing planning permissions granted. These properties are largely purchased by people moving into the location and the demographic age is plus 55. The 2011 Census for Shropshire indicated a higher percentage of residents who are 65 plus and Shropshire Councils strategic housing

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	Part B Reference:

data indicates that 33% of the population of Shropshire will be 65+. This parish council is in danger of losing more schools and services due to decisions made about the type and style of housing delivered to date. This parish council is supportive of development, but the right type of development, which to date has not been delivered. It is not considered this site can guarantee 2 and 3 bedrooed properties which is what has been highlighted in the Parish Plan and Right Place Right Home survey as a priority for this parish.

(Please continue on a separate sheet if necessary)

**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

*Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

WBR 070/080 was rated poor and site WBR 010 did not have a full appraisal as it was not considered initially.

(Please continue on a separate sheet if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

(Please tick one box)

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Office Use Only	Part A Reference:
	Part B Reference:

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*(Please continue on a separate sheet if necessary)*

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Signature: 

S Smith
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Date: 

22/02/2021
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Office Use Only	Part A Reference:
	Part B Reference:

## Representation Form

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### Part B: Representation

Name and Organisation:	Worthen with Shevle Parish Council
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#### Q1. To which document does this representation relate?

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- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
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(Please tick one box)

#### Q2. To which part of the document does this representation relate?

Paragraph:	Shropshire Hills AONB Pgs 40,73 etc	Policy:	Habitats Regulations Assessment of the Regulation 19	Site:	Sites WBR007/008/010	Policies Map:	
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#### Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- |  |      |                          |     |                                     |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant                     | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
| B. Sound                                 | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/>            |
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Part A Reference:

Part B Reference:



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Office Use Only	Part A Reference:
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	Part B Reference:

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*(Please continue on a separate sheet if necessary)*

**Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.**

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Worthen and Brockton are a Leader area to the Shropshire Hills AONB and this must be a consideration given this valued protected environment.

*(Please continue on a separate sheet if necessary)*

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

**Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

- No, I do not wish to participate in hearing session(s)
- Yes, I wish to participate in hearing session(s)

*(Please tick one box)*

**Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Office Use Only	Part A Reference:
	Part B Reference:

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*(Please continue on a separate sheet if necessary)*

**Please note:** *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

Signature: 

S Smith
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Date: 

22/02/2021
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Office Use Only	Part A Reference:
	Part B Reference: