



Eddie West
Local Plan Team Leader
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

By email only:
Planningpolicy@Shropshire.gov.uk

Our Ref: SA31949/ST/ML
Date: 1st February 2021

Dear Eddie,

Shropshire Local Plan – Regulation 19 consultation

Our client, Mr Lee Jones, has the following comments on the emerging Shropshire Local Plan. For your ease of use these are also replicated on the attached forms:

Part A: Consultees' details

Part B: representations on:

- Policy: Strategic Policy SP2 'Strategic Approach'
- Policy: Strategic Policy SP9 – 'Managing Development in Community Clusters'
- Policy: Settlement Policy S8.3 - 'Community Clusters: Ellesmere Place Plan Area'
- Policy Map: Inset S8 – 'Ellesmere Place Plan Area'

Strategic Policy SP2 'Strategic Approach'

This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported.

The identification of Elson as a Community Cluster settlement accords with the Local Plan's vision in this regard, given Elson's employment opportunities and its location on the B5068 less than 1km from Ellesmere, a key service centre for this area of the County.

Strategic Policy SP9 – ‘Managing Development in Community Clusters’

Q4. Why the Plan is unsound

The objective of Policy SP9 to maintain or enhance the sustainability of Community Cluster settlements through the provision of modest levels of development is supported.

Community Clusters are sustainable locations for development in the rural area.

The current pandemic has highlighted the benefits of rural living and we anticipate greater demand for homes and business to locate in the countryside in the future.

It is therefore very disappointing that section 2.c of Policy SP9 seeks to limit development in Community Clusters to “small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings”.

This section runs counter to the Government's key objective of, "significantly boosting the supply of homes" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It makes the Local Plan's job of delivering the housing development that Shropshire needs more difficult than it needs to be.

In our view, Community Clusters should be allowed the flexibility to deliver larger sites with a greater number of dwellings on them, so long as the proposals do not conflict with the criteria in section 4 of policy SP9 (criteria which provide sufficient control over the delivery of new development to ensure that new development is of an appropriate scale).

For the reasons set out above, the Plan fails the 'positively prepared', 'justified', 'effective' and 'consistent with National Policy' tests of soundness.

Q5 Modifications necessary to make the Plan sound

To make the Plan 'sound' requires section 2.c of the policy to be rephrased to enable larger developments (subject to the criteria in the remainder of the policy being met). Our client's land in Elson (submitted under Shropshire's 'Call for Sites' and identified by the Council as ELS001 'Land adjoining Mayfield, Elson, Ellesmere', provides an example of a site that is larger than 0.1ha. but would otherwise accord with the criteria in the policy and should therefore be supported as a sustainable windfall development that would make a greater contribution to the overall need for housing in Shropshire. An indicative site layout is attached as an Appendix to this representation.

Settlement Policy S8.3 - ‘Community Clusters: Ellesmere Place Plan Area’; and Inset S8 – ‘Ellesmere Place Plan Area’

The designation of Elson as a Community Cluster settlement in Policy S8.3 and as identified on Inset S8, is strongly supported as this is seen as vital to ensuring the settlement's long-term future.

The settlement of Elson lies in close proximity to, and has a strong relationship with, the key service centre of Ellesmere. It is also the location of significant employment

BERRYS

premises. Elson therefore provides a highly sustainable location for the provision of additional residential development.

Next Stages

I trust you will take these representations into account. If you have any queries whatsoever, please don't hesitate to contact me to discuss.

Yours sincerely,

Stuart Thomas BA(Hons) MA MRTPI
Head of Planning
For and on behalf of Berrys
DDI: 01743 267069
stuart.thomas@berrys.uk.com

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:	Stuart Thomas (BERRYS) on behalf of MR LEE JONES
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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:	<input type="text"/>	Policy:	<input type="text" value="SP2"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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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 checked="" type="checkbox"/> | No: | <input 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.

<p>This policy's aspiration to accommodate, "investment and new development that contributes to meeting needs and making its settlements more sustainable" is supported.</p> <p>The identification of Elson as a Community Cluster settlement accords with the Local Plan's vision in this regard, given Elson's employment opportunities and its location on the B5068 less than 1km from Ellesmere, a key service centre for this area of the County.</p>

(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.

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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)?

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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:

(Please continue on a separate sheet if necessary)

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Signature:

S. Thomas

Date:

01/02/2021

Office Use Only

Part A Reference:

Part B Reference:

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

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="SP9"/>	Site:	<input type="text"/>	Policies Map:	<input type="text"/>
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The objective of Policy SP9 to maintain or enhance the sustainability of Community Cluster settlements through the provision of modest levels of development is supported. Community Clusters are sustainable locations for development in the rural area. The current pandemic has highlighted the benefits of rural living and we anticipate greater demand for homes and business to locate in the countryside in the future. It is therefore very disappointing that section 2.c of Policy SP9 seeks to limit development in Community Clusters to "small-scale infill sites of 0.1ha or less, which are clearly within and well related to the built form of the settlement, have permanent and substantial buildings on at least two sides and are for up to a maximum of 3 dwellings". This section runs counter to the Government's key objective of, "significantly boosting the supply of homes" expressed in paragraph 59 of the Framework and in more recent Ministerial Statements. It makes the Local Plan's job of delivering the housing development that Shropshire needs more difficult than it needs to be.

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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:

Office Use Only	Part A Reference:
	Part B Reference:

In order to participate in, and therefore assist in ensuring, comprehensive consideration of the appropriateness of the constraints placed upon residential growth in Community Cluster settlements (including Elson).

(Please continue on a separate sheet if necessary)

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Signature: S Thomas

Date: 01/02/2021

Office Use Only

Part A Reference:

Part B Reference:



Existing dwelling approved under application reference - 14/05016

Access to be installed as approved under application reference - 14/05016

Dwelling re-positioned 9 metres to the west of the approved planning.

Private Drive

Turning Head

B 5068

+98.7m

Weigh

Elso

Mayfield

Pond

Pinehurs



OS Mapping obtained from Promap Licence No. 100022432
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 This drawing is the property of Berrys. It shall not be copied or scanned, in part or whole, without prior consent of Berrys.
 Please do not scale from this drawing. All dimensions are to be checked on site.

 Site Area
 0.24 Ha

SCHEDULE OF ACCOMMODATION			
PLOT	DESCRIPTION	BEDS	AREA
01	DETACHED	4	160
02	DETACHED	4	180
03	DETACHED	4	160
TOTAL		12	500m ²

Drawing Revisions:		
A	Schedule of accommodation added	14.08.19
B	Layout amended	10.09.19
C	Dry pond added	19.11.19
D	Layout amended	26.11.19
E	Client details amended	17.12.19
F	Plots reduced to 3	30.11.20

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 PROPERTY | BUSINESS | PLANNING
 01743 271697 | SY2 6FG
www.berrys.uk.com

Client: IVCN Limited

Project: Outline Residential Development, Land Adj Mayfield Farm, Elson, Ellesmere

Drawing: Proposed Site Plan - 3 Units

Drawing Number:	Rev.	Scale	Paper	Drawn By:
SA32708_PL_11	F	1:500	A3	AW
				Date: 13.8.19

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

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S8.3"/>	Site:	<input type="text"/>	Policies Map:	<input type="text" value="S8"/>
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Part B Reference: