

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

By email only:
Planningpolicy@Shropshire.gov.uk

Our Ref: SA23612/ST/ML
Date: 1st February 2021

Dear Eddie,

Shropshire Local Plan – Regulation 19 consultation

Our client, Mr John West, have 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: Settlement Policy S5.1 - 'Development Strategy: Church Stretton Key Centre'
- Policy Map: Inset S5 – 'Church Stretton'

- **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 Church Stretton as a Key Centre accords with the Local Plan's vision in this regard, given Church Stretton's strategic location on the A49 corridor with excellent connections to Shrewsbury and adjoining regions.

- **Settlement Policy S5.1 – 'Development Strategy: Church Stretton Key Centre'; and**
- **Inset S5 – 'Church Stretton'**

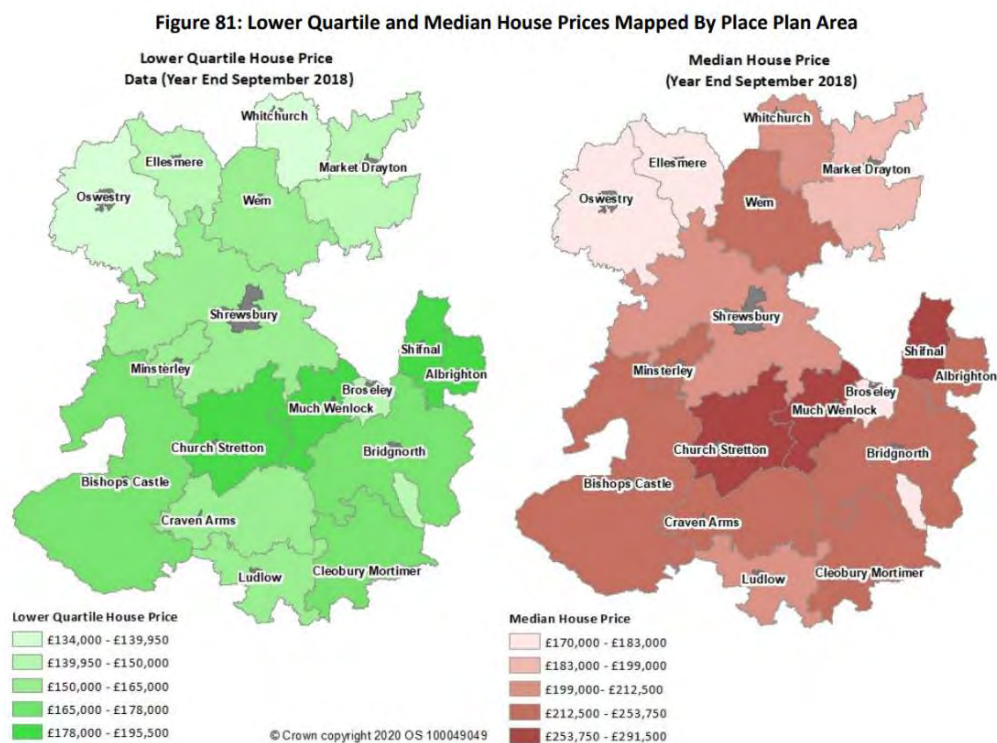
The designation of Church Stretton as a Key Centre settlement in Policy S5.1 is strongly supported as this is seen as vital to ensuring the town's long-term future.

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 Plan's 11 Key Centres. Despite the town's good sustainability credentials, the submission Local Plan proposes no new allocations for residential development in the town. It relies on windfall and a saved SAMDev Plan housing allocation at Oaks Road/ Alison Road (CSTR019) that has so far failed to be delivered.

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

Church Stretton's housing needs

There is high demand for housing and an affordability problem in Church Stretton, as shown by the median house price and lower quartile house prices respectively in figure 81 of the Strategic Housing Market Assessment, reproduced below.



Over the previous plan period, Church Stretton has delivered an average of 16.4 dwellings per annum (in total 213 dwellings over the 13 years 2006-2019), according to the latest available Council's 'Five Year Housing Land Supply Statement' (March 2020). This is reflected in the first row in figure 1 below.

Despite these facts, the submission Local Plan proposes an unjustifiably low level of growth of only 200 dwellings over 22 years, equivalent to only 9 dwellings per annum

over 2016-2038 as shown in the second row in figure 1 below. There is no justification for such a significant reduction in delivery rates.

The level of growth planned for Church Stretton is equivalent to only 10.1% over the plan period, less than half the Shropshire-wide growth rate of 21.9% as shown in the third row in figure 1 below. This very low rate of growth fails the 'justified' and 'positively prepared' tests of soundness.

Figure 1. Relative growth rates

Geography	2016 no. dwellings	Growth	% change 2016-2038	Dwellings per annum
Church Stretton 2006/7 - 2018/19		213 dwellings ¹ over 13 years		16.4
Church Stretton Policy S5.1	1,987 ²	200 dwellings over 22 years	10.1%	9
Shropshire Policy SP2	140,524 ³	30,800 dwellings over 22 years	21.9%	1,400

Sources:

¹ Shropshire Five Year Housing Land Supply Statement 2020, page 31

² Hierarchy of Settlements Paper (August 2020)

³ No. dwellings at 2016, Strategic Housing Market Assessment Part One, page 62, figure 54

Housing pressure and sustainability

The latest 2018-based household projections from the Office of National Statistics forecast a 26.9% growth in households in Shropshire over the plan period as shown in figure 2 below. If this county-wide growth rate is reflected in Church Stretton, it will result in demand for 534 more dwellings over the plan period (26.9% x the existing 1,987 dwellings in the town²).

Figure 2. Office of National Statistics Household projections

Shropshire	2016 no. households	2038 no. households	Change 2016-2038	% change	Rate per annum
2014-based projections	123,886	147,635	23,749	19.2%	1,080
2018-based projections	135,452	171,876	36,424	26.9%	1,656

In practice, Church Stretton's popularity is likely to attract a higher level of demand than the county average, as illustrated by the high demand reflected in the house prices in the SHMA.

A low rate of housing development will result in strong pressure on house prices, making the town even less affordable for local people and further undermining its social and economic sustainability.

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 county 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 (p228) whereas in the South Higher area, 23 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.

The AONB designation

Church Stretton lies within the South Shropshire Hills Area of Outstanding Natural Beauty (AONB). To reflect the AONB, Policy S5.1 requires that:

"Development proposals must recognise the importance of conserving and where possible enhancing the special qualities of the Shropshire Hills AONB as set out in the AONB Management Plan and should be in accordance with Policy DP24 and other relevant policies of this Local Plan."

Explanatory paragraphs 5.85 to 5.90 below Policy S5.1 elaborate on how environmental sustainability can be balanced with social and economic sustainability. It recognises in paragraph 5.88 that:

"Church Stretton plays an important role in south Shropshire, providing services and facilities for a wide rural hinterland and as such has been identified as a key centre".

To balance the environmental, economic and social dimensions of sustainability, paragraph 5.90 requires development to provide *"the highest and most sensitive design standards"*. It notes that new development can help conserve and enhance the distinctive characteristics of the town and the AONB through good design.

We concur that well designed development on appropriate sites can provide the necessary balance, providing for the town's undisputed development needs whilst protecting and enhancing the AONB. However, this is best achieved by allocating sites large enough to deliver landscape enhancements for the town.

The Council's Landscape & Visual Sensitivity Assessment (LVSS) identified the northern central area close to the railway line as having the lowest landscape sensitivity for employment development as shown in figure 3 below. The area close to the railway line is also the best area in the town for housing development.

Figure 3. Extract from page 14 of the Church Stretton LVSS
CHURCH STRETTON LANDSCAPE SENSITIVITY

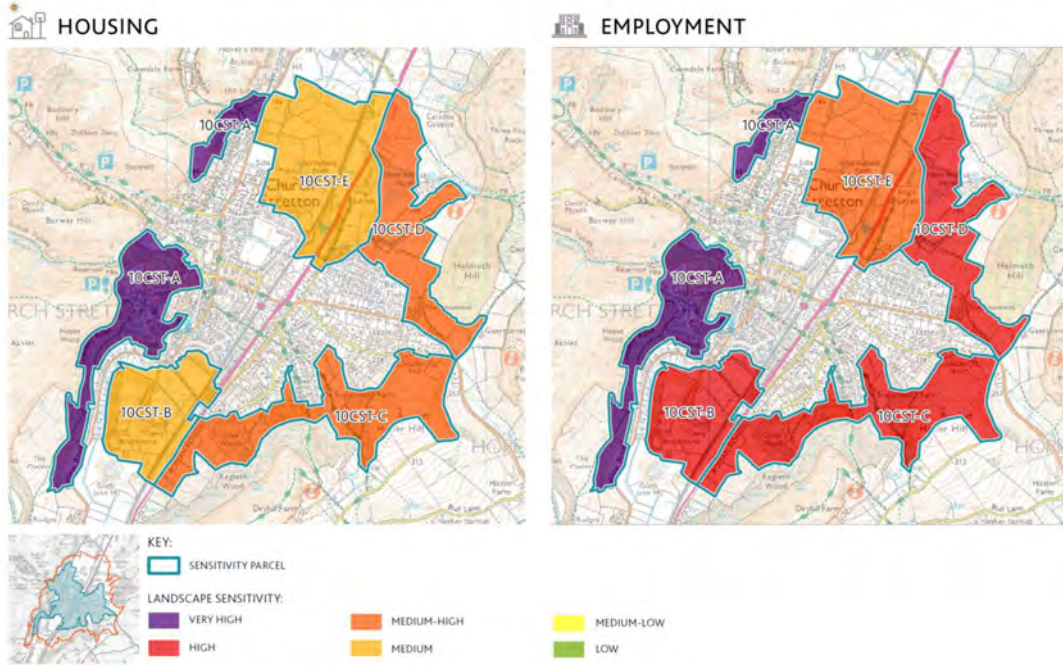


Figure 4. Extract from page 15 of the Church Stretton LVSS
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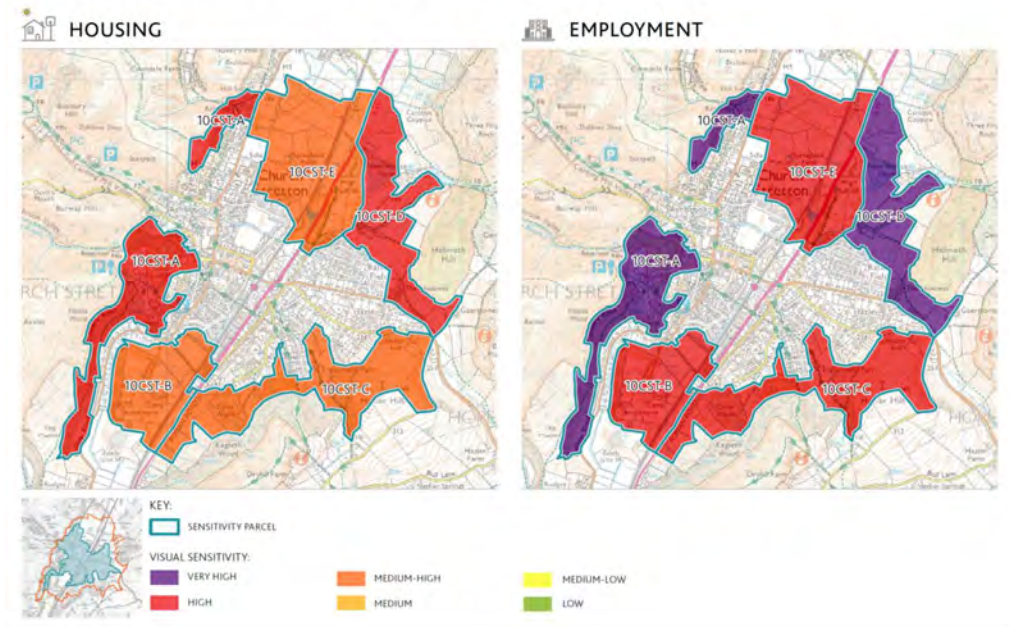
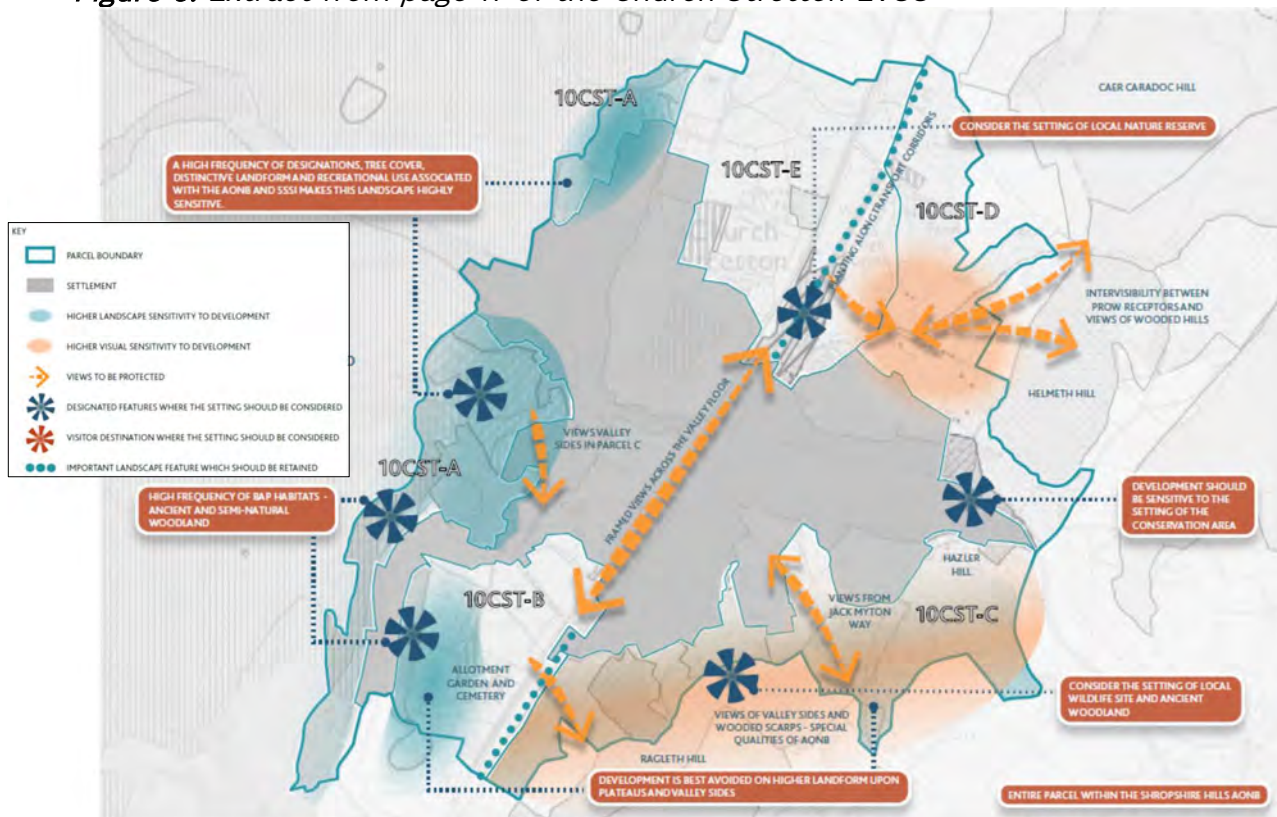


Figure 5. Extract from page 17 of the Church Stretton LVSS



Parcel 10CST-E to the north of the town, west of the railway line, adjoining the secondary school, has no designated features or key views to be protected. The LVSS notes for this parcel that, "Development could be accommodated within fields in low lying areas, where changes to landform would not be discernible, with potential to enhance and improve existing gappy hedgerows and tree cover." (LVSS page 13). This area is therefore a good contender for the existing employment allocation ELR078 and to accommodate Church Stretton's housing needs.

Church Stretton Site Assessments

The Council's Site Assessments for Church Stretton appraised 39 sites with resulting Sustainability Appraisal scores ranging from 1 to -18, as reported on pages 10-14 of the Church Stretton Place Plan Area Site Assessments. 12 sites were rated 'poor' (scores -12 to -18), 18 sites were rated 'fair' (scores -4 to -11) and 9 sites were rated 'good' (scores +1 to -3). One of the sites rated 'Good' is our client's land, site CST035 'Springbank Farm, Church Stretton' (a site location plan has been attached to this letter for ease of reference).

The results of the site assessment detail that, whilst the site achieved the joint second highest score in the Stage 2a Sustainability Appraisal and that residential development on the site was considered to be achievable and viable in the Stage 2b Screening, the site was removed from the assessment process due to concerns over flood risk and ecological impacts. However, these issues have been addressed in the detailed reports on flood risk and ecology prepared in support of a planning application on part of site

CST035 (application ref. 18/01258/OUT), which was approved at the meeting of the Council's Southern Planning Committee on 16th February 2021.

Our client's land therefore represents a unique and highly sustainable opportunity to deliver residential development in the town on land that is partially brownfield, partially benefits from outline planning consent for five dwellings and adjoins existing buildings and the employment allocation ELR078. Development on the site will not, therefore, encroach into open countryside but will assimilate into the settlement with ease, ensuring that the character and appearance of the area is preserved and enhanced.

In addition, and significantly, it is understood that Church Stretton Town Council consider that if Shropshire Council's housing target for Church Stretton is to be achieved, then new sites for limited additional housing will be required and has previously supported the development of site CST035 for up to 20 dwellings.

Conclusion

For the reasons set out above, the low level of growth for Church Stretton and lack of new housing allocations means Policy S5.1 fails the 'positively prepared', 'justified' and 'effective' tests of soundness.

- **Q5 Modifications necessary to make the Plan sound**

To make the Plan 'sound' requires an increase in the housing requirement for Church Stretton and the allocation of land to deliver housing in a manner that protects and enhances the AONB.

Policy S5.1 and the Church Stretton Policies Map should therefore be amended to include our client's land (reference CST035) with the development boundary of the settlement and allocated for residential development for up to 20 dwellings. The inclusion of this land would result in a greater level of certainty that the aims and objectives of the Plan, including the strategic growth objectives in this area of the County, will be realised over the Plan period.

- **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:	Mr Stuart Thomas (BERRYS) on behalf of Mr John West
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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="S5.1"/>	Site:	<input type="text" value="CST035"/>	Policies Map:	<input type="text" value="S5: Church Stretton"/>
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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.

Please see overleaf

- **Q4 Why the Plan is unsound**

The designation of Church Stretton as a Key Centre settlement in Policy S5.1 is strongly supported as this is seen as vital to ensuring the town's long-term future.

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 Plan's 11 Key Centres.

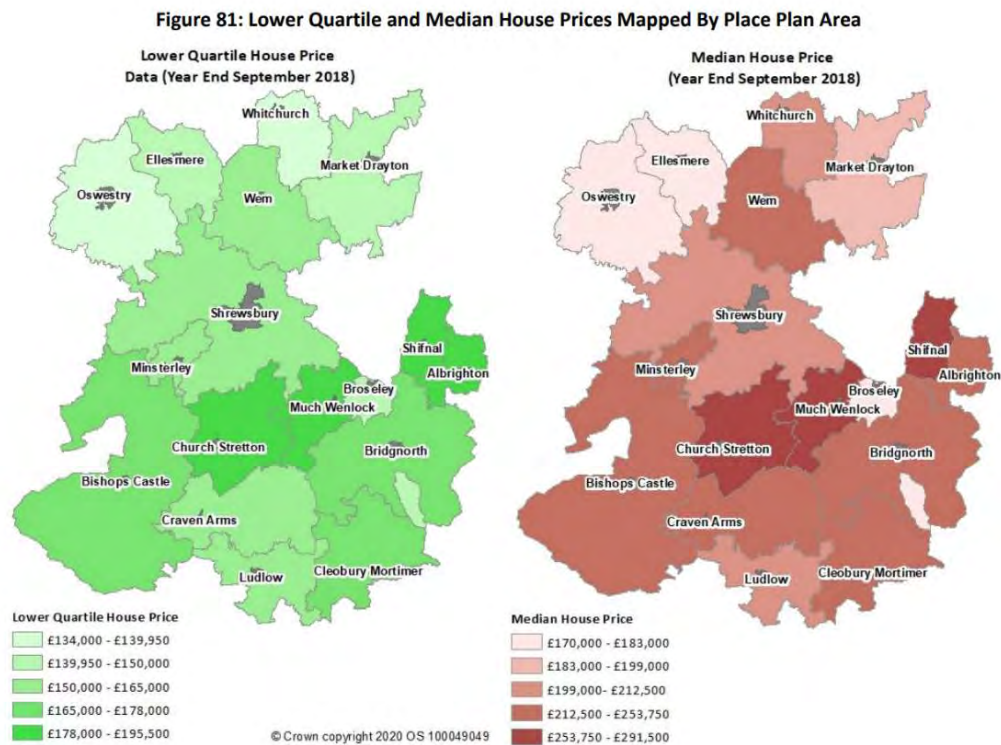
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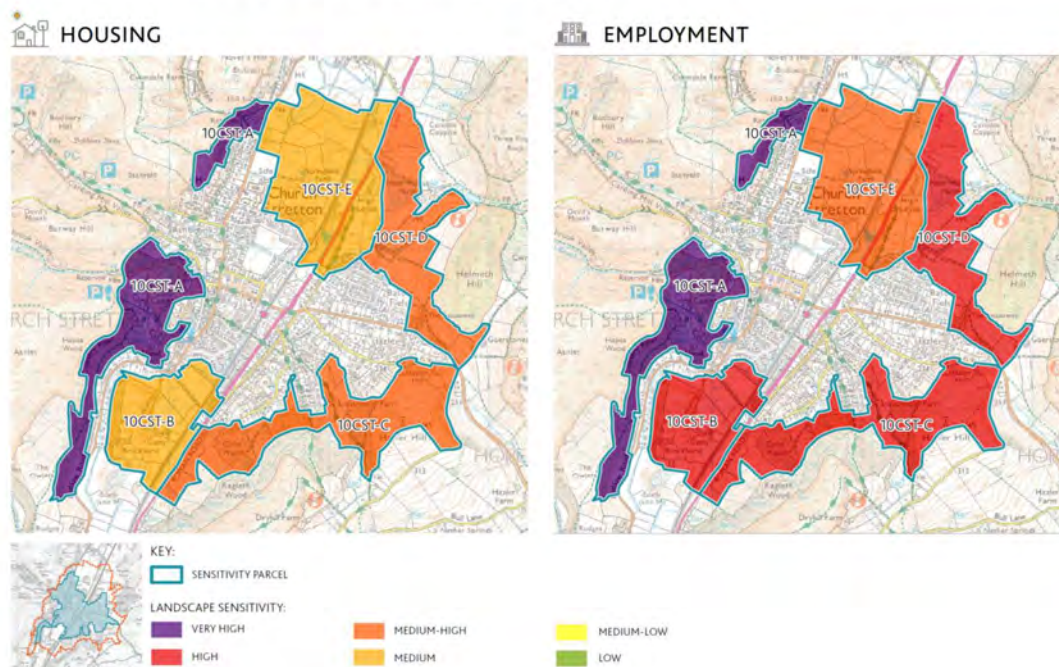


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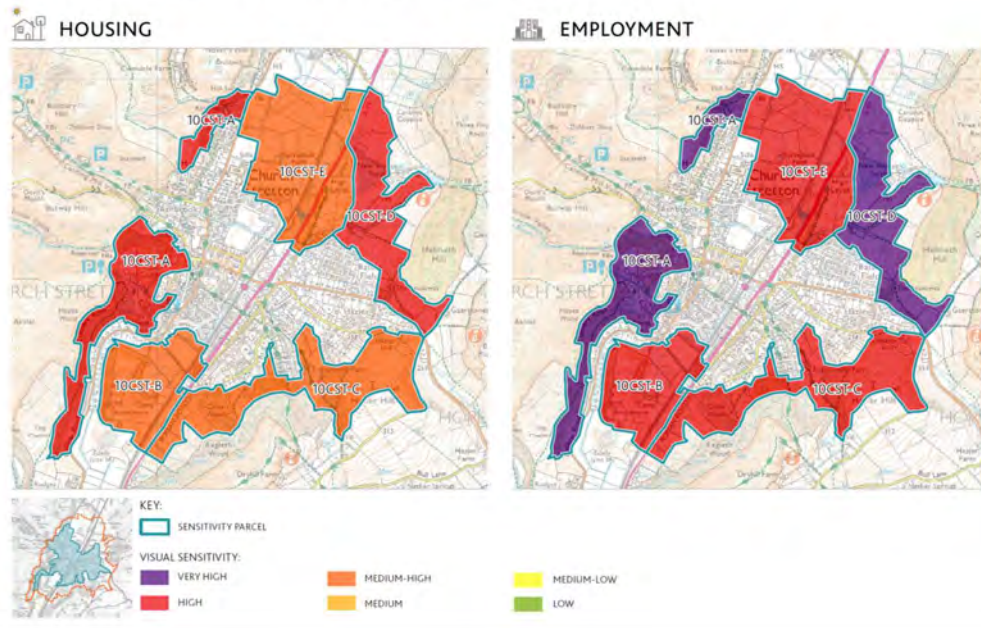
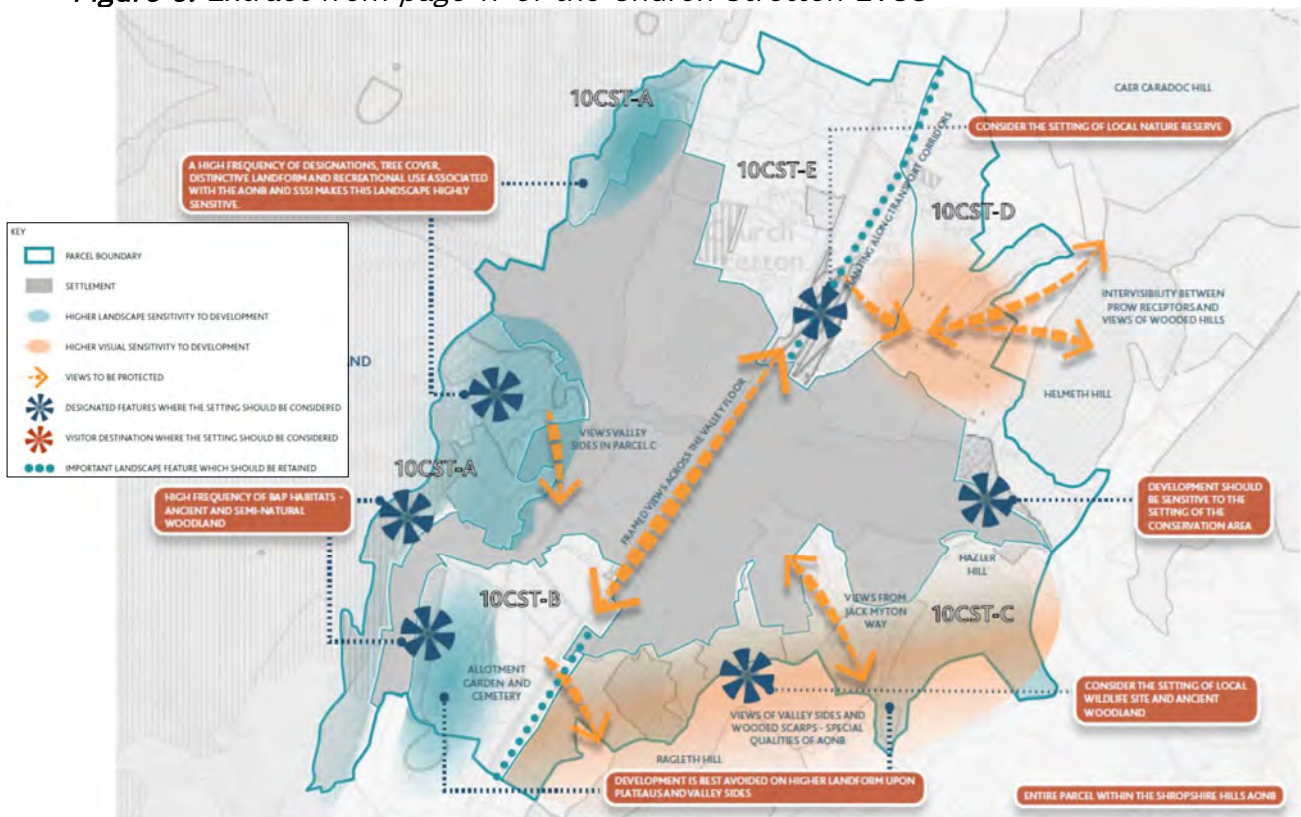


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Conclusion

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- **Q5 Modifications necessary to make the Plan sound**

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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.

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 see above.

(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:

In order to participate in, and therefore assist in ensuring, comprehensive consideration of the appropriateness of the planned level and distribution of residential growth in Whitchurch during the Plan period.

(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.

Office Use Only

Part A Reference:

Part B Reference:

Signature: S. Thomas

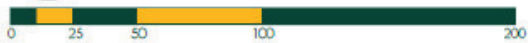
Date: 01/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Site Location Plan:



OS Mapping obtained from Promap Licence No. 100020492
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BERRYS
 PROPERTY | BUSINESS | PLANNING
 01743 271697 | SY2 6LG
www.berrys.uk.com

Client:
 Mr. JIN and Mrs SA West

Project:
 Local Plan Representation on Land adjacent
 Stretton Road, Church Stretton, SY2 6EX

Drawing:
 Location Plan

Drawing Number	Rev.	Scale	Paper	Drawn By	Date
SA25996/LP1		1:2500	A4	RC	Mar 2017

Representation Form

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Name and Organisation:	Mr Stuart Thomas (BERRYS) on behalf of Mr John West
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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
- 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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- | | | | | |
|--|------|-------------------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
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<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 Church Stretton as a Key Centre accords with the Local Plan's vision in this regard, given Church Stretton's strategic location on the A49 corridor with excellent connections to Shrewsbury and adjoining regions.</p>

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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:

(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. Thomas

Date:

01/02/2021

Office Use Only

Part A Reference:

Part B Reference: