# BERRYS

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

By email only: <u>Planningpolicy@Shropshire.gov.uk</u>

**Our Ref:** SA36633/ST/ML **Date:** 1<sup>st</sup> February 2021

Dear Eddie,

### Shropshire Local Plan – Regulation 19 consultation

Our client, Aequusland Ltd, 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: Strategic Policy SP13 'Delivering Sustainable Economic Growth & Enterprise'
- Policy: Strategic Policy SP14 'Strategic Corridors'
- Policy: Settlement Policy S10.1 'Development Strategy: Ludlow Town'
- Policy: Settlement Policy S10.1(ii) 'Employment Allocations: Ludlow Principal Centre'
- Policy Map: Inset S10 'Ludlow'
- Site: Local Plan Employment Allocation LUD052

#### 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 Ludlow as a Principal Centre is also supported as this designation accords with the Local Plan's vision, given Ludlow's strategic location on the A49 corridor with excellent connections to the rest of Shropshire and adjoining regions.



#### Strategic Policy SP13 'Delivering Sustainable Economic Growth and Enterprise'

The aim and objective of this policy, to support the delivery of the economic growth strategy and promote a 'step change' in the economic productivity of the Shropshire economy is supported.

The supporting text to the policy (paragraph 3.123) highlights the importance of the policy providing flexibility in the development of the employment land supply to meet the needs of Shropshire and its communities. However, criterion 7 seeks to protect allocated employment land and established employment areas primarily for Class B (i.e. General Industrial and Storage or Distribution) employment uses.

Given the uncertainty of post COVID marketplace it is considered that policy SP13 should provide greater flexibility in the employment uses permissible on allocated sites to ensure that the needs of Shropshire and its communities are met.

To ensure the Plan passes the 'positively prepared' and 'effective' tests of soundness criterion 7 of policy SP13 should be amended to identify that allocated employment land is protected for all of the employment use classes identified in the policy.

#### Strategic Policy SP14 'Strategic Corridors'

The supporting text to this policy specifically identifies (paragraph 3.142(e)) Ludlow as a Principal Centre on a Strategic Corridor and the policy states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity".

Policy SP14 is therefore supported as it identifies the importance of Ludlow as a significant centre for growth in Shropshire, both socially and economically.

#### Settlement Policy S10.1 'Development Strategy: Ludlow Town'

This policy and its supporting text is supported as it recognises the strategic role of Ludlow as the largest market town in south Shropshire and a principal focus for investment, employment, housing and development during the Plan period.

In addition, the identification of 11ha. of employment land to meet the needs of the town and its hinterland (including employment land allocation LUD052 and saved employment land allocation ELR058) is supported as this land will make a significant and unique contribution towards meeting the employment growth needs of both the Town and this area of the County and to realising both the objective of the Shropshire Economic Growth Strategy to deliver a 'step change' in the capacity and productivity of the local economy and the vision of the 'Draft Ludlow Local Economic Growth Strategy 2020-2025' – "To be ambitious in its approach to economic growth and seek

# BERRYS

to attract inward investment, whilst retaining the individuality, identity, skills and strong cultural heritage of the town".

#### Settlement Policy S10.1(ii) 'Employment Allocations: Ludlow Principal Centre'; Inset S10 'Ludlow'; and Local Plan Employment Allocation LUD052

Strategic Policy S10.1(ii) 'Employment Allocations: Ludlow Principal Centre', Policy Map Inset S10 Ludlow and Employment Allocation 'Land south of The Sheet on A49, Ludlow' (LUD052) are supported.

Proposed employment land allocation LUD052, together with saved employment land allocation ELR058, have been assessed by the Council as being unconstrained, viable, deliverable and developable.

The combined site is large and, as detailed within paragraph 5.136 of the Plan, would meet the employment needs of Ludlow by providing around 8 hectares of land, significantly improving Ludlow's employment land offer and broadening the range of commercial premises and business representation in the town.

The statement in paragraph 5.136 that "there is scope for flexibility in the employment uses delivered on the allocations, but any flexibility must respect the significance and setting of this historic town to ensure it's history will continue to be recognised and appreciated" is also supported. However, further to our representation on policy SP13, we would request that the Council enable maximum flexibility in employment generating uses given the uncertainty of the post-COVID marketplace.

We are aware of concerns expressed by Historic England over the allocation of LUD052 and have therefore undertaken an initial Heritage Assessment ('Heritage Technical Report', BERRYS, February 2021), which is submitted in support of this representation (see Appendix). The assessment considers the impact of the site's proposed development on the historic environment, including Caynham Camp, Ludlow Castle (complete with town walls), St. Laurence's Church and any on-site archaeological interest.

The assessment clearly identifies that any harm in developing the site would be less than substantial and, in addition, that any such potential harm can be mitigated at the detailed design and planning application stages through a sensitive design solution and conditions placed upon any subsequent consent.

It is evident therefore that there is no reason, from a heritage perspective, why this site should not be allocated.

Given the above, the allocation of site LUD052 is supported as it represents a significant, and unique, opportunity to meet the economic needs of Ludlow during the Plan period and to realise the ambitions of both the Shropshire and Ludlow Economic Growth Strategies.



#### 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 <u>stuart.thomas@berrys.uk.com</u>

# Shropshire Council: Shropshire Local Plan



# **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)**.

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## **Part B: Representation**

-		- I							
	Name and Organisation: Mr Stuart Thomas (BERRYS) on behalf of Aequusland Ltd								
Q	Q1. To which document does this representation relate?								
Ľ	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan								
C	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan								
C	Habitats Regulations A Shropshire Local Plan (Please tick one box)	Assessment of the Regulation 19: Pre-Submission Draft of the second second second second second second second s	he						
Q	2. To which part of the	e document does this representation relate?							
Pa	aragraph:	Policy: S10.1 Site: Policies Map:							
_	3. Do you consider the hropshire Local Plan is	e Regulation 19: Pre-Submission Draft of the s:							
	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.

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

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(Please tick one box)

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Signature: S. Thomas			Date:	01/02/2021
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		Office Use Only	Part B Reference	ce:

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02. 1	To which part of the	document does t	his re	presentatio	n relate?			
Parag	raph:	Policy: S10.1 (ii)	Site:	LUD052	Policies Map:	S10		
-	Do you consider the	-	re-Sub	omission Dr	aft of the			
Shro	pshire Local Plan is	:						
A.	Legally compliant		Yes:		No:			
В. 3	Sound		Yes:	$\checkmark$	No:			
C. (	Compliant with the Duty	v to Co-operate	Yes:		No:			
(Ple	ease tick as appropriate	).		_				
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Yes, I wish to participate in hearing session(s)

(Please tick one box)

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(Please continue on a separate sheet if necessary)

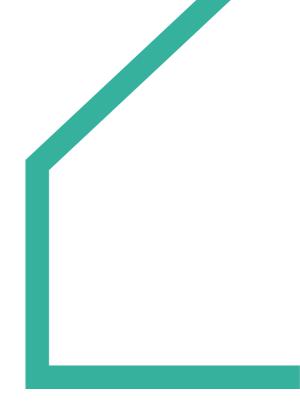
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Signature:

S. Thomas

Date: 01/02/2021

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Office Use Only	Part B Reference:	



# Heritage Technical Note

**Employment Allocation** 

Ludlow, Shropshire

February 2021







T: 01743 271697 | E: shrewsbury@berrys.uk.com | berrys.uk.com

APPLICANTS DETAILS Aequusland Ltd

ISSUED BY Phoebe Farrell BA (Hons) MA IHBC Heritage Consultant

APPROVED BY Stuart Thomas BA (Hons) MA MRTPI Head of Planning

PROJECT Proposed Employment Allocation Ludlow

## BERRYS

Beech House Anchorage Avenue Shrewsbury Business Park Shrewsbury SY2 6FG



## Contents

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4.	Observations	. 11
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## 1. Introduction

- 1.1 This technical note has been prepared in response to Historic England's concerns over the preferred employment allocation LUD052 south of Sheet Road (henceforth known as the 'Site') which forms an extension of an existing allocation in the SAMDev Plan 2006-2026 (ELR058) adopted 17<sup>th</sup> December 2015. The sites are set out below (Fig.1).
- 1.2 This is a summary of findings related to the historic environment and form part of the formal representations of the Regulation 19 pre-submission draft of the Shropshire Local Plan.

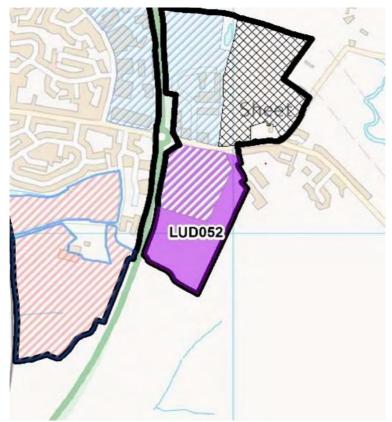


Fig. 1 Extract from Shropshire Council's Policies Map 2016-38

## 2. Limitations

- 2.1 This report has primarily been produced through desktop research, using relevant secondary sources including:
  - Historic Environment Records (HER)
  - Historic England National Heritage List England (NHLE)
  - Shropshire Archives
  - UK Census Records (online resource)
  - National Library of Scotland (online resource)
- 2.2 One site visit was undertaken for photographs, to assess the significance and setting of the heritage asset/s identified. Conditions were dry and sunny.
- 2.3 The site visit was undertaken during the covid-19 pandemic therefore the 'setting' of the heritage asset/s may not be a true representation, e.g. reduced traffic noise. In addition, access to the secondary sources, namely Shropshire Archives were limited.
- 2.4 There has been no direct correspondence with Historic England, however initial conversations with Shropshire Council Planning Policy Team regarding the nature of their concerns have informed the scope of this technical note.

## 3. Identifying Heritage Assets

- 3.1 The following legislative, planning policy and guidance are relevant:
  - Planning (Listed Buildings and Conservation Areas) Act (1990)
  - Ancient Monuments and Archaeological Areas Act (1979)
  - National Planning Policy Framework (2019) 'The Framework'
  - National Planning Practice Guidance: *Conserving and enhancing the historic environment (2019)*
  - Conservation Principles: *Policies and Guidance for the Sustainable Management of the Historic Environment (2008)*
  - Good Practice Guide 3: The Setting of Heritage Assets (2017)
  - Advice Note 3: The Historic Environment and Site Allocations in Local Plans (2015)
- 3.2 The National Planning Policy Framework (henceforth known as the 'Framework') defines a heritage asset as:

"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)".

3.3 Annex 2 of the Framework defines setting as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral." 3.4 Department for Culture, Media and Sport (2013) states that:

*"the significance of ancient monuments derives not only from their physical presence, but also from their setting."* 

- 3.5 Fig. 2 identifies a 1km radius of the site, which no designated heritage asset of concern fall within. The town of Ludlow is located to the east which has the highest density of designated heritage assets including scheduled monuments which are given the highest protection in planning policy.
- 3.6 It is important to understand the significance of any heritage assets that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but a more holistic process which seeks to understand their significance and value.



*Fig. 2 Designated heritage assets within a 1km buffer © Historic England* 

Listed Buildings

Scheduled Ancient Monuments

- 3.7 Outside the 1km buffer, <u>Caynham Camp</u>, <u>Ludlow Castle</u> (complete with <u>town walls</u>) and <u>St. Laurence's Church</u> are all notable features within the landscape that need to be considered (Fig. 3).
- 3.8 It is also apparent that there is archaeological potential on the site in the form of cropmarks suggesting a Roman Military Site (HER PRN no. 04532).
- 3.9 The Portable Antiquities Scheme have recorded a total of 23 finds within600m of the cropmark 5 of which were Roman.
- 3.10 The non-designated heritage asset of archaeological interest was also highlighted in the development of the approved residential site opposite LUD052. 14/04608/OUT for mixed residential development compromising 137 dwellings at Foldgate Lane and creation of vehicular access off A49 was allowed at appeal 15/02340/REF
- 3.11 An archaeological desk-based assessment undertaken as part of the submission which confirmed that:

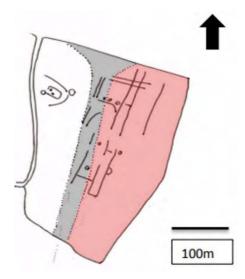
"...finds relate mainly to the far (eastern) side of the A49, towards Sheet."

- 3.12 Fig. 4 is taken from the archaeological desk-based assessment and indicates the potential for further archaeological remains on the Site (the far eastern side of the A49 to which the author refers).
- 3.13 The Planning Inspector acknowledged the archaeological interest of the site and concluded that:

"The submission of a programme of archaeological work is necessary and reasonable as the site, or parts thereof, are known to hold archaeological interest and such a condition would allow their recording." 3.14 Footnote 63 of the Framework cites that;

"Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets"

3.15 It is evident that neither Shropshire Council nor the Inspector concluded that the archaeological remains present were of equivalent significance to scheduled monuments, therefore it would be prudent to apply the same rationale to LUD052.



*Fig. 4 Composite plot of crop-marks at 1:50000 scale Courtesy of Iain Soden Heritage Services Ltd* 



Approximate route of A49 Proposed LUD052 employment allocation

3.16 Therefore, should the Site be allocated and a suitable scheme come forward further investigations could be dealt with via conditions



Address/Client: Aequusland Ltd Berrys Reference: SA39716

*Fig. 3 Designated heritage assets © Historic England* 



- Listed Buildings
- *Scheduled Ancient Monuments*
- *Employment Site LUD052*
- N Allocated Site ELR058

### 4. Observations

- 4.1 There is no *direct* relationship with any nearby designated heritage assets and the Site. However, the Site does positively contribute to the setting of Caynham Camp (an Iron Age hillfort).
- 4.2 It is noted in the scheduling description:

"tradition links the hillfort with Cromwell's campaign against the Royalistheld Ludlow Castle, stating that he used the hill as a camp from which to launch his attack."

- 4.3 How any future development of the Site will impact the *experience* of the understanding of the relationship between Caynham Camp and Ludlow Castle.
- 4.4 It is likely the previously allocated ERL058 would also result in an impact on the *setting* of Caynham Camp and although no development has come forward to date therefore this cannot be addressed in detail.
- 4.5 Both Ludlow Castle and St. Laurence's Church are visible when walking up Caynham Camp and at its summit. The Site is also visible and therefore any development would alter these views, although not considerably.
- 4.6 The Ludlow Eco Park (including park and ride) is much less visible and tucks more neatly behind the settlement of Caynham itself in contrast to the more exposed LUD052 site on the east of the A49, which visually tapers out when viewed from the summit of Caynham Camp.
- 4.7 The former 'Tuffins' site (now Co-op) and Eco Park are both low rise developments and benefit from lower levels. The land of the Site is higher

than both these developed sites which has the potential to make it more exposing.

- 4.8 If the Site is considered to contribute to Caynham Camp it may be considered that there is *harm* to the Scheduled Monument.
- 4.9 Inevitably, the setting of Caynham Camp has changed with development of Ludlow and its former smaller settlements on the suburbs e.g. Ludford, Rocks Green and Sheet. The latter which is now severed by the A49 from the rest of Ludlow.
- 4.10 In recent years there has been both residential and commercial development on the outskirts however largely this has been well contained and bound by the A49 until the SAMDev allocations and the Eco Park.
- 4.11 The actual site of Caynham Camp has also been eroded by the erection of numerous unsightly pylons which has resulted in loss of significance.
- 4.12 However, the allocation would not result in a loss of views to the castle or church and by default of distance.
- 4.13 The rural nature of the landscape which distinguishes the break between the more developed settlement of Ludlow would not be interrupted with surrounding views to the Clee Hills and Mortimer Forest also contributing to its setting and understanding its significance.
- 4.14 The proposed site allocation would *not* sever the last link with its original setting. However, it is acknowledged that there may be accumulative harm due to the already existing site allocation to the north of the Site.



View from Site towards Travelodge, Co-op, Pets at Home etc.

LUD052 to Sheet Farm buildings – land slopes away

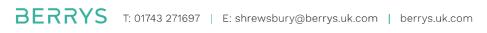




View from Eco Park Road to Sheet Road with Site on horizon

View towards summit of Caynham Camp





View looking towards Ludlow from top of Caynham Camp



## 5. Conclusion

- 5.1 Site allocations should avoid and minimise conflict with the conservation of heritage assets. Historic England's Advice Note 3 *The Historic Environment and Site Allocations in Local Plans* sets out guidance for Local Authorities in accordance with para. 182 of the National Planning Policy Framework so that proposed sites are justified.
- 5.2 It is suggested that if the site is allocated that archaeological field evaluations will need to be undertaken when the site comes forward for development. This would enable any appropriate archaeological action or mitigation, e.g. landscaped areas to protect below ground remains.
- 5.3 It is suggested that to mitigate any harm scale and density should be controlled via a design code set out in a site-specific policy.
- 5.4 The Framework does not provide a scale beyond the three possible levels:
  - substantial
  - less than substantial
  - neutral/no harm
- 5.5 In the absence of a proposed scheme or a site-criteria based assessment, initial observations set out in this technical note suggest that any the harm in developing the Site would be *less than substantial*.

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(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 Lles Only	Part A Reference	ce:
		Office Use Only	Part B Reference	ce:

# Shropshire Council: Shropshire Local Plan



# **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**

Г								
	Name and Organisation:	Mr Sturart Thomas (BERRYS) on behalf of Aequusland Ltd						
Q	. To which document does this representation relate?							
Ľ	Regulation 19: Pre-Sub	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
Ľ	Sustainability Appraisa Local Plan	of the Regulation 19	): Pre-S	ubmission Dra	aft of t	the Shropshire		
Ľ	Habitats Regulations As Shropshire Local Plan (Please tick one box)	•						
Q	2. To which part of the	document does t	this re	presentatio	n rel	ate?		
Pa	aragraph:	Policy: SP13	Site:		P	olicies Map:		
_	3. Do you consider the hropshire Local Plan is	-	re-Sub	omission Dr	aft o	f the		
	A. Legally compliant		Yes:		No:			
	B. Sound		Yes:		No:	$\checkmark$		
	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 of	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.							

The aim and objective of this policy, to support the delivery of the economic growth strategy and promote a 'step change' in the economic productivity of the Shropshire economy is supported.

The supporting text to the policy (paragraph 3.123) highlights the importance of the policy providing flexibility in the development of the employment land supply to meet the needs of Shropshire and its communities. However, criterion 7 seeks to protect allocated employment land and established employment areas primarily for Class B (i.e. General Industrial and Storage or Distribution) employment uses.

Policy SP13 will therefore constrain growth rather than meet Shropshire's housing needs and therefore fails the 'positively prepared' test of soundness.

Given the uncertainty of post COVID marketplace it is considered that policy SP13 should provide greater flexibility in the employment uses permissible on allocated sites to ensure that the needs of Shropshire and its communities are met. 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.

To ensure the Plan passes the 'positively prepared' and 'effective' tests of soundness criterion 7 of policy SP13 should be amended to identify that allocated employment land is protected for all of the employment use classes identified in the policy.

(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:

Aequusland Ltd are an active developer in Shropshire and will be able to contribute positively to discussions relating to employment land issues in the area.

(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:	ure: S. Thomas		Date:	01/02/2021
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		Office Use Offiy	Part B Reference	ce:

# Shropshire Council: Shropshire Local Plan



# **Representation Form**

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## **Part B: Representation**

· · · · · · · · · · · · · · · · · · ·								
Name and Organisation:	Name and Organisation: Mr Sturart Thomas (BERRYS) on behalf of Aequusland Ltd							
Q1. To which document does this representation relate?								
Regulation 19: Pre-Sub	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan							
Sustainability Appraisal Local Plan	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan							
Habitats Regulations As Shropshire Local Plan (Please tick one box)	ssessment of the Regulation 19: Pre-Submission Draft of the							
Q2. To which part of the	e document does this representation relate?							
Paragraph: P	Policy: SP14 Site: Policies Map:							
Q3. Do you consider the Shropshire Local Plan is:	Regulation 19: Pre-Submission Draft of the							
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.

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The supporting text to this policy specifically identifies (paragraph 3.142(e)) Ludlow as a Principal Centre on a Strategic Corridor and the policy states that the "Shropshire Economic Growth Strategy seeks to deliver a 'step change' in the capacity and productivity of the local economy. To contribute to this aim, 'Strategic Corridors' along the principal rail and strategic road routes through the County will be the primary focus for major development especially along 'strategic corridors' with both rail and road connectivity".

Policy SP14 is therefore supported as it identifies the importance of Ludlow as a significant centre for growth in Shropshire, both socially and economically.

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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