



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:	Shropshire Homes
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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="CST019VAR"/>	Policies Map:	<input type="text" value="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

(Please continue on a separate sheet if necessary)

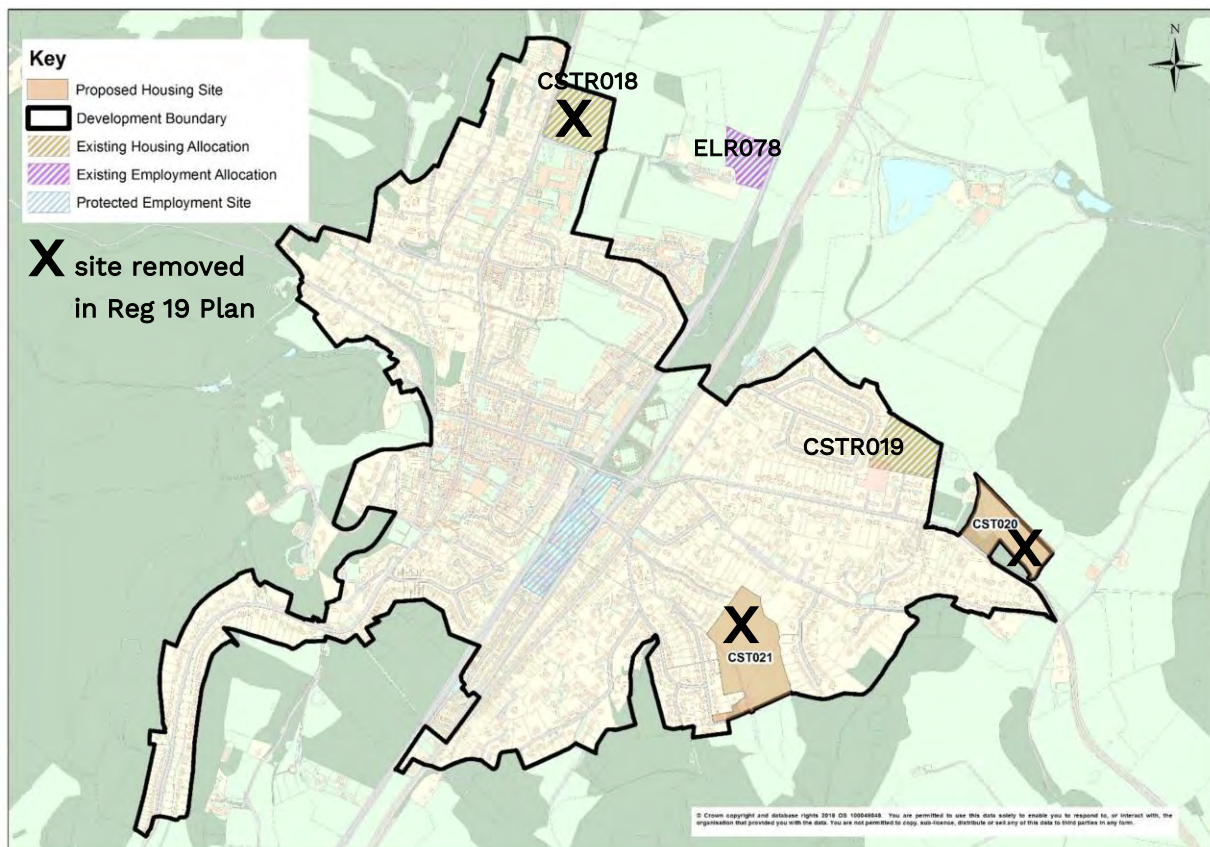
Q4. Why the Plan is unsound

Overview

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 and deletes one of the existing SAMDev Plan allocations for 50 dwellings (CSTR018) on page 317 of the emerging Local Plan. It has also dropped the two sites proposed for allocation at 'Preferred Options' stage, sites CST020 and CST021, as shown in figure 1 below.

Figure 1. The 'Preferred Options' Plan (Nov 2018) with sites removed highlighted X



Despite the removal of 3 sites, the emerging Local Plan does not identify where the town's future housing development will be situated, relying instead only on windfall and the remaining saved SAMDev Plan housing allocation CSTR019 that has so far failed to be delivered. For the reasons elaborated in this representation, the Plan's failure to identify land to meet the town's housing requirements fails the 'positively prepared', 'justified' and 'effective' tests of soundness.

The emerging Plan also saves a SAMDev Plan employment allocation at Springbank Farm (ELR078) that has access issues. Unless the Plan changes

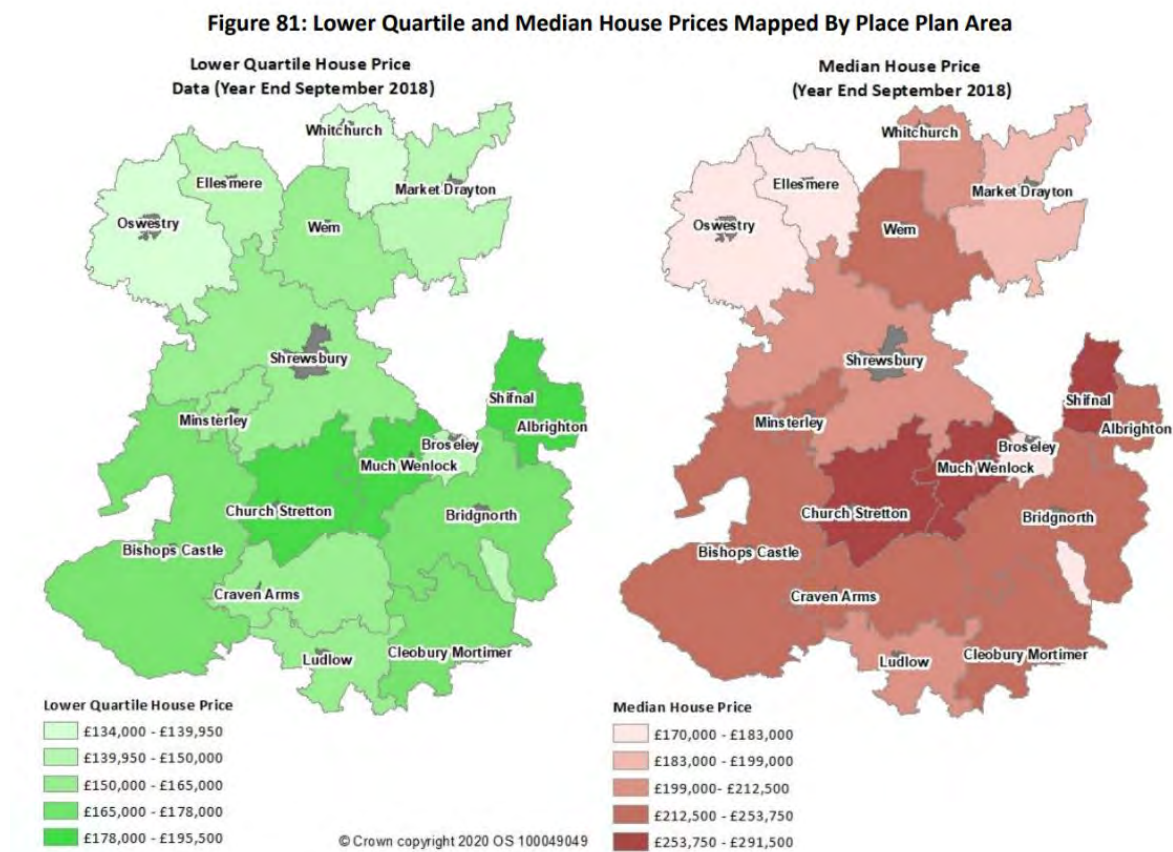
the current situation that the SAMDev Plan has failed to deliver, this employment allocation will remain undeliverable, failing the 'effective' test of soundness.

Policy S5.1 proposes a low level of growth for the town, 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 in this representation, we consider the Plan fails the 'positively prepared' and 'justified' 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.

Figure 2. Extract from the SHMA



The SAMDev Plan provides for growth of 370 dwellings over 20 years, equivalent to 0.93% per annum. The county's latest available Five Year Housing Land Supply Statement shows the town has to date delivered growth of 0.82% p.a., as shown in the first 2 rows of the table below. Church Stretton has strong housing demand and high housing need, as shown in the SHMA above and the Viability Study later in this representation.

The Local Plan Review provides for county-wide growth of approximately 1.0% per annum, yet only half this rate, 0.46% p.a., for Church Stretton. While its position in the South Shropshire Hills Area of Outstanding Natural Beauty (AONB) is a valid consideration, Shropshire Council nevertheless considered a rate of 0.63% per annum appropriate in the 'Preferred Options' consultation in November 2018. For the reasons explained later in this representation, this rate is far more justified than the proposed low rate in Policy S5.1 of only 0.46% or 200 dwellings over 2016-2038, which fails the 'justified' and 'positively prepared' tests of soundness.

Figure 3. Relative growth rates

Geography	2016 no. dwellings	Growth	% change per annum	Dwellings per annum
SAMDev Plan Policy S5	1,987 ²	370 dwellings over 2006-2026	0.93%p.a.	18.5
Completions in Church Stretton 2006/7 - 2018/19	1,987 ²	213 dwellings ¹ over 13 years	0.82%p.a.	16.4
Shropshire-wide Policy SP2	140,524 ³	30,800 dwellings over 22 years	1.0%p.a.	1,400
Church Stretton Policy S5.1	1,987 ²	200 dwellings over 22 years	0.46%p.a.	9
Preferred Options (Nov 2018)	1,987 ²	250 dwellings over 2016-2036	0.63%p.a.	12.5

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

An appropriate rate of growth for Church Stretton must consider the latest 2018-based household projections from the Office of National Statistics. These forecast a 26.9% growth in households in Shropshire over the plan period as shown in figure 4 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 4. 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 on page 2 of this representation. Demand is therefore likely to outstrip 534 dwellings over the plan period.

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.

For these reasons Policy S5.1's planned rate of growth of only 200 dwellings fails the 'justified' and 'positively prepared' tests of soundness.

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. Its current distribution of growth, including only 200 dwellings in Church Stretton, fails the 'effective' test of soundness.

Allocation of sites in Church Stretton

No new sites are allocated for development in Policy S5.1, with the town relying heavily on windfall and the saved SAMDev Plan allocation for 50 dwellings (CSTR019). [Please note Shropshire Homes' promoted site CST019VAR is no relation to the SAMDev allocation CSTR019, despite the similarity in numbering.]

SAMDev Plan allocation CSTR018 (School Playing Fields) is one of the few allocations deleted by the emerging Local Plan in Schedule A2 on page 317 of the Plan. This allocation for around 50 dwellings was previously relied on by Shropshire Council to demonstrate that Church Stretton's housing needs could be met in a plan-led manner.

At Preferred Options stage site CST021 (Snatchfield Farm) was proposed for allocation for 70 dwellings and site CST020 (Land NW of Gaerstone Farm) was proposed for allocation for 40 dwellings. Due to a high level of public objections, both sites were dropped in the pre-submission Local Plan.

The emerging Local Plan allocates no new sites. With the deletion of one of the SAMDev Plan allocations (CSTR018) it now relies on only one saved SAMDev allocation that has so far failed to deliver (CSTR019) and windfall.

Church Stretton has experienced high housing demand for many years and almost all suitable windfall sites have long since been developed. There are few suitable windfall plots left in the town. The few that remain will struggle to meet the Plan's environmental policies SP5 (High-Quality Design), DP12 (The Natural Environment), DP23 (Conserving and Enhancing the Historic Environment) and DP24 (Shropshire Hills Area of Outstanding Natural Beauty). Church Stretton's heavy reliance on windfall fails the 'effective' test of soundness.

The Plan's failure to allocate any new sites for development over the 22 year plan period fails the 'positively prepared', 'justified' and 'effective' tests of soundness.

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 a site large enough to deliver landscape enhancements for the town.

The Landscape & Visual Sensitivity Assessment

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 5 overleaf. The area close to the railway line is also the best area in the town for housing development and is promoted by Shropshire Homes (* on maps).

Figure 5. Extract from page 14 of the Church Stretton LVSS
CHURCH STRETTON LANDSCAPE SENSITIVITY

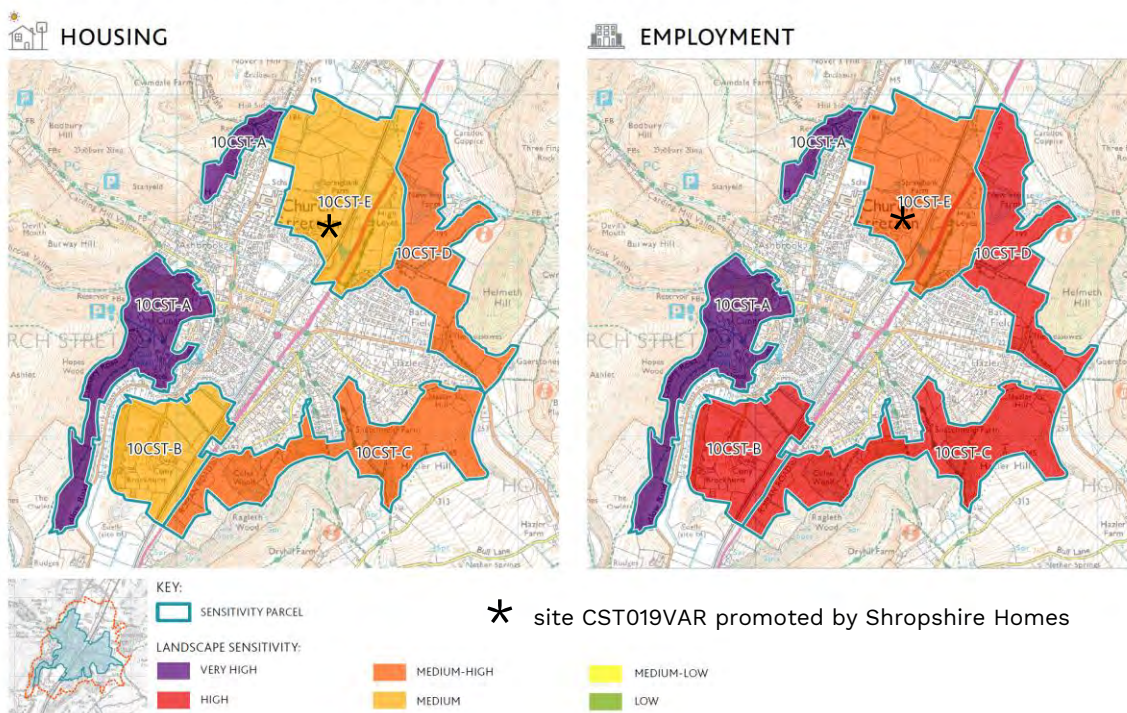


Figure 6. Extract from page 15 of the Church Stretton LVSS
CHURCH STRETTON VISUAL SENSITIVITY

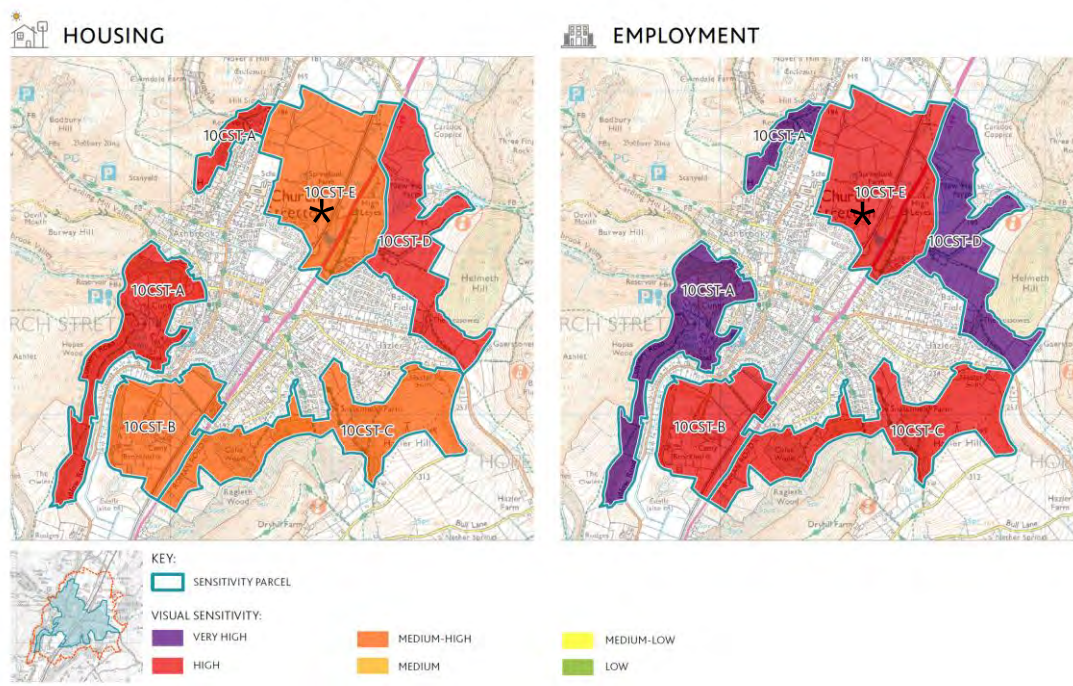
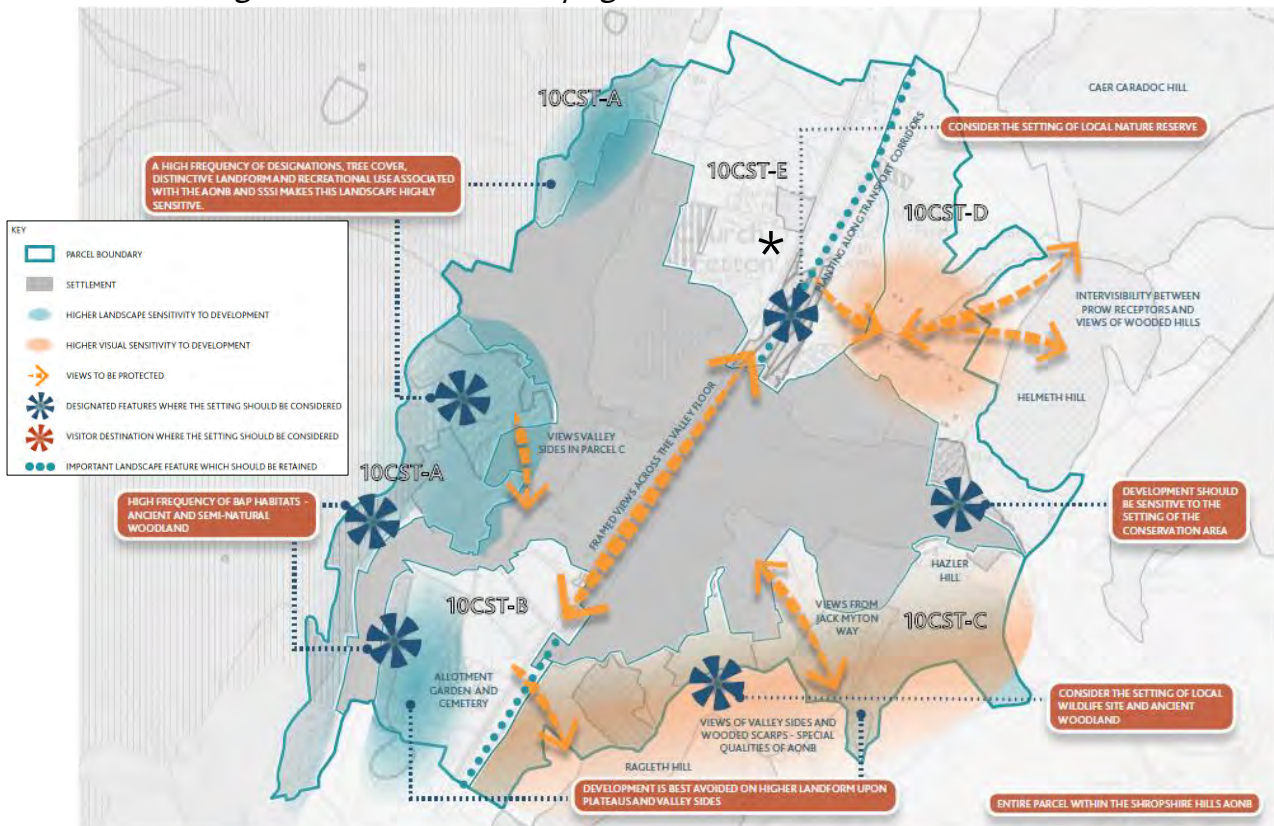


Figure 7. Extract from page 17 of the Church Stretton LVSS



* site CST019VAR promoted by Shropshire Homes

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 site CST019VAR, outlined in red in the aerial photograph below. Shropshire Homes have recently acquired an interest in this site, which has built development on three sides and would make a suitable infill site to help meet the town's housing needs. Further details are contained in **Appendix 1** to this representation. In summary, site CST019VAR will:

- provide a suitable site to help meet housing needs;
- fit within existing landscaping
- provide enhanced planting to screen the town
- protect and enhance biodiversity
- provide access to the adjoining employment allocation ELR078

Figure 8. Site CST019VAR Land south of Springbank Farm

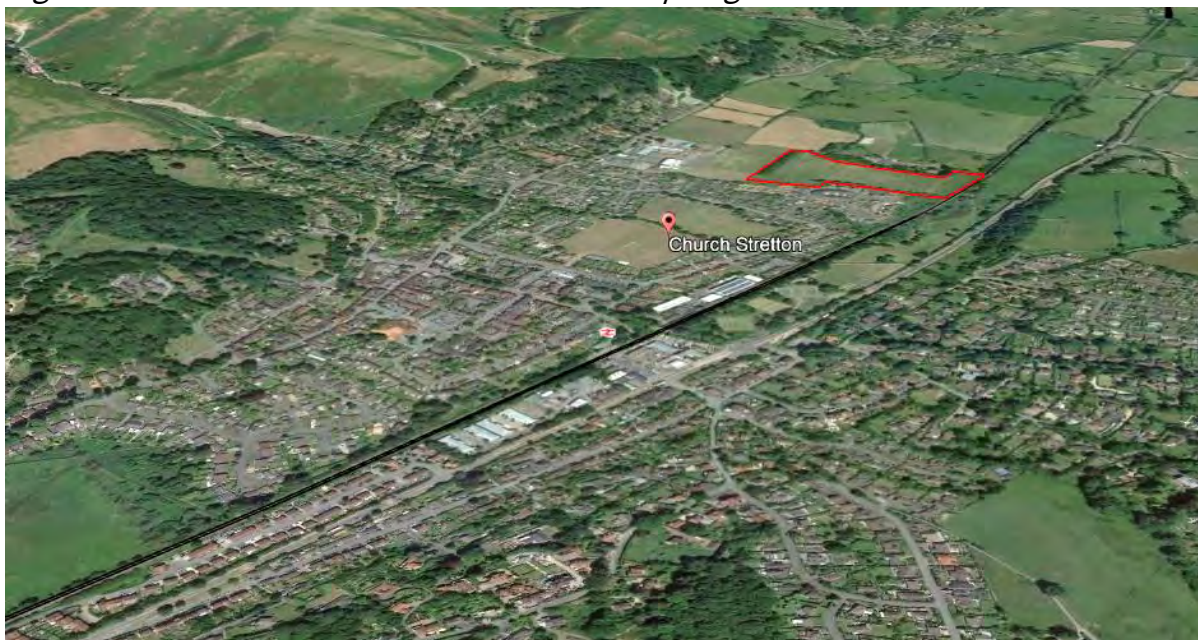


Figure 9. View towards the site from the south



Recent housing developments

The Policies Map for Church Stretton does not include recent developments within its development boundary, notably the major development of 34 dwellings at Lawley Close (figure 10 overleaf) and 5 dwellings at Springbank Farm granted permission on 16th February 2021 (figure 11).

It also does not include the employment allocation ELR078, which currently stands isolated from the town's boundary. These are significant omissions that should be corrected with a revised development boundary.

Figure 10. Public Access map with recent planning applications



Fig 11. Planning consent for 5 dwellings at Springbank Farm (18/01258/OUT)



Delivery of employment allocation ELR078

Saved SAMDev Plan allocation ELR078 is currently isolated from the development boundary, sitting to the north of new housing development at Lawley Close to the west of the railway line.

Employment allocation ELR078 comprises 1.27 hectares of land at Springbank Farm for B1 uses, "*subject to a satisfactory and appropriate vehicular access and ecological assessment.*" No suitable scheme has come forward since the SAMDev Plan was prepared that can deliver this. The new Local Plan provides an opportunity to change the situation in order to deliver this employment allocation.

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

As shown above, the town's growth figure and lack of any new allocations of land fail the 'positively prepared', 'justified' and 'effective' tests of soundness.

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. We suggest the following changes to Policy S5.1 and the Church Stretton Policies Map to reflect the 0.63% per annum rate of growth proposed at 'Preferred Options' stage, which results in 275 dwellings¹ over the 22 year plan period:

- "2. Church Stretton will act as a Key Centre and contribute towards strategic growth objectives in the south of the County, providing of around ~~200~~ **275 dwellings** and around 2 hectares of employment development. New housing and employment development will respond to local needs.*

- 3. New residential development will be delivered through the saved SAMDev residential allocation; **the site allocation listed in Schedule 5.1 (i) below and shown on the Policies Map; and appropriate small-scale windfall residential development within the Church Stretton development boundary shown on the Policies Map; and appropriate cross-subsidy and exception development where it is consistent with relevant policies of this Local Plan.***

¹ 1,987 dwellings in Church Stretton in 2016 x 0.63% growth x 22 year plan period = 275

Schedule 5.1(i) Residential Site Allocations: Church Stretton		
Site Allocation	Development Guidelines	Provision
Land south of Springbank Farm (CST019VAR)	<p>Provide access to employment allocation ELR078.</p> <p>Protect and enhance the Local Nature Reserve to provide a net gain in biodiversity.</p> <p>Provide landscaping and tree planting to enhance views towards the town.</p> <p>Provide sustainable drainage solutions.</p>	65 dwellings

The Policies Map should be updated to show site CST019VAR as an allocation for residential development as shown in figure 12.

The development boundary should be updated to include the existing development at Lawley Close, the planning consent 18/01258/OUT for 5 dwellings at Springbank Farm, allocation CST019VAR and the employment allocation ELR078 as outlined in red in figure 13.

Figure 12. Site CST019VAR between Lawley Close and Springbank Farm



Figure 13. Proposed extension to development boundary on Policies Map



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:

Shropshire Homes understand the local housing market exceptionally well and will be able to assist in making the Plan sound.

(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: H. Howie

Date: 16/02/2021

Office Use Only

Part A Reference:

Part B Reference:

Appendix 1

Land south of Springbank Farm (CST019VAR)

The site has built development on three sides, including planning consent for 5 new dwellings on its northern border. The Shrewsbury-Ludlow railway line defines the fourth side to the east. A mix of mature trees border the site on three sides, screening it in the landscape and from its neighbours.

The site lies between the recent residential development at Lawley Close and Springbank Farm. It is bounded on its western side by the school playing fields and on its eastern side by the railway line. To its south-east is the Local Nature Reserve (LNR).

The SAMDev Plan employment allocation ELR078 adjoins the site's north-east corner. Access is proposed from the south, via Churchill Road and Lawley Close.

Figure 1. Aerial view of the site; numbers refer to figures below.



Figure 2. View of the site from its south-east corner



Figure 3. View of the site from its south-west corner



Figure 4. View of the site from the west



Figure 5. View of the site from the south

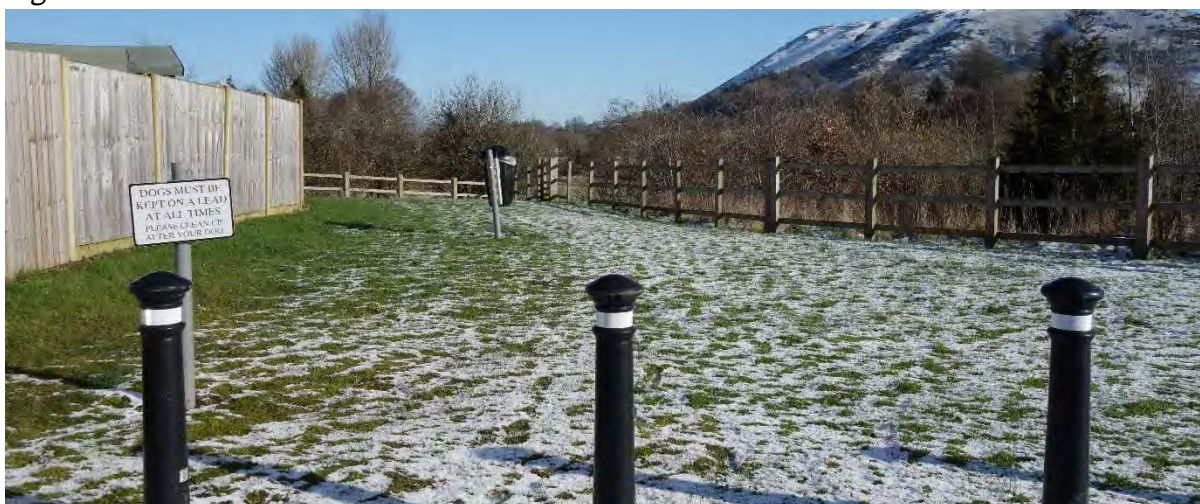
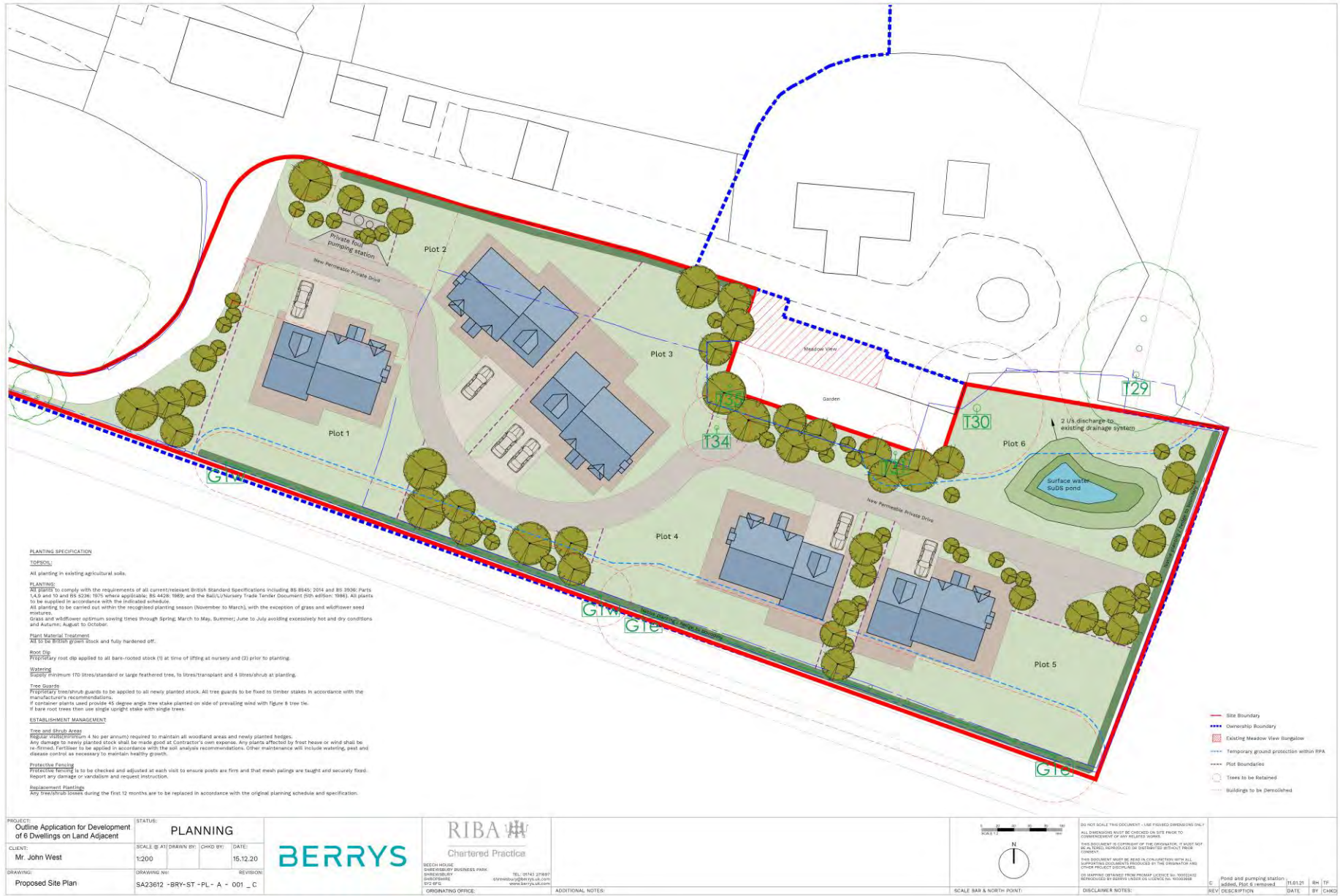


Figure 6. Outline planning consent 18/01258/OUT for 5 dwellings to the north of the site



Site CST019VAR was assessed by Shropshire Council and scored 'Good' for sustainability. It is located within close walking distance of all services and facilities, including:

- Secondary School 100m
- Playing fields and childrens' play area 175m
- Bus stops 250m
- High Street 650m
- Railway Station 700m
- Supermarket 730m
- Industrial estate 800m

Figure 7. Location relative to the town centre



The site assessment identified that a significant proportion of the site was in flood zones 2 and 3. This is accommodated in the illustrative layout plan overleaf as public open space. This land also provides ample space for improving biodiversity and providing landscaping improvements.

Previous assessments assumed access would be off the B4370 Shrewsbury Road to the west of the site via an existing farm track. County highways were concerned that there was insufficient land available to accommodate the necessary road width. Shropshire Homes have therefore approached the owners of the Lawley Close development (Connexus) who have confirmed a willingness to include their roadway to provide access from the south via Lawley Close.

As part of a residential development, Shropshire Homes will deliver an adoptable access to the boundary of employment allocation ELR078, helping to deliver employment to the town.

The site can deliver around 65 dwellings together with associated infrastructure, sustainable drainage and public open space. Shropshire Homes can confirm that the site is viable and deliverable.

An indicative layout plan for the site is attached, illustrating the proposed road access and identifying the flood risk zones, which will be incorporated as landscaped public open space and/or biodiversity areas.

Illustrative Proposed Block Plan



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