

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:	John Needham Associates
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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: Policy: Site: Policies Map:

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.

Please see attached statement

(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 attached statement.

(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:

To make certain that the reasons put forward in the attached statement are fully understood.

(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 that the Inspector has identified the matters and issues for examination.

Signature:

Date: 22/02/2021

Use Only

Part A Reference:

Part B Reference:

**PRE-SUBMISSION DRAFT OF THE SHROPSHIRE LOCAL PLAN REVIEW
2016 TO 2038**

REGULATION 19 CONSULTATION REPRESENTATIONS

RELATING TO: KEY CENTRE: CHURCH STRETTON

**SITE AT SANDFORD AVENUE DESIGNATED -- CST020
(Identified in Regulation 18 consultation)
CHURCH STRETTON**

S5.1. Development Strategy: Church Stretton Key Centre

SITE CST020

Representations were submitted in the last Regulation 18 Consultation which sought to maintain this site within the proposed allocations for housing development in the next plan period on an amended basis with access from the top of Sandford avenue avoiding access direct from Sandford Avenue which would have had an adverse environmental impact in relation to the avenue of Lime trees that run along the avenue which are all long standing TPO trees.

The attached site capacity layout and access plan demonstrates this alternative approach. **Appendix 1.**

The house types suggested are smaller affordable and open market units. A safe and satisfactory access can be obtained, and a further benefit shown is the formation of a car park to serve visitors who come to walk the hills nearby.

The proposed policy strategy correctly notes the importance of this Main Town as a Key Centre for the delivery of services in support of a wide area in the LPR including housing development.

However, the proposals put forward do not deliver this strategy and are objected to as being unsound because they make no provision for any new housing sites and only include two sites which failed to deliver any housing in the last plan period.

All other SAMDev sites previously included and which failed to deliver any housing in the last plan period have been removed. The consequence is that with no new housing allocations and no significant housing delivered in the last plan period that Church Stretton has had little housing to meet its obligations as a key centre for three decades. This is a serious flaw in the delivery of the strategy.

The constraints of the town in terms of its landscape status and location within the AONB, noted in this Review have long been recognised. The discreet siting of the original nuclear settlement however is greatly contrasted with the prominence of the Edwardian developments which were specifically designed to exploit the dramatic landscape possibilities of the topography in the surrounding hills. It is this latter approach that gives the Town its bold and unique character.

This bold approach is followed throughout the 20th century with development leading off the higher reaches of the town and following the pattern of service roads across the hills laid out by the Stretton Development Company in the Edwardian period. This has not detracted from the town but has reinforced its unique character and at the same time met the strategic needs of the population for the growth of families and the need for services.

We should not be distracted from allocating appropriate sites for housing such as the one in hand at CST020 which although on higher ground is screened all round by existing mature planting and which will readily and discreetly assimilate into this landscape without harming its appearance.

The outcome of the LPR neglects the duty to provide deliverable housing and the sustainability benefits that this provides to the community in terms of supporting services and the community. Church Stretton school was threatened previously with closure and was rescued by a large allocation of housing and the lesson of that episode appears to have been forgotten. Already three public houses in the immediate hinterland of this Key Centre have closed and there is no allocation for housing development in the rural surrounding area either.

CONCLUSION

It is contended that the lack of any housing allocations proposed for this Key settlement make the LP review outcomes unsound.

It is contended this site put forward for consideration for inclusion in the SLAA and LPR at Regulation 18 stage, as modified, is entirely acceptable in landscape terms and compatible with the existing pattern of development in the town as well as assisting the long-term sustainability and deliverability for the town as a whole.

The CST020 site is in single family ownership, is not in the Green Belt, has no known legal or physical constraints or impediments and can be delivered quickly in accordance with the requirements of the NPPF and by a Local Shropshire developer. Its allocation for a housing development will contribute to the soundness of the plan which will provide much sought after lower and mid-range second stage housing for the settlement.

22 February 2021

JOHN NEEDHAM ASSOCIATES

APPENDIX 1 Illustrative site capacity and access layout plan.

~ CHURCH STRETTON ~

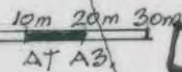
SUGGESTED LAYOUT & MIX.

- 2 NO 2 BED LOW COST
- 3 NO 3 BED LOW COST
- 1 NO 3 BED BUNGALOW OP.
- 3 NO 2 BED BUNGALOWS OP'S.
- 7 NO SELF-BUILD PLOTS.
- 3 NO 3 BED OPEN MARKET.
- 13 NO 4 BED OPEN MARKET.



DRG No 1546/1.

SCALE 1:1250.



DATE FEB 2021.

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