

## 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:	Roger Parry & Partners
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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"/>	Site:	CST0033 & CST034	Policies Map:	Inset 5 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 checked="" 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 checked="" 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 addendum.
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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.*

Due to the amendments by Shropshire County Council to the key centre of Church Stretton, there is now a shortfall in the housing supply 2021-2038. On this basis we are proposing the allocation of CST033 (Watling Street North (eastern field)) & CST034 (Watling Street North (southern field)).

(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 ensure the allocation of CST033 & CST034 is considered correctly.

(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:

R L Parry

Date:

25/02/2021

Office Use Only	Part A Reference:
	Part B Reference:

Ref: Downes/RLP/EH  
Your Ref: Reg 19 pre-submission draft local plan



Shropshire Council  
Planning Policy & Strategy Team  
Shirehall  
Abbey Foregate  
Shrewsbury  
Shropshire  
SY2 6ND

25 February 2021

Dear Sir/ Madam,

**RE: Shropshire Council Local Plan - Regulation 19: pre-submission draft of the Shropshire Local Plan Consultation – CST033 & CST034. Watling Street North, Church Stretton.**

I am writing in response to the consultation for the pre-submission draft of the Shropshire Local Plan, with regards to land adjoining Watling Street North, Church Stretton belonging to our clients Mr. & Mrs. Downes. This site is currently an agricultural field located to the north of Church Stretton, ref. CST033/ CST034.

We are pleased to note this site has been identified as a 'Long Term Potential SLAA Residential Site' within the consultation. This finds the site to have no significant constraints but has future potential. I am writing as we believe this land can be considered for short term potential due to the following:

**Availability**

Mr. & Mrs. Downes have the benefit of full title to the land and are willing to make it immediately available for development. The adjoining land has recently been developed for residential use and this site has received interest from developers.

**Deliverability and Sustainability**

We can confirm this is a well located and fully deliverable site with an area of 3.65 ha. We believe this site is suitably placed to provide development in the Key Centre of Church Stretton towards the target of 250 dwellings by 2038, being situated with an established access to the A49 (requiring improvements) and adjoining recently developed land. Due to the removal of an existing large site from the Local Plan, there is a shortfall in the housing supply for 2021-2038 in Church Stretton.

Our proposed site CST033/ CST034 has achieved a sustainability rating of **FAIR**, which is one of the better ratings compared to the other sites within Church Stretton. The land is well positioned with access to the highway on the western boundary and the southern boundary is adjoining land that has recently gained residential planning permission and has already been developed. The land in question CST033/ CST034 lies outside the areas of flood risk.

Property Professionals



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### **Access**

The land benefits from direct access onto the A49 via Watling Street North. This access will require upgrading, but this can be achieved. The land adjoining Watling Street North all the way to the point of access is owned by Mr. & Mrs. Downes, providing opportunity for access onto the A49, landscaping and green space.

A preliminary highway access report was carried out by John Sumner, from Sumner Consultancy Ltd on the 7<sup>th</sup> August 2015 on the access onto the A49 from Watlings Street North (enclosed). It was established 3 lanes could be accommodated within the existing carriageway to provide a ghost Island junction (subject to further and more details surveys). The A49 in turn has excellent access to Shrewsbury and Ludlow and employment opportunities and the access will not put further strain on the minor roads leading out of Church Stretton as the current preferred sites will.

### **Surveys**

Our client is very keen to provide this site for residential development, therefore is happy to provide any information the Council deems as necessary as further evidence of the site being available and sustainable such as; environmental, habitat, flood or highways reports. In addition to this we would be happy to provide indicative layout plans to show how the development could be implemented.

Please do not hesitate to contact me should you have any questions with regards to site CST033 & CST034.

Yours sincerely,

Roger L. Parry FRICS  
Partner, Roger Parry & Partners LLP  
roger@rogerparry.net

Member of:



Encl.

- i. Preliminary highway access report.

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## PRELIMINARY A49 ACCESS REPORT

Gemma Lawley from Shropshire Council was approached with regard to a proposed development of 15 – 20 houses having access from the end of Watling Street North to Sandford Avenue.

Her reply was, “*we would not support any additional dwellings with access off Watling Street North*”.

A preliminary assessment of a possible access onto the A49, approximately 800m to the north of the A49/Sandford Avenue traffic signals was carried out on Friday 7<sup>th</sup> August 2015, see attached copy of the Land Registry Plan.

There is at this location a “junction” for Watling Street North. Watling Street North is defined as a Byway Open to All Traffic (BOAT), and is maintained by Shropshire Council.



Watling Street North Junction with the A49

Measurements for visibility splays are generally taken from a point where the centreline of the minor road meets the channel of the major road, Point A. The distance back along the minor arm to Point B, from which visibility is measured is known as the X distance.

The Y distance represents the distance that a driver who is about to exit from the minor arm can see to his left and right along the main alignment.

The appropriate X distance for this site would be either 2.4m or 4.5m back from the road edge. This distance is dependent on the requirements of the Highway Authority and the number of proposed dwellings using the access.

The Watling Street North junction is located within the national speed limit of 60mph. In accordance with the Design Manual for Roads and Bridges, the Y distance for this speed limit is 215m.

Visibility from the Watling Street North junction is restricted to the north by a summit along the A49.

Visibility from 2.4m

North - approximately 80m\*  
South - 215m+

Visibility from 4.5m

North - approximately 60m\*  
South - 85m

\* The distance is difficult to assess due to the tall grass in the verge



Visibility from Watling Street North Junction to the North at 2.4m



Due to the restricted visibility from Watling Street North, the visibility was checked from a point near to the summit along the A49 (Possible Access Location), which was 26.0m to the north of Watling Street North junction.

Visibility from 2.4m

North - 215m+

South - 215m+

Visibility from 4.5m

North - approximately 65m\*

South - approximately 110m

\* The distance is again difficult to assess due to the tall grass in the verge and the overhanging hedge. The potential visibility splays would need to be assessed when a topographical survey has been produced.

Visibility from 2.4m to the north from the Possible Access Location



Visibility from 2.4m to the south from the Possible Access Location



Adjoining the Watling Street North junction, the width of the A49 carriageway is 9.0m. The road has edge of carriageway line marking offset 0.65m from the highway verge. The centreline marking to the south of Watling Street North junction is a continuous line on the western side and a broken line on the eastern side. This configuration swaps 17.7m to the north of the Watling Street North junction.

On the western side of the carriageway the verge is relatively flat for a distance of 2.7m from the edge of the carriageway, then it falls away to the boundary hedge which is 6.2m from the edge of the carriageway.

If the Possible Access Location is acceptable then it will depend on the density of the development if works would be necessary to the A49. For 15 – 20 houses, then it is possible that no work would be required, and a visibility from 2.4m may be acceptable. However this is dependent on the requirements of the Highway Authority.



For a possible development in excess of 30 – 50 houses, then visibility from 4.5m would be required and a ghost island junction (right turning lane) would be necessary. However to construct this form of junction it will be necessary to widen the existing road either side of the junction.

The lane widths for a ghost island junction are:

Through Lanes	3.0m min	3.65m max	
Turning Lane	3.0m min	3.65m desirable	5.0m max



Ghost Island Junction

If the minimum widths were used, then the 3 lanes could be accommodated within the existing carriageway. Assuming all lane widths of 3.25m, which would be above the minimum widths, then the required carriageway width would be 9.75m.

To achieve visibility splays from 4.5m within the existing highway boundary, the eastern channel of the carriageway could be realigned by 2.0m to the west, and with ghost island lane widths of possibly 3.25m the widening could be accommodated within the relatively flat area of verge on the western side of the carriageway.

The above would need to be assessed in more detail from a topographical survey of the A49 in this location.

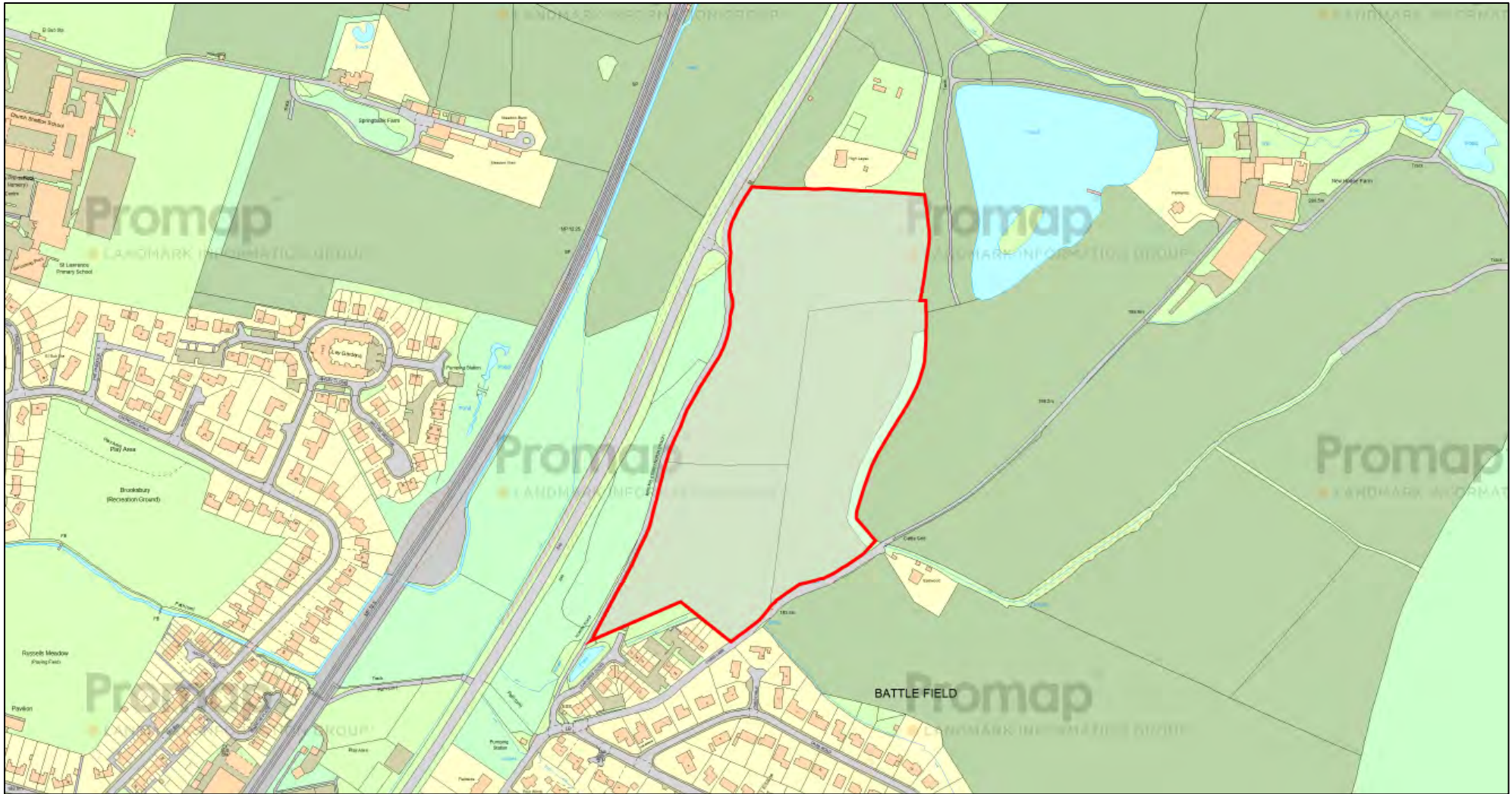
The access road from the A49 to the site could follow the 200m contour line as shown below. This should avoid excessive excavation and keep the road below the summit of 206m. Alternatively it could follow the 200m contour on the western side parallel to Watling Street North. Another alternative could be to widen Watling Street North so it can be utilised as the access, although there may be local opposition to this.

For a smaller development, 15 – 20 houses, the access road with the agreement of the Highway Authority could be constructed as a single width road with passing places, which would reduce the impact as well as construction costs.



--- Possible route of access road





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Roger Parry & Partners LLP  
The Property Experts

JOB:	Reg 19 pre-submission draft local plan
CLIENT:	Mr & Mrs Downes
TITLE:	Site Plan
LOCATION:	CST033/ CST034
SCALE:	Not to Scale
DATE:	2021
DRAWING NO:	1
DRAWN BY:	EH